

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

**Lewes District Local Plan: Part 1  
Joint Core Strategy**

**Lower Hoddern Farm,  
Peacehaven (MM14)**

**Proposed Modifications Background Paper**

**August 2015**

## **Justification for Proposed Main Modification MM14: Lower Hoddern Farm, Peacehaven**

**Site area:** 11 ha

**Current land use:** Agricultural land (Grade 2)

**Ownership:** The Appleton family owns the entire site

1. This paper has been prepared to provide further detail and explanation of the Proposed Modification MM14, to supplement the justification text included in the proposed modification. MM14 has been drafted in response to the Inspector's Initial Findings Letter [ID-05].

### **Topography**

2. The site slopes gently towards the south and is predominantly flat in the northern half with the highest point at the north western corner (approximately 46m AOD). A dry valley extending from the South Downs to the north east extends into the southern part of the Site and creates a gentle undulating effect. The lowest point on the site is approximately 35m AOD in the south east corner.

### **Adjacent land uses**

3. Existing residential estate development is located along the western boundary of the site. A small agricultural field extends along the northern boundary, beyond which are located some residential properties and commercial units, the latter predominantly used for vehicle servicing and repairs. Agricultural land and part of the Peacehaven Centenary Park abut the eastern boundary, beyond which lies the South Downs National Park and the Peacehaven Waste Water Treatment Works (WTW). The latter is largely hidden from public view by an extensive landscaped bund and a 'green' roof. Peacehaven Community College and the Centenary Park are located on the southern boundary.

### **Access**

4. Opportunities for vehicular access to the site exist at Pelham Rise to the north west and from the current owner's right of access from Hoyle Road to the south. The existing residential road network to the west of the site provides opportunities for pedestrian/cycle access to the Meridian Centre and other facilities, whilst the proximity of Peacehaven Centenary Park to the south offers opportunities to access the National Park public rights of way network via a well-used bridleway (Peacehaven 7a).

### **Development constraints**

5. No abnormal build costs have been identified. The site is not located in an area at risk of flooding.

6. 'Saved' Policy PT18 of the adopted Lewes District Local Plan 2003<sup>1</sup> allocates approximately 2 ha of land at the southern extremity of the site for public open space and sports pitches to serve the Peacehaven area.
7. East Sussex County Council has identified the entire site as an Archaeological Notification Area (ANA). ANAs define currently known and recorded areas of heritage sensitivity and assist in meeting to meet the aims of the National Planning Policy Framework (128) which states that 'as a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes or has the potential to include heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.'
8. Southern Water, in its response to the public consultation on the Emerging Core Strategy, expressed concerns about the proximity of the site to the Peacehaven WTW and advised that "*the landowner/developer should therefore commission an assessment to determine how far housing development should be separated from the works....*" Mouchel Ltd were accordingly commissioned by the Appleton family to evaluate the likely impact of the WTW on the proposed Lower Hoddern Farm development at sensitive receptors.
9. The Odour Assessment Report<sup>2</sup> published by Mouchel concluded that '*Analysis of the available information indicates that there are no significant contributions from the WTW likely to cause odour nuisance in the opening year of the proposal at sensitive locations.*'
10. East Sussex County Council, as the local highway authority, also raised concerns about the impact of the additional residential development in this location on the capacity and operation of the A259, which provides the principal road link between the coastal settlements in the district. It has concluded from the Newhaven Transport Study 2011<sup>3</sup>, together with subsequent transport modelling work, that the only option for unlocking housing growth in Peacehaven lies in the promotion of effective enhancements to existing bus services and infrastructure along the A259 corridor in order to increase the share of total person demands by bus for the whole coastal area. Further housing development is also contingent on the delivery of a number of transport infrastructure improvements, including improvements to the operation of the A259/Telscombe Cliffs Way junction, the Sutton Avenue roundabout, and the Newhaven Ring Road.

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<sup>1</sup> <http://www.lewes.gov.uk/planning/localplan.asp>

<sup>2</sup> [http://www.lewes.gov.uk/Files/plan\\_REP-286-003b\\_Appendix\\_B\\_Issue\\_15\\_Odur\\_Study.pdf](http://www.lewes.gov.uk/Files/plan_REP-286-003b_Appendix_B_Issue_15_Odur_Study.pdf)

<sup>3</sup> [http://www.lewes.gov.uk/Files/plan\\_Newhaven\\_transport\\_study\\_report.pdf](http://www.lewes.gov.uk/Files/plan_Newhaven_transport_study_report.pdf)

## SHLAA

11. The site (Ref. 24PT) was assessed in the 2010 SHLAA as suitable, available and achievable.

## Landscape Capacity

12. The Lewes District Council and South Downs National Parks Authority 'Landscape Capacity Study' (September 2012)<sup>4</sup> was undertaken to inform the emerging Core Strategy by identifying where development could be accommodated in the District without unacceptable landscape impact. It concludes that Peacehaven and Telscombe are the towns with the greatest potential for development growth in terms of landscape capacity, and that the largest area with scope for development is the land south of Lower Hoddern Farm. The Study notes that this land lies outside of the National Park and development would provide an opportunity to strengthen the surrounding landscape through improving the existing hard urban edge.

## Issues & Emerging Options Topic Papers 2010

13. The District Council published a number of Core Strategy *'Issues & Emerging Options'* Topic Papers for public consultation between 21 May 2010 and 16 July 2010. These Topic Papers brought together previous engagement work undertaken with District Councillors, representatives of Town and Parish Councils, and members of the Local Strategic Partnership.
14. The aim of the public consultation was to ensure that the Council had identified the relevant issues and challenges facing the district and to seek public views on the proposed spatial vision, strategic objectives and policy direction over the plan period. Topic Paper 5, *Developing a Strategy for Accommodating and Delivering Growth*<sup>5</sup>, sought views on the option of greenfield extensions on land adjoining the built up boundary of Peacehaven and Telscombe (Option 9, page 6).
15. A summary of the comments received on this option, and how these comments influenced the emerging Core Strategy, is set out in the *Summary of Consultation on the Core Strategy: Issues and Emerging Options Topic Papers*<sup>6</sup>. Representations were equally split in favour and against the option (pages 33-35).

## Emerging Core Strategy 2011

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<sup>4</sup> [http://www.lewes.gov.uk/Files/plan\\_LCS\\_2012.pdf](http://www.lewes.gov.uk/Files/plan_LCS_2012.pdf)

<sup>5</sup> [http://www.lewes.gov.uk/Files/plan\\_corestrategy\\_LDFTopicPaper5.pdf](http://www.lewes.gov.uk/Files/plan_corestrategy_LDFTopicPaper5.pdf)

<sup>6</sup> [http://www.lewes.gov.uk/Files/plan\\_representations2010.pdf](http://www.lewes.gov.uk/Files/plan_representations2010.pdf)

16. The Emerging Core Strategy<sup>7</sup> was published for public consultation between 30 September 2011 and 2 December 2011. It identified land at Lower Hoddern Farm as a potential option for a strategic housing allocation for up to 450 dwellings. The document noted that Peacehaven has a significant level of housing need, that Lower Hoddern Farm had been assessed as 'deliverable' in the 2011 SHLAA, and that ESCC, as the local highway authority, had advised that this option could be satisfactorily accommodated by the local transport network.
17. A summary of the comments received on this option and how these comments influenced the Proposed Submission Document is set out in the *Summary of Consultation on the Emerging Core Strategy*<sup>8</sup>. 22 respondents supported the Lower Hoddern Farm option and 13 objected, including Peacehaven Town Council.

### **The Proposed Submission Core Strategy 2013**

18. Following the publication of the Emerging Core Strategy, East Sussex County Council changed its view on the acceptable level of traffic growth that could be accommodated on the A259 west of Peacehaven. The County Council's new transport advice was set out in the document '*New housing in Peacehaven and Newhaven. Impacts on the A259 west of Peacehaven; on Newhaven Ring Road, and consequences for housing numbers*', September 2012<sup>9</sup>.
19. As a result of this updated transport advice, which concluded that in the morning peak on the A259 west of Peacehaven the headroom for additional westbound traffic is only 70 vehicles per hour, no strategic housing allocation was proposed in Peacehaven and Telscombe in the Proposed Submission Core Strategy. Housing allocations to meet the planned level of housing growth of 220 dwellings in Peacehaven and Telscombe were at that stage anticipated to be allocated through either a Neighbourhood Plan or the Local Plan Part 2 (Site Allocations and Development Management Policies Development Plan Document).

### **Future Development**

20. Any proposed development at Lower Hoddern Farm would need to take account of the following opportunities:
- i. To improve the character and quality of the existing urban edge

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<sup>7</sup> [http://www.lewes.gov.uk/Files/plan\\_Emerging\\_Core\\_Strategy\\_Final.pdf](http://www.lewes.gov.uk/Files/plan_Emerging_Core_Strategy_Final.pdf)

<sup>8</sup> <http://www.lewes.gov.uk/planning/20616.asp>

<sup>9</sup> [http://www.lewes.gov.uk/Files/plan\\_TransportAdvice\\_2012.pdf](http://www.lewes.gov.uk/Files/plan_TransportAdvice_2012.pdf)

- ii. To provide an enhanced setting to the open undulating landscape adjacent to, or within, the South Downs National Park
- iii. To improve pedestrian and cycle connections to existing the Meridian Centre, local schools, community facilities, including the Centenary Park, and local employment opportunities
- iv. To provide improved connectivity, accessibility and permeability for existing and proposed residents in the northern parts of Peacehaven.

21. A Masterplan Report for Lower Hoddern Farm<sup>10</sup> has been produced by Allen Pyke Associates. This report demonstrates that 450 dwellings can be accommodated by the proposed allocation, in accordance with the development density guidelines proposed in Core Policy 2 of the Submission Core Strategy, whilst at the same time enhancing the existing urban edge and setting of the South Downs National Park.

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<sup>10</sup> [http://www.lewes.gov.uk/Files/plan\\_REP-286-003a\\_Appendix\\_A\\_Issue\\_15 -  
Landscape and Masterplan Study.pdf](http://www.lewes.gov.uk/Files/plan_REP-286-003a_Appendix_A_Issue_15_-_Landscape_and_Masterplan_Study.pdf)