

# Assessing the potential for accommodating a new settlement within the Lewes District: Scoping Report

April 2012



## Section 1 - Introduction

1.1 Lewes District Council and the South Downs National Park Authority are working in partnership to develop a Local Development Framework (LDF) for Lewes District. The first document of the LDF will be the Core Strategy, a high-level document which will set out how much and where development will take place in the District until 2030.

1.2 As part of preparing the Core Strategy, an Emerging Core Strategy document went out for consultation between 30<sup>th</sup> September and 2<sup>nd</sup> December. The consultation document discussed options for distributing housing in the district and gave ranges to the larger and more sustainable settlements, suggesting what each settlement could accommodate.

1.3 During the consultation period, a small amount of comments were received that suggested that some/all of the housing requirement could be met by the development of a new settlement. This option had not been considered in developing the Emerging Core Strategy and therefore it was felt necessary to investigate such an approach further, to see if it was a realistic option.

1.4 Before committing a significant amount of resources to examining the option in a detailed manner, it has been decided to undertake an initial scoping exercise in order to determine whether the potential for the delivery of a new settlement exists in Lewes District.

1.5 The Report is structured as follows:

- Section 2 provides background to the scoping report
- Section 3 seeks to identify the minimum population and size of a new settlement
- Section 4 seeks to locate areas that are not restricted by environmental constraints
- Section 5 seeks to locate areas that have reasonable access to modes of transport.
- Section 6 seeks to locate areas where land of sufficient size is available and suitable for a new settlement.
- Section 7 concludes whether a new settlement is possible in Lewes District and if this option should be examined further.

## Section 2- Background

2.1 There is a long tradition of planned settlement making in Britain, with the notion of new communities planned in the public interest emerging significantly at the end of the 19<sup>th</sup> Century. Such settlements were first built through philanthropic and private initiative as exemplified by the Garden City initiative and later by the Government in their new town programme started in the middle of the 20<sup>th</sup> Century, developed to meet the housing needs of post war Britain.

2.2 Most recently the 2003 Sustainable communities plan initiated a fresh strategic planning approach by the Government in which major growth areas were designated in South-East England. This programme has emerged in response to the climate change agenda as the Eco-towns initiative a government sponsored programme.

2.3 Government policy, contained in the National Planning Policy Framework (para 52), states that the principle of delivering “new settlements or extensions to existing villages and towns that follow the principles of Garden Cities” would sometimes be an appropriate way of delivering the supply of new homes.

### What is a new settlement?

2.4 In considering what constitutes a new settlement, regard has been given to a report commissioned by the then Department of Environment in 1993 ‘Alternative Development Patterns: New Settlements’ which defined a new settlement as: *“a free standing settlement, promoted by private and/or public sector interest, where the completed new development – of whatever size – constitutes 50 per cent more of the total size of a settlement, measured in terms of population/dwellings”*.

2.5 On this basis, consideration is being given to the principle of enlarging an existing settlement by more than 50% of the population/dwellings, as well as developing a free-standing new community. Thus when this report discusses ‘new settlements’, it refers to both free-standing new settlements and large-scale extensions of existing settlements.

### Housing Delivery target for the District

2.6 Of particular relevance for this scoping report is the amount of development that Lewes District will need to accommodate over the period 2010 - 2030. As made clear in the Emerging Core Strategy, a target of 4,150 net new additional dwellings has been identified as the preferred approach for delivering housing over this period.

2.7 A new settlement would undoubtedly help towards meeting a large proportion, if not all, of the housing target. Indeed, as the target should be seen as a minimum and thus should not prevent additional development from

coming forward over the plan period, it could mean that a new settlement helps exceed the housing target.

2.8 Thus when determining the minimum size of a new settlement in the next section of the report, the preferred housing target has not been considered as a constraint to limit the size of a new settlement.

## Section 3 – Sustainable settlement size and viability

3.1 For the purpose of this scoping report it is important to identify the minimum space and size requirements of a new settlement.

3.2 In the Eco Towns supplement to Planning Policy Statement 1: *Delivering Sustainable Development*, paragraph ET 4.1 states that “eco-towns are one of a range of options local planning authorities should consider when determining how to meet their current or emerging housing requirements... Eco-towns should be allocated as a strategic development option within the Core Strategy”. The National Planning Policy Framework, as discussed earlier also supports the use of such new settlements to fulfil housing targets.

3.3 The Department of Communities and Local Government described new eco towns as “small new towns of at least 5,000 – 20,000 homes. They are intended to exploit the potential to create a complete new settlement to achieve zero carbon development and more sustainable living using the best new design and architecture”<sup>1</sup>.

3.4 In respect of seeking a location for an eco town paragraph ET 2.2 states that in “the area for development needed, should be able to make provision for a minimum of 5,000 homes. Planning on this scale allows the development to exploit a number of opportunities and benefits” that promote sustainable living.

3.5 Policy ET 11.2 states that at least 50 per cent of trips originating in eco-towns should be made by non-car means, with the potential for this to increase over time to at least 60 per cent. The National Planning Policy Framework (para 30) also places a strong emphasis on supporting “a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport.”

3.6 Whilst any new settlement in Lewes District may not be to an eco-town standard, nor is the eco-town ideal supported by current Government policy, concepts from this agenda remain useful when considering the development of a new settlement.

### Settlement services

3.7 Should a new settlement be developed, a minimum expectation will be that it provides access to education, local transport modes and health services.

3.8 East Sussex County Council is the local education authority for Lewes District. They advise that a new primary school would be required when a minimum of 840 dwellings are brought forward (this figure depends on the housing mix, for instance 1-bed flats are not considered to add to education

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<sup>1</sup> Eco-Towns Prospectus. Communities and Local Government, July 2007

needs). Furthermore, they state that 5,000 new homes would require new secondary education to be provided.

3.9 The Health Authority seek to provide 1 GP per 1,800 population with a new surgery identified as a need where 2.5 GP's are required (4,700 population) which equates to around 2,070 homes<sup>2</sup>.

3.10 In respect of providing an economically viable bus service, informal discussions with the Brighton and Hove Bus Company state that a development, providing a population of 3,400 (around 1,500 homes) would be required to support a new service.

### Size

3.11 It is quite clear that no new settlement will ever be fully self-sufficient and that such a development would rely on neighbouring settlements for access to employment and higher-order services. However, considering the need for a new settlement to deliver the minimum amount of services as listed in the section above, this report investigates whether it would be possible for Lewes District to accommodate a settlement of a minimum of 5,000 homes.

3.12 In terms of identifying the land requirement to accommodate the housing, the National Planning Policy Framework (para 57), states that local authorities should develop their own density policies in response to local conditions.

3.13 For the purposes of this report a density of 30 per hectare is assumed, given the rural location of any new or extended settlement, the historic approach to density in PPS3 and the average trajectory density used in the Lewes District Strategic Housing Land Availability Assessment. As such to deliver a settlement of 5,000 homes, 167 hectares of land would be required.

3.14 This figure of 167 hectares does not include space that would be required to provide non-residential uses in the new settlement, such as retail, employment as well as the health and education services discussed earlier.

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<sup>2</sup> Based on DCLG/ONS(Nomis) statistics, November 2010 which state that the average household size in Lewes District was 2.27 in 2008

## Section 4 – Environmental Constraints

4.1 The District is home to a number of environmental constraints that would preclude development of a new settlement taking place in or near to such environmental designations. This section of the report discusses these constraints and screens out parts of the District from further consideration for a new development as a result.

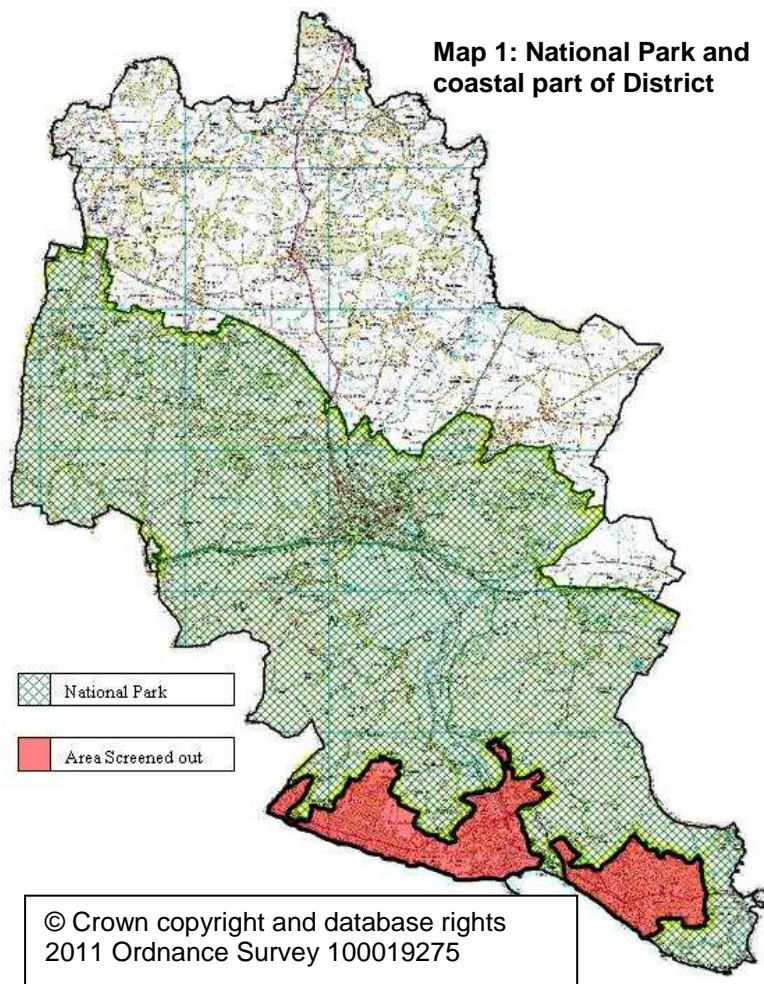
### The South Downs National Park

4.2 The South Downs National Park (SDNP) covers around 56% of Lewes District. As a result of the designation, this report is produced in partnership with the National Park Authority. Consideration has been given to the designation and the purposes of the National Park<sup>3</sup>, which are:

- To conserve and enhance the natural beauty, wildlife and cultural heritage of the National Park
- To promote opportunities for the understanding and enjoyment of the special qualities of the area by the public

4.3 Whilst the National Park designation does not prevent development from occurring within its boundaries, it is the opinion of both the National Park Authority and the District Council that a new settlement in the SDNP would not accord to either of its purposes. This opinion is reinforced by the UK Government's Vision and Circular for English National Parks and the Broads<sup>4</sup>, which states "that the Parks are not suitable locations for unrestricted housing" (para 78).

4.4 As a result, we have screened out the parts of the District in the National Park from further consideration for a new settlement. Given that the boundaries of the



<sup>3</sup> As detailed in the Environment Act 1995

<sup>4</sup> <http://archive.defra.gov.uk/rural/documents/national-parks/vision-circular2010.pdf>

towns on the southern coast are tightly bound by the National Park's boundaries, this essentially rules out the possibility of a new settlement in the southern part of the district. This can be seen on **Map 1**.

### Protected European Sites

4.5 Lewes District is home to 2 protected European Sites; Lewes Downs Special Area of Conservation and Castle Hill Special Area of Conservation (SACs). Both sites are within the SDNP, so are already not considered appropriate locations.

4.6 In addition to development at the site of these protected areas we also have to consider whether development elsewhere would have a likely significant effect on the European Sites.

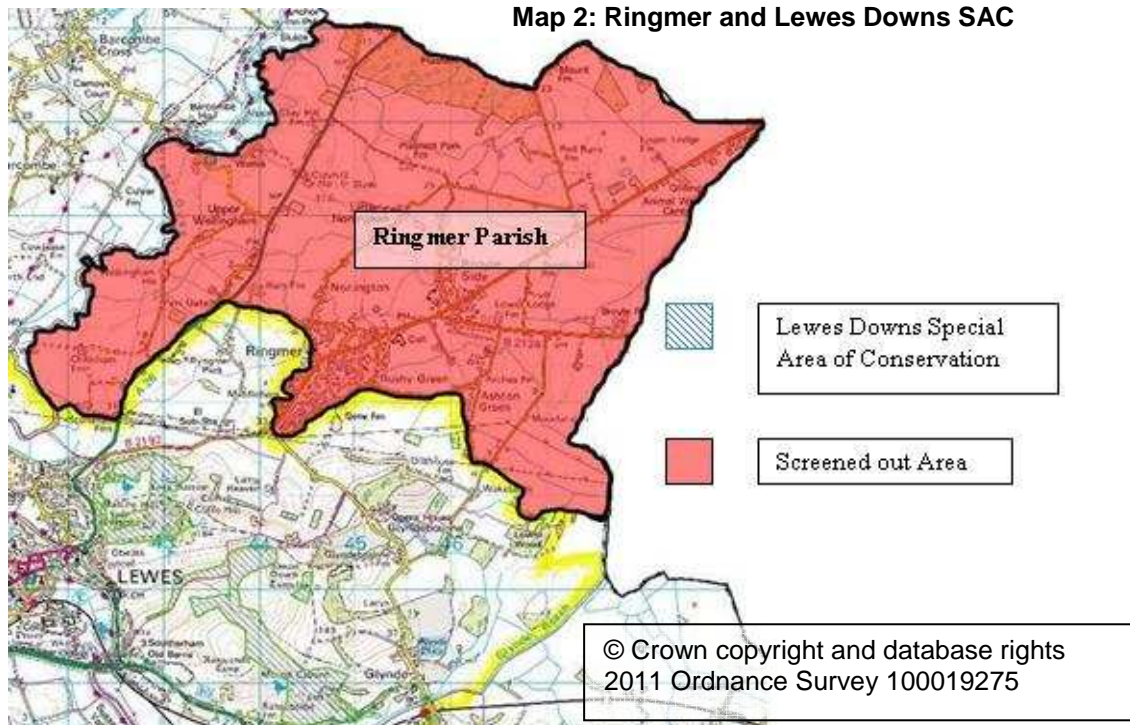
4.7 An Appropriate Assessment Screening Opinion was undertaken in November 2010 to see whether there would be a likely significant effect on the protected sites of the District. Natural England was of the opinion that no development in Lewes District is likely to have a significant effect on the Castle Hill Special Area of Conservation. As a result, there is no need to screen out any additional part of the district from consideration of a new settlement based on this opinion.

4.8 However, in the same document, Natural England were of the opinion that a significant effect on the Lewes Downs Special Area of Conservation was likely should development increase transport movements by around 1,000 Annual Average Daily Trips (AADT) on the roads which lie within 200m of any parts of the site, namely the B2192 and the A26 between Earwig Corner and the Cuilfail Tunnel.

4.9 Any new settlement with a minimum population of 11,350 (5,000 new homes) would, with a high degree of certainty, add well in excess of 1,000 AADT to the local transport network. Should such a settlement be located in Ringmer Parish, this would in all likelihood increase traffic movements on the roads which surround the Lewes Downs SAC over 1,000 AADT with little hope of avoidance or mitigation. As a result the remainder of Ringmer Parish (part of Ringmer in the National Park has already been ruled out) is excluded from the area of search for a new settlement. This is shown in **Map 2** (the area bounded in yellow indicates that it lies in the National Park):



Map 2: Ringmer and Lewes Downs SAC



4.10 In addition to the protected European Sites in Lewes District, we also have to consider the effect of any such sites nearby. Ashdown Forest is one such site, being both a SAC and a Special Protection Area (SPA). Wealden District Council, as detailed in their Core Strategy that has been submitted for examination, has agreed an approach with Natural England for the protection of Ashdown Forest.

4.11 The approach includes prohibiting any net additional dwellings within 400m of the designated area and requires development within 7km of the site to provide Suitable Alternative Natural Greenspaces (SANGs) at the rate of 8ha per 1,000 residents in order to reduce recreational disturbance at Ashdown Forest.

4.12 Whilst no part of Lewes District lies within 400m of the Ashdown Forest, parts of Chailey and Newick Parishes (including Newick Village) do lie within the 7km area. Whilst this does not remove this area from further consideration in this study, if a new settlement were to be located in this area, there would need to be space for at least an extra 90.8 hectares of SANGS on top of the space needed for the settlement itself.

4.13 In addition, should a new settlement come forward in the district, it would need to be proved that additional transport movements would be less than 1,000 ADT on the parts of the A22 and A275 which are within 200m of the Ashdown Forest.

4.14 It is thought that such a development in either the parish of Newick or the parts of Chailey that lie on the A275 could exceed this threshold and thus, should a site for a new settlement be thought appropriate for this part of the district, additional work would be needed to prove that traffic levels would not have a significant negative impact on the Ashdown Forest.

## Sites of Special Scientific Interest

4.15 Sites of Special Scientific Interest (SSSI) are sites designated with the aim to protect and manage important national wildlife and geological sites. There are a number of such sites in Lewes District. In the area not already screened out from consideration for a new settlement, there are two sites. These sites are Chailey Common and Ditchling Common and are shown in the map below.

4.16 The reasons for designation is not for this report to describe and can be found elsewhere<sup>5</sup>, but given the need to protect such sites, we will not be considering these areas for a new settlement.

## Ancient Woodland

4.17 Ancient woodland is an important environmental resource which covers almost 4% of the land in Lewes District and is mostly found outside of the National Park. Paragraph 118 of the National Planning Policy Framework makes clear that local authorities should generally not allow development that would result in the loss or deterioration of ancient woodland.

4.18 Discussions with the Landscape and Tree Officer of the District Council underline the importance of ancient woodland. In order to protect the wildlife, a buffer of a minimum of 15 metres would be needed from any development.

4.19 Furthermore, depending on the type of ancient woodland, a buffer of up to 500 metres may be needed for strategic development such as a new settlement.

4.20 As a result of the wording of both current and likely future planning policy, we have screened out areas of ancient woodland and areas immediately surrounding (15m) from consideration for a new settlement. If this report concludes that there is scope for new development in the district, further work will be needed to see how much of a buffer would need to be given around ancient woodland.

## Flood Risk

4.21 Flooding is a major issue for large parts of the District. This is particularly the case in the towns of Lewes and Newhaven, but flood risk is also prevalent in the rural areas alongside the River Ouse and its tributaries.

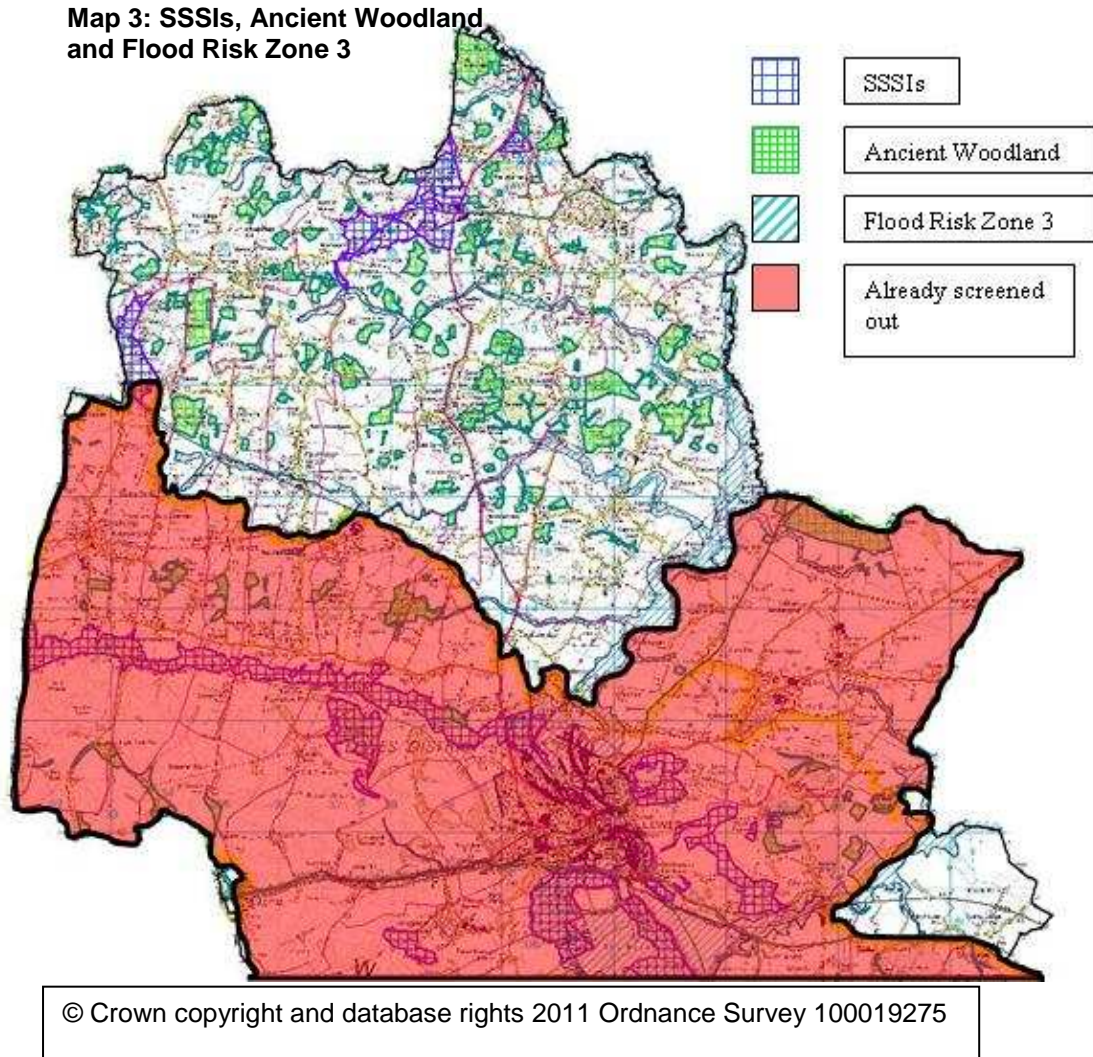
4.22 Areas of land in Flood Risk Zone 3 that are not currently developed are classified as being in Flood Risk Zone 3b (functional floodplain). Table 1 of the Technical Guidance to the National Planning Policy Framework states that only “water compatible uses and essential infrastructure” should be considered as suitable development types in the functional floodplain.

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<sup>5</sup> <http://www.sssi.naturalengland.org.uk/Special/sssi/search.cfm>

4.23 Given the current and emerging national policy regarding development in areas of flood risk, we have screened out areas classified as functional floodplain from consideration for a new settlement. This removes areas such as land north of Barcombe Cross.

4.24 **Map 3** overleaf shows the locations where SSSIs, ancient woodland and area of flood risk are located and have thus been screened out.



## Section 5 – Transport

5.1 As suggested in earlier sections of this report, it cannot be expected that a settlement consisting of 5000 dwellings can be fully self sufficient. Thus, any new settlement would need to have decent transport options to neighbouring settlements in order to have reasonable access to jobs and higher order services.

5.2 This section of the report screens out locations which have inadequate transport links. It also screens out any locations where development of a new settlement would cause unacceptable impacts on the existing transport network (as determined by the Highways Authority) with no obvious way of mitigating this impact.

### Road

5.3 This report assumes that any new settlement would be connected to the road network in some way. Thus we have not screened out any part of the district from consideration of a new settlement because currently there are no current roads to such an area.

5.4 Nevertheless it would be a benefit for a new settlement to have access to the trunk road network, given that such a settlement would not be self-sufficient and would be reliant on neighbouring settlements for services. However, considering that the district's largest town in terms of population (Seaford) does not have direct access to the trunk road network, such access is not thought of as a must have for a new settlement. As a result, no part of the district has been screened out of consideration for a new settlement, due to not having access to the trunk road network.

5.5 It is also thought likely that new bus services would be provided to any new settlement of such a size and therefore no part of the district has been screened out for further consideration in this report based on a lack of bus services.

5.6 Of the area not yet screened out from consideration of a new settlement, East Sussex County Council have made clear that they would not be in support of development that would increase transport going into Ditchling on the B2112<sup>6</sup>.

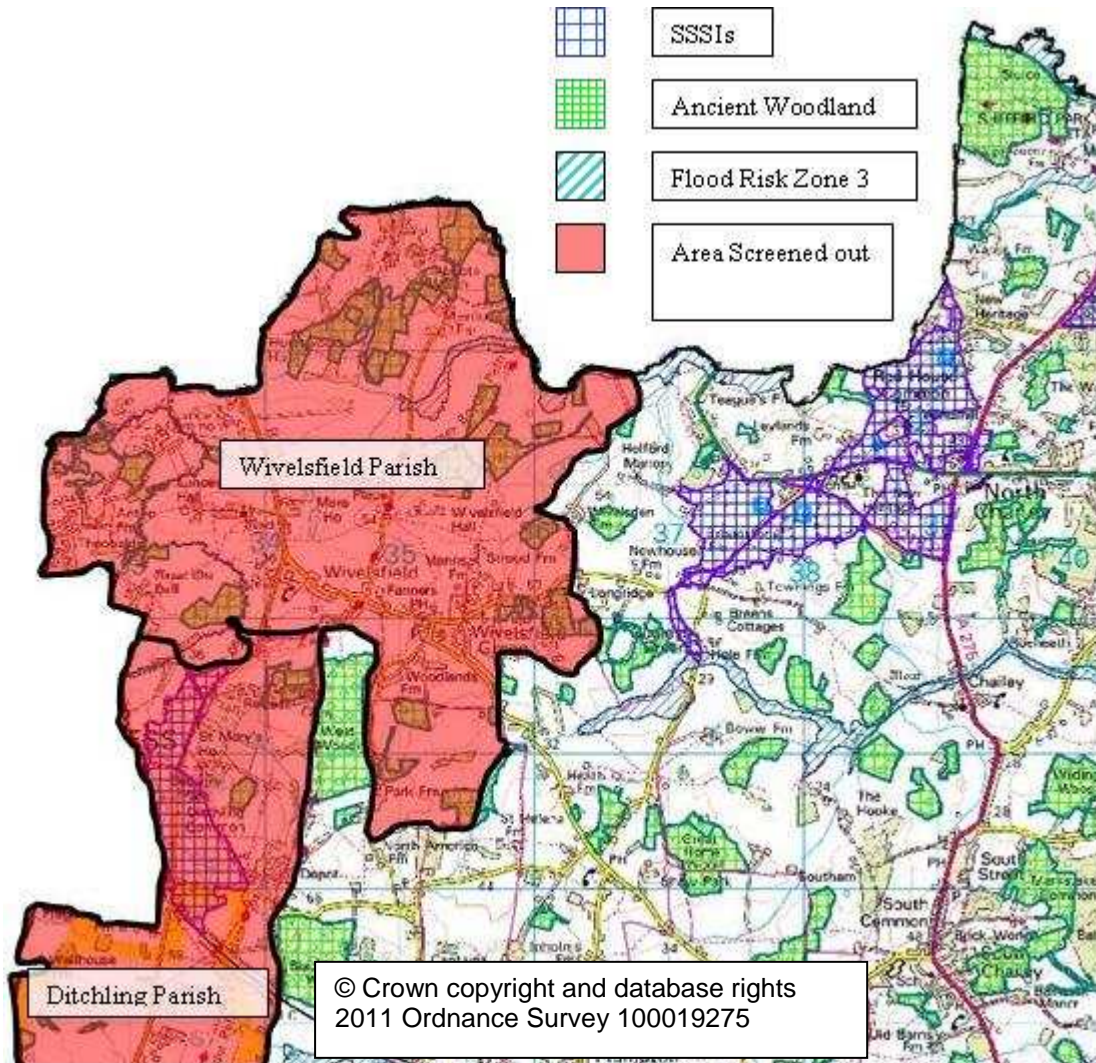
5.7 Given that potential sites (much smaller than would be needed for a new settlement), submitted in the Strategic Housing Land Availability Assessment in Wivelsfield Parish were ruled out on grounds of increasing traffic into Ditchling (with no obvious way to mitigate this impact – i.e. a relief road for Ditchling is considered undeliverable due to the National Park designation), it is not thought that a new settlement could be achieved in this location. As a result of this, Wivelsfield Parish has been screened out from

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<sup>6</sup> See ESCC's position statement regarding transport - [http://www.lewes.gov.uk/Files/plan\\_Transport\\_Position\\_Statement.pdf](http://www.lewes.gov.uk/Files/plan_Transport_Position_Statement.pdf)

further consideration in this report as has the remainder of Ditchling Parish. This is shown on **Map 4** below.

**Map 4: Wivelsfield and Ditchling Parishes**

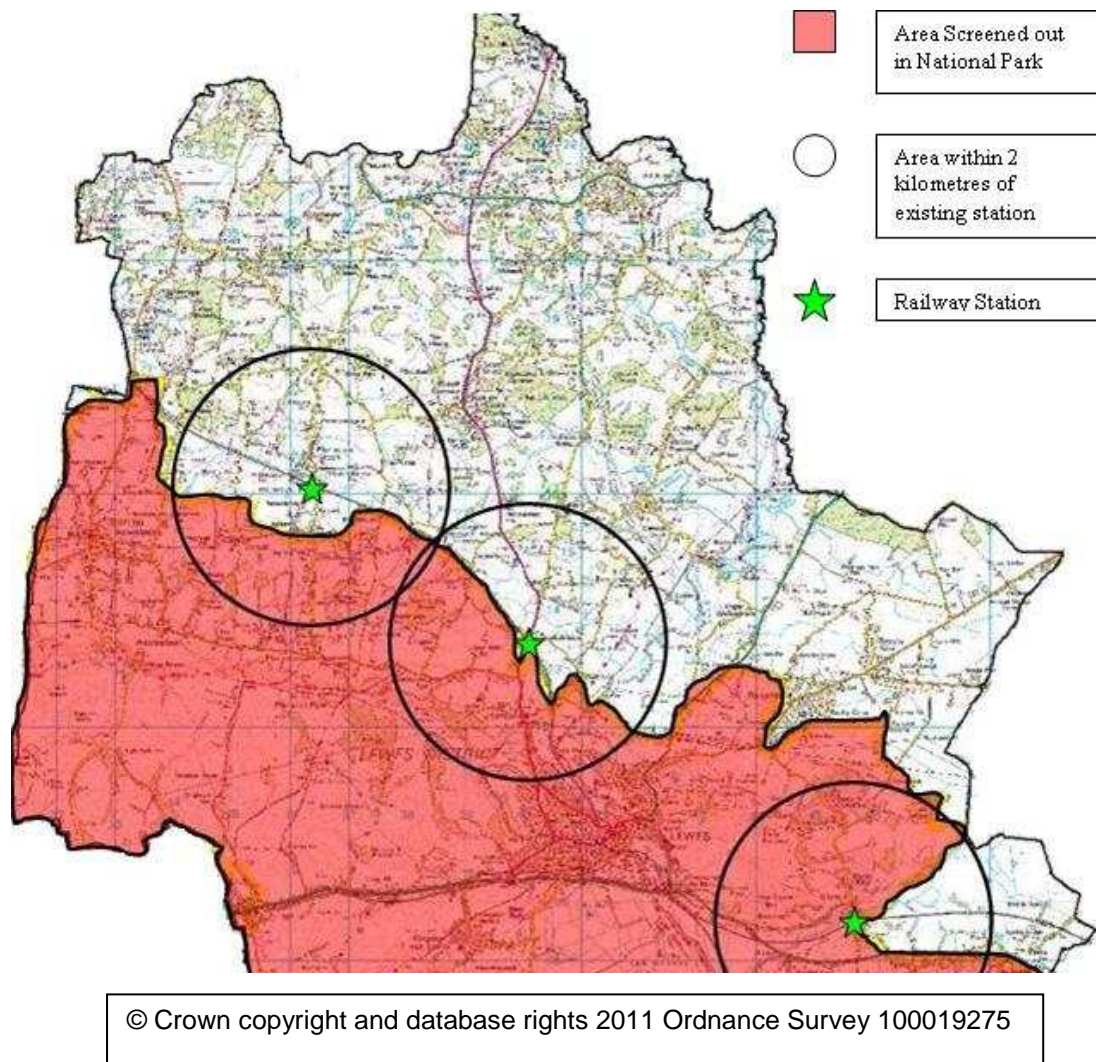


Rail

5.8 Given the Government’s stance on reducing car usage and making the fullest use of public transport, it would be highly desirable for any new settlement to have access to the railway network. The areas not already screened out from consideration that have access to the rail network or locations near to Plumpton Green, Cooksbridge and Glynde Railway Stations.

5.9 As a result we have screened out locations that do not have such access, which we consider to be areas that are over 2km away from an existing station (indicated in the **Map 5** as a black circle – the area in red has already been screened out from being able to accommodate a new settlement as it indicates the National Park boundary).

**Map 5: Railway Stations 2km boundary**



5.10 In addition, whilst it is an aim of Lewes District Council to re-open the railway line between Lewes and Uckfield, East Sussex County Council's Local Transport Plan 3 (LTP 3) does not provide any confidence that this is likely to come forward. It is also not a scheme that is detailed in any Rail Utilisation Strategy prepared by Network Rail.

5.11 It should be stated that LTP3 does not factor in the possibility of a new settlement of 5,000 homes being built on this former line and it is thought that a new settlement along the desired route has the potential to increase the business case for such a reinstatement. However, considering the uncertainty regarding the deliverability of the line (and indeed the precise route such a line would follow), we have screened out from consideration all parts of the district without access to rail, including any area that would benefit from rail travel if the Lewes to Uckfield line was reinstated.

5.12 Should the likelihood of the line being reinstated increase in the future, it may be that a new settlement in the vicinity of the line is revisited as an option. This is consistent with the approach taken by Wealden District

Council when they examined the possibility of delivering a new settlement at Isfield, also along the route the former Lewes – Uckfield line<sup>7</sup>.

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<sup>7</sup> See Wealden District Council's Issues and Options Consultation Papers (paragraph 5.38)  
[http://consult.wealden.gov.uk/portal/planning/core\\_strategy/csio?pointId=section\\_2521132833193#section-section\\_2521132833193](http://consult.wealden.gov.uk/portal/planning/core_strategy/csio?pointId=section_2521132833193#section-section_2521132833193)

## Section 6 – Land Availability

6.1 The Lewes District Strategic Housing Land Availability Assessment (SHLAA) assesses the potential for sites in the district to accommodate housing. On the submission form for each site submission, the proponents inform the Council if the owner is aware of the submission. If they are aware, we assume that the land is available for strategic housing development (unless informed otherwise).

6.2 The SHLAA was first completed in September 2010 and was updated to reflect the circumstances as at April 1, 2011 in September 2011.

6.3 Looking at the remaining areas of the District, there is no available land in the area of search around Firle and Cooksbridge. As a result, we have screened out these possibilities from further consideration for a new settlement.

6.4 There was a site submitted around Plumpton Green of sufficient size in the SHLAA to deliver a new settlement. This is highlighted in the SHLAA as site 11PL.

### Suitability of remaining area(s)

6.5 Whilst it is recognised that there is enough space for a new settlement in SHLAA site 11PL, we have to consider whether it is suitable for a settlement to be located on it.

6.6 As we have shown in previous parts of this report, land in the National Park and land which is covered by ancient woodland has been screened out. Whilst this does remove parts of site PL11 from consideration, the capacity to deliver housing on the remaining part of the site is unaffected.

6.7 We also have to take into account other evidence based work for the Core Strategy. One such document is the Landscape Capacity Study, completed in September 2011. The aim of the Landscape Capacity Study (LCS) is to help inform the emerging Core Strategy and future planning policy decisions. In particular, it helps in identifying where development might be accommodated within the District without having an unacceptable impact on the landscape.

6.8 The LCS looks at areas surrounding the towns and villages across the District where it is considered that there is likely to be future development pressures as evidenced by sites identified in the SHLAA.

6.9 Site PL11 covers a large swathe of the area between Plumpton Green and South Chailey. As the LCS looks only at land immediately surrounding existing settlements, most of the site PL11 has not been assessed in the document. Of the part of site that is near to the border of Plumpton Green and is covered in the LCS, the study concludes that there is negligible/low capacity for the landscape to change. This is as the area houses open



grassland/agricultural land with long open view to the Downs and thus there is seen to be little scope for sympathetic mitigation of development in the area.

6.10 Equally, site PL11 extends to the western fringe of South Chailey. The LCS assesses that the capacity to change around the site is negligible, noting the openness of the area and distant views.

6.11 Also, the panoramic views across the Low Weald from the escarpment ridge of the Downs has a strong influence on the landscape character of the South Downs National Park

6.12 Taking into account the conclusions of the LCS, the impact on the South Downs National Park, as well as The East Sussex County Landscape Assessment, which includes in the vision for the area the “retention of long unspoilt views to the downs”, it is not considered appropriate to make major changes to the landscape by creating a new settlement at this location.

6.12 Even if the site was considered appropriate in landscape terms, it is unlikely to be considered appropriate in transport terms given the lack of access to the strategic highway network. Therefore, site PL11 has been screened out from further consideration of a new settlement. Such a conclusion is in line with the findings of the SHLAA, which concluded that site 11PL is ‘not suitable’ for development.

## **Section 7 – Conclusion**

7.1 This report has considered the principle of locating a new settlement of a minimum of 5,000 homes in Lewes District. It has taken into account environmental constraints, transport implications and land availability. This exercise has identified that there is no scope to develop a new settlement within Lewes District and thus such an option for accommodating new housing will not be considered any further in the development of the Core Strategy.