

# Emerging Core Strategy



**Lewes District Council  
South Downs National Park Authority**

**Local Development Framework**

**September 2011**

**Price £12 (+ £2 p&p)**



## **Lewes District – Local Development Framework**

### **The Emerging Core Strategy**

This document is available for public consultation for a 6 week period between the 30<sup>th</sup> September 2011 and the 11<sup>th</sup> November 2011. Although the document has been jointly prepared by Lewes District Council and the South Downs National Park Authority, comments should be submitted to the District Council as they are managing the consultation exercise. Comments can be sent to the District Council by:

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You can also be kept informed on the latest news and developments on the Core Strategy, as well as contributing towards any debate on the document, by following the Lewes District Council Facebook page and the District Council's Twitter account (this can be accessed through our homepage – [www.lewes.gov.uk](http://www.lewes.gov.uk))

**This document can be made available in large print, audiotape, disk or in another language upon request. Please telephone 01273 484141 or e-mail: [lewesdc@lewes.gov.uk](mailto:lewesdc@lewes.gov.uk)**

## Emerging Core Strategy – For Consultation

### Foreword

*“Lewes District Council and the South Downs National Park Authority have agreed to work in partnership in preparing a new long-term planning strategy for the district. This is to be called the Core Strategy. Work commenced on preparing the Core Strategy in 2009 and it is due to be adopted by early 2013.*

*This document represents a key stage in producing the Core Strategy and it provides the opportunity for you to tell the District Council and National Park Authority what you think of the ideas that have been developed to date.*

*Although this Emerging Core Strategy is the result of a significant amount of research, assessment and consultation, it does not represent the District Council’s and National Park Authority’s final view on what the Core Strategy will contain. Before we reach that point we are keen to get your views so that final policy choices are informed by the opinions of those who live, work and visit Lewes District. Your input into this process is greatly appreciated and I thank you for taking the time to read this consultation document.”*

Cllr Tom Jones – Deputy Leader and Lead Councillor for Planning – Lewes District Council, and Member of the South Downs National Park Authority

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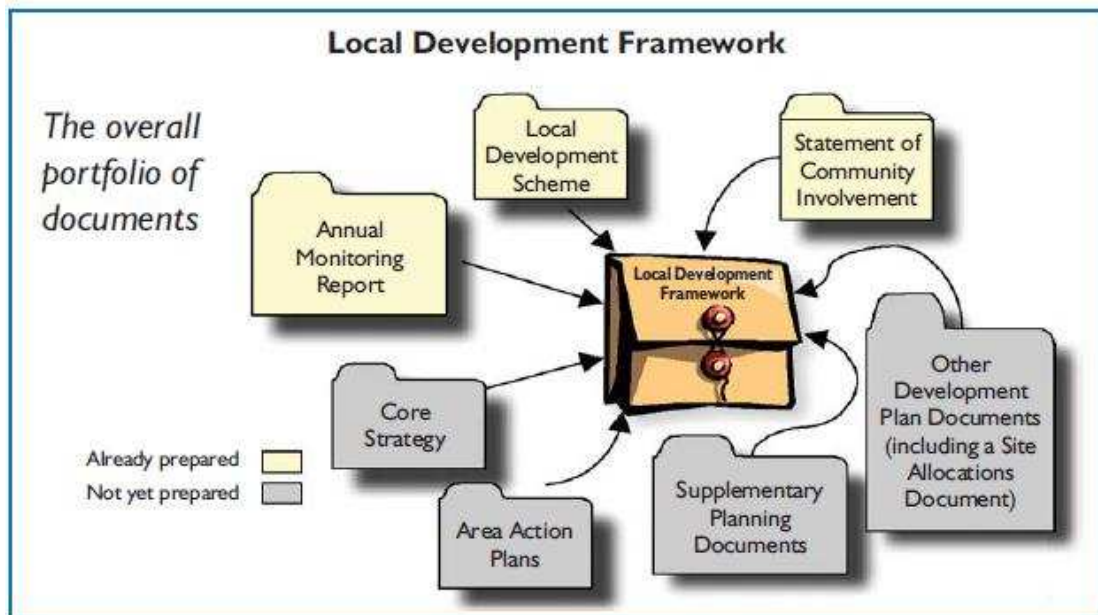
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## 1. Introduction

- 1.1 Lewes District Council, in partnership with the South Downs National Park Authority (NPA), is currently preparing a plan that will, once adopted, guide new development and change in the District for the period up to 2030. The involvement and views of those who live, work and visit the District in preparing such a plan is essential. Therefore, we have prepared an initial draft of what such a plan for Lewes District could look like and are now seeking the views on this from as many individuals and organisations as possible. The ways in which you can submit comments to us on this document are contained inside the front cover. The remaining parts of this introductory section provide some background and context to this plan.

### What is the Local Development Framework?

- 1.2 The plan that we are currently preparing will, once adopted, form part of the Local Development Framework (LDF) for the District. The LDF is presented like a portfolio of documents, which will each deal with a different aspect of planning or the administration of planning.
- 1.3 So far, we have produced the following documents for the LDF; a Local Development Scheme that sets out the proposed timetable of the production of the various documents within the LDF; a Statement of Community Involvement that sets out how and when we will undertake consultation in relation to the LDF (and significant planning applications); and an up-to-date Annual Monitoring Report that amongst other things reviews progress on the production of the LDF. All of these documents are available to view on the Council's website [www.lewes.gov.uk](http://www.lewes.gov.uk). The diagram below illustrates the LDF for Lewes District.



- 1.4 The LDF will eventually set out a plan for how places are expected to change over a period of time and will reflect other relevant strategies and policies in the area. It will make clear where, what, when and how development will take place and in doing so it will establish a clear vision for the District that helps to create sustainable communities where people want to live and work, now and in the future.

**What is the Core Strategy?**

- 1.5 The plan that is currently being prepared is called the Core Strategy. This plan is the pivotal document in the LDF and will set out the overarching strategy to which all other documents in the LDF will need to conform. The Core Strategy sets a vision for where we want Lewes District to be in 2030. It then sets a broad strategy for how that vision could be achieved. This broad strategy needs to identify how much development will take place over a given period of time (e.g. the number of new houses to be built), as well as the areas where development and change will occur. It may appear that the policies within this document do not appear very detailed. This is because we first have to establish an agreed policy strategy in this document, and then develop detailed policies in subsequent plans forming part of the LDF.

**How is the Core Strategy prepared?**

- 1.6 The process of preparing a Core Strategy can be sub-divided into a number of specific stages, which are identified in the table below. Ongoing engagement with the public and key organisations will be undertaken throughout the production of the Core Strategy. This will be in addition to three formal consultation periods, which are identified in red below.

**Table 1 – Timetable for preparing the Core Strategy**

<b>Stages in preparing the Core Strategy</b>	
Issues and Emerging Options Topic Papers <sup>1</sup>	May 2010
Emerging Strategy (including other options considered) <sup>1</sup>	Autumn 2011
Proposed Submission Document <sup>2</sup>	Spring 2012
Formal Submission <sup>3</sup>	Summer 2012
Examination	Autumn 2012
Adoption	Early 2013

<sup>1</sup> These stages will constitute Regulation 25 of The Town and Country Planning (Local Development) (England) (Amendment) Regulations 2008

<sup>2</sup> Regulation 27 of the above regulations

<sup>3</sup> Regulation 30 of the above regulations

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- 1.7 As can be seen from the above table, one of the stages in preparing the Core Strategy has already been undertaken. In May 2010, nine Topic Papers were published by the District Council and consulted upon. Included within these papers were proposed objectives for the Core Strategy, a proposed vision for the District and potential policy areas and policy options for consideration. Views were sought on all aspects covered in the Topic Papers. In parallel with the consultation on the Topic Papers, the District Council also held seven drop-in sessions and two discussion forums in various venues across the District. These events were held in order to obtain views on the content of the Topic Papers and to also understand what issues people felt a plan for the District should be addressing and how they felt they could be addressed.
- 1.8 A background paper has been prepared that identifies the main views received during this consultation process and how the views expressed have influenced this document. This paper is entitled ‘Summary of Consultation on the Core Strategy: Issues and Emerging Options Topic Papers’ and can be viewed at <http://www.lewes.gov.uk/corestrategy/index.asp>

### **What is the role of the South Downs National Park Authority?**

- 1.9 The Core Strategy is being prepared in order to cover the whole of Lewes District, including that part of the District within the South Downs National Park. The map contained within the characteristics section of this document (see page 13) identifies the extent of the National Park within Lewes District.
- 1.10 On the 1<sup>st</sup> April 2011 the National Park Authority became the “sole planning authority” for the whole designated area. Hence, from this date Lewes District Council has been formally working alongside the South Downs National Park Authority in progressing the Core Strategy. This means that this document has been approved for publication and consultation by both the District Council and the National Park Authority. Because the Core Strategy will apply to two planning authorities the document is presented in a way that enables the policies that apply to either one of the authorities, or both, to be identified.
- 1.11 Eventually the National Park Authority will prepare its own Core Strategy, which will cover the whole of the National Park area from Winchester in the west to Eastbourne in the east. The anticipated adoption date of their Core Strategy is 2014. Given the relatively close adoption dates of the respective Core Strategy documents, and that policies within this Core Strategy look ahead to 2030, it is likely that a number of the policies that apply to the National Park will be taken forward into their own policy document.

## **What determines the content of the Core Strategy?**

1.12 There are many different influences on the content of the Core Strategy, a summary of which is as follows.

### National influences

1.13 The Core Strategy needs to be in accordance with, but not duplicate, guidance and policy contained within a series of documents provided by the Government called Planning Policy Statements (PPS) and Planning Policy Guidance (PPG)<sup>4</sup>. In addition there are a number of planning circulars and ‘Dear Chief Planning Officer’ letters sent out by the Government that provide non-statutory advice and guidance on particular issues. Regard needs to be had to these circulars and letters in formulating this Core Strategy document.

1.14 It is recognised that national policy and guidance, in the formats identified in the previous paragraph, is currently being reviewed. On the 25<sup>th</sup> July 2011 the Government published a draft National Planning Policy Framework for consultation. Once this framework has been adopted it is expected to replace all PPSs, PPGs and circulars and will become a key influence on the content of the Core Strategy document.

### Other Strategy documents

1.15 There is a need to take account of local strategies and policies, in particular the Sustainable Community Strategy (SCS). Hence, this Core Strategy should reflect the relevant priorities set out in the Lewes District Sustainable Community Strategy “Local Voices, Local Choices” [http://www.lvlc.info/ldscs\\_final.pdf](http://www.lvlc.info/ldscs_final.pdf) . These priorities are as follows:

- A valued environment
- Decent and affordable housing for all
- Safer and stronger communities
- Access to good local facilities
- Healthier communities
- A vibrant and sustainable economy

1.16 A number of organisations, who provide public services and/or have an interest within the District, also prepare their own plans and strategies, which this Core Strategy should reflect. Amongst others, these strategies include East Sussex County Council’s Local Transport Plan<sup>5</sup>, the relevant Catchment Flood Management Plans and Shoreline Management Plans, and the East Sussex Economic Development Strategy.

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<sup>4</sup><http://www.communities.gov.uk/planningandbuilding/planningsystem/planningpolicy/>

<sup>5</sup> The current version of this plan is Local Transport Plan 3, which was adopted in 2011



Evidence base studies

- 1.17 A key requirement in developing policies for the LDF is that they are underpinned by robust evidence. Hence, during the course of the past couple of years a number of studies have been undertaken on several different subject areas. References to these studies will appear throughout this document, particularly in the justification of a preferred approach for a policy. The full extent of the evidence base studies and their content can be viewed at:  
<http://www.lewes.gov.uk/planning/backgroundreps.asp>
- 1.18 It is accepted that not all the evidence required to underpin all elements of the Core Strategy is in place yet. This is generally because the District Council and National Park Authority need to establish a clear idea as to the eventual strategy for growth prior to certain pieces of evidence being undertaken (for example, the green infrastructure study). Where further evidence is to be undertaken in advance of the Proposed Submission stage this is indicated in the document. Despite this, given the ‘front-loading’ nature of developing planning policy documents, the majority of the key evidence required to develop and evaluate policy options has been completed and informs this document.

National Park influences

- 1.19 Since a significant part of the Core Strategy plan area is within the South Downs National Park, the two statutory National Park purposes will need to underpin the strategy and policies that could be utilised and/or delivered in the National Park area. The two purposes that govern the National Park, as set out in the Environment Act 1995 are:
- To conserve and enhance the natural beauty, wildlife and cultural heritage of the National Park; and
  - To promote opportunities for the understanding and enjoyment of the special qualities of the area by the public.
- 1.20 National Park Authorities also have a Duty to, “...seek to foster the economic and social well-being of local communities within the National Park” in pursuit of the two National Park purposes. This duty will need to be met through the policies in the Core Strategy for the National Park area within Lewes District.

Sustainability Appraisal/Strategic Environmental Assessment (SEA)

- 1.21 As the Core Strategy needs to contribute towards the achievement of sustainable development, it needs to be subject to the Sustainability Appraisal process. This process incorporates the requirements of the Strategic Environmental Assessment (SEA) Directive. The Sustainability Appraisal process assesses strategy and policy options against a set of objectives that reflect the characteristics and issues within the plan area.

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- 1.22 A Sustainability Appraisal Report accompanies this document. It identifies all strategy and policy options considered and details how they performed against the objectives. The proposed strategy and policies that have been included within this document are generally options that have performed well in the SA process. However, it also needs to be recognised that consideration has been given to other issues such as findings of the emerging evidence base, stakeholder involvement to date and delivering the key strategic objectives.

### Views of individuals and organisations

- 1.23 Throughout the preparation of the Core Strategy, the views and opinions expressed by those individuals and organisations who have an interest in the area are key to the plans content. Obtaining such views and opinions is undertaken both through formal consultation methods (such as the consultation on the Issues and Emerging Options Topic Papers) and through informal engagement (one-to-one meetings, workshops, inputting into evidence studies, etc).

### **Changes to the planning system through the Localism Bill**

- 1.24 It is recognised that a number of changes are anticipated to the planning system over the course of the next couple of years. Many of these changes will be enacted through the Localism Bill, which is due to receive Royal Assent in late 2011. How these changes are being addressed in the formulation of this document is detailed below.

### National Planning Policy

- 1.25 A review of national planning policy has been announced by the Government. This review seeks to consolidate policy statements, circulars and guidance documents into a single consolidated National Planning Policy Framework. A draft of this framework was issued for consultation on the 25<sup>th</sup> July 2011 and the final version is expected to be in place by April 2012. For the time being the raft of existing national planning policy remains in place, predominantly in the form of 25 separate Planning Policy Guidance notes and Statements. Hence, this Core Strategy has been prepared to be in accordance with the current national planning policy, but consideration has also been given to the emerging National Planning Policy Framework. Once the framework has been adopted it will be reflected in the emerging Core Strategy.

### Regional Planning Policy

- 1.26 In May 2009, the Regional Spatial Strategy (RSS) for the South East, known as the South East Plan, was adopted. One of the key requirements in preparing the LDF is that it needs to be in “general conformity” with the relevant RSS for that area. However, the

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Government has made it clear that they intend to abolish all RSSs and have included provision for this in the Localism Bill. Hence, it is expected that once the Localism Bill has become enacted, the South East Plan will no longer form part of the development plan for Lewes District.

- 1.27 The abolition of all RSSs is expected to take place in advance of the publication of the Core Strategy Proposed Submission document for consultation. With this being the case, we have taken the decision to review certain policy approaches that are set out in the South East Plan. Hence, amongst other things, a decision has been made to review the housing target for the district. Therefore, this document sets out housing target options that differ from the South East Plan<sup>6</sup>, even though at the time of writing this plan is still in existence. It may be that policies and strategies from the South East Plan merit being incorporated into this Core Strategy document. This has been considered in the formulation of this document, particularly through the Sustainability Appraisal/SEA process.

### Neighbourhood Planning

- 1.28 Although the regional tier of planning policy, in the form of Regional Spatial Strategies, is to be abolished, a new tier is to be created at a local level. This will be in the form of neighbourhood planning, which will include Neighbourhood Plans and Development Orders. This Core Strategy is being prepared with an eye to this forthcoming new tier of planning as many of the strategic level policies that are eventually set could be implemented through a neighbourhood plan/order.

### **How is the Core Strategy structured?**

- 1.29 This Core Strategy document describes the current characteristics of Lewes District and from this the key issues and challenges are identified. The aspirations of the Local Development Framework are described through a long term vision, with associated objectives for the District as a whole. How these objectives are proposed to be delivered is then detailed. This is in the form of a spatial strategy that will identify how much development is planned for, over what time period, in what locations and by what means it will be delivered. Generic policies on key issues are then detailed. These policies will also be key in the delivery of the objectives. It is worth noting that for many of the emerging policies in this document only the headline elements of the policy are identified (i.e. the direction that the preferred policy option will take). The actual detailed wording of many of the emerging policies has not been set out at this stage. The Proposed Submission stage of this document will include the detailed policy wording.

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<sup>6</sup> Planning for this housing target has been considered as an option.

**How to use this document?**

- 1.30 It is important to note that the strategy and policies set out in this document are only considered the 'preferred option' at this stage. For many policy areas, other strategy and policy options have been considered and these are referred to in this document, as well as being signposted to in the relevant section of the Sustainability Appraisal Report. In some instances it has also been decided not to identify a preferred option and instead identify all options under consideration and ask for comments on them. Comments are not only invited on the preferred strategy and policies, but also the other options that have been considered. In light of comments received, conclusions reached on certain options may change and a different strategy/policy approach may be put forward in the next version of the Core Strategy.
- 1.31 Following on from each preferred strategy/policy put forward are some questions to consider in making a response to this document. Questions are also posed at the end of the sections that identify the characteristics, issues, vision and objectives. The questions are identified in a grey text box.
- 1.32 Notwithstanding the specific questions raised, respondents are welcome to submit comments on any aspect of this document.

## 2. A portrait of Lewes District



2.1 This section of the Core Strategy provides a spatial portrait of Lewes District. This is important to identify the issues and challenges that face the district. Given the diverse nature of Lewes District, the characteristics that apply to the district as a whole are identified, followed by those that apply to individual character areas.

## General Characteristics

- Lewes District is located within East Sussex, in the South East region of England and around 45 to 60 miles south of London.
- The District covers an area of 292 sq km, extending from the English Channel coast through the South Downs National Park and into the countryside of the Sussex Weald to the north.
- The total population is 97,466(2010 mid-year estimate), 77% of whom live in the five urban areas of Lewes, Newhaven, Peacehaven, Seaford and Telscombe Cliffs/East Saltdean. The remainder of the population live in 23 predominantly rural parishes.
- Just over one half of the area of the District lies within the South Downs National Park, which came into being on the 1<sup>st</sup> April 2010. The population of this area is approximately 22,500.
- The city of Brighton & Hove is located on the south-western boundary and exerts a strong influence on the life of the District, providing employment, shopping, leisure opportunities, together with other services and facilities.
- The towns of Haywards Heath and Burgess Hill in Mid Sussex District abut the north-western boundary, with the more rural district of Wealden located to the east, beyond which lies the coastal resort of Eastbourne.
- The District benefits from good access to the trunk road network, with the A27/A26 linking Lewes and Newhaven to neighbouring Brighton and Eastbourne and the nearby A23/M23 providing access to London, Gatwick and the M25.
- The A27 carries an average daily traffic flow of 57,000 vehicles through the District and by 2026 the volume of traffic on the Falmer section is expected to exceed available road capacity (Highways Agency Regional Network Report 2008).
- In addition to the trunk road network, the District is served by a number of key A roads. This includes the A259, which links the coastal communities, and the A26, A272 and A275, which are key routes through the northern part of the District.
- Lewes, Seaford and Newhaven are linked by rail connections to London, Gatwick, and towns along the Sussex coast and beyond.
- The port of Newhaven provides cross channel passenger and freight services to Dieppe, in Haute Normandie, France, and beyond to northern Europe.
- Lewes District is included in both the South East Local Enterprise Partnership (LEP) and the Coast to Capital LEP. Each LEP is a public and private sector partnership, which seeks to improve economic prosperity.

## Environmental Characteristics

- The landscape and historic environment of the District is highly valued by both residents and visitors. There is a diverse and attractive

countryside, including chalk cliffs, shingle beaches, downland, heathland, river valleys, flood plains and areas of ancient woodland.

- The high quality natural environment is emphasised by the high level of environmental protection in parts of the District, including the National Park, 16 Sites of Special Scientific Interest, two Special Areas of Conservation, two National Nature Reserves, four Local Nature Reserves, and three Wildlife Trust Reserves.
- Of the 2,437 hectares of land designated as Sites of Special Scientific Interest, around 43% is considered by Natural England to be in an unfavourable condition.
- The District has a rich built heritage including 35 Conservation Areas, ranging in size from the historic core of Lewes town to small villages and hamlets in the Sussex Downs and Weald.
- There are over 1,700 Listed Buildings and over 100 Scheduled Ancient Monuments, together with numerous sites of archaeological interest and four historic parks included on the English Heritage Register of Parks and Gardens. There is also one historic battlefield site in the District (Lewes 1264).
- Significant areas, including the towns of Lewes and Newhaven, are at risk of flooding from the River Ouse and its tributaries, or inundation from the sea. In addition, there are many parts of the District that have areas prone to surface water flooding and ground water flooding during times of intense rainfall. Coastal erosion is apparent in various places along the coastline.
- Generally air quality in the District is good, but an Air Quality Management Area is in operation in Lewes town centre, where most of the air pollution is generated by traffic. Another area of concern, in terms of air quality, is the area beside the A259 in the centre of Newhaven, where the levels of nitrogen dioxide are close to the national limits.
- Large parts of the District benefit from a highly peaceful and tranquil environment, with minimal light pollution, that is much valued by residents and visitors.

### **Social Characteristics**

- The District has a significantly higher percentage of residents over 65 years of age (23.8%) compared with the national average (16.6%). By contrast, it has a smaller proportion of residents aged 15-29 years (14.7%) compared with the national average (20.1%).
- In 2001, 97.9% of the population were white, compared with 91.3% in England and Wales, with the remainder coming from a wide variety of ethnic groups, the largest of which are Bengalis and Cantonese.
- The population of the district is projected to remain stable, with minimal growth expected between 2008 and 2026<sup>7</sup>. This is due to inward

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<sup>7</sup> The population and household projections are based upon the future levels of housing provision set out in the South East Plan for Lewes District. They will be revised to include projections to 2030 and if an alternative housing provision target is chosen. In addition, it is thought that the projections underestimate the population and that the population is likely to rise during the stated time period.

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migration balancing out the natural decrease (i.e. deaths exceeding births).

- The number of households is expected to grow by 9% over the same period (from 42,182 to 45,794 households), mainly due to a continued decrease in average household size.
- The 65+ age group is expected to increase by around 32% between 2008 and 2026, as those born in the 'baby boom' of the 1950s and 1960s reach retirement age. In the same period the numbers of very elderly (aged 85 and over) are projected to rise from 3,824 to 5,947, an increase of 55%.
- By 2026, single person households are expected to comprise 40% of all the households in the District, compared with 33% in 2006; around 11,000 of these single person households will be pensioners.
- Over 21% of households in the District do not have access to a car, and a high proportion of these householders are pensioners.
- The mean household income is £35,887, which is higher than the mean for East Sussex or Great Britain, but still well below the South East region's mean of £40,239.
- Overall levels of deprivation across the District are comparatively low, although there are small areas within the towns that fall within the worst 30% in England, when measured against the Index of Multiple Deprivation 2010.
- Most of the population is active and in good health compared to other parts of East Sussex and although there is a higher than average number of retired people, life expectancy is above the national average. Nevertheless, there are significant pockets of ill health, particularly in the coastal towns, where a relatively high proportion of households contain one person or more with a limiting long-term illness.
- House prices are relatively high, driven by commuting and the District's status as a popular retirement location. In 2010 average house prices in the District were more than 7 times average earnings and despite a more recent fall in house prices due to current market conditions, long term pressures of housing supply and affordability remain.
- 2,227 households are currently on the Council Housing Register, with 61 homeless households in temporary accommodation (as at April 2011).
- Considerable variation exists in the price of dwellings across the District, with a corresponding difference in the level of household income necessary to buy, with higher levels in Lewes town and the rural parts of the District compared with the coastal towns.
- Access to recreational facilities is good compared to the national average, although there is a general shortfall in the provision of children's play space and tennis courts across the District.
- Community life is a strong and distinctive feature of the District and residents identify closely with their towns, neighbourhoods and villages.



## **Economic Characteristics**

- Lewes District is generally prosperous with unemployment levels below the national, regional and East Sussex rates.
- Over 36% of residents who work are employed in managerial or professional roles.
- Self-employment is a significant feature of the District, representing 18% of the economically active population, compared with 14% in the South East.
- There are around 30,900 jobs in the District, predominantly in public administration, education and health (37.8%), retail (15%) and manufacturing (8.3%).
- Small companies of between 1 and 10 employees account for 88% of all local businesses.
- Lewes town accounts for almost half the District's employment, the high level of public sector employment having, in the past, protected it from job losses in traditional manufacturing.
- Newhaven, which is relatively dependent upon manufacturing employment, has suffered significant job losses and has not shared in the wider economic prosperity of recent years.
- Jobs within the District are relatively poorly paid, with average weekly earnings well below the national or regional average, although marginally above the average for East Sussex. However, there are areas within the District where average weekly earnings are above average.
- The District has significant levels of out-commuting to jobs elsewhere, particularly Brighton & Hove, the Crawley/Gatwick area and London.
- Sussex and Brighton Universities are located adjacent to the District boundary at Falmer. Part of the Sussex University campus, including the Sussex Innovation Centre, is located within Lewes District.
- A high percentage of residents in the coastal towns have no skills qualifications.
- The rural parts of the District have undergone major change as agricultural employment has contracted and been replaced by a growth in remote home working and rural tourism. These parts of the District include a number of rural industrial estates, often on farms. 2009 figures, show that tourism now supports approximately 2,300 full time equivalent jobs in the District).
- Many employment premises in the district are ageing and do not meet modern business requirements. An exception to this is the recently opened Newhaven Enterprise Centre, which has consistently high occupancy rates.
- Employment land is under pressure from higher-value competing land uses, particularly residential and retail.

## **Lewes town**

- Lewes is the county town of East Sussex with a population of 16,348 and lies entirely within the South Downs National Park.

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- It is located on the River Ouse at the point where it flows southwards through a gap in the South Downs. Significant parts of the town are at risk of flooding from the river and there was a severe flood event in the town in October 2000.
- It is considered to be one of the best preserved small market towns in England, with significant artistic and cultural heritage, making it a popular tourist destination.
- The town contains the remains of Lewes Castle and the medieval priory, together with a rich and varied architectural heritage that includes over 500 listed buildings.
- The historic core of the town comprises three individual settlements – Lewes High Street, Southover and Cliffe – each preserving its own identity. Beyond these areas are a number of well preserved Victorian and Edwardian suburbs.
- Lewes is an important administrative centre, containing the Crown and County Courts, prison, and headquarters of the County and District Councils, Sussex Police, Ambulance Service and local NHS Trust. Other notable establishments and companies include Sussex Downs College and Harvey's Brewery.
- 44% of jobs in Lewes are within public administration, education and health.
- There is a thriving town centre and strong sense of community. The town has a strong tradition of bonfire celebrations on the 5<sup>th</sup> November.
- Transition Town Lewes was launched in April 2007 and about twenty Transition Groups have formed around issues such as energy use, transport, food and housing.
- The town has the largest retail centre in the District with a number of local specialist shops.
- The town has unusually good public transport connections with direct rail services to London, Gatwick Airport, Ebbsfleet, which has a Eurostar station, Brighton, Eastbourne and Seaford. The town is also a hub for local bus services.

### **Newhaven**

- With a population of 12,225 the town of Newhaven is located at the mouth of the River Ouse, on the English Channel coast.
- The town has had a harbour for sea-faring vessels since the 16<sup>th</sup> Century. Today the main services operating from the harbour are the cross-channel ferry to Dieppe and commercial trade in aggregates and scrap metals. There is also a commercial fishing fleet and small marina.
- Although there are a number of derelict and under-utilised sites that are near to, or adjoin the harbour, there has been significant recent water-front redevelopment at West Quay. There is also 12 hectares of land at Eastside, which is allocated for business development, but has yet to be implemented.

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- Newhaven Fort, built in the 1860s to defend the growing harbour, is a Scheduled Ancient Monument. The marine workshops on East Quay are another prominent heritage asset within the town (Grade II\*).
- The town has a concentration of industry and a range of facilities involved in waste management. Due to such uses currently and historically on a number of sites, including those that are derelict, there are a significant number of sites that are potentially contaminated.
- Denton Island has recently seen an upsurge in economic activity with the successful establishment of the Enterprise Centre and the Newhaven campus of Sussex Downs College.
- Retail offer within the town centre is declining with a number of vacant units.
- The town has two railway stations offering direct train services to Lewes, Seaford and Brighton.
- A high proportion of jobs in the town (37%) are in manufacturing, which is significantly higher than the regional and national averages.

### **Peacehaven & Telscombe**

- The settlement has a population of 21,657 and extends back from the cliff edge to open downland behind the town. Coast defences protect most areas of cliff top development from erosion by the sea.
- The settlement is generally a 20<sup>th</sup> century, mainly low density residential development, characterised by a rigid grid street layout.
- The A259 coast road is the only vehicular route in and out of the urban area and suffers from congestion at peak periods, particularly in the Brighton direction. However, there is a frequent bus service, with priority measures in place, along the A259 to and from Brighton.
- The Meridian Centre provides a supermarket, shops, library, leisure and other public facilities. Other retail outlets and services are scattered along the A259.
- Despite its large residential population, Peacehaven only provides 5% of the total employment in the District. Consequently, most residents have to travel out of the town to work, particularly in Brighton.

### **Seaford**

- The town is the largest settlement in the District with a population of 24,044. It is located between the sea and the Downs on the eastern edge of the Ouse Valley.
- The historic core of the town is set back from the modern seafront where a wide shingle beach is maintained as a sea defence and provides a popular amenity attraction.
- The retail offer in the town consists of a mix of chain stores and independent retailers. With vacancy rates being relatively low, the town centre is considered to be thriving.
- The Martello Tower on the seafront was constructed during the Napoleonic Wars and is the most westerly of a chain of such fortifications stretching as far as Hythe in Kent.

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- The town contains significant post-war residential estate development that absorbed the two downland villages of Chyngton and Blatchington, both now designated as Conservation Areas.
- Immediately adjacent to the town are the dramatic cliffs of Seaford Head, which act as a significant visitor attraction, whilst further beyond are the famous landscapes of the Seven Sisters and Cuckmere Haven. Despite these attractions the town's visitor economy is considered to have untapped potential.
- The town's railway station offers direct train services to Newhaven, Lewes and Brighton.
- One third of the population are aged 65 or over, which is significantly higher than the national average of 17.6%.
- A high proportion of the jobs in the town are in the health and education sectors.

### **The rural area of the Low Weald**

- The rural area of the Low Weald is an intimate landscape characterised by an irregular field pattern enclosed by thick hedgerows and shaws and areas of ancient woodland, together with extensive areas of protected heathland at Chailey Common.
- The quality of 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.
- Villages in this part of the district are small (less than 2,000 population), with the exception of Ringmer, which has a wider range of facilities and services including a secondary school.
- House prices in the Low Weald area of the district are generally higher than in the rest of the District.
- The social mix and vitality of villages is being undermined by a shortage of affordable housing, high levels of out commuting, a decline in the number and range of local services, and limited public transport.
- A proportion of households in the rural area do not have access to mains heating supplies, which leaves them vulnerable to increases in oil prices and may exacerbate fuel poverty
- The non-farming rural economy has seen considerable growth in recent years, due to farm diversification, the growth in knowledge dependent businesses and increasing levels of self-employment and home working.
- Due to the nature of the terrain and clay soils, parts of the Low Weald, such as Barcombe Mills, are prone to localised flooding.

### **The rural area of the South Downs**

- The rural area of the South Downs is very accessible countryside offering outstanding recreational opportunities, with Ditchling Beacon and Mount Caburn amongst some of the best recognised attractions.
- The area contains a range of iconic places and views that are part of the national consciousness, from Cuckmere Haven and the views of

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the Seven Sisters to the internationally renowned opera house at Glyndebourne.

- The area has a number of small villages and hamlets of the highest architectural and historic quality, most of which retain a sense of seclusion and tranquillity despite their proximity to major transport corridors and urban areas.
- Despite the rural nature of the area, there are a number of key facilities and establishments that are important to the wider area, such as Plumpton Agricultural College.
- As with the Low Weald area, the social mix and vitality of villages is being undermined by a shortage of affordable housing, high levels of out commuting, a decline in the number and range of local services, and limited public transport.
- The landscape character and natural beauty is vulnerable to continuing development pressures along the south coast, which are leading to additional demands on groundwater resources, localised recreational pressures, increased traffic and pressure for visually intrusive developments.

### **Questions to consider:**

- *Have the correct characteristics that are relevant to Lewes District been identified, or not?*
- *Have any characteristics been misinterpreted?*

### **3. Key Strategic Issues and Challenges**

- 3.1 This section of the document identifies the strategic issues and challenges facing Lewes District that the Core Strategy is seeking to address. Developing the spatial portrait has identified some of the issues, as has the early work on the Core Strategy and Sustainability Appraisal process. This included the engagement work that led to the formulation of the Topic Papers and the subsequent consultation on them. These issues and challenges also reflect the issues and priorities that are detailed in the Sustainable Community Strategy.
- 3.2 It is these strategic issues and challenges that need to be addressed in the planning of the district and, as such, they inform the subsequent vision, objectives and strategy that follows this section.

#### **Accommodating and delivering growth**

- There is a requirement to bring forward sufficient land to meet the expected need for new homes arising from the future growth in population and households.
- We need to determine the best way of ensuring that these new homes meet local needs, particularly the provision of affordable housing and housing for an ageing population.
- There is a need to deliver sufficient sites and premises for business and other uses to provide employment and facilitate the growth and regeneration of the local economy.
- We need to work in partnership with other agencies and organisations to deliver this growth and the necessary infrastructure improvements.
- Although growth options are limited, due to significant environmental constraints, there is still a need to ensure that new development is provided in the most sustainable locations.
- We need to ensure that new development is provided in a way that enables the most sustainable means of using natural resources, such as water, energy and soil, to be utilised.
- There is a need, and duty, to address cross-boundary influences and links with the adjacent authorities of Brighton & Hove, Mid-Sussex and Wealden, where much higher levels of growth are planned than in Lewes District.

#### **Improving access to housing**

- Improving the amount and availability of affordable housing, both rented and shared ownership, is a priority due to relatively high house prices, below average wages, and continued in-migration.
- We need to be flexible in terms of housing provision in order to be able to respond effectively to changes in the housing market.

### **Promoting sustainable economic growth and regeneration**

- We need to determine the best way of addressing the pockets of socio-economic deprivation along the coast, low average wages, the impact of a declining workforce, and the high level of out-commuting which is unsustainable and undermines the local economy.
- We need to address the identified lack of good quality modern business premises and smaller units in order to support the growth and retention of local businesses and the District's ability to attract inward investment.
- There is a need to ensure the provision of relevant employment skills, training and support to meet the needs of existing and potential companies and the local workforce, both now and in the future.
- We need to work in partnership to deliver the regeneration of vacant, underused or poor quality sites and premises and improve accessibility before allocating new green field sites for business development, particularly at Newhaven.
- We need to address the inadequate access to good quality and high speed electronic/IT communications, particularly in view of its role in supporting home-working, rural employment and new start-up businesses.
- We need to determine the best way of maintaining and enhancing the role of Newhaven as a regionally significant port with its associated facilities.
- We need to recognise the contribution that the rural area can make to the District's economy, including the potential enhanced role of tourism in terms of providing employment opportunities, attracting investment and creating wealth. However, it does need to be recognised that tourism alone will not lead to a buoyant rural economy and that other sectors are equally as important.

### **Creating healthy, sustainable communities**

- We need to work in partnership with other organisations to ensure adequate access to health, education and other community services and facilities and to reduce inequalities across the District.
- We need to determine the best way of addressing inadequacies in the provision or quality of recreational facilities and open spaces, particularly for children and teenagers.
- We need to support the quality of community life through partnership working to promote social inclusion, tackle deprivation, encourage community cohesion, and reduce the fear of crime.
- We need to ensure that the needs and aspirations of the growing elderly population are addressed by meeting changing housing requirements and developing the integrated provision of good quality services that will maintain people's independence and social contacts in old age.

## **Protecting and enhancing the distinctive quality of the environment**

- There is a need to continue to protect and enhance the quality of the District's environment, whilst also taking the opportunity to capitalise upon the designation of the South Downs National Park in order to improve people's understanding and appreciation of the landscape, attract new investment, and achieve economic benefits through tourism.
- We need to conserve and enhance the natural beauty, wildlife and cultural heritage of the National Park, whilst promoting opportunities for the understanding and enjoyment of its special qualities by the public.
- We need to determine the best way of managing change and raising the quality of new development in order to preserve and enhance the character of the District's heritage assets, including its many Conservation Areas.
- We need to protect existing open spaces, create new spaces, and link these spaces together to develop a green infrastructure network that will deliver environmental and social benefits, such as enhancing biodiversity, reducing flood risk and improving community health and well-being.
- In view of the significant environmental constraints on the outward expansion of many of our larger settlements, we need to determine the best way of avoiding 'town cramming' and the loss of existing residential amenities.
- There is a need to ensure that new development contributes to reducing flood risk and surface water run-off; protecting and restoring natural habitats; maintaining and improving air quality; and protects drinking water supplies and bathing areas.

## **Tackling climate change**

- We need to mitigate the causes and effects of climate change through the location and nature of new development and by helping to shape places that create lower carbon emissions and are resilient and adaptive to climate change.
- We need to promote and encourage alternative energy sources using decentralised or low carbon technologies, and energy and water efficiency in the design, construction and use of buildings.
- We need to determine the best way of encouraging people to move around the District in a sustainable manner and of ensuring maximum accessibility to new development by walking, cycling and public transport.
- We need to address the risk of flooding by using the Strategic Flood Risk Assessment and the East Sussex Preliminary Flood Risk Assessment to inform planning decisions and the identification of sites for development.
- We need to manage and adapt development in areas that are at risk from coastal erosion.



**Question to consider:**

- *Do you agree with the issues and challenges that have been identified in this section?*

- 3.3 Each of the headline issues and challenges are dealt with in turn in this document. The Spatial Strategy addresses 'accommodating and delivering growth' and then the Core Delivery Policies address the five subsequent issues/challenges.

#### 4. A Vision for Lewes District

4.1 The vision brings together the ‘characteristics’ and ‘issues/challenges’, as identified in the previous sections of this report. Underpinning the spatial vision are a set of strategic planning objectives (see section 5) that have been put together with the aim of delivering this spatial vision and provide the direction for the spatial strategy and policies for the plan area. The vision essentially describes the aspiration of what Lewes District will be like in 2030, which is the end date for the Core Strategy.

4.2 The spatial vision for Lewes District supports the vision that has been established by the Lewes District Sustainable Community Strategy, which was produced and is now being implemented by the Local Strategic Partnership (Local Voices, Local Choices). The vision of the Sustainable Community Strategy is as follows:

*“Our long term vision is of vibrant, distinctive, safe and sustainable communities where everyone who lives, works, visits or studies in the District supports one another and takes care of the environment – a **community we can all be proud of.**”*

4.3 Within the context set by the Sustainable Community Strategy, and reflecting the priorities and concerns addressed through the consultation process to-date, the vision identified below is proposed as the guiding or principal aim for this Core Strategy.

4.4 As demonstrated by the characteristics and key issues, Lewes District is very diverse with areas having distinct characteristics and issues that are unique to themselves, within the context of the District. For this reason, an over-arching vision has been set for the whole district, with a vision then identified for each of the differing character areas. To bring about the following vision, multi-agency and cross boundary working will be essential.

##### ***District wide***

*By 2030 the district and its residents will have responded to the challenges of climate change, through a reduction in the district’s carbon footprint and by adapting to the consequences of climate change. This will have been done through a variety of means, such as sustainable construction techniques, utilising alternative travel options to the private car (including the reinstated Lewes to Uckfield railway line) and increased production of green energy. Measures to reduce risk to the district from the increased frequency and severity of flood events will have been introduced, particularly in the urban areas. Despite the risk of flooding posed by the rivers, the recreational opportunities presented by these key environmental features will have been realised.*

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*The parts of the district within the South Downs National Park will have been conserved and enhanced under the leadership of the National Park Authority, and the area will be better understood and enjoyed by both residents and visitors. Elsewhere, the unique, distinctive and general high quality heritage, built and natural environment of the district will have been preserved, and in some instances enhanced, particularly through urban regeneration along the coastal strip. The enjoyment of the built and natural environment of the district will have been assisted through a strong sustainable tourism industry. Enhancements to the biodiversity of the district, including the further creation of a high quality network of habitats, will have been established and the relative tranquillity enjoyed by many parts of the district will have been retained.*

*Improved employment opportunities will have reduced the need for out commuting thereby supporting local services such as the retail centres. To enable this, businesses, including homeworking, will be supported by the provision of modern business accommodation and access to high quality and high speed e-communications.*

*Recent development in the District will have contributed to making existing communities more sustainable and addressing some of the previous imbalances in the standard of living across the District. The timely delivery of key infrastructure requirements, including sustainable transport options, accessible health care and education facilities, will have been key to achieving this.*

*Appropriate new housing will have been delivered that has contributed to meeting the significant housing need that has resulted from an increase in population and changes to the demographic profile. The provision of appropriate affordable housing, in appropriate locations, will have enabled those who wish to live in the district to do so.*

### **Newhaven**

*By 2030, Newhaven will have undergone significant regeneration and developed and strengthened its economic base. Building upon the success of the Enterprise Centre the town will have become the focus for enterprise and training within the District, with links to the two universities in Brighton. Much of the economic regeneration will have centred upon port generated activities, high-tech industries and the tourism industry with the town acting as the continental gateway to the National Park. The regeneration of Newhaven will have resulted in a revitalised and more accessible town centre, with an improved public realm and a greater range of uses and activity. The improved accessibility of the town centre will have been aided by an improved highway network, greater connectivity to the towns railway stations and a high quality public transport corridor along the A259.*

**Peacehaven and Telscombe**

*By 2030, the regeneration of Newhaven will have directly and indirectly helped to improve the vitality of Peacehaven and Telscombe. The A259 will have a high quality sustainable transport corridor, thereby improving the accessibility of this part of the District to neighbouring coastal towns and cities, where the higher order services and facilities exist. The provision and quality of recreational and community services both here and in the towns of Newhaven and Seaford will have been enhanced.*

**Seaford**

*By 2030, Seaford will have made greater use of its coastal location through a regenerated seafront that is easily accessed from the town centre and key transport hubs, such as the railway station. The retail provision on offer in the town will have been improved and advantage will have been taken of the opportunities presented by the National Park. This will have included the improved provision of tourist facilities and accommodation that have widened the town's economic base, whilst maintaining the relative tranquillity of the town, as well as the heritage assets, which are valued by residents and visitors alike.*

**Lewes town**

*Whilst embracing and achieving the Purposes and Duty of the National Park and Conservation Area objectives, by 2030 the town of Lewes will have had its role as a County town strengthened and will be seen as desirable to those who live in the town, those who visit and the businesses that exist or wish to establish themselves in the town. The provision of affordable housing and a range of premises to meet modern businesses needs will be key to achieving this. Such a range of premises will have ensured that whilst the public sector and the tourism industry forms an important part of the town's economy, it does not dominate it. The economic and recreational opportunities presented by the heritage assets of the town, including the Castle, the Priory, Anne of Cleves House and the historic battlefield, will have been utilised whilst at the same time being conserved and enhanced.*

**The rural area of the Low Weald**

*By 2030, the Low Weald villages and wider countryside would have retained and, where possible, enhanced their attractive character and identity. Although the majority of recent development would have been directed to the urban areas of the District, development that meets local affordable housing and community needs and supports the rural economy will have been sensitively accommodated, particularly in those settlements with the best range of community services and facilities and ease of access to employment opportunities. With the London to Lewes railway line passing through this part of the district, linkages to the stations of Plumpton and Cooksbridge will have been improved, thereby improving the accessibility to and from this part of the district by sustainable means. Although travel by the private car will still, in many instances, be the only practical way of accessing and*

*travelling around this part of the district, improvements to road safety, including the lowering of speed limits in the villages, will ensure that this form of transportation is undertaken in the safest possible manner.*

*As a result of significant growth at the nearby towns of Uckfield, Burgess Hill and Haywards Heath, the demand for informal recreation and leisure facilities will have increased and been met in this area where appropriate, which will have resulted in better facilities for the Low Weald communities and a much needed stimulus to the economy in this area.*

***The rural area of the South Downs National Park***

*By 2030, the highly valued character of the South Downs National Park will have been protected and enhanced. Development to meet the social and economic needs of the existing communities', including the provision of affordable housing, will have been met and sensitively accommodated within environmental limits. The area will perform an important tourism, heritage and recreational role within the region while having due regard to the high quality landscape, conservation of wildlife and the cultural heritage of the South Downs.*

*The needs of residents and the increased number of visitors to this part of the National Park will have been sustainably managed. This will have included enhanced accessibility to and around this area, including through the use of an enhanced sustainable transport network and improved linkages between the Downland villages.*

**Questions to consider:**

- *Do you consider the vision to be achievable, realistic and relevant to Lewes District?*
- *Do you consider the vision to be locally distinctive to Lewes District?*
- *Do you agree with the different character areas identified in the vision?*

## 5. Strategic Objectives

5.1 The ten strategic objectives, identified in this section, outline the direction that the Local Development Framework will take in order to achieve its vision of Lewes District in 2030. The following strategic objectives are not in any order of importance:

**1. To deliver the homes and accommodation for the needs of the District and ensure the housing growth requirements are accommodated in the most sustainable way.**

The Council and Authority will work with housing agencies and the private sector to meet the identified local housing need resulting from the changing demographics of the district, particularly an ageing population. A key element of this objective will be ensuring that a suitable mix of housing size, type, tenure and affordability is achieved.

**2. To take advantage of the richness and diversity of the District's natural and heritage assets to promote and achieve a sustainable tourism industry in and around the District.**

A key part of this objective will be strong and continued partnership working between the Council, and other agencies, and the South Downs National Park Authority. Collectively we will promote opportunities for public enjoyment and understanding of the National Park's special qualities and will also ensure that economic, environmental and social opportunities created by the new National Park are realised across the whole of Lewes District.

**3. To work with other agencies to improve the accessibility to key community services and facilities and provide the new and upgraded infrastructure that is required to create and support sustainable communities.**

The Council and Authority will work in partnership with the agencies responsible for provision of physical, social and green infrastructure. This will include the programming, funding and delivery of all infrastructure required to support new development. Where appropriate, the provision of new infrastructure should also benefit the wider community and redress current inequalities in provision. This includes education, healthcare provision, public transport, as well as recreation and open space.

**4. To conserve and enhance the high quality of the District's towns, villages, and rural environment by ensuring that all new development is designed to a high standard and maintains and enhances the local vernacular character and 'sense of place' of individual settlements.**

The Council and Authority will seek regular dialogue with builders, architects, designers and householders in order to raise standards of design and construction in the area. This will include publication by the

Council and/or National Park Authority of guidance on appropriate design, materials, construction methods and the creation of safe, legible layouts that provide inclusive access to all.

**5. To conserve and enhance the natural beauty, wildlife and cultural heritage of the area.**

The Council and the South Downs National Park Authority will work closely together to ensure that the effects of this Purpose benefit all parts of Lewes District, and not just within the National Park.

**6. To maximise opportunities for re-using suitable previously developed land in urban areas and to plan for new development in the highly sustainable locations without adversely affecting the character of the area.**

Among other development initiatives, the Council and Authority will prioritise the redevelopment of vacant and derelict sites in existing urban areas. This complements the overall aim of locating new development where it makes efficient use of suitable and available land located in sustainable locations (i.e. close to existing services and public transport).

**7. To reduce the need for travel and to promote a sustainable system of transport and land use for people who live in, work in, and visit the District.**

The Council will work with the relevant transportation agencies to promote alternative and sustainable modes of transport to the private car, including improving the provision of facilities that enable safe walking and cycling, and the connectivity, capacity, accessibility and frequency of public transport to places in the district and outlying areas, including to continental Europe through Newhaven Port. Successful achievement of this objective will also involve the delivery of high speed and high quality e-communications across the whole of Lewes District, which enables those who wish to work from home to do so, thereby reducing the need for travel. Achieving this objective should assist in tackling some of the current areas that are subject to poor air quality in the district (predominantly caused by transport) and ensure that further such areas do not become apparent.

**8. To ensure that the District reduces locally contributing causes of climate change, including through the implementation of the highest feasible standards of sustainable construction techniques in new developments.**

This objective will involve the Council and other responsible agencies seeking to reduce the current carbon emissions from the existing development stock and encourage the sustainable use of resources, as well as promoting low carbon emissions, resource efficiency measures and renewable energy in new development. Key to the achievement of

this objective will be the successful achievement of the sustainable transport objective.

**9. To reduce the District’s vulnerability to the impacts of climate change, particularly by seeking to reduce the number of properties, community assets and infrastructure that are at an unacceptable risk of flooding, or coastal erosion.**

The Council and National Park Authority will work closely with the Environment Agency on current and future river and sea flooding issues. An important element of this objective will be seeking to ensure that climate change impacts on biodiversity habitats and species are minimised.

**10. To stimulate and maintain a buoyant and balanced local economy through regeneration of the coastal towns, support for the rural economy and ensuring that the economy does not become reliant on one or two sectors.**

Key to this will be for the Council, National Park Authority and other organisations to take advantage of the opportunities for economic growth and prosperity that exist in the district. This includes regeneration at Newhaven associated with the existing port, creating a sustainable tourism economy that takes advantage of the District’s key attractions, harnessing the knowledge at local universities, colleges and schools and diversifying the economy of Lewes town so that it is less reliant on the public sector and tourism. This will require the creation of more modern and varied commercial premises to meet the needs of new and expanding local businesses.

**Questions to consider:**

- *Do you consider that the strategic objectives will achieve the vision?*
- *Can the strategic objectives be achieved by 2030?*
- *Will the objectives help achieve the vision and priorities that are set out in the Sustainable Community Strategy?*



## **6. The Spatial Strategy – where development and change could take place – options available**

- 6.1 Having identified the vision and strategic objectives, this section sets out the potential locations within the plan area where development and change could help deliver the vision and objectives – this is the spatial strategy. This section also identifies the proposed level of development and change that is planned to take place over the lifetime of the plan.
- 6.2 Following on from the spatial strategy is a set of proposed generic core policies that will, unless stated, apply across the whole of the plan area and set out how development and change takes place to ensure it contributes to achieving the vision.
- 6.3 The Core Strategy that is eventually adopted will contain a delivery section, which will outline how each policy will be implemented. Indicators will also be identified, which will be the measures that will be used to monitor how the policy is working. For some policies there will also be targets, which will cover critical measures of success for the plan as a whole. The Annual Monitoring Report will report on progress against performance indicators and targets and recommend actions where necessary to keep the plan on track.

### **The Settlement Hierarchy**

- 6.4 In developing any proposals for development and change in the Core Strategy it is essential that an understanding of the role that each of the existing settlements plays is developed. This is to help ensure that development is distributed in the most sustainable manner, particularly having regard to where the need for development exists. For this reason, a settlement hierarchy has been developed and is detailed in this section. The purpose of the hierarchy is to identify the most sustainable settlements, in and around the District, based on their accessibility and the range of retail, services, facilities and employment they offer. The most sustainable settlements should be the main focus for additional growth.
- 6.5 A key influence in developing the settlement hierarchy has been the Rural Settlement Study. This study identifies the key social, environmental and economic characteristics and issues in each of the rural settlements. The study then goes on to identify a hierarchy of the rural settlements based on their current attributes and sustainability. It is accepted that the district contains a number of towns that were not included in the Rural Settlement Study. To determine the role of the towns in the district the evidence that was used to identify the primary regional centres and the secondary regional centres in the South East

Plan has been utilised<sup>8</sup>. None of the towns within Lewes District were identified as such centres, although towns within the vicinity of the District were (such towns exert a strong influence on Lewes District and are identified in the hierarchy). Given the findings of the aforementioned evidence, the category's identified for the rural settlements and that all of the District's towns perform a broadly similar function, it has been decided to place all of the towns into the same category of 'District Centre'.

- 6.6 The table below, which identifies the proposed settlement hierarchy, refers to levels of housing growth for each of the settlement categories below the District Centre level. Although such figures are not identified for the Primary, Secondary and District Centres, given the high sustainability ratings of the settlements within these categories it is in these locations where the focus of growth should be. The figures identified for the Rural Service Centres, Service Villages and Local Villages are derived from the Rural Settlement Study (<http://www.lewes.gov.uk/planning/backgroundreps.asp>) and are considered to be levels of growth that are appropriate to the type of settlement based on the level of service provision, accessibility, historic levels and rates of growth and levels of housing need. In determining these levels of growth, no detailed assessment is undertaken on the opportunities and constraints to development in such settlements. Therefore, it needs to be appreciated that the theoretical levels of growth for the different types of rural settlement may not be deliverable in the case of a number of settlements. Paragraphs 6.21 to 6.34 consider this issue in more detail.

**Table 2 – Proposed Settlement Hierarchy**

<b>Settlement category</b>	<b>Function</b>	<b>Settlements within this category</b>
Primary Regional Centre	A large accessible settlement by road and public transport with a centre containing a large range of retail units, including the sale of higher order goods, a range of leisure opportunities, significant levels of employment and facilities such as a hospital with A & E services. Such settlements meet all of their own needs for such higher level services.	Brighton and Eastbourne (both settlements are outside of the District, but they exert a strong influence on the District)

<sup>8</sup> Technical Note 2 – Strategic Network of Town Centres. See: [http://webarchive.nationalarchives.gov.uk/20100528142817/http://www.southeast-ra.gov.uk/southeastplan/plan/march\\_2006/tech\\_notes/technical\\_note\\_2-town\\_centres-march\\_2006.pdf](http://webarchive.nationalarchives.gov.uk/20100528142817/http://www.southeast-ra.gov.uk/southeastplan/plan/march_2006/tech_notes/technical_note_2-town_centres-march_2006.pdf)

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<p>Secondary Regional Centre</p>	<p>An accessible settlement by road and public transport with a centre containing a range of retail units, including high street chains. A reasonable range of leisure opportunities are available and the town contains significant levels of employment. Key facilities, such as a hospital, are available. Such settlements meet the majority of their own needs.</p>	<p>Haywards Heath (this settlement is outside of the District, but it exerts a strong influence on the northern part of the District)</p>
<p>District Centre</p>	<p>Accessible settlements by road and public transport containing a range of shops, employment opportunities and facilities including a secondary school. Such settlements are not reliant upon other centres to meet day to day needs, but they require support from nearby secondary or primary centres to meet the higher level needs of their residents.</p>	<p>Burgess Hill (this settlement is outside of the District, but it immediately borders the eastern boundary and is an influence on the north western part of the District), Uckfield (outside of the District, but is a strong influence on the north eastern part of the District), Seaford, Lewes, Newhaven, Peacehaven &amp; Telscombe</p>
<p>Rural Service Centre  <i>100+</i></p>	<p>Sustainable locations (with either a frequent bus or rail service) with a number of key services and facilities that meet many day to day needs of their residents and those from the wider rural hinterland. Some employment opportunities are available.</p>	<p>Newick, Ringmer</p>
<p>Service Village  <i>30 - 100</i></p>	<p>Villages that have a basic level of services and facilities, public transport provision (possibly not frequent) and limited employment opportunities. Residents can have some of their day to day needs met in such locations, although higher order settlements need to be accessed to enable this to be fully achieved.</p>	<p>Barcombe Cross, Ditchling, Glynde, Plumpton Green, Wivelsfield Green</p>

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Local Village  10 - 30	Villages that have very few facilities and services and have poor levels of accessibility to higher order settlements. Few, if any, employment opportunities are available.	Broyleside, Cooksbridge, Chailey North, Chailey South, Falmer, Firle, Kingston, Piddinghoe, Rodmell, South Street, South Heighton
Hamlet	Settlements that generally have a population of less than 100, have an historic core (generally with a church), but are generally lacking social infrastructure and ease of accessibility to higher order settlements.	Barcombe, Bishopstone, Norton, Chailey Green, East Chiltington, Hamsey, Offham, Plumpton, Iford, Streat, Southease, Tarring Neville, Telscombe Village, Wivelsfield, Westmeston

### **Questions to consider:**

- *Do you agree with the settlement categories identified and the functions that have been defined?*
- *Do you agree with how the settlements have been categorised? If not, what changes should be made to the settlement hierarchy?*
- *Do you agree with the levels of growth that are considered appropriate to the type of settlement (appreciating that opportunities and constraints to growth are not factored into these 'theoretical' figures)?*

### **Accommodating and delivering growth**

- 6.7 Over the coming years, Lewes District must evolve to accommodate the new development required to meet the changing housing needs of the population, support the local economy, and develop services and facilities needed to support the local community. Therefore, an important element of the spatial strategy is setting out the level of development that will be delivered in the plan area over a given period of time, including how this development will be distributed around the district.
- 6.8 As identified in the introductory section, the Core Strategy will need to establish the development targets for the district. With the Government's proposed abolition of the South East Plan, it is important to review the targets set in that document, particularly relating to housing delivery. Any targets that the Core Strategy sets will need to be supported by evidence and hence reference is made in this section to a number of evidence base documents and background papers.
- 6.9 It is important to realise that the proposed development detailed in this spatial strategy will need to be supported by appropriate infrastructure that does not compromise the existing levels of infrastructure provision. Therefore, an Infrastructure Delivery Plan is in the process of being prepared alongside the Core Strategy document. The Infrastructure

Delivery Plan will accompany the latter stages of the Core Strategy document (i.e. it will be included in the Proposed Submission document, which will be consulted upon in Spring 2012) and it will set out the infrastructure that will be required to support the development proposed along with details on the infrastructure provider, timings and potential costings. In the case of a number of the options for development that are identified in the spatial strategy, some of the key elements of infrastructure that will need to be provided to support the proposals are already evident. Hence, whilst this document does contain some references to certain infrastructure requirements (for example, highway junction improvements), it needs to be noted that at this stage the requirements identified are not exhaustive.

### The amount of development

- 6.10 The general focus of development over the coming years is going to be on the housing and employment sectors as this is where the greatest level of need exists. This is not to say that there is not a need for further provision of community, recreation and leisure facilities. The delivery of some of these facilities will be specifically highlighted for some of the locational policies within the Core Strategy, as well as within in the Infrastructure Delivery Plan, which will accompany the Proposed Submission document. In addition, generic policies concerning the provision of such facilities are proposed to ensure that suitable provision is forthcoming.
- 6.11 As well as identifying the quantum of development to be planned for in the housing and employment sectors, the Core Strategy is also expected to identify the floorspace/land requirements for other sectors. The Employment and Economic Land Assessment, which forms a key part of the evidence base for the Core Strategy, considered the expected requirements for the non B-class sectors (i.e. not commercial and industrial needs). This assessment concluded that the future land needs for the non B-class sectors are likely to be modest. Expected areas of growth, in terms of land requirements, are anticipated in the retail sector (1 – 2 hectares), hotels and catering (1 hectare) and waste/recycling (1+ hectares). The assessment considers that the majority of these requirements will be met on land already held by the relevant provider, or incorporated within mixed use developments.
- 6.12 In respect to the expected land requirements in the retail sector it needs to be appreciated that a detailed and up-to-date retail assessment has yet to be undertaken to inform this Core Strategy. This will be prepared in order to inform the Proposed Submission document and will provide a more definitive assessment and identification of expected retail need in the plan area. Once this need has been identified the Core Strategy will need to set out how the need will be met strategically.

- 6.13 In terms of future housing provision, the District Council has prepared a Housing Background Paper (<http://www.lewes.gov.uk/corestrategy/index.asp>) that identifies options for the proposed housing delivery target and how they have been derived. The target that will eventually be defined in the Core Strategy will be for a 20 year period, running from April 2010 up until 2030.
- 6.14 In arriving at the proposed housing delivery target a balance has been struck between the predicted level of housing need over the coming years and the ability of the District to accommodate additional development in a sustainable manner. An additional key consideration has also been the need to ensure that future housing provision, in the part of the plan area within the National Park, is in accordance with National Park Purposes. The housing background paper identifies why the proposed housing delivery target has been selected above the other options considered.
- 6.15 The provision of employment land to be planned for is very much influenced by the findings of the Employment and Economic Land Assessment. Whereas the housing delivery target is for a 20 year period, the provision of employment land only looks ahead to 2026 (this is due to the evidence base for determining this level of growth only looking ahead to this date). Because of this, a review of this element of the spatial strategy will need to be undertaken at a relatively early stage in the plan period.
- 6.16 The preferred approach for the level of housing and employment land to be planned for is as follows:

**Provision of housing and employment land**

In the period between 2010 and 2030, 4,150 net additional dwellings will be provided in the plan area (this is the equivalent of 208 net additional dwellings per annum).

In the period between 2010 and 2026, 50,000 to 64,000 sq. metres of employment floorspace (B1, B2 and B8) will be provided in the plan area. Between 30,000 and 40,000 sq. metres of this floorspace will be as industrial space (B1c, B2 and B8), and between 20,000 and 24,000 sq. metres will be as office space (B1a).

- 6.17 Other approaches to the provision of housing and employment land, in terms of quantity, which have been considered, but not recommended as the preferred approach at this stage are as follows:

**Other options considered**

1. To have a housing target that is consistent with the expected level of housing need over the plan period (this level of need is 300 net additional dwellings per annum and is the lower end of the range of housing need identified<sup>9</sup>)
2. To have a housing target that is consistent with the expected level of housing need over the plan period (this level of need is 450 net additional dwellings per annum and is the upper end of the range of housing need identified)
3. To have a housing target that is based upon the housing target set out in the South East Plan (based upon the residual housing target from the South East Plan this would equate to 206 net additional dwellings between 2010 and 2026 and then 220 net additional dwellings for the remaining part of the plan period)
4. To plan for a higher level industrial floorspace
5. To plan for a lower level of industrial floorspace
6. To plan for a lower level of office floorspace

**Questions to consider:**

- *Do you agree with the level of housing and employment growth that is proposed for the plan area?*
- *Do you have a view on any of the options that have been considered?*

The distribution of development

6.18 Taking the preferred targets for housing and employment growth, the District Council and National Park Authority have considered a number of approaches for how this growth could be distributed. Some of this growth can already be accounted for as it has either already been developed in the plan period, or it is classed as a commitment<sup>10</sup>. The tables below identify the development that can already be accounted for and therefore identifies what additional level of housing and employment land development will need to be planned for during the plan period.

**Table 3 – Proposed employment floorspace requirements**

	Floorspace requirement (sq metres)	Existing potential supply (sq metres)	Residual requirement (sq metres)
Industrial	30,000 – 40,000	167,600	0
Office	20,000 – 24,000	8,000	12,000 – 16,000
Total	50,000 – 64,000	175,600	0

<sup>9</sup> See Housing Background Paper.

<sup>10</sup> Commitments include housing and employment premises that are either under construction, have an extant planning permission that is likely to be implemented, or are existing allocations that are deemed deliverable or developable.

**Table 4 – Proposed housing requirements**

	(A) Total requirement	(B) Already developed in the plan period	(C) Units under construction	(D) Units with extant permission (& likely to be delivered)	(E) Units that is already allocated & considered deliverable and developable.	Residual requirement to plan for (A – B, C, D & E)
Housing (within the National Park)	Plan – wide requirement:	12	78	97	0	Plan – wide requirement:
Housing (outside of the National Park)	4,150	149	87	606	427	2,694

6.19 The options that have been identified for distributing the residual requirement for housing growth are based on the evidence base work, community engagement undertaken to date and the Sustainability Appraisal process. The settlement hierarchy, previously set out in this chapter, is a key influence in distributing housing development, as is the Strategic Housing Land Availability Assessment.

6.20 The table above does not identify any residual requirement to be met for the delivery of industrial space. However, this does not paint the full picture. The Employment and Economic Land Assessment (EELA) has identified that the majority of the employment land commitments are in the Newhaven area and that there is a short-fall in supply in the Lewes town area. It is for this reason why the EELA has recommended the identification and delivery of a 1 – 1.5 hectare industrial site in or near to Lewes town, along with an additional 1 – 1.25 hectare office site in or around the town. It will be for the Core Strategy to set the approach for how this additional employment land need is to be met. The Core Strategy should also consider how some of the more long-standing employment land commitments, particularly in Newhaven, could eventually be delivered, as well as considering how to upgrade some of the existing stock of employment premises.

The distribution of residential development

6.21 The Core Strategy will set the over-arching approach for how new housing will be distributed across the plan area for the lifetime of the plan. It will not be the role of the Core Strategy to identify and allocate every single housing site. Planning Policy Statement 12 (Local Spatial Planning) emphasises this point, although it does allow for the Core Strategy to allocate strategic sites for development, which are those sites that are considered central to the achievement of the strategy. For this Core Strategy, the District Council and National Park Authority have taken the decision to define a strategic housing site allocation as being capable of delivering a minimum of 100 dwellings (approximately



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6 months of the plan area's housing land supply), whilst also being identified as deliverable in the Strategic Housing Land Availability Assessment (SHLAA).

- 6.22 As well as identifying a long-term strategy for distributing housing, the Core Strategy will also need to satisfy the requirements of national planning policy that requires Local Planning Authorities to maintain a continuous five year supply of deliverable sites available for housing. Because of this, the adopted Core Strategy is likely to contain some strategic site allocations, in addition to identifying broad locations for housing development. The broad locations for housing development are generally areas that will be earmarked for development, but will not have a definitive site boundary and detailed proposal defined at this stage.
- 6.23 Housing delivered by way of strategic level sites and the identification of broad locations is not going to be the only way by which new housing is secured in the plan area. Smaller sites will play an important role in helping to maintain a sufficient supply of new housing, particularly in the more rural locations in the District and in the National Park. The Strategic Housing Land Availability Assessment (SHLAA) provides an indication of the potential capacity of settlements to accommodate housing development, although this needs to be tempered against other evidence base documents (including the Rural Settlement Study) and whether delivering development at the capacity indicated will be in line with the strategic objectives, the vision for the plan area and within the South Downs National Park, in line with National Park Purposes.
- 6.24 A number of broad options for distributing housing were identified in the Issues and Emerging Options Topic Papers that were published in May 2010 (<http://www.lewes.gov.uk/corestrategy/index.asp>). These options were based on theoretical approaches that could be taken in two specific parts of the plan area. These parts were the area that was classified as being within the Sussex Coast Sub-Region in the South East Plan and the area outside of the sub-region. Given the expected abolition of the South East Plan it has been decided to develop the Core Strategy without the need to satisfy particular housing requirements for the sub-region and non sub-region areas (even though the South East Plan allowed for a certain amount of flexibility on this issue – see the Housing Background Paper for further information relating to this issue). Instead the Core Strategy focuses on a plan-wide approach, which will eventually need to identify a requirement for the areas of the District inside and outside the National Park.
- 6.25 Options that were identified for both in and outside of the Sussex Coast Sub-Region were done so prior to the Strategic Housing Land Availability Assessment (SHLAA) being undertaken, along with a number of other evidence base documents. This has meant that certain approaches to distributing the housing development are not

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considered to be realistic options to deliver. Despite this, when assessing these options through the Sustainability Appraisal process, it was evident that those options that proposed to develop predominantly on brownfield land in urban areas where the greatest range of services, facilities, employment, etc, existed were most preferable.

6.26 Based on the results of this appraisal, along with the proposed settlement hierarchy, the findings of the evidence base documents, in particular the SHLAA, and the need to meet the Purposes and Duty within the part of the District within the National Park, a range of approaches have been developed to distribute housing growth. These are summarised in the table below and the paragraphs that follow provide the explanation. For some categories a range of figures are provided for each settlement to reflect the different options that are available.

**Table 5 – Options for housing distribution summarised**

<b>Settlement</b> (NP denotes if it is in the National Park)	<b>Commitments</b> (as at 1 <sup>st</sup> April 2011)	<b>Housing delivered on strategic sites</b>	<b>Housing to be delivered on identified small-scale sites<sup>11</sup></b>	<b>Housing to be delivered on broad locations for development/change</b>	<b>Total</b>
Edge of Haywards Heath (within Wivelsfield Parish)	0	0	0	0 – 180	0 – 180
Seaford	190	0	125	0	315
Lewes (NP)	162	0	70	0 – 270 + any housing on North Street, if taken forward as an area for change	232 – 502 + North Street
Newhaven	423	Any housing on Eastside, if alternative options to the employment allocation are taken forward	275	Any housing on Eastside, if alternative options to the employment allocation are taken forward	698 + Eastside
Peacehaven & Telscombe	270	0 - 450	185	0 – 563	455 – 1018
Edge of Burgess Hill (within Wivelsfield Parish)	70	0	0	0 – 150	70 – 220

<sup>11</sup> This means sites that will be allocated in the subsequent Allocations Development Plan Document and/or Neighbourhood Plans. The potential capacity to accommodate such sites is based on the SHLAA findings, the Settlement Hierarchy and the Rural Settlement Study. A small-scale site is considered to have a capacity to accommodate less than 100 dwellings.

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Ringmer and Broyleside (see paras 6.32 – 6.34)	46	Total level of housing to be delivered during the plan period on identified sites is between 130 and 601 dwellings			176 – 647
Newick	20	0	100 – 154	0	120 – 174
Barcombe Cross	1	0	30	0	31
Plumpton Green	4	0	30 - 100	0	34 – 104
Wivelsfield Green	17	0	30	0	47
Cooksbridge	6	0	30	0	36
North Chailey	1	0	30	0	31
South Chailey	2	0	10	0	12
All other settlements and areas	84	0	0	0	84

Note: *All figures quoted in the table above are options for how the proposed housing target could be met. The figures are not allocations.*

*Although the upper end of the ranges identified for each settlement is only slightly less than the overall level of housing development to be planned for in Lewes District, it needs to be appreciated that no figure for potential residential units is yet to be quoted for the Eastside and North Street sites and that the 161 housing units already built in 10/11 are not accounted for. Hence, the eventual strategy that is taken forward could take forward the lower-end figure for certain settlements and the higher-end figure, or somewhere in between, for others.*

- 6.27 In compiling the above table it has been assumed that the Secondary Regional Centre (Haywards Heath) and the District Centres should be the main focus of development given their high sustainability rating in the Settlement Hierarchy. This is generally as a result of their accessibility and range of retail, key services and facilities and employment opportunities they have available. Despite this, it has been apparent in the SHLAA that a number of these settlements have very limited potential to accommodate significant levels of growth.
- 6.28 In the case of the District Centres within the plan area (Lewes, Newhaven, Peacehaven/ Telscombe and Seaford), the National Park designation either encapsulates the whole settlement, or it immediately borders it in most locations. Given the need “to conserve and enhance the natural beauty, wildlife and cultural heritage of the National Park” (the first National Park purpose), opportunities to expand these settlements outwards into the National Park whilst ensuring this purpose is not compromised are going to be limited. This has been particularly evident for Seaford, which is the largest town in the plan area. Extremely limited outward expansion of the town has been identified and this has been a key contributing factor as to why there are no options currently identified for strategic site allocations, or broad locations for growth, in and around the town. Towns such as

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Newhaven and Lewes have significant areas at risk of flooding, which again reduces the scope for new development sites to be delivered.

- 6.29 With limited scope for outward expansion of the District's towns it will be important to ensure opportunities to deliver housing on appropriate sites within the existing built up areas are fully realised.
- 6.30 The Rural Service Centres are considered in the Rural Settlement Study to have potential to accommodate over 100 additional residential units on identified sites over the plan period, subject to there being the potential for suitable sites to be identified (the current version of the SHLAA identifies such potential). The Service Villages have only a limited ability to accommodate growth in a sustainable manner whilst ensuring that the character of those villages is maintained. Hence, the Rural Settlement Study considers that between 30 and 100 dwellings could be delivered on identified sites over the plan period in such villages. There are exceptions to this, namely the villages of Ditchling and Glynde. Ditchling, and the vast majority of the village of Glynde are within the National Park and it is considered that in such locations development should be limited to affordable housing that meets a local need on exception sites<sup>12</sup> and currently unidentified infill developments within the planning boundary. Such an approach is in line with the findings of the SHLAA, as neither settlement has been identified as having any significant potential for housing sites.
- 6.31 **For settlements that are not listed in the above table it is proposed that only small-scale exception schemes and currently unidentified infill developments within the planning boundary will be delivered in such locations.** These settlements are those that are classed as hamlets in the Settlement Hierarchy and also the local villages and service villages that are within the National Park and have had very limited, or in most cases no potential deliverable or developable sites identified in the SHLAA. The exception to this is South Street, which is a local village that is not within the National Park, but where no development potential has been identified in the SHLAA.
- 6.32 Ringmer, which is classed as a Rural Service Centre, is considered as a settlement that is suitable for delivering a minimum of 100 dwellings on identified sites over the plan period, subject to there being the potential for suitable sites to be identified. The SHLAA identifies the potential for such sites to be identified. Broyleside, which lies adjacent to Ringmer and within the same Parish, is classed as a Local Village. A range of between 10 and 30 dwellings being delivered on identified sites is considered suitable for this village for the plan period. As with Ringmer, the SHLAA identifies such potential to be available. Part of the development potential at Ringmer and Broyleside, as evidenced by

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<sup>12</sup> Exception sites are where planning permission is granted for an affordable housing scheme on land that is outside a Planning Boundary for a settlement. See Policy RES10 of the Local Plan for further information on Exception Sites.

the SHLAA, is on areas that are classed as strategic due to their potential capacity for development.

- 6.33 Ringmer Parish has been selected as one of the pilot areas for preparing a neighbourhood plan. As mentioned in section 1, the introduction of neighbourhood planning forms part of the reform of the planning system that is taking place through the Localism Bill. In advance of the Bill becoming enacted the Government is keen to understand how neighbourhood planning will work in practice and has therefore selected a number of pilot areas, of which Ringmer Parish is one. The Ringmer Neighbourhood Plan is being prepared by the Parish Council in parallel with the Core Strategy and therefore it is proposed that the Neighbourhood Plan will consider what sites to allocate for development, including whether any strategic sites are to be brought forward. Despite this, and to ensure that all reasonable options are consulted upon<sup>13</sup>, the areas in question are still identified in this document and have been subject to the Sustainability Appraisal process.
- 6.34 Despite the above, and considering that Ringmer has significant development potential, as evidenced by the SHLAA, the Core Strategy will need to make a decision as to the level of growth to be delivered here up until 2030. Although Ringmer is considered as a settlement that is suitable for a minimum of 100 new dwellings on identified sites over the plan period, the potential for development is significantly in excess of this figure. Therefore, a decision will need to be made as to whether Ringmer delivers a level of housing that meets a wider District housing need.

#### Options for Strategic Housing Allocations / Broad Locations for Growth

- 6.35 Strategic housing allocations are sites that would be formally allocated in the Core Strategy. The allocation would contain a definitive site boundary and would specify the amount, type and mix of development, along with identifying when it would be expected to be implemented. To be considered as a strategic site allocation the site will need to be identified as 'deliverable' in the SHLAA. Based on the current version of the SHLAA the options that are currently under consideration as strategic housing allocations are as follows:
- Eastside, Newhaven (residential development could act as an enabling development on this site in order to deliver some of the existing employment allocation)
  - Lower Hoddern Farm, Peacehaven (up to 450 residential units)
- 6.36 Further information on these sites, including key issues of note and the site maps are contained within the following pages of this document.

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<sup>13</sup> The consideration of reasonable alternatives is a legal requirement under the SEA Directive

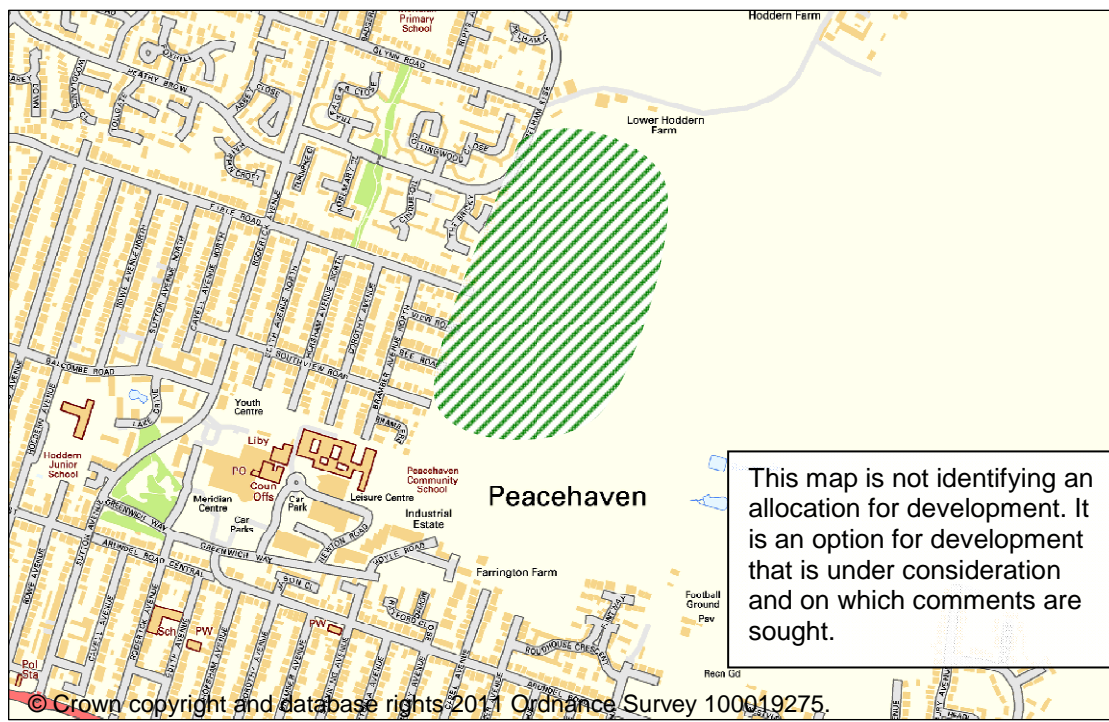
6.37 As well as options for strategic site allocations, there are also options for broad locations for development. Such areas do not have a definitive boundary and, if eventually contained in the Core Strategy, they would need to be subject to an Area Action Plan, Neighbourhood Plan or Allocations Development Plan Document in order to bring forward a more precise definition of the site and detailed proposal. The strategic site options can also be considered as options for broad locations for development and are, therefore, in addition to the following options:

- Old Malling Farm, Lewes (up to 270 residential units)
- South of Lewes Road, Ringmer (up to 154 residential units)
- North of Bishops Lane, Ringmer (up to 286 residential units)
- Fingerpost Farm, Ringmer (up to 100 residential units)
- North Street, Lewes (residential units would form part of a comprehensive mixed use redevelopment scheme on this site)
- Valley Road, Peacehaven (up to 113 residential units)
- Land east of Valebridge Road, Burgess Hill, within Wivelsfield Parish (up to 150 residential units)
- Land at Greenhill Way/Ridge Way, Haywards Heath, within Wivelsfield Parish (up to 180 residential units)

### Eastside, Newhaven

6.38 This site/area is considered in ‘the distribution of employment development’ section that follows in this document.

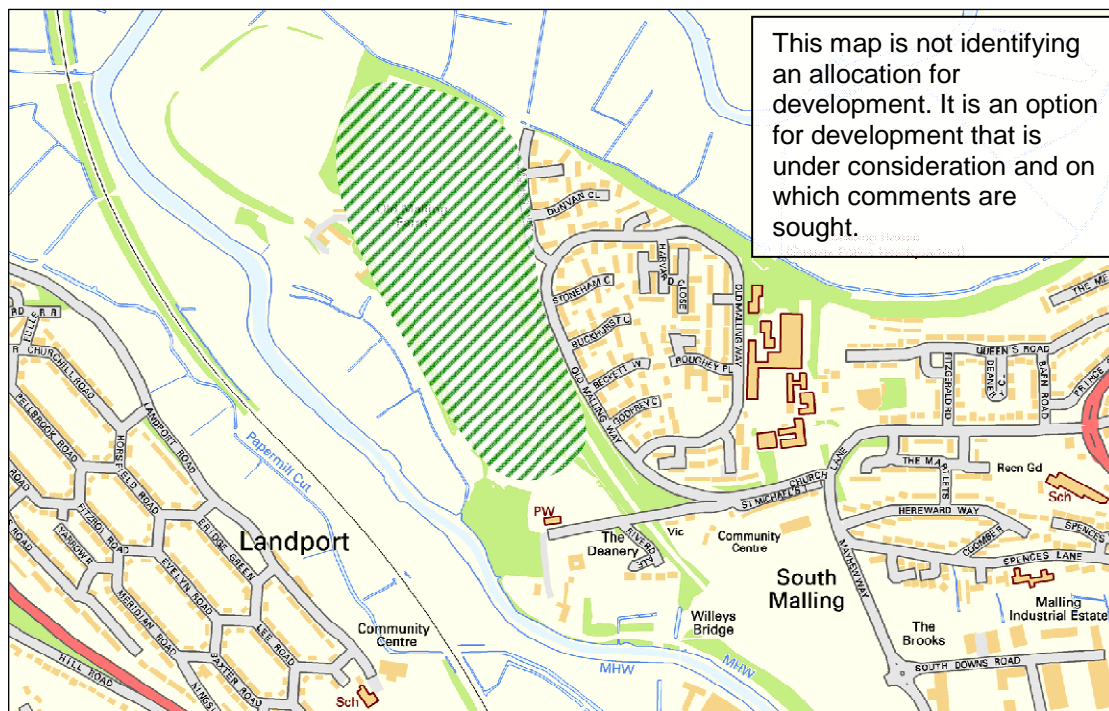
Lower Hoddern Farm, Peacehaven (for all sites/areas the area hatched in green on the maps identifies the site/area in question - all boundaries are indicative)



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- 6.39 The site at Lower Hoddern Farm is being considered as a strategic housing allocation, or an identified broad location for development, for up to 450 dwellings with the possibility of small-scale employment units (likely to be office units) being incorporated into the scheme. The proposed Sports Park is immediately to the south of the site.
- 6.40 The site has been categorised as having low/medium capacity for change in the Landscape Capacity Study. This is likely to mean that certain parts of the site will need to be kept clear of development (possible open space provision), have the density carefully considered and ensure that the design and layout respects the current landscape qualities. This point has been reflected in the potential development capacity of the site.
- 6.41 Based on the transport evidence that has been collected and the opinion of the Highways Authority (East Sussex County Council), the Lower Hoddern Farm option could be accommodated by the local transport network.
- 6.42 The town of Peacehaven has a significant level of housing need. This can be evidenced by the District Council's housing register, which at the end of March 2011 had 255 households seeking affordable housing in the town.

### Old Malling Farm, Lewes

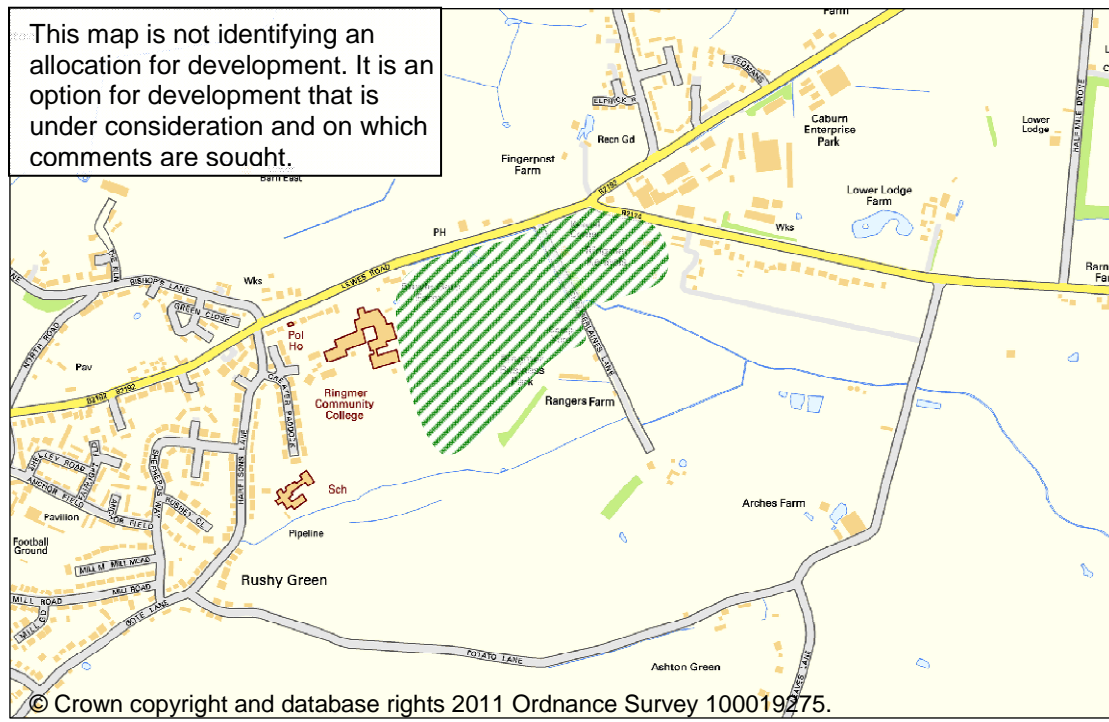


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- 6.43 The area at Old Mallig Farm is being considered as an identified broad location for development, for up to 270 dwellings. The site is within the National Park, although it has been categorised as having medium capacity for change in the Landscape Capacity Study, predominantly due to the area being relatively self contained from the wider landscape, particularly in the southern section. Further work looking at the landscape implications of developing this option will be undertaken by the National Park Authority. This will be in addition to determining how developing this area for housing could meet the needs of the town of Lewes and its hinterland.
- 6.44 Access to the site would be achieved from Old Mallig Way and therefore improved access points would need to be created, which would involve crossing the Site of Nature Conservation Importance (the disused railway line). Based on the transport evidence that has been collected and the opinion of the Highways Authority (East Sussex County Council), the Old Mallig Farm option could be accommodated by the local transport network. However, as development on this site would impact upon the critical junctions on the A26 in the town, mitigation measures relating to Earwig Corner, the Church Street/Mallig Hill junction and the Brooks Road/Phoenix Causeway roundabout would need to be implemented to enable development to go ahead on this site.
- 6.45 Although the town of Lewes is in the National Park, it does have significant development needs, particularly additional housing. This can be evidenced by the District Council's housing register, which at the end of March 2011 had 467 households seeking affordable housing in the town.



South of Lewes Road, Ringmer



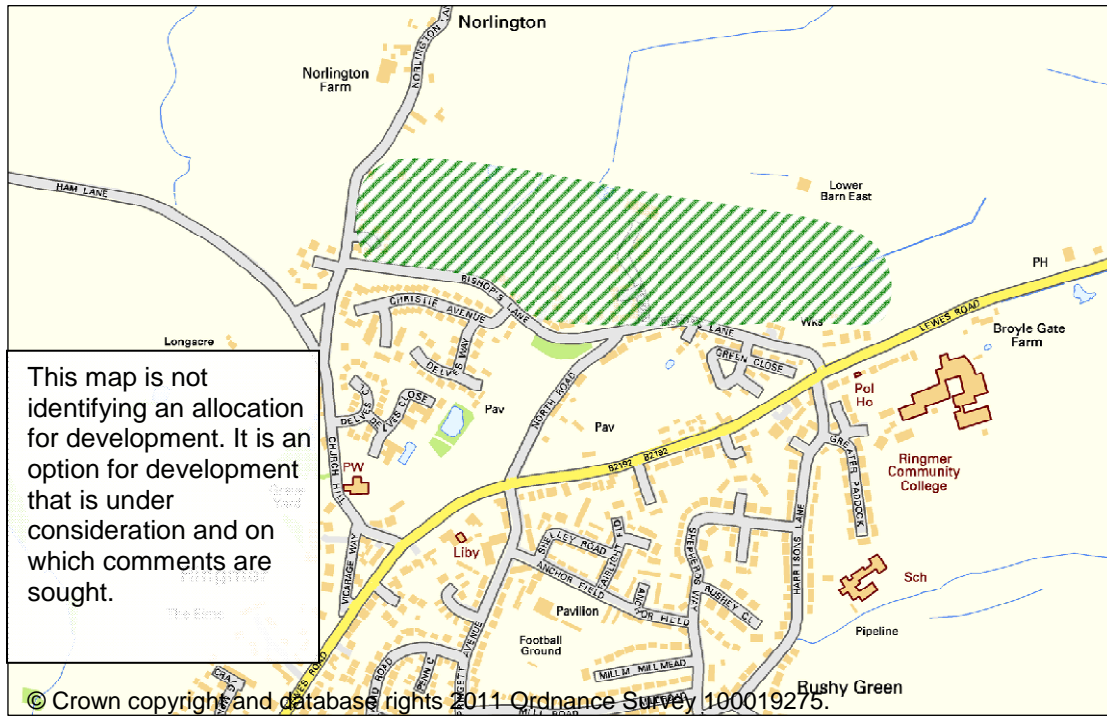
- 6.46 The site south of Lewes Road, Ringmer is being considered as an identified broad location for development, for up to 154 dwellings along with sports/leisure and open space facilities. Much of the site is currently allocated in the Lewes District Local Plan for the development of sport and recreational uses, although to date no firm proposals to implement this allocation have been forthcoming since the Local Plan was adopted in 2003.
- 6.47 The site has been categorised as having medium capacity for change in the Landscape Capacity Study, meaning that the principle of development should be acceptable in landscape terms. However, development in this area would erode the current gap of open countryside between Ringmer and the Broyle area. As with all other options in the Ringmer area, due consideration will need to be given to fluvial and surface water flooding should any of the options be taken forward. It is considered that development in Ringmer may provide an opportunity to solve a number of wet spots and “pinch points” where key investment is required to improve the management of surface water flooding.
- 6.48 Based on the transport evidence that has been collected and the opinion of the Highways Authority (East Sussex County Council), development that is consistent with this option could be accommodated by the local transport network. However, and as with all broad location options in Ringmer, this would be contingent upon improvements being made at the Earwig Corner and the Church Street/Malling Hill junctions. This would need to be alongside improvements to public

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transport provision and cycle and pedestrian links (to include the completion of the Ringmer to Lewes cycleway).

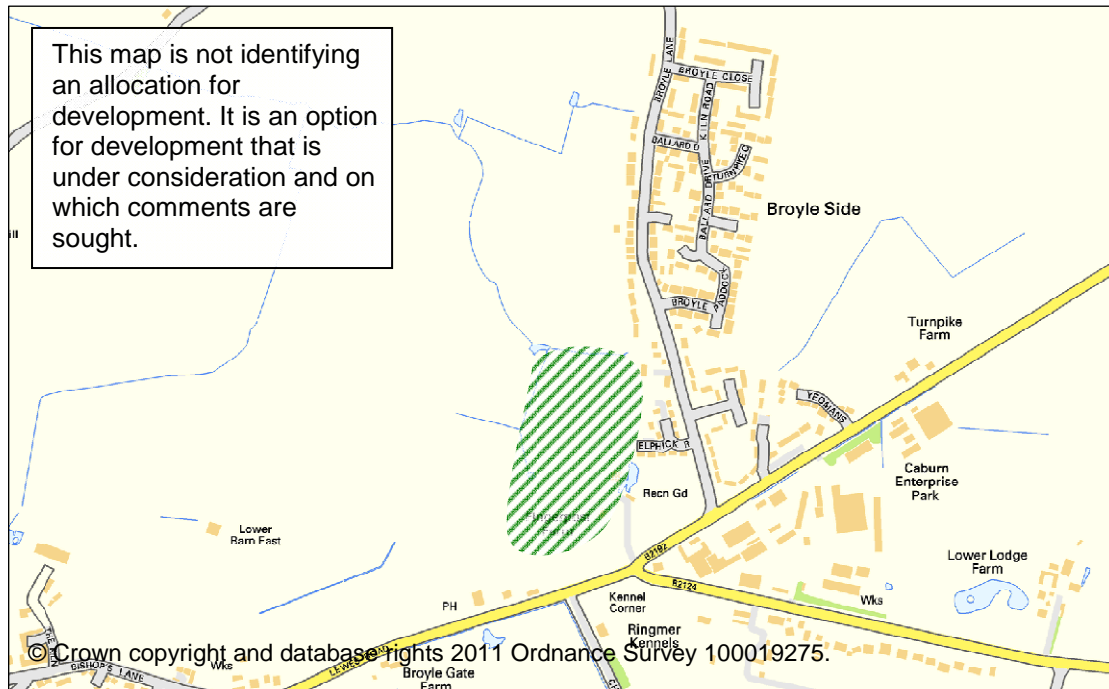
- 6.49 Ringmer is the largest village in the plan area and unsurprisingly it has the most significant need for housing out of any village covered by the Core Strategy. This is evidenced by the Housing Register, which at the end of March 2011 had 69 households seeking affordable housing in the village.

### North of Bishops Lane, Ringmer



- 6.50 The site to the north of Bishops Lane, Ringmer is being considered as an identified broad location for development, for up to 286 dwellings. Much of the western part of the site was identified in the Local Plan as a potential option for housing in the period between 2006 and 2011. The site has been categorised as having medium capacity for change in the Landscape Capacity Study, meaning that the principle for development should be acceptable in landscape terms.
- 6.51 The potential site/area covered by this option includes the Diplocks Business Site. If housing were to come forward on this part of the site then the business units would need to be replaced elsewhere in the locality.

Fingerpost Farm, Ringmer



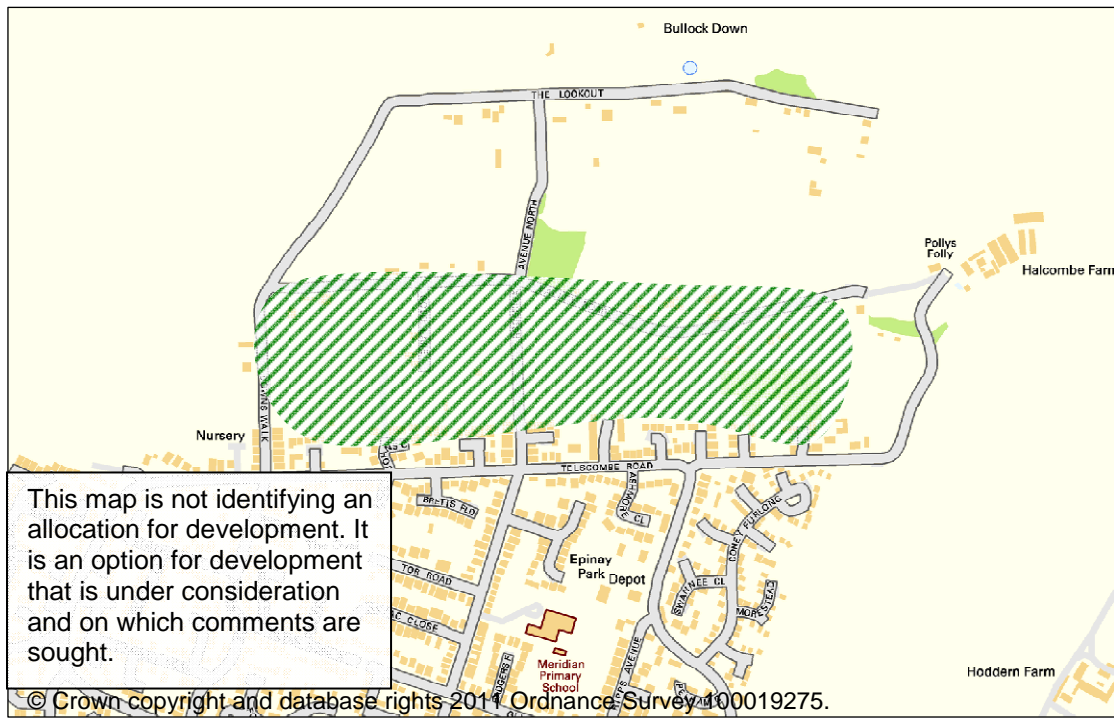
6.52 The site at Fingerpost Farm lies to the north of the B2192 and adjoins the settlement of Broyle Side. The site is being considered as a broad location for development for up to 100 dwellings. The site has been categorised as having medium capacity for change in the Landscape Capacity Study, meaning that the principle for development should be acceptable in landscape terms.

6.53 The same issues on potential impact on the local transport network (and improvements at the junctions at Earwig Corner and Church Street/Malling Hill) and housing need exist for this site as they do for the other two options in Ringmer.

North Street, Lewes

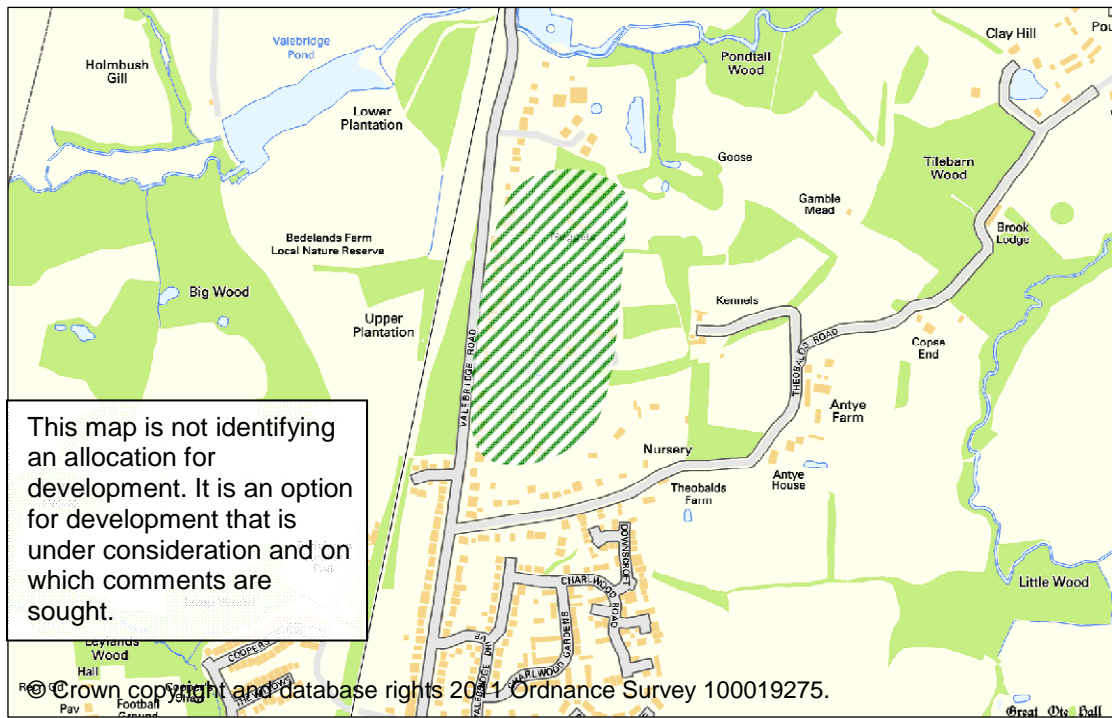
6.54 This site/area is considered in ‘the distribution of employment development’ section that follows in this document.

Valley Road, Peacehaven



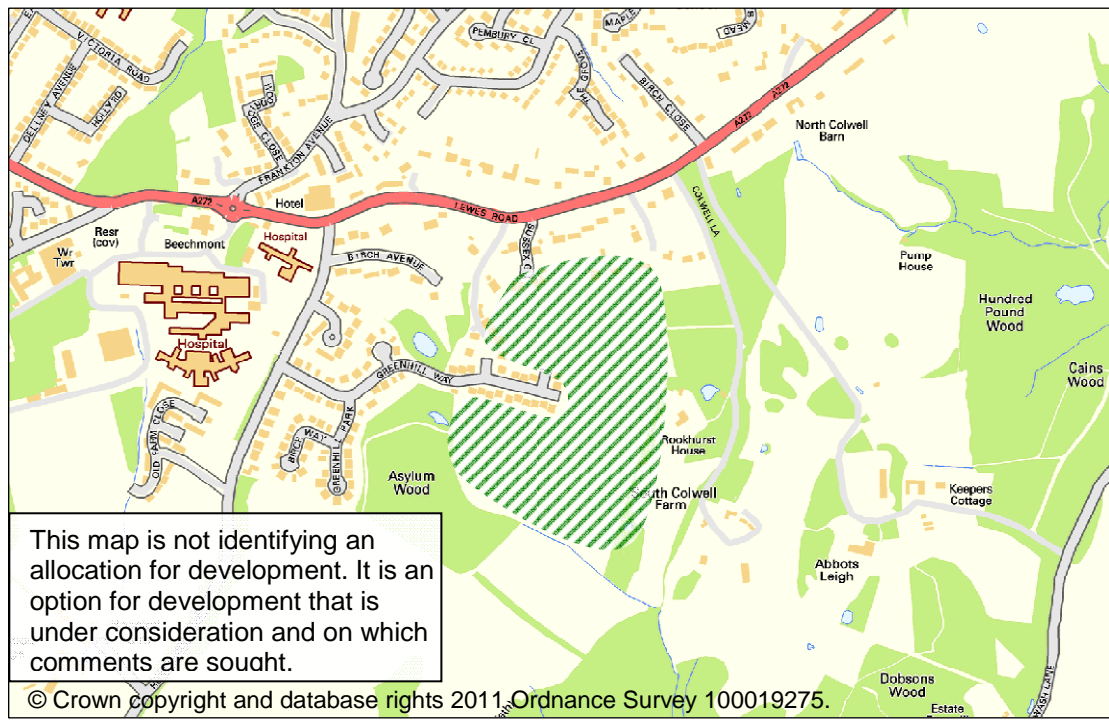
- 6.55 The area at Valley Road is being considered as an identified broad location for development, for approximately 110 dwellings. This figure is based upon the Local Plan, which identified parts of the Valley Road area as a potential option for housing in the period between 2006 and 2011. It is also based upon the findings of the Landscape Capacity Study, which identified the Valley Road area as having low/medium capacity for change, meaning that certain parts of the area maybe unsuitable for development in landscape terms, or would need to be brought forward at a relatively low density.
- 6.56 Based on the transport evidence that has been collected and the opinion of the Highways Authority (East Sussex County Council), the Valley Road option could be accommodated by the local transport network.
- 6.57 The SHLAA identifies the Valley Road area as being developable, which means it should not be considered as an allocation in the short-term (i.e. first 5 years of the plan period). It is for this reason why the area is identified as an option for an identified broad location for development.

Land east of Valebridge Road, Burgess Hill (within Wivelsfield Parish)



- 6.58 The area to the east of Valebridge Road is being considered as an identified broad location for development, for up to 150 dwellings. The SHLAA identifies much of this area as being developable, due to significant parcels of land only becoming available for development in 2018. It is for this reason why the area is not being considered as an allocation in the short-term.
- 6.59 The site has been categorised as having medium/high capacity for change in the Landscape Capacity Study, meaning that the principle for development should be acceptable in landscape terms.
- 6.60 Access to this area would be from Valebridge Road, which is within West Sussex. To ensure that the traffic impact of this option is properly assessed a Transport Model is being produced to assess the impact of development proposals in and around parts of Burgess Hill that are within Mid Sussex District. Using this model, once it becomes available, this option for development will need to be assessed to determine its likely impact on the highway network in the area and any potential mitigation proposals that will be required.

Land at Greenhill Way/Ridge Way, Haywards Heath (within Wivelsfield Parish)



- 6.61 The area of land at Greenhill Way is being considered as an identified broad location for development, for up to 180 dwellings. The SHLAA identifies this area as being developable from 2017 onwards, due to the need for the completed Haywards Heath Relief Road to be operational prior to any development coming forward in this location (as stipulated by West Sussex County Council). It is for this reason why the area is not being considered as an allocation in the short-term.
- 6.62 The site has been categorised as having medium/high capacity for change in the Landscape Capacity Study, meaning that the principle for development should be acceptable in landscape terms.
- 6.63 Apart from the two options within Wivelsfield Parish, no consideration has yet to be given as to when these options could be delivered and over what period of time. Once it has been determined which options are to be proposed for development (in the Proposed Submission document) the timing and phasing of the sites and areas will be proposed. The timing and phasing of sites and areas for development will be planned in such a way so as to ensure a continuously consistent level of housing delivery during the plan period, which also allows for the timely provision of infrastructure to serve such development.

**Questions to consider:**

- *Do you have any views on the options for the levels of growth that are being considered for the settlements identified in table 5?*

- *Do you agree with the approach to housing development for the villages within the National Park (see para 6.31)?*
- *Should Ringmer have a planned level of housing growth that meets a wider District housing need?*
- *Do you have any views on the options that have been identified for strategic housing allocations/broad locations for growth?*
- *Which, if any, of the options do you consider should be taken forward in the Core Strategy document?*
- *Do you agree that the broad location options at Ringmer should be considered through the Ringmer Neighbourhood Plan, and not the Core Strategy?*
- *Are there any development principles that will need to apply to certain sites if they are to be allocated or identified in the Core Strategy?*
- *Do you consider that there are other options for strategic housing allocations/ broad locations for growth that need to be considered?*

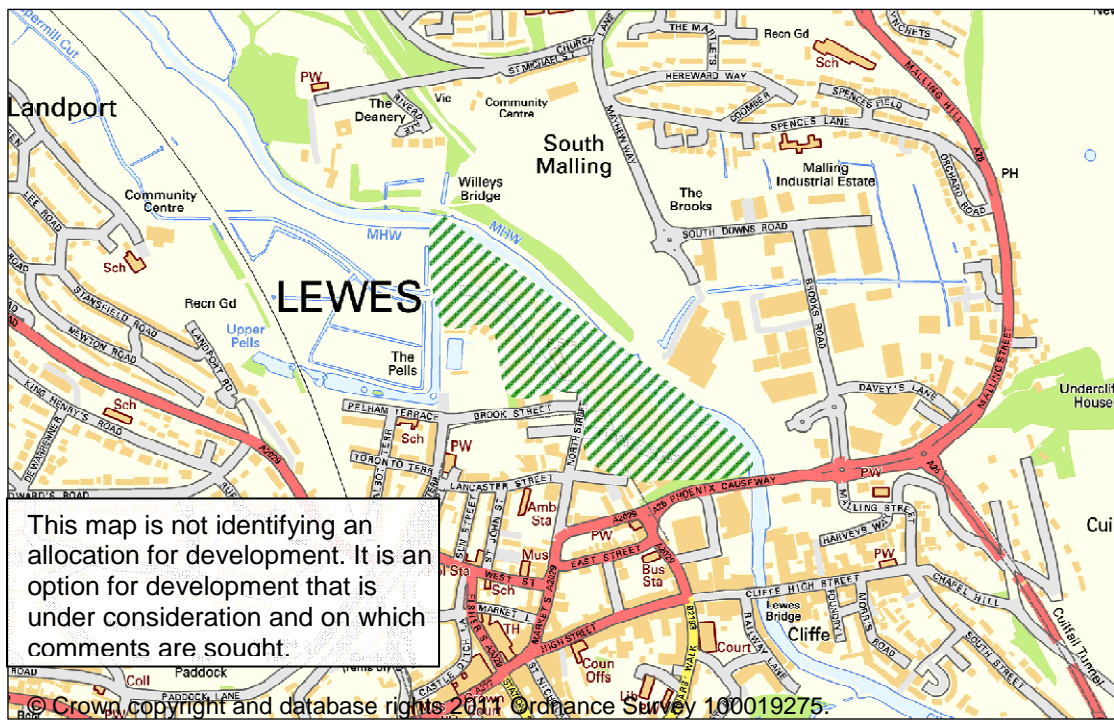
#### Meeting the employment land needs

- 6.64 In terms of identifying a potential strategy for meeting the need for any additional employment land over the plan period, the findings and recommendations from Employment and Economic Land Assessment is a key influence. Table 3 on page 39 identifies that there is little in the way of a residual requirement to be met on a plan-wide basis. However, as mentioned in paragraph 6.20, there is a need for more employment land in or near to Lewes town, beyond what is already committed to be delivered.
- 6.65 Although a need for 1 - 1.25 hectares of land for office space and 1 – 1.5 hectares of land for industrial space has been identified in or near to Lewes town, these figures could change depending on what happens to one of the largest existing employment sites in the town, which is the North Street area.
- 6.66 Topic Paper 7, which formed part of the Issues and Emerging Options consultation in May 2010<sup>14</sup>, provides much of the context to this area in Lewes, which includes explaining why alternative planning approaches to this part of the town are being considered. Within this Topic Paper, four strategic planning options were identified for this area. Comments were sought on the options identified and additional options that could be considered were also invited to be put forward. Based on the comments that were received on these options, the evidence base documents that have been prepared and the Sustainability Appraisal of the options, the preferred option at this stage is identified below. This preferred option has also been influenced by the feel that the current intentions of the majority landowner for this site are not clear.

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<sup>14</sup> [http://www.lewes.gov.uk/Files/plan\\_corestrategy\\_LDFTopicPaper7.pdf](http://www.lewes.gov.uk/Files/plan_corestrategy_LDFTopicPaper7.pdf)

North Street, Lewes



**North Street, Lewes**

To identify the North Street area as a broad location for change. This would allow for the creation of a new neighbourhood for the town, with predominantly a mix of employment premises (preferably offices) and housing. Such a scheme will need to be able to generate sufficient development value to provide all necessary infrastructure, including upgraded flood defences.

6.67 Other options for the long-term strategic planning approach for the North Street area that have been considered, but not recommended as the preferred approach at this stage are as follows:



### **Other options considered**

1. To retain the North Street area for employment use, selectively upgrading the existing buildings for employment use as opportunities arise. No upgraded flood defences would be provided.
2. Clearance of existing buildings from the area and utilising it for flood storage and/or other low key uses, such as open space or surface car parking. No upgraded flood defences would be provided.
3. Restore some of the flood plain, but allow an element of flood resistant and flood resilient development in selected lower risk locations and integrate this with a wider package of flood risk measures both on site (e.g. open landscaped areas) and off site (e.g. managing surface water drainage). No upgraded hard flood defences would be provided.

### **Questions to consider:**

*Do you agree with the proposed strategic planning approach to the North Street area?*

*Do you have a view on any of the options that have been considered?*

- 6.68 If the preferred approach for the North Street area is eventually taken forward in the adopted Core Strategy and then implemented it will be important to ensure that any of the existing employment premises that are lost as a result of the redevelopment are replaced elsewhere in the locality. The first preference will be to incorporate new employment units within the redevelopment scheme for the site. The Employment and Economic Land Assessment (EELA) considers that “there would be scope to provide office development within any mixed use development of the North Street Strategic site.”
- 6.69 Paragraph 12.29 of the EELA states that “if the North Street site were to be developed for offices and a mix of other uses, this could increase the requirement for additional industrial land in Lewes town to allow relocation of firms established there.” The Assessment does go on to say that if options were not deliverable or available in Lewes town for meeting this need, then potential sites in Ringmer could be considered as an alternative.
- 6.70 As previously mentioned, the majority landowner for the North Street area has yet to make clear what their intentions for this site are. Hence, there is no certainty, at this stage, as to whether the preferred approach is deliverable during the lifetime of the Core Strategy. It therefore cannot be established how much of the existing employment floorspace could be lost as a result of the preferred policy approach being pursued and therefore this is not referred to in the policy that follows.
- 6.71 The proposed strategic planning approach to meeting the employment land needs for the plan area (see below) needs to be considered alongside the proposed generic core policy on encouraging economic development and regeneration.

### **Meeting the employment land needs**

The need for an additional 1 – 1.25 hectares of land to deliver office premises will be met through a combination of redeveloping the North Street site (assuming there is a net increase in office floorspace on this site) and through the identification of small-scale sites for office use within Lewes town in the Allocations Development Plan Document. The identification of these sites will be informed by the Employment and Economic Land Assessment, including any updates undertaken.

The approach for meeting any shortfall in the provision of land for office premises in Lewes town will be through the allocation of additional employment sites for office use at Ringmer, provided that all options to deliver this shortfall in Lewes town have been exhausted.

The approach for meeting the need for an additional 1 – 1.5 hectares of land for industrial use will be through the allocation of additional employment sites for industrial use at Ringmer. Such sites will be allocated through the Ringmer Neighbourhood Plan.

To ensure that the proposed policy approach is implementable, the District Council and National Park Authority will need to be assured of sound progress being made on the Ringmer Neighbourhood Plan, including the allocation of the required amount of employment land, by the time the Core Strategy – Proposed Submission document is prepared. If this is not the case, then the Core Strategy will need to consider the identification of an area at Ringmer for this additional employment land. On the basis of the evidence collected to date, only one such area has currently been identified and this is to the east and south of the Caburn Enterprise Centre.

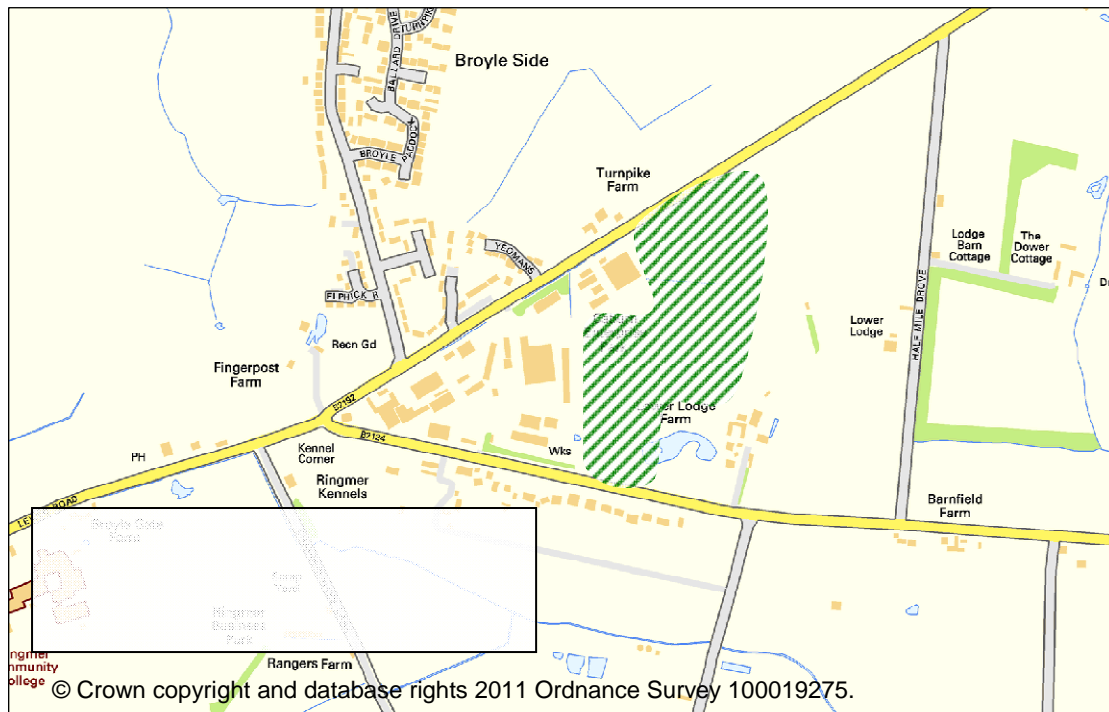
#### **Questions to consider:**

- *Do you agree with the proposed strategic planning approach to meeting the employment land needs for the plan area?*
- *Do you consider that there are other approaches that the District Council/ National Park Authority should consider? If so, what are they?*

6.72 The delivery of additional employment land in Ringmer is seen as an aspiration in the Employment Strategy for Ringmer, which has been prepared by the Parish Council and seeks to enhance employment opportunities in the area. Hence, the proposed District-wide strategy ties in with this local aspiration. To reflect this local view and given the timing of the Ringmer Neighbourhood Plan, the first preference is that the actual sites for this additional employment land are identified and allocated in the Neighbourhood Plan. However, should the expected progress on the Neighbourhood Plan not materialise, and given the short-term need to deliver employment land in the area, the Core Strategy will need to take forward this issue.

6.73 Should the Core Strategy need to identify where in Ringmer the required industrial floorspace will need to be delivered, the Employment and Economic Land Assessment (EELA), and any subsequent information gathered, will need to be utilised to inform the identification of a potential employment area. The EELA identified an area of search bordering the Caburn Enterprise Centre (identified on the map below) as having potential for future employment use. The area has been identified as having a high capacity for change in the Landscape Capacity Study and no obvious barriers to delivery are apparent at this stage, other than the need to mitigate any impact upon the local transport network. Based on the findings of the evidence base work to date and the Sustainability Appraisal, no other realistic options have been identified.

Caburn Enterprise Centre Area of Search



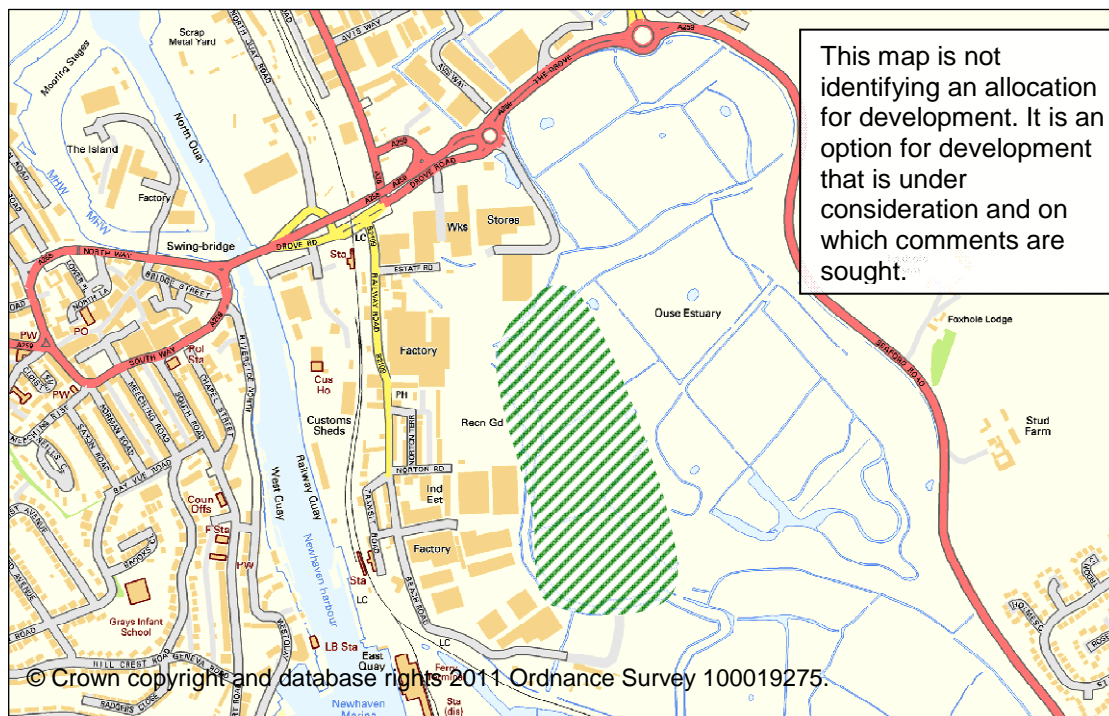
6.74 Currently, there are considered to be limited options for distributing the office use to be planned for in the Lewes town area. The EELA identified and assessed a number of sites in Lewes town and as documented in the Sustainability Appraisal few of these sites are considered deliverable for such at use at this stage. Along with the North Street site, only two other options (the former Harveys Brewery Yard in Pinwell Lane and land within Sussex Downs College) are considered to have the potential for office use. Totalling the land area of these two sites only amounts to 1 hectare; this is equivalent to the bottom end of the required range for new office sites. These two sites, along with any other options that are subsequently identified will be considered when the Allocations DPD is prepared. However, given the limited choice for meeting this need, it is considered sensible to identify

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a contingency, and hence the proposal for Ringmer to meet any shortfall.

- 6.75 One of the issues that was identified in the Employment and Economic Land Assessment (EELA) was that a significant proportion of the potential employment land supply in the southern part of the District was on a site where significant doubts over its potential delivery were apparent. This site is the Eastside business allocation at Newhaven (see map below).

### Eastside, Newhaven



- 6.76 The site that has been allocated for business development (B1 and B8) for approximately 30 years, but has never been delivered due to the cost that would be incurred in developing the site, particularly in a relatively poor commercial property market. With this in mind, one of the key considerations for the Core Strategy needs to be what happens to this strategic level site in any future strategy for the district. A number of options for this site have been developed. Based on the findings of the evidence base, particularly the EELA, the Sustainability Appraisal findings and the stakeholder engagement undertaken to date (particularly on Topic Paper 8 at the Issues and Emerging Options stage), the preferred approach for this site at this stage is as follows:

### **Eastside, Newhaven**

To identify the Eastside site for a business led (B1 and B8) mixed use scheme. If demonstrated to be necessary for economic viability, such an

option would allow for higher value ‘enabling development’, such as housing, which therefore enables part of the required employment land need in the area to be delivered.

An Area Action Plan would be prepared for this area, which would provide the details on the development mix, how the scheme would link into the wider area, how the different uses can co-exist and the issue of the Port Access Road.

6.77 Other options for the long-term strategic planning approach for the Eastside area that have been considered, but not recommended as the preferred approach at this stage are as follows:

#### **Other options considered**

1. To de-allocate the site (hence it will no longer be included within the Planning Boundary for Newhaven).
2. To continue with the existing Local Plan allocation for business uses (B1 and B8).

#### **Questions to consider:**

- *Do you agree with the proposed strategic planning approach to the Eastside area?*
- *Do you have a view on any of the options that have been considered?*
- *Are there any additional options that should be considered for this area?*

6.78 There are a number of reasons why the preferred approach has been identified at this stage. The EELA recognises the Eastside site (incorporated into a slightly wider site assessment, ref: ELW3) as an important part of the potential supply of employment land in this part of the District, although at the same time appreciating the uncertainty over the delivery of the current allocation. Section 11 of the EELA suggests alternative approaches to encouraging employment development in Lewes District, including, “on appropriate sites and where a clear need is demonstrated, allowing a limited amount of higher value “enabling development” to help fund infrastructure and support provision of speculative employment premises (para 11.8 of EELA). In this instance it is considered that a need for employment development on this site is demonstrated and that the site is also appropriate (taking into account its assessment in the EELA). The current Local Plan allocation at Eastside is for B1 and B8 use. The site assessment in the EELA identifies potential uses for this site as B1, B2 and B8, hence this has been reflected in the preferred approach for this area.

6.79 The preferred approach is considered to be in conformity with the Physical Development Vision for Newhaven, which was prepared for Newhaven Strategic Network by BBP Regeneration and forms part of

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the evidence base for the Core Strategy. Paragraph 6.36 of this document states that Eastside “could create a mixed use environment with residential uses to the west together with employment space to the east”. Seeking a quantity of employment land on the Eastside site should also aid in the achievement of Strategic Objective 9 and the part of the District-wide vision that states “*improved employment opportunities will have reduced the need for out commuting*”.

- 6.80 Following the period of consultation on this document, the District Council and National Park Authority will prepare the Proposed Submission document and determine which of the options that have been presented in this chapter, along with other options submitted, should be taken forward. Based on the chosen spatial strategy, the local implications for each of the towns and rural areas will be set out in this document.

## 7. Core Delivery Policies

- 7.1 The Spatial Strategy has addressed the issue/challenge of accommodating and delivering growth. Section 3 of this document identifies five other key strategic issues and challenges that are to be addressed through the Core Strategy and wider LDF. Each of these issues and challenges are addressed in this section through the identification of potential policy areas and approaches. Unless specifically stated, these policy areas will be expected to apply to development across the whole of the plan area.
- 7.2 The Core Delivery Policies should not duplicate policies that are contained within Regional Spatial Strategies (South East Plan), or national policy (Planning Policy Statements and in future the National Planning Policy Framework). As previously mentioned in this document, the South East Plan is due to be abolished shortly and national policy is due to be reviewed. Hence, at this stage it cannot be established if a proposed policy option is merely going to be repeating national planning policy, as at the point of adoption of this document it is not yet known what the content of national planning policy will be.
- 7.3 Because of this, certain policy options, including identified emerging approaches, may appear to be duplicating national and/or regional planning policy at this stage. This is to ensure that the District Council and the National Park Authority are not left with a policy vacuum for any particular policy area, once the Core Strategy has been adopted. If, at the time of the Proposed Submission stage, it appears that a proposed Core Delivery Policy is merely repeating policy that is contained within the emerging National Planning Policy Framework, then that policy area will be removed.
- 7.4 At this stage, only the potential policy direction is indicated and the detailed, (or what would be the final policy) wording is not provided. This will be developed as the eventual policies are progressed in the Proposed Submission document.

### **Key Strategy Issue/Challenge: Improving access to housing**

- 7.5 The core delivery policies that are seen as integral to addressing this key issue/challenge are identified in this section.

### **Core Policy 1 – Affordable Housing**

- 7.6 One of the key strategic objectives for the emerging Core Strategy is to “deliver the homes and accommodation for the needs of the District”. A key element in achieving this objective will be delivering affordable housing to meet local needs.
- 7.7 As evidenced in the Strategic Housing Market Assessment and the Assessment of the Local Need for Housing, Lewes District experiences

significant internal migration pressures, particularly from people moving out of Brighton and Hove and areas in and around London. With such migration pressures, property prices within the District are significantly greater than national and regional averages. This has had an impact upon the availability and affordability of housing for those who wish to live locally who are on relatively low incomes. This is reflected in Lewes District having one of the highest house price to income ratios in the country. As a result, Lewes District has a very significant demand for affordable housing, as evidenced by the District Council's Housing Register. In April 2008 this register had 2,207 households registered for affordable housing, since when the figure has remained at over 2,000 households<sup>15</sup>. In 1998 there were only 642 households on the housing register.

- 7.8 With an obvious and increasing need for affordable housing, the Core Strategy needs to address how this issue can be tackled. This will be key in order to also help deliver one of the key aims of the District Council's Housing Strategy, which is to deliver a minimum of 60 affordable houses per annum.
- 7.9 To help inform an approach to delivering affordable housing, a Strategic Housing Market Assessment (SHMA) was undertaken in 2008. This assessment considered what percentage of affordable housing should be sought on new residential developments that will come forward during the plan period. The SHMA suggested differing approaches to the delivery of affordable housing within separate sub-areas within the district. However, in suggesting these approaches it needs to be recognised that the SHMA did not undertake a detailed appraisal as to whether or not the suggested approaches would be financially viable. With this being the case, a Viability Assessment has been commissioned to examine the potential approaches to securing affordable housing and how this could relate to any Community Infrastructure Levy – Charging Schedule. The results of this assessment have not been determined as yet and therefore it needs to be recognised that the preferred policy approach, along with the other options considered, will be subject to this assessment. It maybe that as a result of the Viability Assessment a more flexible approach is considered appropriate for securing affordable housing. This could entail having a percentage requirement that responds to changes in the housing market, land values and build costs.
- 7.10 Based on the findings of the evidence, the Sustainability Appraisal outcomes and the input of stakeholders to date, at this stage the preferred approach for delivering affordable housing is as follows:

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<sup>15</sup> The 2008 figure is quoted as this was prior to when the housing register was changed from a waiting list to the Choice Based Lettings (CBL) system. The introduction of the CBL system may have had an impact on the number of households who joined the Housing Register.



**Potential approach to Core Policy 1**

Sub-area	Threshold	Percentage requirement
Coastal towns	15	30%
Lewes town	15	35%
Rural area	5	40%

For further information on this approach, see chapter 9 of the SHMA.

A key part of the approach to securing affordable housing will be retaining the current Local Plan policy (RES10) that is concerned with provision of affordable homes on exception sites (ie, outside the Planning Boundary).

7.11 Other approaches to the provision of affordable housing that have been considered, but not recommended as the preferred approach at this stage are as follows:

**Other options considered**

**1(a)** To have a continuation of the current District – wide policy (as contained within the Local Plan), which sets the threshold at 15 dwellings with a 25% affordable housing requirement.

**1(b)** To replicate the South East Plan policy direction – the threshold will be 15 dwellings (as per the national indicative minimum site size threshold in PPS3), with a 40% affordable housing requirement in the part of the District within the Sussex Coast sub-region and a 35% requirement in the remaining part of the District.

**Questions to consider:**

- *Do you agree with the preferred policy approach identified?*
- *Do you have any comments on the other options that have been considered?*
- *Are there any options that have not been identified that should be considered in developing this policy area?*

**Core Policy 2 – Housing Type, Mix and Density**

7.12 In order to produce and maintain sustainable communities it is essential to deliver an appropriate range of homes and accommodation to meet the identified needs of the District. Policy flexibility is also necessary in order to react without delay to changes in local housing needs and in the housing market. The SHMA advises that it is not appropriate or practical in Lewes District to prescribe standard targets for each housing type as this would lack flexibility to respond to changes in demands in the market. The SHMA also identifies the need to set out policy relating to the scale and location of housing for the local ageing population.

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- 7.13 There has been a trend over recent years towards the provision of flats/maisonettes, but there was still also a strong growth in the provision of semi detached and detached dwellings. The Local Housing Needs Assessment has identified the main growth in demand to 2030 to be for elderly-friendly dwellings and small homes for single person households and couples with no dependents. However, there is also a need for family homes, particularly due to the level of under-occupation of larger family homes in the District, creating pressure for homes of this type. Elderly-friendly dwellings are likely to include a combination of smaller units to allow people to downsize in the area in which they want to live, flexible and adaptable 'Lifetime Homes', and specialist accommodation such as nursing homes and extra care homes.
- 7.14 There are no longer specific minimum density requirements set at the national level. Seeking higher densities assists in making the best use of available land and hence the South East Plan set an overall regional density target of 40 dwellings per hectare. There is often a delicate balance between making the most efficient use of land, the sustainability of the location and the character and amenity of the surroundings. As a result, and given the very diverse character of Lewes District, a single prescriptive density requirement is considered to be too inflexible. Instead an average density expectation is set out to guide developers, whilst still allowing for higher or lower densities where individual circumstances merit them.
- 7.15 The average density range has been established by taking the average densities achieved in completed housing developments across the District between April 2007 and March 2011. Completions that have occurred as a result of conversions and changes of use have not been included as the density is determined by the existing building. Given the very different character of the towns within the plan area, when compared with the villages, it has been decided to set a separate target average density range for the towns and for the villages. This stance is further supported by the average densities achieved on completed residential schemes during the last 4 years. For the towns the average density has been 52 dwellings per hectare and the equivalent figure for the villages has been 25.
- 7.16 Based on the findings of the evidence base and the Sustainability Appraisal outcomes, the preferred approach for delivering an appropriate mix of housing types, sizes and density is as follows:

### **Potential approach to Core Policy 2**

1. Provide a range of dwelling types and sizes to meet the identified local need, based on the most up-to-date evidence (currently for accommodation for the ageing population; and smaller units for single person households and couples with no dependents), taking into account the existing character and housing mix of the vicinity, in order to deliver sustainable, mixed communities. Specific standards/targets for each type and size of dwelling are not proposed so as to ensure flexibility to 'meet the identified local need' as this may change over time and/or differ by location.
2. Support the provision of flexible and adaptable accommodation to help meet the diverse needs of the community and the changing needs of occupants over time and to encourage the Lifetime Homes standard to be met in new residential developments.
3. Set a (target) average density range (between 47 and 57 dwellings per hectare for the towns and between 20 and 30 dwellings per hectare for the villages), allowing for actual densities on individual sites to be lower or higher than this, taking into consideration the site context, including the character of the surrounding area, site accessibility, the size/type of dwellings needed in the locality. Expected densities to be achieved on allocated sites will be identified in the development principles that accompany the site allocation (either in the Core Strategy, or subsequent Site Allocations DPD).

7.17 Other approaches to housing type, mix and density that have been considered, but not recommended as the preferred approach at this stage are as follows:

### **Other options considered**

- 2(a)** Setting percentage standards for the proportion of housing types and sizes to be delivered across the District.
- 2(b)** Setting various percentage standards for the proportion of housing types and sizes to be delivered in different specified parts of the District.
- 2(c)** Setting a minimum density requirement across the District.
- 2(d)** Reflecting the regional density target from the South East Plan in this Core Policy.
- 2(e)** Not setting density targets.
- 2(f)** Requiring, rather than encourage, the Lifetime Homes standard to be met in all new residential developments.

**Questions to consider:**

- *Do you agree with approach that is proposed?*
- *Do you have any views on the policy options that have been discounted at this stage?*
- *Do you think there are other options that should be considered in relation to housing types, mix or density?*

**Core Policy 3 – Gypsy and Traveller Accommodation**

- 7.18 It is important to provide appropriate and affordable housing to meet the diverse needs of the District, including sufficient and suitable pitches for Gypsies and Travellers. Latest evidence, including the East Sussex and Brighton and Hove Gypsy and Traveller Accommodation Assessment (GTAA) and the South East Plan Partial Review (incomplete), indicates a need for 9 additional permanent pitches between 2011 and 2016 for the area covered by this plan (an overall target of 13 pitches was identified but 4 permanent pitches have recently been granted planning permission, leaving a residual number of 9 pitches to 2016). No accommodation requirements for Travelling Show People have been identified for the period to 2016.
- 7.19 Evidence suggests that a range of sites, including community owned and managed sites, as well as privately owned and local authority sites, should be provided and that there is a need for transit sites across the GTAA area as well as the permanent pitch requirements identified. Lewes District has a recently refurbished transit site with 10 pitches beside the A27 at Southerham, near Lewes, which is centrally located in the District. Further transit sites are therefore not a current priority as the particular need for additional transit sites as identified in the GTAA is further east in the GTAA area, outside Lewes District.
- 7.20 To help inform the process of identifying potential sites that could accommodate pitches for Gypsies and Travellers, a site assessment study has been undertaken<sup>16</sup>. This study has highlighted the difficulty of finding appropriate sites to accommodate such pitches with only two of the 14 sites assessed being considered to have some potential albeit with issues that would need to be resolved if they were to come forward (flood risk, landscaping and possible land contamination). The sites in question and their potential pitch capacity are:
- Land North of Offham Filling Station, A275, Offham - 3 pitches
  - Denton Depot, Newhaven – 4 pitches
- 7.21 Even if the above sites were to be taken forward by the District Council/ National Park Authority there would still be a shortfall of supply based on the level of need that is considered appropriate to plan for. Because of this, coupled with the uncertainty surrounding the above two sites, additional sites will need to be identified, assessed and possibly allocated in order to meet the need.

<sup>16</sup> [http://www.lewes.gov.uk/Files/plan\\_GTSA.pdf](http://www.lewes.gov.uk/Files/plan_GTSA.pdf)

- 7.22 As outlined above, the current pitch requirement of 9 permanent pitches is based on the need identified up to 2016<sup>17</sup>, the first ten years of the South East Plan. The period beyond this will require a further assessment of needs through an updated GTAA, or equivalent. However, in order to ensure that the Core Strategy is planning for a five year supply from its point of adoption, the 3% compound growth previously applied to the 2011 – 2016 period is extended to 2018. As a result an additional 2 permanent pitches need to be provided.
- 7.23 Based on current evidence available the preferred strategy for the provision of Gypsy and Traveller accommodation in Lewes District is:

**Potential approach to Core Policy 3**

1. Provide a total of 11 additional permanent pitches for Gypsies and Travellers in Lewes District for the period 2011 to 2018.
2. In order to meet this need, identify appropriate and deliverable sites within the Core Strategy. The sites selected will be informed by the Site Assessment Study, including any additional sites that are submitted to the District Council/National Park Authority prior to the Proposed Submission stage. Any shortfall in the planned provision will be expected to be identified and met through the Site Allocations DPD.
3. Keep the levels of need under review beyond 2018 and address any additional identified need by identifying, and where necessary, allocating additional sites in a further DPD.
4. Develop a criteria-based policy for use in selecting site allocations for Gypsy and Traveller accommodation and to assist in the consideration of planning applications for pitches on other sites if unexpected demand arises. The criteria will recognise the need for Gypsies and Travellers to be accommodated in sustainable locations, within or in close proximity to existing sustainable settlements, with good access by sustainable travel modes to essential services. Other criteria will include avoiding an adverse impact on landscape or the visual amenity of the area (having particular regard to designations such as the South Downs National Park and conservation areas); biodiversity or locally, nationally or internationally designated areas of nature conservation; heritage assets; residential amenity (including a reasonable standard of residential amenity for the site occupier); or flood risk. Sites will also be expected to have safe and convenient vehicular access to the highway network; and existing utilities infrastructure at the site, or available in reasonable proximity.

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<sup>17</sup> Gypsy and Traveller Accommodation Needs Assessments Guidance, DCLG (2007). Para. 94 states that Gypsy and Traveller needs should be made for next 5 – 10 years, rather than 15 years, due to the difficulties accurately forecasting need for this community in the longer term.

Note: no other reasonable, realistic and relevant strategic approaches to this policy area have been identified at this stage.

**Questions to consider:**

- *Do you agree with the approach that is proposed, including the level of pitches to be planned for?*
- *Do you consider the most suitable sites identified through the Site Assessment work (Land North of Offham Filling Station, A275, Offham and Denton Depot, Newhaven) to be suitable for use for Gypsy and traveller accommodation?*
- *Do you know of any other sites that may potentially help meet the need for additional pitches?*

**Key Strategy Issue/Challenge: Promoting sustainable economic growth and regeneration**

7.24 The core delivery policies that are seen as integral to addressing this key issue/challenge are identified in this section.

**Core Policy 4 – Encouraging economic development and regeneration**

7.25 The two directly relevant strategic objectives of the emerging Core Strategy are to, “stimulate and maintain a buoyant and balanced local economy through regeneration of the coastal towns, support for the rural economy and ensuring that the economy does not become reliant on one or two sectors”, and to, “take advantage of the richness and diversity of the District’s natural and heritage assets to promote and achieve a sustainable tourism industry in and around the District”. The Spatial Strategy section of this document identifies the preferred level and potential location of employment land and premises over the plan period. In addition to that part of the strategy, further approaches to economic development and regeneration will be required in order to ensure that the aforementioned objectives are deliverable.

7.26 To inform this part of the Core Strategy, an Employment and Economic Land Assessment has been undertaken as part of the evidence base. This assessment has recognised the need for Lewes District to retain its existing business premises and become the location of choice for start-up businesses by creating the right environment and facilities for business to set up and grow, developing a wider economic base and tackling competition from larger economic centres nearby.

7.27 The Employment and Economic Land Assessment found the District to have a reasonably buoyant local economy. However, while there is also a reasonable industrial base and below average unemployment, recent job growth and business formation rates have been below the regional average and skills and workplace earnings are also relatively low. Significant potential constraints to economic growth have been identified. This includes a number of current and potential employment

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sites being at risk of flooding and that the National Park designation, which applies to 56% of the plan area, could potentially affect the supply of new employment sites. The relatively low quality of many existing employment sites in the District is also a limiting factor to economic growth. A further concern is the strong reliance of the local economy on manufacturing and public sector jobs, both of which face decline, and the low representation in the knowledge based and growth sectors.

- 7.28 The future economic potential of the District is likely to be characterised by the continued movement away from traditional manufacturing to more service based activities with a more developed business service sector. This will be reliant on successfully encouraging local start-ups and the expansion of small indigenous firms by providing a range of suitable, small, flexibly managed units, which includes supplying move-on space for small businesses that wish to expand.
- 7.29 Based on the findings of the Employment and Economic Land Assessment and the Sustainability Appraisal outcomes the preferred strategic approach for delivering employment land and supporting economic development and regeneration is as follows:

**Potential approach to Core Policy 4**

1. Identify sufficient sites in sustainable locations to provide for a flexible range of employment space to meet current and future needs.
2. Safeguard existing employment sites from other competing uses unless there are demonstrated economic viability or environmental amenity reasons for not doing so (including demonstrated lack of developer interest, persistently high vacancy rates, serious adverse environmental impacts from existing operations, the site is otherwise unlikely to perform an employment role in the future, or loss of some space would facilitate further /improved employment floorspace). There will be a presumption in favour of retaining the unimplemented employment site allocations from the Local Plan (2003) for meeting part of the Districts employment land need. However, if there are clear economic viability or environmental amenity reasons for not doing so then such sites will be de-allocated or considered for alternative uses through the Site Allocations DPD (note: the Eastside allocation in Newhaven is considered separately in this document).
3. Support the appropriate intensification, upgrading and redevelopment of existing employment sites for employment uses.
4. Promote the delivery of new office space, particularly in Lewes town.
5. Promote small, flexible, start-up and serviced business units (including scope for accommodating business expansion).
6. Promote the development of sustainable tourism, including recreation, leisure, cultural and creative sectors, and having particular regard to the opportunities provided by the South Downs National Park.
7. Support the continued use of Newhaven port for freight and passengers including plans for expansion and modernisation of the port as identified in the port authority's Port Masterplan.
8. Promote modern and high speed e-communications and IT infrastructure.
9. Support sustainable working practices (eg. homeworking and live/work).
10. Increase the skills and educational attainment level of the District's labour supply.
11. Where necessary, identify Local Development Orders to support economic development and regeneration, particularly on existing employment sites.



Note: no other reasonable, realistic and relevant strategic approaches to this policy area have been identified at this stage.

**Questions to consider:**

- *Do you agree with approach that is proposed?*
- *Do you think there are other options that should be considered that would help support economic development and regeneration in the District?*

**Core Policy 5 – The Visitor Economy**

- 7.30 Tourism is an important sector of the local economy, accounting for 7% of employment (approx. 2300 jobs) in the District. The sector has a recognised potential for growth, particularly now that over half of the District’s geographical area lies within the South Downs National Park. The rural area of the South Downs allows very good access to high quality countryside, offering outstanding recreational opportunities. Attractions include iconic places and views including at Cuckmere Haven, the Seven Sisters, Glyndebourne Opera House, Ditchling Beacon and Mount Caburn. There is also a wealth of architectural and historic quality in the towns and villages of the District, as evidenced by the numerous conservation areas and listed buildings. A full calendar of cultural events through the year also attracts numerous visitors to the area.
- 7.31 The need to continue to protect and enhance the quality of the District’s environment, whilst also taking the opportunity to: make the most of the designation of the South Downs National Park; improve peoples’ understanding and appreciation of the landscape and built heritage; attract new investment; and achieve economic benefits through tourism, have been identified as key issues for the LDF to address. As a result one of the LDF strategic objectives is to, “Take advantage of the richness and diversity of the District’s natural and heritage assets to promote and achieve a sustainable tourism industry in and around the District”. The visitor economy will also be fundamental in achieving the objective to, “Stimulate and maintain a buoyant and balanced local economy through regeneration of the coastal towns, support for the rural economy and ensuring that the economy does not become reliant on one or two sectors”. The National Park is expected to result in a growth in the District’s visitor economy, both within and outside the National Park boundary. However, as evidenced by the Hotel Futures Study, a lack of appropriate visitor accommodation of all types has been identified in the District.
- 7.32 As part of the evidence base for this policy area, a Camping and Caravanning Study has been undertaken. This study has concluded that there is market potential for the modest expansion of existing touring caravan and camping sites in the District and that the existing saved Local Plan policies (E15 – E17), which cover this subject area,

provide an appropriate level of support to allow for this market potential to be met.

- 7.33 While tourism is a key sector of the local economy, its growth will also raise challenges for the environment and for local communities. High numbers of visitors can put pressure on some locations in terms of their tranquillity, appearance and by physical erosion. Pressure for development to serve visitor demands can also compete with the needs of local communities for constrained land resources, particularly within the National Park. Visitor traffic could result in increased congestion on certain routes, and car parking difficulties can affect the environment, as well as local peoples' and visitors' experiences of the area. It is therefore essential that growth in the tourism sector is based upon sustainable visitor attractions. Such attractions retain the economic and social advantages of tourism development while having minimal impact on the environment and the local community through reducing, or mitigating any undesirable impacts on the natural, historic, cultural or social environment to balance the needs of the visitors with those of the destination.
- 7.34 Based on the findings of the Employment and Economic Land Assessment and other relevant evidence, the emerging strategic approach for delivering a strong and sustainable visitor economy is as follows:

**Potential approach to Core Policy 5**

1. Support for the provision of new and the upgrading/enhancement of existing sustainable visitor attractions and a wide range of accommodation types supporting emerging and innovative visitor facilities and accommodation offers, and giving flexibility to adjust to changing trends.
2. Presumption in favour of the retention of existing visitor accommodation stock, including camping and caravan sites.
3. Promote sustainable tourism in rural areas, both within and outside the National Park boundary, including the promotion of opportunities for the understanding and enjoyment of the National Park while recognising the importance of conserving and enhancing the natural beauty, wildlife and cultural heritage of the area as assets that form the basis of the tourist industry here.
4. Support a year-round visitor economy and reduce seasonal restrictions wherever appropriate.
5. Support for a sustainable tourist sector, use of public transport, local attractions, and local crafts, produce and appropriate tourism development that supports farm business/diversification.
6. Provide sufficient land for the provision of new hotel accommodation (the Economic and Employment Land Assessment recommends about 1 hectare).
7. Propose the retention of saved Local Plan policies E15, E16 and E17 for Development Management purposes until such time as a Development Management DPD is adopted.

Note: no other reasonable, realistic and relevant strategic approaches to this policy area have been identified at this stage.

**Questions to consider:**

- *Do you agree with preferred approach that is proposed?*
- *Do you think there are other options that should be considered that would help support the visitor economy in the District?*

## **Core Policy 6 – Retail and Sustainable Town and Local Centres**

- 7.35 National and regional planning policy emphasises the need for LDFs to support the vitality and viability of town and local/village centres, not just for retailing but for a range of activities. The aim is to provide sustainable shops, facilities and services locally to where people live and work.
- 7.36 Our existing evidence base for retail and other related town/village centre services consists primarily of the Lewes District Retail Study (2005). This was a comprehensive assessment of retail activity and town centres but is now considered quite dated, particularly given the changes in economic conditions that have taken place since 2005. Despite this, the study made a number of policy recommendations that are still considered applicable today, some of which form the basis of our current emerging strategy, together with national and regional guidance. The District Council and National Park Authority will be commissioning consultants to update the retail study in Autumn 2011 to ensure that the emerging approach remains appropriate and viable. This updated information will then inform our proposed strategy for retailing and town/local centres.
- 7.37 As an interim measure, we also had a simple audit of retail premises in the urban areas undertaken in 2009 and 2010 to identify problem areas with vacancy rates and to help gauge the impacts of the economic recession. The results in 2010 were, in the main, more encouraging, showing vacancy rates generally much reduced over the 2009 figure, with the exception of Newhaven town centre, which continues to decline (25% vacancy rates mid 2010). Ringmer was also included for the first time in 2010 with a 22% vacancy rate found, although this has since dropped to 11% with some new businesses opening in the village centre in the last year.
- 7.38 With regard to the evidence currently available, and to national and regional planning policy, the emerging strategy for retail and town/local centres is as follows:

### **Potential approach to Core Policy 6**

1. Set out the retail and functional hierarchy of our town and local centres.
2. Set out the amount of new retail floorspace (for comparison and/or convenience goods) to be accommodated in each town centre up to 2030, if any is found to be needed by the updated retail study in Autumn 2011.
3. Promote and enhance the viability and vitality of the town and local centres, including encouraging high quality mixed use developments with active ground floor frontages, supporting appropriate enhancements to the evening economy, and supporting small and independent businesses.
4. Seek to protect local shops and facilities but where these are found to no longer be viable, take a flexible approach to the consideration of alternative uses, on their individual merits, that would be of benefit to the local community and the vitality and viability of the local centre.
5. Taking a more flexible approach to the Newhaven town centre (the area within the ring road) that would allow for alternative uses other than retail. Such an approach would allow for changes of use from unviable/long-term vacant retail units to other uses in order to support the overall vitality of the area (including residential). Such a policy approach is likely to involve removing the Primary Shopping area designation (taken from the Local Plan) that covers a significant part of the town centre.
6. Seek to reinforce and enhance the distinctive character and eclectic mix of specialist/niche retailers and service providers in Lewes town and support its role as the District's principle leisure, cultural and visitor destination town.
7. Support the role of the Meridian Centre in the provision of shops and services in Peacehaven/Telscombe. Explore the potential for further improvements and development opportunities at the Meridian Centre and its immediate surroundings. Commercial uses along South Coast Road (A259) will be appropriate to the function of a local centre and would need to complement the role of the Meridian Centre as the main district centre in Peacehaven.
8. Reinforce the Seaford town centre for retail provision, while encouraging more diverse uses in the peripheral area around the shopping core to help increase vitality beyond the central area, particularly uses that would help Seaford to exploit its potential as a visitor destination more fully (while having regard to its understated seaside character).

7.39 Other approaches to retail and sustainable town and local centres that have been considered, but not recommended as the preferred approach at this stage are as follows:

### **Other options considered**

- 6(a)** To maintain the current policy approach for Newhaven town centre.
- 6(b)** To maintain the current policy approach for South Coast Road (A259) at Peacehaven.

**Questions to consider:**

- *Do you agree with the approach that is proposed?*
- *Do you think there are other options that should be considered that would help provide sustainable, vibrant and vital town and local centres across the District?*
- *Do you consider the approaches set out for each town are appropriate, having regard to their existing function and character?*
- *Do you agree that Newhaven town centre should be reclassified (downwards) as having a local support function, rather than a district level town centre function, given the decline it has faced in recent decades?*
- *Do you feel that any of the approaches are obviously out-dated, given that they are largely based on evidence from 2005, or are they still appropriate?*

**Key Strategy Issue/Challenge: Creating healthy, sustainable communities**

7.40 The core delivery policies that are seen as integral to addressing this key issue/challenge are identified in this section.

**Core Policy 7 – Infrastructure**

7.41 Providing additional homes and employment, together with the projected demographic changes, will place additional pressures on the District's infrastructure capacity. Infrastructure is a broad term that includes many different components, such as, roads, hospitals, village shops, sewers, coastal and flood defences, sub-stations, bus services, parks and cultural facilities. Investment will be required for improvements to existing infrastructure and the provision of new infrastructure to support development growth and support the creation of sustainable communities. The projected significant increase in the proportion of elderly people in the District's population will be an important factor in infrastructure provision over the plan period, including the retention of existing elderly day care provision.

7.42 National planning policy and the South East Plan require developments to make appropriate provision for the infrastructure and services that will be needed by that development, either on-site or to make an appropriate financial contribution towards off-site provision. The South East Plan also requires the scale and pace of development to depend upon sufficient infrastructure capacity being available to service the needs of the development. The timely provision of the infrastructure requirements associated with growth is recognised as an important element in the quality of life for local people. We will set out required infrastructure and how/when this will be delivered in our Infrastructure

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Delivery Plan that will accompany the adopted Core Strategy (and will be consulted upon at the Proposed Submission stage).

7.43 Further work into funding options will be necessary, but it is intended to establish the Community Infrastructure Levy (CIL) in Lewes District through the introduction of a CIL Charging Schedule. CIL is a new levy that local planning authorities can choose to charge on new developments in their area, in order that the burden of new infrastructure costs is shared by all development in a proportionate manner. The money raised can be used to fund local and sub-regional infrastructure provision.

7.44 The emerging approach for the provision of local infrastructure is as follows:

### **Potential approach to Core Policy 7**

1. Protect and where possible enhance existing physical and social infrastructure, including that which serves the elderly, unless it is evidently no longer required, occupies unsuitable land/premises and/or suitable alternative provision will be made.
2. Prepare an Infrastructure Delivery Plan to identify key infrastructure requirements and shortfalls and how these can be met in a timely manner. We will work with key delivery partners to identify the appropriate level of provision, priorities and the associated financial costs.
3. Require developer contributions towards infrastructure provision through the combination of s106 planning obligations and/or CIL as appropriate. To this end we would establish (working with key stakeholders, including infrastructure providers, local communities and developers) a CIL Charging Schedule and clearly set out what contributions would be expected in association with different types and sizes of development.

Note: no other reasonable, realistic and relevant strategic approaches to this policy area have been identified at this stage.

### **Questions to consider:**

- *Do you agree with the approach that is proposed?*
- *Do you think there are other options that should be considered that would be help to provide suitable infrastructure in the District?*
- *Do you have views on key pieces of infrastructure that should be included in the Infrastructure Delivery Plan?*
- *Do you consider a combination of s106 planning obligations (for on-site provisions) and CIL (for off-site provisions) to be an appropriate funding mechanism for infrastructure? Should the Council consider other mechanisms?*

## Core Policy 8 – Green Infrastructure

- 7.45 Green infrastructure refers to a multi-functional linked network of green spaces that provide opportunities for biodiversity and recreation. Green infrastructure, as defined in the South East Plan, can include:
- parks and gardens – including urban parks, country parks and formal gardens
  - natural and semi-natural urban greenspaces – including woodlands, urban forestry, scrub, grasslands (e.g. downlands, commons and meadows) wetlands, open and running water, wasteland and derelict open land and rock areas (eg cliffs, quarries and pits)
  - green corridors – including river and canal banks, cycleways, and rights of way
  - outdoor sports facilities (with natural or artificial surfaces, either publicly or privately owned) – including tennis courts, bowling greens, sports pitches, golf courses, athletics tracks, school and other institutional playing fields, and other outdoor sports areas
  - amenity greenspace (most commonly, but not exclusively, in housing areas) – including informal recreation spaces, greenspaces in and around housing, domestic gardens and village greens
  - provision for children and teenagers – including play areas, skateboard parks, outdoor basketball hoops, and other more informal areas (e.g. ‘hanging out’ areas, teenage shelters)
  - allotments, community gardens, and city (urban) farms
  - cemeteries and churchyards
  - accessible countryside in urban fringe areas
  - river and canal corridors
  - green roofs and walls
- 7.46 Green infrastructure assets in Lewes District are many and varied. They include, for example, parks, gardens, playing fields, river corridors, woodlands, former chalk pits, golf courses, allotments, beaches, former railway land, country parks, and beaches. In addition, 56% of the District now lies within the South Downs National Park, where the Park Authority is required to promote opportunities for the understanding and enjoyment of the special qualities of the area (as reflected in strategic objective 2 for this plan). Green infrastructure plays an important role in the character and environment of the District and in enhancing the quality of life here. While development pressures grow, so does the need to protect, enhance and appropriately manage our green infrastructure resources so that they may be linked together in order to meet the primary functions of the South East Green Infrastructure Framework (SEGIF) in the District by:
- conserving and enhancing biodiversity
  - creating a sense of space and place
  - supporting healthy living by increasing outdoor recreational opportunities for play, exercise and relaxation
  - mitigating climate change impacts
  - reducing the incidence and severity of flooding



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- supporting healthy eco-systems
- reducing energy consumption through managing microclimates effectively
- providing sustainable transport routes
- encouraging local food production

7.47 Development within the District and in surrounding areas is likely to put greater demands on our green infrastructure and therefore there will be an increasing need to maintain and enhance the quality of our green spaces in relation to development pressure.

7.48 PPS12 requires the Core Strategy to set out the strategic level policy for the protection and provision of green infrastructure networks. At the strategic level the District's green infrastructure assets need to be considered as one overarching asset that crosses the District's boundaries and that can provide the multiple functions set out above, rather than considering individual green spaces purely for their most apparent role such as an area for outdoor sports recreation, an area of woodland habitat etc.

7.49 Having regard to PPS12 and South East Plan Policy CC8 the emerging strategy for green infrastructure is as follows:

### **Potential approach to Core Policy 8**

1. Identify areas where there is potential for the enhancement or restoration of existing green infrastructure and opportunities for the provision of new green space.
2. Ensure that development maintains and/or appropriately manages identified green infrastructure.
3. Require development to contribute to the creation of new green spaces and/or network linkages, as part of the infrastructure necessary to support new developments.
3. Support the creation of new green infrastructure (including new linkages between existing green infrastructure) to enhance the overall role of the green infrastructure network.
4. Resist development that adversely affects green infrastructure, undermines its functional integrity, or results in a loss of green space (unless appropriate alternative provision will be provided to a greater standard than the green infrastructure affected or lost by the development).

Note: no other reasonable, realistic and relevant strategic approaches to this policy area have been identified at this stage.

**Questions to consider:**

- *Do you agree with the approach that is proposed?*
- *Do you think there are other options that should be considered that would help protect, enhance and provide green infrastructure in the District?*

**Key Strategy Issue/Challenge: Protecting and enhancing the distinctive quality of the environment**

7.50 The core delivery policies that are seen as integral to addressing this key issue/challenge are identified in this section.

**Core Policy 9 – Air Quality**

7.51 In general, air quality in the District is good. However, as recognised in the characteristics section there are areas of concern, particularly with regard to nitrogen dioxide emissions. In 2005 an Air Quality Management Area (AQMA) was declared in Lewes town centre for nitrogen dioxide, the main source of which is from road traffic. There are similar concerns in the South Way area of Newhaven, which has not been declared an AQMA but where nitrogen dioxide has been recorded at levels approaching the maximum acceptable limits. Addressing these problematic areas, and ensuring that further pockets of poor air quality do not become prevalent, will be a key part in the achievement of the objective that concerns reducing the need for travel and to promote a sustainable system of transport and land use (objective number 7).

7.52 Air quality is closely controlled by EU obligations, transposed into minimum national standards for a number of air pollutants, which are set out in the Air Quality Standards Regulations 2007. For nitrogen dioxide there are two targets:

- Level not to exceed  $200\mu\text{g.m}^{-3}$  more than 18 times a year (1 hour mean) - something which is not currently an issue in Lewes District.
- The annual mean should not exceed  $40\mu\text{g.m}^{-3}$  – currently exceeded in Lewes town centre.

7.53 Saved Local Plan Policy ST30 relates to air quality but is based on superseded legislation and guidance. As such it is proposed that the basis of the saved policy is transferred, but is enhanced and amended in line with current legislation and guidance and to reflect the Air Quality Management Plan and the requirements of the AQMA.

7.54 Air quality objectives, policy and management are largely shaped by EU law and the declared AQMA. With this in mind, the preferred strategy for air quality in Lewes District is:

### Potential approach to Core Policy 9

1. Seek improvements in air quality through implementation of the Air Quality Action Plan and having particular regard to the impacts of development on the air quality of the Lewes town centre AQMA (and any others subsequently declared).
2. Ensure that all development will have an acceptable impact on the surrounding area in terms of its effect on health, the natural environment or general amenity, taking into account cumulative impacts.
3. Promote opportunities for walking and cycling and congestion management to reduce traffic levels in areas of reduced air quality, particularly in town centre locations.
4. Require mitigation measures where development and/or associated traffic would adversely affect any declared AQMA.
5. Seek best practice methods to reduce levels of dust and other pollutants arising from the construction of development and/or from the use of the completed development.

Note: no other reasonable, realistic and relevant strategic approaches to this policy area have been identified at this stage.

#### Questions to consider:

- *Do you agree with the approach that is proposed?*
- *Do you think there are other options that should be considered that would help improve air quality in the District?*

### Core Policy 10 – Natural Environment and Landscape Character

7.55 Lewes District contains high quality and diverse landscapes, which includes heathland, river valleys and floodplains, rolling downland, chalk cliffs, shingle beaches, rural fields and ancient woodlands. Most notably, part of the District's valued landscape has been recognised through the designation of the South Downs National Park. The National Park encompasses the southern part of the District, although it excludes the coastal towns. The National Park Authority has a statutory duty to pursue the two National Park purposes<sup>18</sup> and they will be fundamental as they develop their own Management Plan over the coming years.

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<sup>18</sup> - (1) To conserve and enhance the natural beauty, wildlife and cultural heritage of the National Park, and; (2) To promote opportunities for the understanding and enjoyment of the special qualities of the area by the public.

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- 7.56 The Low Weald, which offers a gentle rolling landscape north of the National Park, has its own special character of low lying land with a patchwork of small fields, hedgerows, woodland, ponds and streams which collectively form an enclosed and intimate landscape. Although not afforded the same level of recognition as the South Downs, the Low Weald is a landscape that is highly valued. Of particular value, are the views that are obtained from the escarpment on the South Downs over the Low Weald area.
- 7.57 East Sussex County Council has produced a ‘County Landscape Assessment’, which identifies a number of different landscape character areas, some of which are within Lewes District. This assessment identifies the characteristics of each character area and identifies some of the pressures and priorities for them. A Landscape Capacity Study has been produced to inform the Core Strategy, and any subsequent planning policy documents in the area. This study considers land that is located adjacent to the main settlements within the District and “refers to the degree to which a particular landscape character type or area is able to accommodate change without significant effects on its character, or overall change of landscape character type”.<sup>19</sup>
- 7.58 As well as significant landscape qualities, the District is also fortunate to have a plethora of sites designated for their biodiversity value. This includes Sites of Special Scientific Interest (SSSI), Sites of Nature Conservation Importance (SNCI), National Nature Reserves (NNR), Local Nature Reserves (LNR) and Wildlife Trust Reserves. There is also a significant resource of ancient woodland in the District, as evidenced in the Revision of the Ancient Woodland Inventory<sup>20</sup>.
- 7.59 Two sites in the District are designated as a Special Area of Conservation (SAC), which is a designation made to protect flora, fauna and habitats of European-wide interest. The sites in question are the Lewes Downs SAC and the Castle Hill SAC. Both of the sites are designated for their chalk grassland and the species that are found in these locations, including orchids. In addition to the two SAC’s in Lewes District, there are also two other European designated sites within close proximity to the District’s borders. These are the Ashdown Forest, which is designated as a SAC and Special Protection Area (SPA), and the Pevensy Levels, designated as a Ramsar Site (wetland of global importance) and possible SAC. There is a legal duty for an assessment to be made as to whether the Core Strategy is likely to have an impact on these sites.
- 7.60 A Habitats Regulation Assessment Screening Statement ([link](#)) has been produced by the District Council. This statement has concluded that the Core Strategy, either alone or in combination with other plans

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<sup>19</sup> Landscape Character Assessment (LCA) guidance, Countryside Agency and Scottish Natural Heritage (2002)

<sup>20</sup> [http://www.lewes.gov.uk/Files/plan\\_Lewes\\_ancient\\_woodland\\_survey\\_report.pdf](http://www.lewes.gov.uk/Files/plan_Lewes_ancient_woodland_survey_report.pdf)

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and projects, will not generate any significant effects in relation to the Castle Hill SAC and the Pevensy Levels SAC and SPA. Further assessment needs to be undertaken to determine whether or not the Core Strategy could have an impact upon the Lewes Downs SAC, as a result of the possibility of increased traffic generated by new development harming the air quality at the site, and the Ashdown Forest (for the same reason as the Lewes Downs SAC, along with determining whether development proposals in the north of the district will create additional recreational pressure on this site). This further assessment will be undertaken prior to the Proposed Submission document being prepared. Notwithstanding the outcome of this further assessment, a specific development proposed in the plan area could result in significant effects on one or more of the aforementioned European sites. In such cases, a Project Level (Regulation 48) Habitats Regulation Assessment will need to be undertaken by the proponent when the planning application is submitted to determine whether mitigation measures are required.

- 7.61 The natural environment and the landscapes that have evolved in the District, continue to be a resource for farming, forestry, tourism, healthy activity and recreation, as well as being vulnerable to the potential impacts of human influence, climate change and flooding. The pressure from these factors, have the potential to impact negatively on habitats and the landscape character of the District. An example of this is that over 43% of the 1,868 hectares of land designated in the District as SSSI has been found to be in an unfavourable condition.
- 7.62 Stewardship of the natural environment and elements which give the District its unique landscape characteristics therefore is of prime importance and ensuring that development is sustainable in environmental terms is a central theme in planning.
- 7.63 Planning policy can provide the basis for which the form and location of development can be managed to ensure the effective protection of the natural environment and the retention of the quality and character of the countryside and coast.
- 7.64 Against the context set in the previous paragraphs and further information that is contained in the evidence prepared to date for the Core Strategy, the preferred approach, at this stage, for this policy area is as follows:

### **Potential approach to Core Policy 10**

1. The highest priority will be given to the conservation and enhancement of the landscape qualities of the South Downs National Park, and the integrity of European designated sites (SAC's and SPA's) in and around Lewes District.
2. Maintaining the integrity of the European designated sites will be achieved through ensuring that development causes no significant adverse effects on the integrity of the sites, including in combination with other plans, projects and proposals. The duty to demonstrate this will be for the individual or organisation who is proposing the development.
3. The conservation and enhancement of the landscape quality of the National Park, including the setting in terms of views into and from the Park, will be achieved by ensuring that all development complies with the National Park purposes and the forthcoming Management Plan.
4. More generally, the landscape characteristics and qualities, along with the natural environment (biodiversity resources) in the plan area, will be conserved and enhanced by:
  - Not permitting new development that would harm landscape character or nature conservation interests, unless the benefits of the development outweigh the harm caused, in which case appropriate mitigation and compensation is provided.
  - Seeking to conserve and enhance the landscape qualities of the District, as informed by the County Landscape Assessment and the Landscape Capacity Study.
  - Seeking the conservation, enhancement and net gain in local biodiversity resources.
  - Seeking to maintain ecological corridors and avoiding habitat fragmentation.

Note: no other reasonable, realistic and relevant strategic approaches to this policy area have been identified at this stage.

#### **Questions to consider:**

- *Do you agree with the approach that is proposed?*
- *Do you think there are other options that should be considered for this policy area?*

### **Core Policy 11 – Built and Historic Environment and High Quality Design**

- 7.65 Lewes District enjoys a rich and varied built heritage, including 35 Conservation Areas, ranging in size from the historic core of Lewes town to small villages and hamlets in the Sussex Downs and Weald. There are more than 1,700 Listed Buildings and more than 100

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Scheduled Ancient monuments, together with numerous sites of archaeological interest, four historic parks included on the English Heritage Register of Parks and Gardens, and a historic battlefield (Lewes 1264).

- 7.66 Current national and regional planning policy seeks to ensure the delivery of high quality development, well-designed and built to a high standard. It requires local planning authorities to set out the quality of development that will be expected in the area in order to:
- create places, streets and spaces which meet the needs of people, are visually attractive, safe, accessible, functional, have their own distinctive identity and maintain and improve local character;
  - promote designs and layouts which make efficient and effective use of land, including encouraging innovative layouts to help deliver high quality outcomes (PPS1).
- 7.67 PPS5 (Planning for the Historic Environment) and the saved Local Plan policies for the historic environment are considered to currently give a clear and strong policy position with regard to proposals relating to the historic environment in the District. However, with the expected arrival of a new condensed National Planning Policy Framework PPS5 would be superseded, potentially by much less detailed national guidance. Coupled with the expected abolition of the South East Plan, this could leave the District Council and National Park Authority with a policy vacuum in this area.
- 7.68 With regard to design and the built and historic environment, the preferred strategy is to:

**Potential approach to Core Policy 11**

1. Prepare generic design and built environment policy to ensure a high quality of design in all development, having in mind that the existing national and regional planning policies may have been revoked, revised or condensed when the Core Strategy is submitted or adopted, which would leave Lewes District with a policy vacuum in this respect.

Such a policy approach could include requiring development to be of a high quality design, make a positive contribution to the unique character and appearance of the surrounding area, be locally distinctive, well integrated and respond to its local context. It would also expect development to be designed so as to: reduce crime and the fear of crime; support inclusive communities; be well integrated in terms of access and functionality with the surroundings; create usable, accessible and easily understood places; reduce energy and water consumption; take opportunities for renewable energy generation and use locally sourced and sustainable materials and construction techniques; minimise flood risk; be adaptable to climate change; be visually attractive with good architecture and landscaping; take opportunities to improve the character or quality of the area; help meet the needs of the local area; make efficient/effective use of land; provide appropriate public and private amenity space; provide for appropriate car and cycle parking; create a high quality public realm with residential streets that are pedestrian, cycle and vehicle friendly; support local pride and civic identity; and provide for the retention or re-establishment of biodiversity.

2. Consider setting design standards with regard to matters such as crime reduction (eg Secured by Design principles), private outdoor space, connectivity and local distinctiveness.

3. Retain saved Local Plan policy ST3 (Design, Form and Setting of Development) for Development Management purposes until such time as a Development Management DPD is adopted.

4. Conserve and enhance the historic environment and recognise the role that nationally and locally important historic assets play in the distinctive character of the diverse settlements of the District. Propose the retention of saved Local Plan Policies H2, H3, H4, H5, H7, H12, H13 and H14 for Development Management purposes until such time as a Development Management DPD is adopted.

7.69 Other approaches to the built and historic environment and high quality design that have been considered, but not recommended as the preferred approach at this stage are as follows:



**Other options considered**

**11(a)** Continue with existing saved Local Plan design related policy, particularly policy ST3: Design, Form and Setting of Development. *The aims of ST3 are still relevant however this alone would not allow us to seek other standards and/or respond to design related opportunities that have emerged since the Local Plan was adopted.*

**11(b)** Prepare generic design and built environment policy to avoid a high level policy vacuum but do not retain any currently saved Local Plan policies relating to design and the built environment.

*The concern with this is that not keeping Local Plan Policy ST3 and the saved Historic Environment policies in the interim would leave uncertainty for Development Management decision making.*

**Questions to consider:**

*Do you agree with the approach that is proposed?*

*Do you think there are other options that should be considered that would help ensure the delivery of well designed new development and contribute to high quality built environments in the District?*

**Key Strategy Issue/Challenge: Tackling climate change**

7.70 The core delivery policies that are seen as integral to addressing this key issue/challenge are identified in this section.

**Core Policy 12 – Flood Risk, Coastal Erosion and Sustainable Drainage**

7.71 Flood risk is a significant concern for the District, with particular risk identified at Lewes and Newhaven. The Strategic Flood Risk Assessment found that 11.1% of land in the District lies within Flood Zone 2 (medium probability of flooding), of which 9.9% lies within Flood Zone 3 (high probability of flooding/functional floodplain). The risk of flooding to residential property is significant with over 2000 homes located in Flood Zone 3. Flood risk was most recently highlighted in October 2000, when Lewes experienced an extreme flood event, affecting many homes and businesses. The likelihood of flooding is predicted to increase as a result of climate change causing more extreme weather events, such as prolonged periods of intense rainfall. Reducing the District's vulnerability to the impacts of climate change, and particularly flooding to residential properties, is therefore a key objective of this plan.

7.72 The District features 14.5km of coastline, along which there is a typical rate of coastal erosion of 0.3m per year, however rates vary from year to year and at different sections of the coast. Sections of the coast at Peacehaven and Telscombe are protected by hard coast defences and

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the beach at Seaford is managed to provide protection from sea flooding.

- 7.73 The Ouse to Seaford Head Coastal Defence Strategy will recommend (when adopted later this year) maintaining existing river embankments and coastal defences and build higher as tidal/river levels rise over time. It will also recommend that the shingle defences on the coast are maintained like they are now.
- 7.74 Fluvial flooding from the River Ouse and inundation from the sea are the primary flood risks in the District, however there are other more limited flood risks that nonetheless can have a significant impact on homes and businesses, such as surface water flooding, with some areas more susceptible than others. Many of these areas have been identified in the Preliminary Flood Risk Assessment. This has been prepared by East Sussex County Council, who have an emerging role as the Lead Local Flood Authority. As part of this role, the County Council will take on the management of surface water flooding and Sustainable Drainage Systems (SuDS).
- 7.75 The preferred strategic approach for managing flood risk, coastal erosion and for sustainable drainage, as evidenced by the SFRA, SMP, CFMPs and national and regional policy is as follows:

### **Potential approach to Core Policy 12**

1. Development will be directed away from areas of flood risk when possible. Development in areas of flood risk (as identified in the latest Environment Agency and SFRA flood risk and climate change maps) will be required to meet the Sequential and Exception tests (where necessary).
2. Where site specific flood risk assessments are required, they must demonstrate that the development and its means of access will be safe from flooding without increasing the risk of flooding elsewhere. Whenever possible development should reduce overall flood risk.
3. Flood protection, resilience, resistance and mitigation measures should be appropriate to the specific requirements of the site and have regard to the character of the natural and built environment of the site and surrounding, to climate change implications, and to biodiversity.
4. Liaise closely with the Environment Agency on development and flood risk.
5. Work towards the long-term protection and re-creation of the River Ouse corridor, which will enhance biodiversity and reduce the number of properties affected by flooding from the Ouse, particularly in Lewes town.
6. Seek to reduce surface water run-off. Ensure there is no increase in surface water run-off from new developments and require development to incorporate Sustainable Drainage Systems (SuDS) unless it is demonstrated that SuDS are not technically appropriate. Liaise with ESCC as the lead local flood authority on the whole life management and maintenance of SuDS.
7. Work with partners to implement the current South Downs Shoreline Management Plan (SMP), Catchment Flood Management Plan (CFMP) and other relevant flood/coastal protection strategies and plans.
8. Ensure that development avoids undeveloped coastline unless it specifically requires a rural coastal location, meets the sequential test and does not have other adverse impacts. Prevent development on unstable areas of coastline, or areas at risk of erosion as identified in the SMP.

Note: no other reasonable, realistic and relevant strategic approaches to this policy area have been identified at this stage.

#### **Questions to consider:**

- *Do you agree with the approach that is proposed?*
- *Do you think there are other options that should be considered that would help manage flood risk and coastal erosion in the District?*

### **Core Policy 13 – Sustainable Travel**

- 7.76 The need to encourage people to move around the District in a sustainable manner and to ensure maximum accessibility to new development by walking, cycling and public transport has been identified as one of the key issues that the LDF needs to address.
- 7.77 Transport is the fastest growing source of greenhouse gases and CO2 emissions. It accounts for around a quarter of carbon emissions from UK domestic energy use, with road vehicles responsible for 93% of this. Reductions are therefore vital to ensure that the UK meets its targets on CO2 emissions and makes progress towards a lower carbon society. An increase in travel by sustainable transport modes is one of the ways that the District can meet this goal.
- 7.78 Transport issues are a major concern for many people in the District. Some areas are already suffering from congestion and other traffic-related pressures at peak periods, particularly the approaches to Lewes town centre and the A259 through Newhaven, Peacehaven and Telscombe. An Air Quality Management Area has been declared in Lewes town centre, where most of the air pollution is generated by traffic. Levels of nitrogen dioxide in Newhaven town centre are also close to the national limits. Traffic levels on the A27 trunk road is also expected to reach capacity in the near future, particularly to the west of Lewes town where the Highways Agency is forecasting 'highly stressed' road conditions by 2026.
- 7.79 Accessibility issues for the District's rural communities are also widely recognised, in particular the needs of the elderly, the disabled and young people in terms of accessing employment, education, and entertainment facilities. The limited availability of public transport in the rural areas of the District has been identified as a key issue.
- 7.80 The emerging approach for redressing the balance in favour of sustainable transport choices is to work with ESCC and the Highways Agency to improve sustainable transport infrastructure, options and usage in the District (accepting that access to all key services without some reliance on the car in rural areas cannot be achieved) is as follows:

**Potential approach to Core Policy 13**

1. Support development that encourages travel by public transport, cycling and walking and reduces the proportion of journeys made by car in order to help achieve a rebalancing of transport in favour of sustainable modes.
2. Ensure development is located in sustainable locations with good access to schools, shops, jobs and other key services by public transport, cycling and walking, in order to reduce the need to travel by car (unless there is an overriding need for the development in a less accessible location).
3. Ensure development has the lowest practical level of journeys by car by requiring it to minimise its impact on the road network, to incorporate appropriate mitigation measures for impacts on the road network, and to be supported by Transport Assessments and sustainable Travel Plans (mobility management measures), where appropriate (categories of development requiring Travel Plans and/or Transport Assessments will be set out in a SPD).
4. Require development to contribute to transport infrastructure improvements, particularly the provision of safe and reliable sustainable transport options (contribution requirements to be considered as part of the CIL Charging Schedule).
5. Support the expansion and improvement of public transport services throughout the District, particularly in the rural areas, including increased rail travel and improved connections and interchanges between bus and rail services.
6. Support the adopted Local Transport Plan for East Sussex and the subsequent implementation plans to be prepared.
7. Ensure development has appropriate secure and user-friendly cycle parking and car parking provided at levels that support the choice of sustainable transport usage in preference to car journeys. Support the increased and/or improved provision of secure and user-friendly cycle parking and car parking at train stations, where appropriate (parking standards will be set out in a SPD).
8. Support the design of development that prioritises the needs of pedestrians, cyclists and public transport users ahead of motorists.

Note: no other reasonable, realistic and relevant strategic approaches to this policy area have been identified at this stage.

**Questions to consider:**

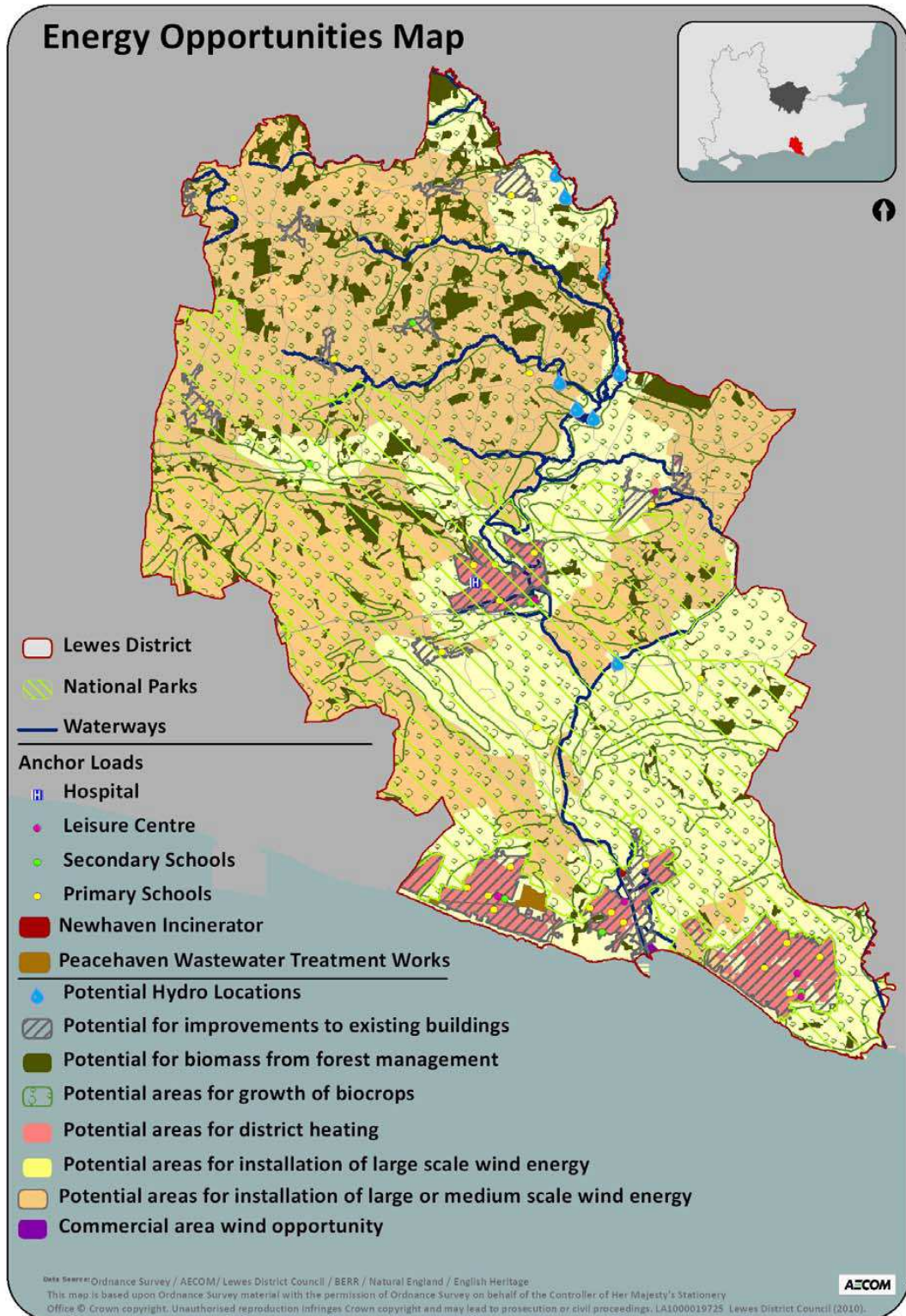
- *Do you agree with the approach that is proposed?*
- *Do you think there are other options that should be considered that would support and encourage sustainable transport use in the District?*

**Core Policy 14 – Renewable and Low Carbon Energy and Sustainable Use of Resources**

- 7.81 Strategic Objective 8 seeks a reduction in locally contributing causes of climate change, including through the implementation of the highest feasible standards of sustainable construction techniques in new developments. A number of the policy areas within this document (i.e. sustainable travel, flood risk, coastal erosion and sustainable drainage) can assist in the achievement of this objective, although none of them address the use of renewable and low carbon energy as well as the sustainable use of resources in any detail.
- 7.82 Efficient and sustainable energy use in new development is one particular area that can help in the achievement of this objective. In this regard, stepped improvements in Building Regulations will result in new residential development reaching ‘zero carbon’<sup>21</sup> from 2016 and non-domestic buildings being ‘zero carbon’ from 2019.
- 7.83 In light of the ambitious programme that will secure the delivery of ‘zero carbon’ buildings over the coming eight years, it seems that the role of the planning system is to help facilitate this.
- 7.84 A Renewable Energy & Low Carbon Development Study has been prepared as part of the evidence for the Core Strategy. Part of the output from this study is an Energy Opportunities Map, which identifies what renewable and low carbon technologies are most viable in different parts of the plan area.
- 7.85 The map is identified below. It is important to note that whilst the map should be used as a tool to indicate favourable options, it should not preclude further site specific investigation to confirm feasibility, or preclude the use of other options.

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<sup>21</sup> A building is zero carbon if it has net zero carbon emissions over the course of a year.



7.86 Considering the resource potential that is summarised in the Energy Opportunities Map it is considered that targets of 12% renewable heat and 30% renewable energy are considered appropriate for the District by 2020<sup>22</sup>.

<sup>22</sup> See Section 4.11 of the Renewable Energy & Low Carbon Development Study for further justification of these targets and what is meant by them.

- 7.87 Achieving ‘zero carbon’ buildings is only one aspect of building sustainability. The use of appropriate building materials, minimising waste and water efficiency are all additional aspects that can improve the sustainability of buildings. The Code for Sustainable Homes<sup>23</sup> covers all of these aspects.
- 7.88 Given that Lewes District has particular sensitivities to the likely impacts of climate change (tackling climate change is identified as one of the headline issues and challenges in section 3 of this document) and that the South East region is classified as a “water stressed” area by the Environment Agency, there seems to be justification for a policy approach that requires compliance with the full Code for Sustainable Homes standards (and not just the mandatory energy requirements of the Code that are as a result of tightening Building Regulations and the move towards ‘zero carbon’ developments). Such an approach is supported by the Renewable Energy & Low Carbon Development Study.
- 7.89 If the Council and National Park Authority are to require that full Code levels are to be met then it will be important to ensure that this will not place an undue financial burden upon developers. Therefore, the emerging policy approach proposes that full Code level requirements will not advance the tightening energy requirements that are being implemented through Building Regulations. Such an approach is not considered to place an undue financial burden upon developers<sup>24</sup>.
- 7.90 Obviously, the Code for Sustainable Homes only applies to residential development and there will be new development beyond this sector coming forward in Lewes District. Therefore, an emerging policy approach for building sustainability standards has been set for non-residential development, which again is supported by the Renewable Energy & Low Carbon Development Study.
- 7.91 Based on current evidence available, in particular the policy options that have been identified in the Renewable Energy & Low Carbon Development Study, the preferred strategy for renewable and low carbon energy and the sustainable use of resources in Lewes District is:

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<sup>23</sup> See: <http://www.breeam.org/page.jsp?id=86> for further information

<sup>24</sup> Code for Sustainable Homes: A Cost Review (CLG, 2010 - <http://www.communities.gov.uk/publications/planningandbuilding/codecostreview>) demonstrated that most of the costs associated with achieving Code Level 3 (and above) were to achieve the mandatory ENE1 energy requirements. The emerging policy does not require further improvements in energy use above that level required by Building Regulations.



#### **Potential approach to Core Policy 14**

1. Renewable and low carbon energy will be encouraged in all development, with proposals responding to opportunities identified in the Energy Opportunities Map. Locations and designs of development that can take advantage of opportunities for decentralised, renewable and low carbon energy will be encouraged.

2. Applications for low carbon and renewable energy installations will be supported, subject to the following issues being satisfactorily addressed:

- The contribution the scheme makes to meeting national and local renewable heat and energy targets.
- Whether it meets the National Park purposes.
- Landscape and visual impact
- Local amenity
- Ecology
- Cultural heritage, including the need to preserve and enhance heritage assets.

3. Developers of any strategic site allocations and broad locations for growth will be required to undertake an Energy Strategy that will seek to incorporate decentralised and renewable or low carbon technologies into their proposals. Where a site/location is to be developed in phases, the Energy Strategy will need to guide the development of the infrastructure to support renewable or low carbon technologies in a coordinated way.

4. To require all new dwellings to meet full Code for Sustainable Homes standards of at least Code level 3 from the point of adoption of this plan, and then at least Code level 4 once further updates to Part L of the Building Regulations come into effect (currently scheduled for 2013). All new non-residential developments over 1,000 square metres (gross floorspace) will be expected to achieve the BREEAM 'Very Good' standard.

7.92 Other approaches to this policy area which have been considered, but not recommended as the preferred approach at this stage are as follows:

#### **Other options considered**

**14(a)** To rely on Building Regulations to secure improvements in the sustainability of new developments.

#### **Questions to consider:**

- *Do you agree with the proposed approach for this policy area?*
- *Do you have any comments on the alternative options that have been considered, but not recommended for inclusion in the Core Strategy at this stage?*
- *Are there any additional options that should be considered?*

## **8. What happens next?**

- 8.1 Thank you for taking the time to read this document. Any comments you wish to make on any aspect of the document will be much appreciated and will help in developing the policies and proposals that will be contained within the next stage of this Core Strategy document. Details of how to submit comments are contained within the inside of the front cover.
- 8.2 Any comments submitted to the District Council, who are managing the consultation exercise, will be acknowledged and all respondents will be kept informed on the progress of the Core Strategy. The District Council and National Park Authority will compile a summary of the comments submitted, and at the time the next stage of the Core Strategy is published (the Proposed Submission document – see following paragraph) details will be provided as to how these comments have helped inform the content of the document.
- 8.3 The Core Strategy Proposed Submission document will be published for consultation in Spring 2012. Within this document will be the key decisions on the spatial strategy and core delivery policies, which have been made by the District Council and National Park Authority. These decisions will have been primarily informed by the stakeholder engagement undertaken, including consultation on this document, the evidence base prepared and the outcomes of the Sustainability Appraisal/Strategic Environmental Assessment process.
- 8.4 Following consultation on the Proposed Submission document the Core Strategy will be submitted for examination. Hence, comments that are made on the Proposed Submission document will be considered by the Inspector who undertakes the Examination. It is this Inspector who will deem whether the plan is 'sound', or not. If the plan is found to be sound then it will be adopted by the District Council and National Park Authority and it will become a key element in the development plan for Lewes District. Therefore it will be used in the determination of planning applications that are submitted in this area.

## Glossary

**Affordable housing** – housing, whether for rent or shared ownership, provided by a Registered Social Landlord at a cost that is considered affordable in relation to incomes that are average or below average, or in relation to the price of general market housing.

**Air Quality Management Areas (AQMA)** – areas that are designated by local authorities where, following an assessment of air quality, individual pollutants exceed standards defined in the National Air Quality Strategy.

**Annual Monitoring Report (AMR)** – a report that is prepared by a local authority, which assesses the impact of policies and whether targets for these policies are being met. Each Annual Monitoring Report is published at the end of the calendar year and it applies to the previous financial year.

**Appropriate Assessment** – an assessment that is required to be undertaken under a European Directive in order to assess the impact of a plan, project or proposal on sites designated to protect flora, fauna and habitats of European-wide interest.

**Catchment Flood Management Plan (CFMP)** – a plan that is prepared by the Environment Agency that sets out how they will work with other key decision makers within a river catchment to identify and agree policies for sustainable flood risk management.

**Commitments** – all proposals for development that are the subject of a current full or outline planning permission, or are unimplemented allocations in an existing Local Plan.

**Community Infrastructure Levy (CIL)** - a levy that local planning authorities can choose to charge on new developments in their area, in order that the burden of new infrastructure costs is shared by all development in a proportionate manner.

**Conservation Area** – an area designated under the Town and Country Planning (Listed Building and Conservation Areas) Act 1990 on account of its special architectural or historic interest, the character and appearance of which it is intended to preserve and enhance.

**Core Strategy** – sets out the long-term vision for the future of an area, the spatial objectives and strategic policies to deliver that vision.

**Developer Contributions** - contributions made by a developer to remedy the impact of development, either by paying money for work to be carried out or by directly providing facilities or works either on or off-site.

**Development Plan** - the statutory development plan is the starting point in the consideration of planning applications for the development or use of land.

**Development Plan Documents (DPDs)** – These will replace the Local Plan and have the same status for decision-making. More than one DPD can be used to provide for the Development Plan at the local level. Types of DPDs include the Core Strategy, Site Specific Allocations and Area Action Plans.

**Employment Land** - that which is in use for the following purposes – office, industrial and warehousing.

**Employment and Economic Land Assessment (also referred to as an Employment Land Review)** - an assessment of the demand for and supply of land for employment purposes. The suitability of sites for employment development are assessed to safeguard the best sites in the face of competition from other higher value uses and help identify those which are no longer suitable for employment development which should be made available for other uses.

**English Heritage** - government advisors with responsibility for all aspects of protecting and promoting the historic environment. English Heritage is responsible for advising the government on the listing of historic buildings.

**Environment Agency** - responsible for wide-ranging matters, including the management of water resources, surface water drainage, flooding and water quality.

**Evidence Base** - The information and data gathered by local authorities to justify the "soundness" of the policy approach set out in Local Development Documents, including physical, economic, and social characteristics of an area.

**Exception site** – a site, located outside a development boundary that should only be used for affordable housing to address the needs of the local community by accommodating households who are either current residents or have an existing family or employment connection.

**Floodplain** - an area of land over which water flows in time of flood or would flow but for the presence of flood defences and other structures where they exist.

**Flood Zone 1 (Low Probability)** - this zone comprises land assessed as having a less than 1 in 1000 annual probability of river or sea flooding in any year (<0.1%).

**Flood Zone 2 (Medium Probability)** - this zone comprises land assessed as having between a 1 in 100 and 1 in 1000 annual probability of river flooding (1% – 0.1%) or between a 1 in 200 and 1 in 1000 annual probability of sea flooding (0.5% – 0.1%) in any year.

**Flood Zone 3a (High Probability)** - this zone comprises land assessed as having a 1 in 100 or greater annual probability of river flooding (>1%) or a 1 in 200 or greater annual probability of flooding from the sea (>0.5%) in any year.

**Flood Zone 3b (Functional Floodplain)** - this zone comprises land where water has to flow or be stored in times of flood (land which would flood with an annual probability of 1 in 20 (5%) or greater in any year or is designed to flood in an extreme (0.1%) flood)

**Housing Association** - a non-profit making, independent organisation that provides housing; generally they provide accommodation for people in housing need who are unable to afford to buy or rent housing on the open market.

**Infill development** – development of a vacant site in a substantially developed frontage or area.

**Infrastructure** – the basic requirements for the satisfactory development of an area and include such things as roads, footpaths, sewers, schools, open space and other community facilities.

**Landscape Character Assessment** - an assessment to identify different landscape areas which have a distinct character based on a recognisable pattern of elements, including combinations of geology, landform, soils, vegetation, land use and human settlement.

**Listed Building** – a building of special architectural or historic interest as designated by English Heritage on behalf of the Department for Culture, Media and Sport, this is a statutory listing.

**Local Plan** – adopted in 2003 this document currently provides the policy framework for the District.

**Local Development Framework (LDF)** – A loose leaf folder, prepared by each Local Planning Authority, containing Local Development Documents. It will replace Local Plans and together these documents will provide the framework for delivering the spatial planning strategy for the Local Planning Authority area

**Local Development Scheme (LDS)** – A document setting out the programme for the preparation of the Local Development Documents. It sets out a 3-year programme and includes information on consultation dates.

**Local Strategic Partnership (LSP)** - A local strategic partnership is a partnership of stakeholders who develop ways of involving local people in shaping the future of their neighbourhood in how services are provided. They are often single, multi-agency bodies which aim to bring together locally the public, private, community and voluntary sectors.

**Local Transport Plan (LTP)** - A fifteen year integrated transport strategy, prepared by local transport authorities in partnership with the community, seeking funding to help provide local transport projects. An Implementation Plan is prepared that sets out capital programme allocations for planned highways maintenance, bridge and structures maintenance and strengthening, and for rights of way.

**National Planning Policy Framework (NPPF)** – national planning policy will eventually be contained within this framework and it will replace the current Planning Policy Statements and Guidance notes. A consultation draft of this framework was issued in July 2011.

**Natural England** - responsible for ensuring that England's natural environment, including its land, flora and fauna, freshwater and marine environments, geology and soils are protected and improved. It also has a responsibility to help people enjoy, understand and access the natural environment.

**Planning Policy Statement (PPS) / Planning Policy Guidance (PPG)** – Statements setting out the Government's policy framework at the national level on planning issues such as housing, employment and rural areas.

**Previously Developed Land** – for the purposes of housing policy in PPS3, land which is or was occupied by a permanent (non-agricultural) structure and associated fixed surface infrastructure, including the curtilage of the development, in urban and rural areas. It excludes land and buildings that have been used for agricultural purposes, forest and woodland, and land in built-up areas, which has not been developed previously

**Registered Social Landlords (RSL)** - these are independent housing organisations registered with the Housing Corporation under the Housing Act 1996. Most are housing associations, but there are also trusts, co-operatives and companies.

**Section 106 agreement** - A legal agreement under section 106 of the 1990 Town & Country Planning Act. Section 106 agreements are legal agreements between a planning authority and a developer, or undertakings offered unilaterally by a developer, that ensure that certain extra works related to a development are undertaken.

**Shoreline Management Plan (SMP)** - a large-scale assessment of the risks associated with coastal processes and helps reduce these risks to people and the developed, historic and natural environments. Coastal processes include tidal patterns, wave height, wave direction and the movement of beach and seabed materials.

**Site of Special Scientific Interest (SSSI)** – an area of special interest by reason of its flora, fauna, geological or physiographical features as identified by Natural England and designated under the Wildlife and Countryside Act 1981.

**Site of Nature Conservation Importance (SNCI)** – an area (non-statutory) designated as being of county or regional wildlife value.

**Spatial Planning** - spatial planning goes beyond traditional land use planning to bring together and integrate policies for the development and use of land with other policies and programmes which influence the nature of places and how they function. This will include policies which can impact on land use, for

example, by influencing the demands on or needs for development, but which are not capable of being delivered solely or mainly through the granting of planning permission and may be delivered through other means.

**Special Area of Conservation (SAC)** - designated natural habitat areas to comply with the EU Directive on the Conservation of Natural Habitats and of Wild Fauna and Flora Directive. Member states are required to identify sites for designation and establish measures necessary for conservation.

**Special Protection Area (SPA)** – designated wild bird areas to comply with the EU Directive on the Conservation of Wild Birds.

**Statement of Community Involvement (SCI)** – sets out the ways in which the Local Planning Authority will consult the community and stakeholders, not only on other LDDs but also on major planning applications.

**Supplementary Planning Documents (SPDs)** – these can be produced to provide policy guidance to supplement the policies and proposals in DPDs. However they do not form part of the Development Plan although they must undergo a formal process of consultation.

**Sustainable Community Strategy (SCS)** - prepared by Local Strategic Partnerships as a set of goals and actions which they, in representing the residential, business, statutory and voluntary interests of an area, wish to promote. The SCS should inform the Local Development Framework and act as an umbrella for all other strategies devised for the area.

**Strategic Flood Risk Assessment (SFRA)** - An assessment of the likelihood of flooding in a particular area so that development needs and mitigation measures can be carefully considered.

**Strategic Housing Land Availability Assessment (SHLAA)** - provides information about potential future sources of land for housing and is a key part of the evidence base. The SHLAA is not a policy document.

**Sustainability Appraisal (SA)/Strategic Environmental Assessment (SEA)** – Local Planning Authorities are required to assess the environmental and sustainability impact of policies and proposals in Development Plan Documents and Supplementary Planning Documents. This is a tool for appraising policies to ensure that they reflect sustainable development objectives, i.e. social, environmental and economic factors.

**Windfall site** - a site not specifically allocated for development in a development plan, but which unexpectedly becomes available for development during the lifetime of a plan. Most "windfalls" are referred to in a housing context. They tend to be small sites for a small number of homes.