



Lewes District Council

To all Members of the Cabinet

A meeting of the **Cabinet** will be held in the **Ditchling Room, Southover House, Southover Road, Lewes Southover House, Southover Road, Lewes** on **Thursday, 28 April 2016** at **14:30** which you are requested to attend.

Please note the venue for this meeting which is wheelchair accessible and has an induction loop to help people who are hearing impaired.

This meeting may be filmed, recorded or broadcast by any person or organisation. Anyone wishing to film or record must notify the Chair prior to the start of the meeting. Members of the public attending the meeting are deemed to have consented to be filmed or recorded, as liability for this is not within the Council's control.

20/04/2016

Catherine Knight
Assistant Director of Corporate Services

Agenda

- 1 Minutes**
To approve the Minutes of the meeting held on 21 March 2016 (copy previously circulated).
- 2 Apologies for Absence**
- 3 Declarations of Interest**
Disclosure by councillors of personal interests in matters on the agenda, the nature of any interest and whether the councillor regards the interest as prejudicial under the terms of the Code of Conduct
- 4 Urgent Items**
Items not on the agenda which the Chair of the meeting is of the opinion should be considered as a matter of urgency by reason of special circumstances as defined in Section 100B(4)(b) of the Local Government Act 1972
- 5 Public Question Time**

To deal with any questions received from members of the public in accordance with Council Procedure Rule 11 (if any).

6 Written Questions from Councillors

To deal with written questions which councillors may wish to put to the Chair of the Cabinet in accordance with Council Procedure Rule 12 (if any).

7 Matters Referred to the Cabinet

Matters referred to the Cabinet (whether by the Scrutiny Committee or by the Council) for reconsideration by the Cabinet in accordance with the provisions contained in the Scrutiny Procedure Rules or the Budget and Policy Framework Procedure Rules set out in Part 4 of the Council's Constitution.

None.

8 Reporting Back on Meetings of Outside Bodies

To receive feedback from the Council's representatives who serve on outside bodies in respect of meetings they have attended (if any).

9 Reports from Officers

- Key Decisions

9.1 Newhaven Enterprise Zone - Report

Cabinet Member: Councillor Smith

To consider the Report of the Director of Business Strategy & Development (Report No 60/16 herewith – page 4).

9.2 Adoption of the Lewes District Local Plan Part 1 - Joint Core Strategy - Report

Cabinet Member: Councillor Jones

To consider the Report of the Director of Business Strategy and Development (Report No 61/16 herewith – page 42).

- Non-Key Decision

9.3 Special Meeting of the Cabinet - 25 May 2016

Cabinet Member: Councillor Smith

To note that a Special Meeting of the Cabinet will be held in the Ditchling Room, Southover House, Southover Road, Lewes, on Wednesday, 25 May 2016 commencing at 1.00pm at which consideration will be given to a Report relating to the Joint Transformation Programme.

For further information about items appearing on this Agenda, please contact Trevor Hayward at Southover House, Southover Road, Lewes, East Sussex BN7 1AB. Telephone 01273 471600

Distribution:

Councillors: P Franklin, B Giles, T Jones, R Maskell, E Merry, T Nicholson and A Smith

Agenda Item No: 9.1 **Report No:** 60/15
Report Title: Newhaven Enterprise Zone
Report To: Cabinet **Date:** 28 April 2016
Cabinet Member: Cllr Andy Smith, Leader of the Council
Ward(s) Affected: Newhaven Valley and Newhaven, Denton & Meeching Wards
Report By: Nazeya Hussain – Director of Business Strategy & Development
Contact Officers-

Name(s): Peter Sharp
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Purpose of Report:

To receive an update on the creation of an Enterprise Zone in Newhaven and consider the resource implications ahead of implementation from April 2017.

Officers Recommendation(s):

- 1 To note the successful application – in partnership with Coast to Capital Local Enterprise Partnership (LEP) - to create an Enterprise Zone on eight key sites across Newhaven to facilitate inward investment, offer value for money and sustain local economic growth, in line with the Government’s key assessment criteria for new Enterprise Zones.
- 2 To note that the Enterprise Zone will officially commence in April 2017 and that there is a significant level of preparatory work required as it is a proposal of regional significance.
- 3 To authorise the Director of Business Strategy & Development to investigate the use of Article 4 Directions to assist in safeguarding Enterprise Zone sites for employment uses.
- 4 To authorise the Director of Service Delivery to waive fees for pre-application advice for sites within the Newhaven Enterprise Zone.
- 5 To authorise the Director of Business Strategy & Development to agree a governance structure with Coast to Capital LEP and Government, and to engage with key supporting partners and landowners through a multi-agency Implementation Team to ensure a holistic approach to the Enterprise Zone.

- 6 To allocate an initial project budget of £150,000 to forward fund the range of support and materials required to successfully establish an Enterprise Zone in Newhaven from the existing Business Rates pooling scheme.
- 7 To note that Coast to Capital LEP will be required to sign a Memorandum of Understanding with the Secretary of State for Communities and Local Government.

Reasons for Recommendations

- 1 Enterprise Zones are economic development promotional incentives based on financial incentives to business occupiers and local authorities. Enterprise Zone status lasts for 25 years from commencement date (April 2017).
- 2 Whilst it is a considerable achievement to have gained Enterprise Zone status for these eight sites across Newhaven, there is a considerable amount of resource required to deliver success as quickly as possible following the start of the Enterprise Zone in April 2017. This is a 25 year project and we are at the early stages of planning for implementation.
- 3 Enterprise Zones across the UK have typically made use of their status through a simplification of planning legislation, making the process more attractive to developers and landowners through a variety of measures including Local Development Orders, Article 4 Directions and reduced fees.
- 4 Governance of the EZ is responsibility of the Coast to Capital LEP, but LDC will need to work with all partners and stakeholders to ensure a governance structure that builds on existing positive working relationships in the town.
- 5 The Memorandum of Understanding is a key agreement between Coast to Capital LEP and the Government, which sets out key operational agreements and lines of accountability to give Government confidence on the ability of the Newhaven Enterprise Zone to deliver.

Information

6 Local Challenges and Opportunities

- 6.1** Newhaven faces a number of challenges and opportunities. These include pockets of high unemployment, low skills and poverty of aspiration; a substantial net outflow of commuters due to paucity of employment opportunities; a weak economic base associated with the decline in traditional port and related manufacturing industries; and poor quality commercial property that is unsuitable for modern business needs within emerging higher value sectors.
- 6.2** At the same time, Newhaven has a real opportunity for growth, with money being committed through the Greater Brighton City Deal and Local Growth Funding to improve flood defences in the town and build a new Port Access Road, as well as the identified opportunity to establish Newhaven as a 'Clean Tech' Growth Hub linked to the development of the University Technical College, E.ON's Rampion Offshore Wind Farm and Newhaven Growth Quarter.
- 6.3** The designation of key sites in Newhaven as an Enterprise Zone is the next step in ongoing regeneration activities in the town and is a major proposal of regional significance. Commencing in April 2017, the Enterprise Zone is forecast to create around 55,000m² of new commercial floorspace, refurbish a further 15,000m² of commercial floorspace and create / sustain around 2,000 jobs over the zone's 25-year lifespan.

7 Enterprise Zones

- 7.1** Enterprise Zones are a central pillar of the Government's long-term plan to rebalance the economy. In total, the Government is investing £330 million to support Enterprise Zones to realise their potential as engine rooms of local economies.
- 7.2** There are now 44 Enterprise Zones across England (including Newhaven) that have been announced. To date¹, the 24 previously established Enterprise Zones have attracted more than 560 businesses, secured £2.2 billion of private sector investment and created over 20,000 local jobs. Enterprise Zones have been successful in attracting world class companies and their suppliers, as well as stimulating local business formation, clustering and growth.
- 7.3** Enterprise Zone status brings with it a number of benefits. These include:
- i.** A business rates discount that could be worth² up to £250,000 per business over a five-year period.

¹ Enterprise Zones Press Release 1 December 2015

² The exact value of the discount will vary due to the £ to Euro exchange rate, as it is based on European State Aid thresholds.

- ii. All business rates growth within the Enterprise Zone for a period of at least 25 years will be retained by the local area, to support the LEP's economic growth and ensure that EZ growth is reinvested locally.
- iii. Government help to develop simplified planning approaches for the EZ using, for example, existing Local Development Order powers.
- iv. Government support to ensure that superfast broadband is rolled out throughout the EZ, achieved through guaranteeing the most supportive regulatory environment and, if necessary, public funding.
- v. Potential to implement Tax Increment Financing (TIF) schemes to borrow capital for the development of infrastructure.
- vi. Focused support from UK Trade & Investment (UKTI) to market EZ's to overseas markets and encourage inward investment.

7.4 It is also worth noting that, whilst local authorities will play a key delivery role in Enterprise Zones, the accountability to Government lies with Local Enterprise Partnerships and EZ's are an agreement between LEPs and Government. In the case of Newhaven, this is Coast to Capital LEP.

8 EZ Newhaven

8.1 The successful EZ bid covers eight non-contiguous sites and a total of 79 ha. In this respect Newhaven is unusual, as the majority of Enterprise Zones are on linked / adjoining sites. As noted by Genecon³, Enterprise Zone status is rare for urban centres (typically due to difficulties associated with multiple land ownerships as well as the lack of space for major companies to occupy) and so the achievement in successfully gaining Enterprise Zone status for Newhaven should be noted.

8.2 There are eight sites in EZ Newhaven, as mapped in Appendix 1. These sites are:

- i. East Quay (19 ha)
- ii. Eastside North (5.2 ha)
- iii. Eastside South (2.2 ha)
- iv. North Quay (13.4 ha)
- v. Railway Quay (4.6 ha)
- vi. Bevan Funnell (2.4 ha)
- vii. Town Centre (5.9 ha)

viii. Avis Way Industrial Estate (26.7 ha)

- 8.3** The rationale for the inclusion of these sites is varied, but includes the desire to safeguard employment space from inappropriate residential development, enhance existing commercial floorspace through making re-investment more attractive for owners and occupiers, and to support the delivery of dormant sites that have been restricted due to lack of viability.
- 8.4** The majority of these sites are privately owned, although significant portions of both the Town Centre and Avis Way are in the Council's ownership.
- 8.5** The Council has undertaken a detailed analysis of the potential benefits of the Enterprise Zone for Newhaven. This estimates that, commencing in April 2017, EZ status will directly lead to the creation of around 55,000m² of new commercial floorspace, refurbish a further 15,000m² of commercial floorspace and create and sustain around 2,000 jobs over the zone's 25-year lifespan.
- 8.6** Alongside the other Newhaven-focused regeneration activity, the Enterprise Zone therefore has the potential to have a significant positive impact on local residents, businesses and economic growth. Enterprise Zone status also places a strong emphasis on the commercial proposition – ensuring effective place-making and the need for a mix of residential, commercial and industrial development across the eight key strategic sites identified.
- 8.7** It is important to note that the Council and Coast to Capital LEP are in the early stages of developing mechanisms to facilitate delivery of the EZ in Newhaven, and these are the first steps in a wide-ranging 25-year project.
- Coast to Capital LEP*
- 8.8** Coast to Capital LEP is unique amongst Local Enterprise Partnerships in that it spans the UK's two strongest economic regions – Greater London and the South East.
- 8.9** The Council has a strong working relationship with Coast to Capital, who have previously included the plans for an Enterprise Zone in Newhaven within their Strategic Economic Plan (published March 2014). The LEP supported the Council in preparing the successful submission, acting as a liaison with Government to ensure that the Newhaven bid met the key criteria for designation.
- 8.10** As noted in paragraph 7.4, ultimate responsibility for the delivery of EZ Newhaven lies with Coast to Capital LEP. However the onus for implementation will fall upon the Council and its local partners, with greater specialist knowledge of the needs of the town and the conditions that must be created for Newhaven's economy to thrive.

- 8.11** Coast to Capital LEP has agreed that 100% of the uplift in business rates as a result of EZ designation will be re-invested in the local area to support delivery of the Enterprise Zone, including site-specific issues and wider infrastructure constraints.

South East LEP

- 8.12** Lewes District is also part of South East LEP (SELEP), which spans East Sussex, Kent and Essex. SELEP has actively supported the Council's ambitions to establish an EZ. Officers will ensure that SELEP is kept fully informed of progress as the EZ develops and, where synergies emerge, to work closely with other Enterprise Zones in the SELEP area.

9 EZ Planning

- 9.1** Enterprise Zone designation offers an opportunity for the Council to consider certain planning measures within the selected sites. There are a range of such measures that could be used to support business investment within the Enterprise Zone. These include:
- 9.2 Local Development Orders:** Local Development Orders (LDO's) are made by local planning authorities and give a grant of planning permission to specific types of development within a defined area. They are meant to streamline the planning process by removing the need for developers to make a planning application to the local planning authority for certain types of development and uses that are specified in the Order.
- 9.3** Given the focus for the Enterprise Zone will be to support new and expanded businesses and job creation, any LDO's would be focused on such schemes. Some of the existing Enterprise Zones in the country have introduced LDO's, although the feedback on their effectiveness has been mixed. The resources required to introduce a LDO are not insignificant, and it will take a minimum of 12 months to implement.
- 9.4 Article 4 Directions:** These directions are used to remove certain permitted development rights in specific areas, and therefore require planning applications to be submitted and determined for proposals that would otherwise not need planning permission. A number of these already exist in the District, although they have generally been used to remove permitted development rights for certain householder proposals in Conservation Areas.
- 9.5** Where Article 4 Directions could have a role within the sites in the Enterprise Zone is with regards to the ability for offices and potentially light industrial buildings becoming residential properties without the need for planning permission. In 2013, the Government introduced permitted development rights that would allow for the change of use from office to residential. This was initially a temporary measure and due to expire in May 2016. In October 2015, however, the Government announced that this permitted development right was to be made permanent and also be expanded to allow for the demolition of office buildings to allow for new residential schemes to come forward. In addition, it was proposed that

light industrial buildings could become residential without the need for planning permission. Secondary legislation to allow for these changes to be implemented is expected to come forward this Spring.

- 9.6** In a number of locations, particularly in London and the South East, there have been very serious concerns raised over these permitted development rights. These have been caused by areas having only a limited supply of existing and potential sites and premises for employment use, and hence the loss of these can impact upon the long-term ability for an area to supply and deliver jobs to support the resident population. Such losses are happening due to the higher market value of residential land and premises being so much greater than employment land and premises, meaning that obtaining such changes of use is a significant financial incentive. Although not yet impacted as greatly as some other areas, Lewes District has not been immune to the loss of employment land and premises through permitted development rights (although in some instances these losses may be deemed appropriate). Certain authorities, including Brighton & Hove City Council, have sought to control such losses by removing the permitted development rights through an Article 4 Direction.
- 9.7** However, this is not to say that residential development will be unacceptable in all instances within the Enterprise Zone. In some cases, residential development may support delivery, improve viability and help to achieve wider regeneration aims for sites, particularly as part of mixed-use schemes.
- 9.8** Given that the key driver of Enterprise Zone designation is to boost local economic growth in Newhaven, there is a risk that the permitted development rights that are due to be made permanent and expanded upon could undermine this aim. There is considered to be merit in investigating whether the Council should introduce Article 4 Directions across parts of the Enterprise Zone to remove these permitted development rights and ensure that these sites remain a focus for employment and enterprise.
- 9.9** In some of the sites within the Enterprise Zone there may not be a need for this as the Council, as landowner, will have control over the future use of premises. With certain other sites, such as the undeveloped land to the east of the river (Eastside North and South), there are no current buildings that would be able to benefit from these permitted development rights, and should they be developed for employment purposes there is always the option to remove permitted development rights in the granting of planning permission. There is also the case that in certain locations, particularly in the Town Centre, the loss of some employment premises to residential may be entirely appropriate, particularly if this is tied in with a wider regeneration proposal.
- 9.10** However, there is still considered to be some merit in investigating such 'interventions' within parts of the Enterprise Zone, particularly as some existing employment land has already been lost through these permitted development rights within one of the Enterprise Zone sites.

- 9.11 Compulsory Purchase Orders:** Consideration is also being given to the option to purchase other sites within the EZ using Compulsory Purchase Orders (CPO's). This will be in order to ensure delivery of the EZ vision and / or development plan policies for those sites affected. Should a need to CPO a specific site be identified, Officers will report to Cabinet for further instruction.
- 9.12 Additional Planning Measures:** In some existing Enterprise Zones, local planning authorities have offered a higher level of service standards when it comes to processing and determining planning applications within the Enterprise Zone. In some cases, this has meant guaranteed timeframes for determination, a dedicated Enterprise Zone Planning team and Committee and / or the waiving of pre-application fees for proposals that deliver on the aims of the Enterprise Zone.
- 9.13** In the case of Newhaven, there is unlikely to be a sufficient volume of planning applications and proposals to merit a dedicated Enterprise Zone Planning team. This is not to say, however, that there will not be an increase in workload for the Planning team, within both Development Management and Strategic Policy. Such workloads will need to be kept under review.
- 9.14** Following initial discussions with affected landowners, and by looking at the past performance for determining the types of applications we will be expecting in the Enterprise Zone, there is not considered to be a need to have any separate standards and arrangements for processing and determining planning applications within the Enterprise Zone. This will again be something kept under review should the Council's performance, in terms of time taken to process planning applications, deteriorate significantly.
- 9.15** The waiving of pre-application fees for schemes within the Enterprise Zone is likely to be more beneficial. This would be conditional upon the proposals being employment-led schemes (ie. creating net increases in job provision) and that no other statutory consultees who input into the process seek to recharge the Council (although this is generally not an issue). The current pre-application fees that we charge can be viewed at Appendix 3. It does need to be borne in mind that should these changes be waived, it will be alongside a likely increase in workloads for the Planning team (primarily for Development Management Officers). However, by not charging for such advice, the Council would send out a positive message to landowners and developers of the type of schemes we are seeking to encourage in the Enterprise Zone, and act as an incentive for them to engage with the Council at the earliest opportunity and therefore improve the chances of their eventual application being successful.
- 9.16** Following a review of the options, Officers feel that the best option is to further explore the use of Article 4 Directions. Given that the Secretary of State has the ability to 'call in' these proposed Directions and amend / reject them, Officers will gauge the views of DCLG before progressing any such proposals. We will also await clarification as to what the

Secondary Legislation will state on this matter. It is also recommended that the waiving of pre-application fees for employment-related uses within the Enterprise Zone sites is approved and implemented immediately, to ensure that the Zone gains the maximum possible traction from commencement in April 2017.

10 EZ Governance

10.1 Government expects all Enterprise Zones to have clear and accountable governance and delivery mechanisms in place prior to the EZ commencing. This includes a requirement to provide regular reports back to Government on progress. Specific obligations will include:

- To establish a Governance Group including representation from DCLG, BIS, UKTI and HCA that will meet on a quarterly basis;
- The development of an Implementation Plan to be submitted to the Secretary of State, which sets out a five-year plan with priorities and a robust delivery mechanism;
- The development of an EZ-specific Marketing Strategy to be agreed by the Secretary of State in partnership with local agencies;
- To ensure local partners are able to promptly obtain the necessary approvals, authorisations, consents, exemptions, licences, permit permissions (including planning permissions) or registrations necessary to deliver the benefits of the Enterprise Zone.

10.2 It is therefore proposed that new governance arrangements are put in place which reflect the Government's guidelines whilst ensuring local partners are engaged to ensure timely delivery. A form of governance is not yet in place, but will be developed over the coming months. The EZ is a 25 year project and the governance is one of a number of critical things which the partners need to take a view on to be clear about delivery.

10.3 The Coast to Capital LEP is ultimately answerable to Government for the implementation of the EZ, and so they will need to have a governance structure that offers them the necessary assurance. Therefore any governance arrangements will need to be agreed by the C2C Board, through a Memorandum of Understanding (MoU). A draft MoU has been prepared by Government and is attached as Appendix 4.

10.4 We will also work with C2C to ensure that elected members at all relevant tiers of local government retain an oversight role, probably through some form of Members Oversight Board.

10.5 More detailed elements of programme delivery will be overseen by an Implementation Team that would include all delivery partners, including landowners. This team would report into the agreed Governance Board.

11 EZ Marketing

- 11.1** It is proposed that the key sites will be marketed in phases to ensure that land values in the market are not deflated by the availability of developable sites with attractive terms for investors and occupiers. The Council will work closely with existing landowners to coordinate marketing activities, as well as addressing site-specific issues on case-by-case basis.
- 11.2** There will also be a requirement to develop a suitable range of marketing materials for promotional purposes. These are likely to include a dedicated website for the Enterprise Zone as well as branding and a social media presence, although the detail has yet to be identified.
- 11.3** Nonetheless, it is essential that the Enterprise Zone brand will be something for Newhaven to own and celebrate and something that will feature consistently throughout all communications materials.

12 EZ Resources

- 12.1** Based on discussions with existing Enterprise Zones and Government departments, a key factor in successfully implementing an Enterprise Zone is the availability of sufficient resource, as well as providing effective project planning. It is strongly recommended that the Councils and the LEP commit resources up-front to enable successful delivery. Given the regional significance of the Newhaven EZ, it is proposed that the Council works with its partners to secure dedicated resources to ensure that we are able to deliver the ambitious vision for Newhaven.
- 12.2** This role will manage the development and successful delivery of the new Enterprise Zone for Newhaven that will be operational from April 2017, in line with the investment and business support objectives of both the Council and Coast to Capital LEP.
- 12.3** In addition to this role, LDC needs to best consider how it would look to take forward its own landholdings within the EZ, and it is proposed that officers explore the option to tender for an implementation partner to drive delivery of modern employment-generating floorspace on LDC owned land in the EZ. This would be one of the delivery partners set out in the table above. This body could also be able to advise third party land-owners on delivery and even separately contract with the landowners to carry out a similar delivery role, to bring a consistent approach across the EZ.
- 12.4** Government has also emphasised the importance of some early 'wins' for Newhaven to assist in building momentum to deliver the targeted growth and development.
- 12.5** As noted in paragraph 11.2, the need to prepare suitable marketing and PR materials will also incur initial costs.
- 12.6** There is also a need to prepare a range of strategic documents (to include a Business Plan showcasing a Growth / Investment Strategy and

an Implementation / Action Plan), which will need support from external consultants. These plans will also explore additional funding options, including SELEP, Coast to Capital, DCLG and prudential borrowing set against a future uplift in business rates.

- 12.7** The initial costs to effectively set up the Enterprise Zone are summarised below.

Resource	Est Initial Costs by Year			Total Resource
	Year 1	Year 2	Year 3	
EZ Programme Manager resource	£60,000	£60,000	£60,000	£180,000
Marketing	£20,000	£10,000	£10,000	£40,000
Strategic Plans	£70,000	£10,000	-	£80,000
TOTAL	£150,000	£80,000	£70,000	£300,000

- 12.8** In Years 2, 3 and beyond, it is expected that these costs will be funded through the uplift in business rates that the Council will earn and will be further set out in the Delivery Plan, which will be developed as part of the Enterprise Zone.

- 12.9** It is recommended that an initial project budget of £150,000 is allocated to allow for successful planning and delivery of the Enterprise Zone in Newhaven in Year 1 (2016/17). Contributions will also be sought from ESCC, Coast to Capital LEP and SELEP to support EZ delivery.

13 EZ Implementation

- 13.1** Officers from the Council's Regeneration & Investment and Strategic Policy teams have now met with the majority of landowners within the Enterprise Zone. The feedback received has been positive.

- 13.2** As each site has different challenges, they each inevitably have different timeframes for development, redevelopment or intensification of existing employment uses.

- 13.3** Another clear indicator of the potential benefit of Enterprise Zone status is the viability gap associated with utilisation of undeveloped sites. This gap is significant as the market rental values for commercial property (on a per square foot basis) is lower than the cost of development, meaning it is unviable to develop these sites for employment-related uses. The business rates discount offered to occupiers for the Enterprise Zone will help to address this viability gap, meaning that more sites are likely to come forward for commercial development.

- 13.4** There does, however, remain a challenge in the short-term around bringing forward development on undeveloped sites due to significant viability gaps. As a result, it is considered prudent to explore the options to pump-prime this development through forward funding infrastructure costs in the expectation of the future business rates income from the site. In effect the sooner that development occurs after April 2017, the greater the revenue generated for the Council for re-investment in local projects

during the 25-year lifespan of the Enterprise Zone. Furthermore, Government has emphasised the importance of some early 'wins' for Newhaven to assist in building momentum to deliver the targeted growth and development.

- 13.5** It is therefore recommended that Officers are authorised to explore mechanisms to address site-specific challenges and report back to Cabinet as appropriate at a later date.
- 13.6** Alongside such mechanisms, the delivery plan for the Enterprise Zone will need to focus on a range of measures to ensure a holistic approach to attract a sufficient level of inward investment. Such measures are, for example, likely to include a strong skills offer (linking with both the UTC and Sussex Downs College), as well as support for innovation and enterprise (linking with Basepoint, managing agents for the Council's highly successful Newhaven Enterprise Centre).

14 EZ Potential Benefits

- 14.1** The Enterprise Zone in Newhaven is a proposal of regional significance and will bring dormant brownfield sites back into use that will create and sustain employment. The Council and Coast to Capital LEP will work closely with developers and occupiers to focus employment opportunities on local residents.
- 14.2** Agreement has been reached with Coast to Capital LEP that all of the business rates uplift (ie. the additional rates brought in due to the Enterprise Zone) will be retained for use at a local level. This will enable the Council to work with Coast to Capital as well as local partners to strengthen key infrastructure, as well as addressing existing site specific issues. This is likely to include, for example, public realm enhancements, sustainable transport improvements and the facilitation of new skills training opportunities to upskill local residents. Specific local benefits are shown in more detail in paragraph 8.5.
- 14.3** It is further forecast that the Enterprise Zone will address existing barriers to enterprise and stimulating growth, not just in Newhaven, but retaining growth, innovation and investment across the wider Greater Brighton City Region.

15 Financial Appraisal

- 15.1** The main body of this report explains that the EZ will retain 100% of the additional business rates generated from the Enterprise Zone. Discounts that the Council may choose to give businesses as an incentive to set up within the Enterprise Zone will be reimbursed to the Council by the Government.
- 15.2** The approved General Fund budget for 2016/17 includes £200,000 for support to businesses, funded from the Council's share of additional business rates income generated by the East Sussex Business Rates Pool under the Government's business rates retention mechanism. In

2015/16 this budget was available to support business growth through a local business rates discount scheme. It is proposed that this budget is used to fund the initial costs to set up the Enterprise Zone identified in paragraph 12.7, an estimated £150,000 in 2016/17. Future years' costs, including those of the EZ Programme Manager to the end of the proposed three year fixed-term contract, can be funded from additional rates generated from the Enterprise Zone and the share from the Business Rates Pool, should it continue in 2017/18 and beyond.

16 Legal Implications

- 16.1** Whilst Enterprise Zones benefit from a number of Government funding initiatives and the possibility of simplified planning as indicated in this report, the classification of an area as an Enterprise Zone does not bring with it any other additional powers to the Council.

State Aid

- 16.2** Local Enterprise Partnerships and local authorities are responsible for compliance with State Aid law, particularly where proposals show that investment is required to address infrastructure, remediation or other development needs. There are no specific State Aid exemption schemes applicable to Enterprise Zones other than in Assisted Areas. Newhaven is not an Assisted Area.

Business Rate Discount

- 16.3** Central Government will reimburse a 100% discount for five years up to the maximum State Aid De Minimis threshold, for businesses that enter the Zone before 31 March 2022. The limitation to the De Minimis threshold means that the discounts are limited by EU State Aid law to €200,000 over a rolling three-year period. The equivalent will depend on the conversion rate at the time, but currently is approximately £50,000 per year.
- 16.4** The Council will be required to ensure that businesses do not receive greater levels of support and the discount must be cumulated with any other aid received under the De Minimis exemption. The Council will need to put in place measures to ensure compliance when aid is provided, as well as ongoing monitoring and reporting.

Public Procurement

- 16.5** The Council will be responsible for ensuring compliance with the public procurement regime and its own Contract Procedure Rules in relation to contracts it awards or funds for the purpose of the Enterprise Zone. The procurement process for the consultant to prepare an Investment Strategy and the Marketing Partner will be developed in accordance with these rules.

Local Development Orders

- 16.6** The Government's intention is for Enterprise Zones to be subjected to a simplified planning regime; however the designation alone does not trigger the change in the planning requirements for the Enterprise Zone. In order to simplify the planning approach, the Council can seek to implement a Local Development Order.
- 16.7** The procedure for doing this is set out in the Town and Country Planning (Development Management Procedure) (England) Order 2015. A Local Development Order can only be made to implement policies contained in a local development plan document, so must be mirrored in the Council's planning policies.
- 16.8** The Order must not grant permission for development affecting a listed building or development that would normally require an Environmental Impact Assessment.

Article 4 Directions

- 16.9** The Town and Country Planning (General Permitted Development) (Amendment) (England) Order 2013 grants planning permission for a change of use of a building and any land within its curtilage from class B1(a) (offices), to a use falling within class C3 (dwelling houses).
- 16.10** The Council can, in exceptional circumstances, make an Article 4 direction that will restrict permitted development rights within a limited area (Article 4(1), GPDO 2015). The direction can cover a single building, street or a neighbourhood.
- 16.11** Legal Services can assist the Director of Business Strategy & Development in assessing the appropriateness of using an Article 4 Direction to safeguard the employment uses that form part of the Enterprise Zone.
- 16.12** Before either of these mechanisms can be implemented, Officers will be required to seek prior authority from full Council.

17 Risk Management Implications

- 17.1** I have completed a risk assessment.
- 17.2** The following risks will arise if the recommendations are not implemented, and I propose to mitigate these risks in the following ways:

Risk	Likelihood	Impact	Mitigation
Lack of coordination with landowners of key sites	High	High	All landowners have already been invited to, and attended, initial meetings with LDC's Regen & Investment team to discuss the overall plans for the EZ.
Reduced uptake of commercial space	Medium	High	Marketing proposals have been formulated ready for

leading to lower level of retained business rates			implementation, and a robust Investment Strategy has been proposed for commissioning.
Lack of capacity to effectively manage EZ	High	Medium	Initial planning has been undertaken by LDC's Regen & Investment team, with discussions being held with key stakeholders to offset the potential lack of capacity.

17.3 The following risks will arise if the recommendations are implemented, and I propose to mitigate these risks in the following ways:

Risk	Likelihood	Impact	Mitigation
The EZ Programme Manager is not effective in role	Low	High	A clear, detailed job description has been prepared to ensure the correct level of experience is recruited.
Unclear governance and implementation structures resulting in lack of clarity or insight into specific local issues	Low	High	LDC's Regen & Investment team is working extremely closely with the LEP to develop delivery and governance structures to ensure that delivery is focused on specific local barriers to growth.

18 Equality Screening

18.1 Between 20 January and 2 February 2016, an Equality Analysis was undertaken on this proposal. Due regard was given to the general equalities duties and to the likely impact of the decision on people with protected characteristics, as set out in the Equality Act 2010.

18.2 The assessment identified that no major changes are required. The EA demonstrates the project is robust, there is little potential for discrimination or adverse outcomes, and opportunities to promote equality have been taken.

18.3 A copy of the EA is attached as an Appendix to this report.

Background Papers

19 Draft Memorandum of Understanding (MoU) with Government and Coast to Capital LEP

Appendices

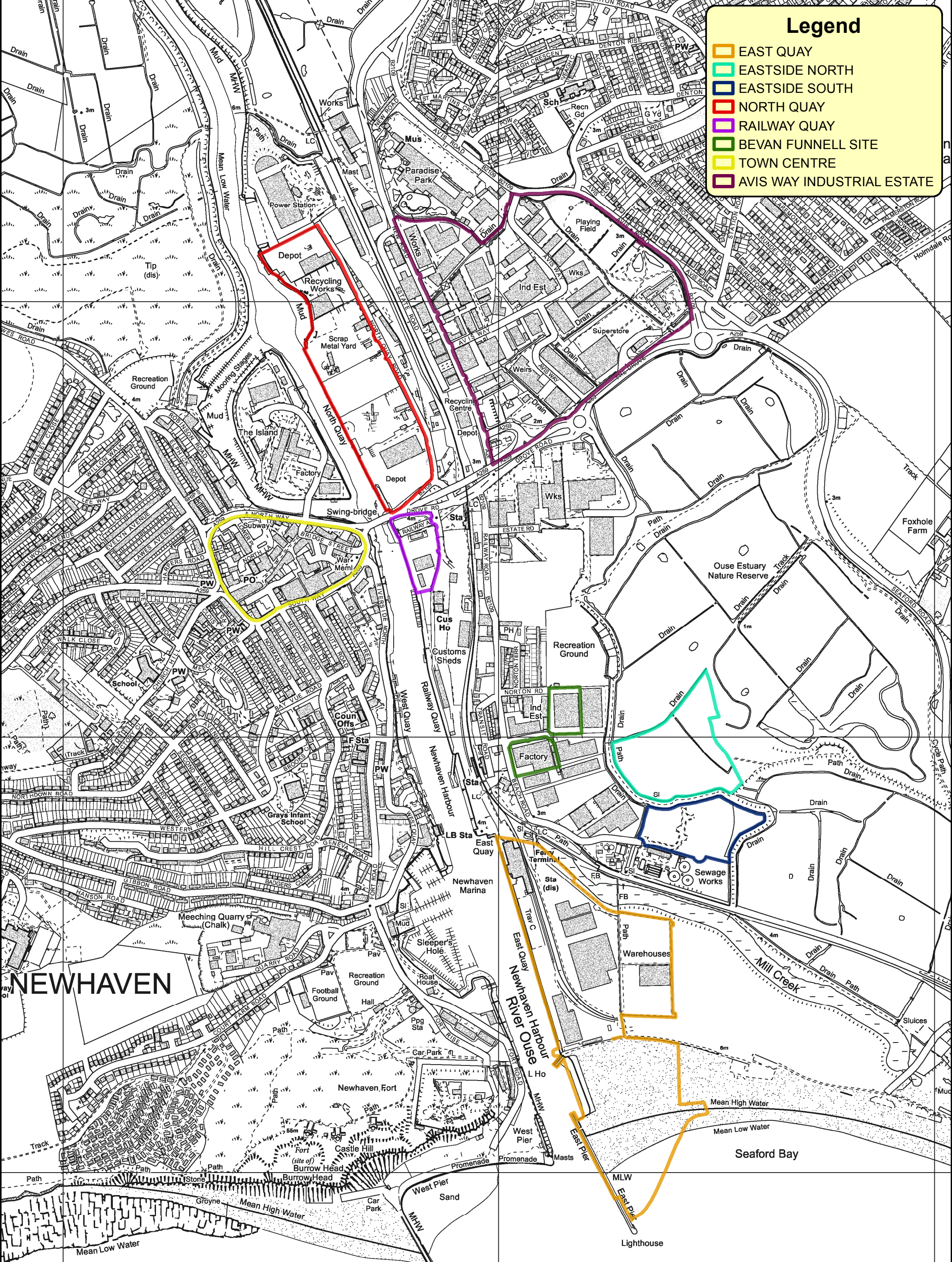
Appendix 1: Map showing Enterprise Zone Sites

Appendix 2: Equality Analysis Report

Appendix 3: Pre-Application Fees Schedule

Legend

- EAST QUAY
- EASTSIDE NORTH
- EASTSIDE SOUTH
- NORTH QUAY
- RAILWAY QUAY
- BEVAN FUNNELL SITE
- TOWN CENTRE
- AVIS WAY INDUSTRIAL ESTATE



NEWHAVEN

1:7,500

Appendix 2: Equality Analysis Report Template

Title:	EZ Newhaven
EA Lead :	Peter Sharp
EA Team:	Regeneration & Investment
Date Commenced:	20 January 2016
Target Completion Date:	2 February 2016
Reason for assessment:	Successful bid to establish an Enterprise Zone on eight specific sites across Newhaven

Context and Scope

1. What are the main purposes and aims of the service/project/decision?

The designation of eight strategic sites across Newhaven as an Enterprise Zone will facilitate the development and growth of the local economy, creating new employment opportunities and an increased level of business investment in the town. Enterprise Zone status also fits well with the wider business support activities undertaken by LDC's Regeneration and Investment team (see Equality Analysis on Business Support).

2. What effect does it have on how other organisations operate and what commitments of resources are involved?

The impact on other organisations will vary considerably. Different sites within the Enterprise Zone will come forward for development at different times over the 25-year lifespan of the Enterprise Zone. In addition, the majority of the sites included are not in LDC's ownership. This will limit the level of involvement that LDC can play in the development of such sites – at least above ensuring that the sites are allocated for intensification of employment uses.

3. How does it relate to the demographics and needs of the local community?

Newhaven has suffered from years of stagnation and decline, but retains substantial physical capacity for growth. Enterprise Zone designation has the potential to achieve high levels of additionality through accelerated development – bringing about a catalytic effect that supports increased high value business specialism and significant employment growth, as well as addressing the need for greater economic diversification.

Supported by Enterprise Zone designation, the development of the eight specific sites offers a tangible opportunity to upskill local residents. Newhaven is characterised by a lower than average skills profile, whilst Census 2011 data showed that local people are 40% more likely to have an unskilled or elementary occupation than the average resident of East Sussex.

Qualification Level	Newhaven	East Sussex	Greater Brighton
NVQ4+	18.4%	26.2%	32.1%
NVQ3	12.5%	12.0%	13.8%
Apprenticeship	3.6%	3.5%	3.0%
NVQ2	16.7%	16.8%	15.1%
NVQ1	18.3%	14.1%	12.9%
No Qualifications	25.8%	22.6%	18.3%
Other	4.6%	4.7%	4.8%

Source: Census 2011

Enterprise Zone designation will create new employment opportunities for local people, offering training and apprenticeships in high-growth sectors, as well as addressing the structural weaknesses in the town's employment and labour markets that have been identified by recent consultant's studies. The new UTC@harbourside further maximises the potential to upskill the local workforce and create new opportunities for local people.

4. How does it relate to the local and national political context?

The Enterprise Zone fits well with the wider context. Newhaven has long been recognised as a key 'Opportunity Area' in strategic documents prepared by key regional bodies including both Coast to Capital and South East Local Enterprise Partnerships. Furthermore, the Greater Brighton City Deal clearly identified Newhaven as an emerging hub for the Low Carbon and Environmental Goods (LCEGS) sector – focused on renewable technologies – noting that *“investment in Newhaven has started to pay dividends, with investor interest supporting the development of the renewable energy and clean-tech sector.”* Enterprise Zone designation offers the potential to capitalise



on this emerging hub to deliver real growth and positive change for the town and its hinterland, through creating and sustaining a variety of employment opportunities for all local residents of working age.

5. Is there any obvious impact on particular equality groups?

Impact	Race (includes ethnic or national origins, colour, & nationality)			Disability (includes mental & physical)			Gender (includes gender reassignment)			Pregnancy (includes maternity & paternity)			Sexual Orientation (includes heterosexual, homosexual & bisexual)			Religion & Belief (includes all faiths, beliefs & agnostic)			Age (includes all age groups)		
	Positive	Negative	None	Positive	Negative	None	Positive	Negative	None	Positive	Negative	None	Positive	Negative	None	Positive	Negative	None	Positive	Negative	None
Tick if relevant			X			X			X			X			X			X			X

6. How does it help to us meet our general duties under the Equality Act 2010?

The designation of an Enterprise Zone in Newhaven will create a higher level of inward investment, leading to an increased level of employment and training opportunities for local residents. However as noted in Q7, below, it would not be prudent to make assumptions at this stage.

7. What is the scope of this analysis?

The scope of this analysis is very difficult to accurately identify, as the Enterprise Zone does not officially start until April 2017. We cannot make assumptions on the type of businesses that may be attracted to the Enterprise Zone, nor the type and number of employment and training opportunities that these businesses may create.

Information gathering and research

8. What existing information and data was obtained and considered in the assessment?

See Q3, above

9. What gaps in information were identified and what action was undertaken/is planned to address them?

There are no gaps. The information available on employment and skills in Newhaven is comprehensive and so no actions are required to address.

10. What communities and groups have been involved and what consultation has taken place as part of this assessment?

Informal consultations have been held with key business networks and major local landowners. This includes Basepoint (managing agents for Newhaven Enterprise Centre), Newhaven Port & Properties, Avalon Properties and RBS. A detailed marketing / engagement plan will be produced over the coming months to ensure that all local



Lewes District Council

businesses and residents are fully aware of the new Enterprise Zone and the opportunities that exist to develop the local economy to create new employment, business growth and training opportunities.

Analysis and assessment

11. What were the main findings, trends and themes from the research and consultation undertaken?

The key theme was that the Enterprise Zone bid was widely supported, with consultees recognising the potential economic opportunities afforded by designation.

12. What positive outcomes were identified?

No outcomes were identified.

13. What negative outcomes were identified?

No outcomes were identified.

Action planning

14. The following specific actions have been identified: *(see paragraph 25 of the guidance)*



Lewes District Council

Issue Identified	Action Required	Lead Officer	Required Resources	Target Date	Measure of Success
Lack of information concerning scale of opportunities created	Monitoring once EZ is in place	Peter Sharp	N/A	April 2020	Whether employment & training opportunities are available for all groups within the EZ.

Summary Statement


Between 20/01/16 and 02/02/16 Equality Analysis was undertaken by Peter Sharp on the successful bid to create an Enterprise Zone in Newhaven.

Due regard was given to the general equalities duties and to the likely impact of the project on people with protected characteristics, as set out in the Equality Act 2010.

The assessment identified:

*No major changes are required. The EA demonstrates the project is robust, there is little potential for discrimination or adverse outcomes, and opportunities to promote equality have been taken.

Approval

Director/Head of Service	Max Woodford – Head of Regeneration & Investment
Signed	
Dated	02/02/2016

Pre-application Fee Schedule

Application Type	Cost excl VAT	Cost Inc VAT	For	Notes
Householder Schemes - works or alterations to an existing residential dwelling, including extensions, garages, satellite dishes, garden structures etc	£12.50	£15	Written advice and site visit*	*Site visit to take place only if deemed necessary by Planning Officer
LISTED BUILDING SCHEMES (where no planning permission will be required) works to listed building	£12.50	£15	Written advice and site visit*	*Site visit to take place only if deemed necessary by Planning Officer
OTHER • Advertisements; • Telecommunications (excl Reg 5 applications); • Changes of use where no operational development (except residential/holiday) • Renewable Energy – (including Wind turbines etc) up to site area of 1ha	£75.00	£90	for 1 meeting*, site visit and written advice	*£60 per additional meeting and written advice
Residential schemes for 1 - 2 dwellings including replacement of a single dwelling	£150.00	£180	for 1 meeting*, site visit and written advice	*£60 per additional meeting and written advice
SMALL MINOR • All residential schemes for the change of use to or erection of 3 - 5 dwellings (or holiday lets) or conversion of building(s) to 3 - 5 residential units (or holiday lets); • All minor non residential schemes for new buildings • Non residential buildings/extensions up to 499 sq m floorspace	£250.00	£300	for 1 meeting*, site visit and written advice	*£60 per additional meeting
MINOR • Residential proposals (including holiday lets) involving the erection of or change of use to between 6 – 9 residential units • Non residential 500 – 1000sq m floorspace	£450.00	£540	upto 2 meetings*, site visit and written advice	*£120 per additional meeting
SMALL SCALE MAJOR • Residential 10-30 houses or site area up to 2 ha; • Non residential 1,000 – 4,999 sq m or site area between 1 -2 ha • Renewable Energy – (including Wind turbines etc) site area of between 1 – 2 ha	£900.00	£1,080	upto 2 meetings*, site visit and written advice	£200 per additional meeting
MEDIUM SCALE MAJOR • Residential 31- 149 houses or site area 2 – 4 ha; • Non residential 5,000 – 9,999 sq m floor space or site area between 2-4 ha • Renewable Energy – (including Wind turbines etc) site area of between 2-4 ha	£1,800.00	£2,160	upto 4 meetings*, site visit and written advice	*£360 per additional meeting
LARGE SCALE MAJOR • Residential greater than 150 houses or site area greater than 4ha; • Non residential 10,000sqm floorspace or site area greater than 4ha; • All Environmental Impact Development • Renewable Energy – (including Wind turbines etc) site area of greater than 4 ha	£3,600.00	£4,320	upto 6 meetings*, site visit and written advice	*£500 per additional meeting

No Pre-application fees for:

Conservation Area Consent advice (where no planning permission will be required)

Lawful Development Certificate advice

Parish/Town Council, voluntary sector, charitable trust or not-for-profit organisation development enquiries.

100% Affordable, Disable access or modification advice

Enterprise Zone Memorandum of Understanding

THIS AGREEMENT is dated [] 2016

PARTIES

1. **THE SECRETARY OF STATE FOR COMMUNITIES AND LOCAL GOVERNMENT** whose principal address is 2 Marsham Street, London, SW1P 4DF (**Secretary of State**);
2. Each of the local authorities for the area of the Enterprise Zone, whose names and principal addresses are listed at Schedule 1 (together the **Relevant Local Authorities**)
3. The Local Enterprise Partnership for the area of the Enterprise Zone, whose names and principal addresses are listed at Schedule 2 (where a local enterprise partnership does not have corporate status then the Accountable Body who acts as the representative is listed) (**together with the Local Enterprise Partnership**)

BACKGROUND

- A The Secretary of State has the power to declare an area to be an Enterprise Zone.
- B. Enterprise Zones are single or multiple sites designated for business development which may offer business rate discounts or enhanced capital allowance for new businesses locating on the sites. Enterprise Zones are on sites which would ordinarily not be expected to generate significant business growth nor generate any business rates without incentives and /or dedicated local stakeholder support. Any increase from business rates income which arise from the development of an Enterprise Zone site will not be affected by business rates reform, reset or redistribution for a period of 25 years.
- C. A local enterprise partnership is a voluntary partnership between local authorities and businesses to help determine local economic priorities and lead economic growth within their local area. This includes arrangements for the establishment and operation of Enterprise Zones. As some local enterprise partnerships are not corporate bodies, a local authority may act as an accountable body on their behalf.
- D. In agreement with the Local Enterprise Partnership local authorities responsible for all or part or all of an Enterprise Zone use any increase in business rates they collect from each Enterprise Zone site to support the further development of the Enterprise Zone and neighbouring areas.
- E. Taking account of the application included within the attached schedule and other representations made by the Local Enterprise Partnership, the Secretary of State with the agreement of the Chancellor of the Exchequer offers the Local Enterprise Partnership and Relevant Accountable Bodies the right to set up and establish arrangements for the operation of the Enterprise Zone subject to the terms and conditions set out within the other paragraphs of this Memorandum of Understanding. To allow all parties to review their interests, in the first instance this Memorandum of Understanding extends to 2020.

IT IS AGREED THAT:

1 DEFINITIONS

In this Memorandum of Understanding the following words and phrases shall have the following meanings:

“Accountable Body” means a local authority organisation(s) responsible for one or more aspects of the operation of the Enterprise Zone in line with plans agreed with the Local Enterprise Partnership.

“Application” means the application for enterprise zone status submitted to the Secretary of State by the Local Enterprise Partnership on [18th September 2015] (which may be amended from time to time after the date of this Memorandum of Understanding) and includes each of the representations at Schedule 3 of this Memorandum of Understanding (in the event of conflicting statements, Schedule 3 and then the latest validly made variation shall take priority).

“Enterprise Zone” means one or more sites which under the Regulations (as amended from time to time) are able to offer specific business incentives and permitted by the Secretary of State to market themselves as such.

“Regulations” means 'Capital Allowances (Designated Assisted Areas) Order 2016', 'Non-Domestic Rating (Designated Areas) Regulations 2016', and 'Non-Domestic Rating (Rates Retention) Regulations 2013'.

“Relevant local authorities” means a local authority on which all or part of an Enterprise Zone is situated and as a consequence collects business rates from businesses in operation on that site.

“Term” means the earlier of 31 March 2020 or the date of the Secretary of State, each of the Local Enterprise Partnership or each of the Relevant Local Authorities giving written notice to the other parties to this Memorandum of Understanding of its intention to terminate the Enterprise Zone status under clause 5.

2 AGREEMENT TO SET UP AND OPERATE AN ENTERPRISE ZONE

Having relied upon the representations made by the Local Enterprise Partnership in the Application, the Secretary of State offers the Local Enterprise Partnership and the Relevant Local Authorities the right to set up and operate the Enterprise Zone for the Term, subject to the terms of this Memorandum of Understanding, including the right to benefit from the following business incentives:

- Permitting the Relevant Local Authorities to retain 100% of any business rate increase which accrues for a period of 25 years from the commencement date (this being [START DATE]) of the Enterprise Zone, providing that such sums are directed towards the development of the Enterprise Zones and thereafter towards the Local Enterprise Partnership's other identified growth priorities;
- Central government will reimburse the cost incurred by Relevant Local Authorities in providing a 100% business rates discount for a period of up to five years, to any business which sets up operations within the Enterprise Zone site before 31 March

2022, and is able to receive the support within the State Aid De Minimis threshold (or other limitation applicable by law);

- As an alternative to the reimbursement of business rates, and up until 31st March 2020, Central Government will reimburse the Relevant Local Authorities the cost of allowing businesses occupying an Enterprise Zone sites within an Assisted Area to count 100% up to €125 million of their first years' expenditure on qualifying plant and machinery assets against taxable income as an Enhanced Capital Allowance (**ECAs**)
- The Local Enterprise Partnership and Relevant Local Authorities can together agree to other local authorities benefitting from the benefits of the Enterprise Zone during the Term provided they have entered into an inter-party agreement as set out in 3.2 (a) and meet the relevant requirements in the regulations. In this situation, notice shall be given to the Secretary of State of the arrangement.

3. TERMS AND CONDITIONS

3.1 The Relevant Local Authorities and the Local Enterprise Partnership agree, having undertaken due investigation, that at the date of this Memorandum of Understanding:

- (a) The statements within the Application are accurate;
- (b) they are not aware of any information which is likely to materially undermine the ability of the Local Enterprise Partnership and the Relevant Local Authorities to deliver the Enterprise Zone in accordance with the Application and achieve the outputs; and
- (c) they are not aware of any information, which is likely to significantly delay the Local Enterprise Partnership in delivering the Enterprise Zone in accordance with the Application or achieving the outputs.

3.2 The Relevant Local Authorities and Local Enterprise Partnership confirm, having undertaken due investigation, that:

- (a) they have obtained or shall use all reasonable endeavours to promptly obtain necessary approvals, authorisations, consents, exemptions, licences, permits, permissions (including planning permission) or registrations necessary to deliver the Enterprise Zone in accordance with the Application;
- (b) they have or will secure the expertise and capacity to set up and operate the Enterprise Zone in accordance with the Application;
- (c) they will undertake all the steps to set up and operate the Enterprise Zone and confirm that each of these shall be achieved compliantly (including but not limited to achieving compliance with applicable procurement, state aid, planning law and all rules relating to the collection and distribution of business rates, discount, and use of business rates for investment); and

- (d) they will deliver the relevant incentives at Schedule 4 for the period set out in the Application and this Memorandum of Understanding.

3.3 The Relevant Local Authorities and the Local Enterprise Partnership agree to:

- (a) organise and promote a governance group for the Enterprise Zone which is able to make strategic and operational decisions. This shall include representatives of each relevant local authority and shall meet at least quarterly (“**Governance Group**”); and
- (b) enter into Memorandum of Understandings with each other which set agreed objectives and priorities for the Enterprise Zone as well as terms necessary to give effect to this Memorandum of Understanding (for example, provisions covering the use of business rates retained by local authorities and how local authorities will use their general power of competence to support the Enterprise Zone, including but not limited to Compulsory Purchase Orders, simplified planning regimes, development orders, Joint Ventures and borrowing to support investment and arrangements for the provision of monitoring data). Where during the Term, new local authorities become involved in the Enterprise Zone or the legal status of Local Enterprise Partnerships and local authorities involved in the Enterprise Zone changes, the Secretary of State requires that the Local Enterprise Partnership uses all reasonable endeavours to enter into new Memorandum of Understandings under this clause. Copies of these Memorandum of Understandings should be sent to the Secretary of State within 50 days of execution.
- (c) to use government subsidies provided for the Enterprise Zone (including the subsidy provided under this Memorandum of Understanding and the Regulations) for the objectives of the Enterprise Zone and in compliance with relevant laws.

3.4 Implementation Plan

The Local Enterprise Partnership in consultation with the Relevant Local Authorities shall design and submit to the Secretary of State a 5 year implementation plan (which sets out the major steps and the individual(s) and organisation(s) who will be responsible to set up, operate and deliver the objectives and priorities which have been agreed for the Enterprise Zone) no later than 31st March 2017.

3.5 The **Cities and Local Growth Unit** shall support:

- (a) the set up and delivery of the Enterprise Zone (in particular through the contact for the Enterprise Zone, which is [redacted] (E-mail: Telephone: [redacted]) (who shall advise on the procedures for establishing the zones and resolving issues, which may arise in relation to government funding or legal arrangements. The Local Enterprise Partnership and Relevant Local Authorities shall be informed if there is a change in the Cities and Local Growth Unit team contact.

- (b) Enterprise Zones by providing information on the Enterprise Zone to the market via press releases, its national Enterprise Zone website, Twitter account and other media; and
- (c) Collaboration, by inviting senior leaders from all England's Enterprise Zones to meet to discuss progress, challenges and good practice with senior government officials and Ministers

this support shall be provided up until 31 March 2020 and may be renewed or subject to alteration after that date.

3.6 The Relevant Local Authorities and Local Enterprise Partnership shall:

- (a) send the Cities and Local Growth Unit contact the details of the primary point of contact ("**Local Enterprise Zone Contact**", a named representative agreed with the Local Enterprise Partnership) for the Enterprise Zone within 20 Working Days of entering into this Memorandum of Understanding. The Cities and Local Growth Unit contact shall be informed if there is a change in the Local Enterprise contact.
- (b) authorise the Local Enterprise Contact to discuss progress of the Enterprise Zone with the Cities and Local Growth Unit contact either in face-to-face or telephone meetings at least once a quarter. Such meetings shall be two-way enabling both parties to understand progress of the Enterprise Zone. Share information about the wider Enterprise Zone network and any issues which might adversely affect the planned progress of the Enterprise Zone.
- (c) take all reasonable steps to allow the Cities and Local Growth Unit team contact (or another team member in their place) to attend the Governance Group meetings (as mentioned at clause 3.5(a) including providing information on the date and location of meetings and sending papers which will be discussed. The Cities and Local Growth Unit team contact shall be entitled to decide whether they attend in an observer capacity or as a participant at the Governance Group meeting.

3.7 Marketing

The Relevant Local Authorities and the Local Enterprise Partnership agree to use all reasonable endeavours to

- (a) promote the Enterprise Zone;
- (b) share with the Secretary of State a marketing plan for the Enterprise Zone within six months of entering into this Memorandum of Understanding; and
- (c) use DCLG and Enterprise Zone logos within marketing communications and signage.

3.8 Monitoring

The Relevant Local Authorities and the Local Enterprise Partnership agree to use all reasonable endeavours to complete the management information at

Schedule 5 within 21 Working Days of the commission from DCLG, which will be quarterly at the end of January, April, July and October.

4. CHANGES

All changes to the text of the application or this Memorandum of Understanding must be approved by the Secretary of State in writing prior to the relevant change being deemed to be effective. Until such time as a change is made in accordance with this clause, the parties shall, continue to perform this Memorandum of Understanding in compliance with its terms before such change.

5. TERMINATION

- (a) The Secretary of State shall be entitled to suspend or withdraw the right of any or all of the Local Enterprise Partnership and / or the Relevant Local Authorities to market an Enterprise Zone if, acting reasonably, the Secretary of State is of the view that a party has acted in a way which significantly damages the reputation of the Enterprise Zone Programme or if there has been a material breach of this Memorandum of Understanding.
- (b) The Relevant Local Authorities and Local Enterprise Partnership with the Memorandum of Understanding involved in delivering the Enterprise Zone is entitled to ask for the Enterprise Zone status to be rescinded by submitting notice in writing.

6. GOOD FAITH AND COOPERATION

Each party covenants with the others that they shall act with the utmost good faith towards the other, shall comply with reasonable requests for information in relation to the Enterprise Zone submitted from time to time and will not do anything which would deliberately put the other in breach of its obligations under this Memorandum of Understanding.

7. MISCELLANEOUS

Nothing in this Memorandum of Understanding shall constitute a partnership or joint venture between any of the parties.

ACCEPTANCE

This Memorandum of Understanding has been entered into on the date stated at the beginning of it.

Signed for and behalf of

SECRETARY OF STATE FOR)

COMMUNITIES)

AND LOCAL GOVERNMENT)

Authorised Signatory: _____

Print Name: _____

1. Local Enterprise Partnership Accountable body signs here

Signed for and in agreement with

LOCAL ENTERPRISE PARTNERSHIP BY THE ACCOUNTABLE BODY

[Insert AUTHORISED BODY DETAILS]

Authorised Signatory: _____

Print Name: _____

(Add more as required)

Signed for and in agreement with

Name of Local Authority

[Insert LOCAL AUTHORITY DETAILS]

Authorised Signatory: _____

Print Name: _____

.....

Signed for and in agreement with

Name of Local Authority

[Insert LOCAL AUTHORITY DETAILS]

Authorised Signatory: _____

Print Name: _____

.....

The following parties are aware of the requirements of this Memorandum of Understanding (including the Application) and shall support and assist development and delivery of the Enterprise Zone throughout the Term, but due to not having the required legal personality

[LOCAL ENTERPRISE PARTNERSHIP]

Authorised Signatory:

Print Name:

[LOCAL ENTERPRISE PARTNERSHIP]

Authorised Signatory:

Print Name:

SCHEDULE 1 - RELEVANT LOCAL AUTHORITIES

SCHEDULE 2 – LOCAL ENTERPRISE PARTNERSHIP

SCHEDULE 3 KEY INFORMATION ON [INSERT NAME] ENTERPRISE ZONE / EXTENSION [FROM NAME OF LOCAL ENTERPRISE PARTNERSHIP APPLICATION]

General	
Name of Enterprise Zone	
Name of Local Enterprise Partnership	
Relevant local authorities	

Fill out information from the application form Q C.8 What is the Local Enterprise Partnership’s agreed approach, with the relevant local authorities, about how the retained rates will be used to support development on the Enterprise Zone?
 Briefly explain your financial or investment plan for how (for example, through borrowing or development of a recycling fund) and when the retained rates will be used.

Fill out information from the application form Q E 1. Please describe the governance arrangements for the proposed Enterprise Zone, clearly setting out the name and job title of the Senior Responsible Officer for delivery of the Zone, the governance structure and explain how progress will be owned by the Local Economic Partnership Board.

Fill out information from the Application form from Q E.2 capacity and skills you will make available to deliver the Enterprise Zone on a day-to-day basis, including the job titles and names of each of the staff members in the Local Enterprise Partnership and the relevant local authorities and the total costs of this staff team.

--

Q E3 will you gather data that will allow the Local Enterprise Partnership and local authorities to monitor progress of the Enterprise Zone, for example this could include on delivering new jobs, business, and investment?

Q E5 Briefly set out your plan for marketing the sites to occupiers and/or investors, in the case of multiple site zones being clear if they will be marketed in clusters or in stages.

SCHEDULE 4 – SITES AND INCENTIVES

Proposed Sites	EZ	District / Local authority Ward	ECA	BRD	BRR

SCHEDULE 5 – MANAGEMENT INFORMATION

Q1* What was the value of the retained rates that were reinvested in the Enterprise Zone in the last financial year?

Q2* What was the value of the retained rates that were reinvested in the LEP area in which the Enterprise Zone is situated, including the amount in Q1, in the last financial year?

Q3* What was the value of the borrowing against retained rates undertaken by the LEP accountable body or the EZ local authority in the last financial year?

Q4 What was the change in the number of newly created jobs, excluding construction jobs, on the Enterprise Zone in this quarter?

Q5 What was the change in the number of newly created construction jobs on the Enterprise Zone in this quarter?

Q6 What was the change in the number of jobs that were safeguarded on the Enterprise Zone in this quarter?

Q7 Was a Local Development Order introduced on the zone or a part of the zone this quarter?

Q8 What was the change in the number of businesses that started trading on the zone this quarter?

Q9 What was the value of any new public sector capital investment on the zone this quarter? Do not include borrowing against retained rates.

Q10 What was the value of any new public sector revenue investment on the zone this quarter?

Q11 What was the value of any new private sector investment on the zone this quarter (excluding non-monetary investment)?

Q12 What was the value of any new private sector non-monetary investment on the zone this quarter, e.g. use of facilities, staff?

Q13 What area of land was reclaimed and made ready for development on the zone this quarter?

Q14 What commercial floorspace was constructed on the zone in this quarter?

Q15 What commercial floorspace was refurbished on the zone this quarter?

Q16* "What was the market rate for leasing commercial floorspace on the Enterprise Zone as of the current date?"

Q17 What land sales were there on the zone this quarter?

Agenda Item No: 9.2 **Report No:** 61/16

Report Title: Adoption of the Lewes District Local Plan Part 1: Joint Core Strategy

Report To: Cabinet **Date:** 28 April 2016

Cabinet Member: Councillor Tom Jones – Lead Councillor for Planning

Ward(s) Affected: All

Report By: Nazeya Hussain, Director of Business Strategy and Development

Contact Officer(s)-

Name(s): Catherine Jack; Edward Sheath
Post Title(s): Planning Policy Lead; Head of Strategic Policy
E-mail(s): catherine.jack@lewes.gov.uk; edward.sheath@lewes.gov.uk
Tel No(s): 01273 484417

Purpose of Report:

To seek Cabinet and Council agreement to adopt and publish the final version of the Lewes District Local Plan Part 1: Joint Core Strategy, incorporating the Inspector's required modifications as set out in the appendix to his Final Report (and including any consequential and other appropriate minor amendments), as part of the statutory Development Plan for Lewes district.

Officers Recommendation(s):

- 1 To recommend to Council that the Lewes District Local Plan Part 1: Joint Core Strategy, incorporating the Inspector's main modifications, should be adopted as part of the Development Plan for Lewes district, in accordance with Section 23 of the Planning and Compulsory Purchase Act 2004 and Regulation 26 of the Town and Country Planning (Local Planning) (England) Regulations 2012.
- 2 To recommend to Council that the Lewes District Local Plan Part 1: Joint Core Strategy should be published together with the relevant adoption statements, Policies Maps, and the Sustainability Appraisal (incorporating Strategic Environmental Assessment) Report in accordance with Regulations 26 and 35 of the Town and Country Planning (Local Planning) (England) Regulations 2012.
- 3 To recommend to Council that the Director of Business Strategy and Development be authorised to agree any further minor editorial corrections and clarifications identified prior to publication of the adopted Lewes District Local Plan Part 1: Joint Core Strategy.

- 4 To recommend to Council that it is noted that in adopting the Lewes District Local Plan Part 1: Joint Core Strategy those 'saved' policies of the Lewes District Local Plan 2003, that are listed in Appendix 2 of The Lewes District Local Plan Part 1: Joint Core Strategy as being replaced, will be rescinded with immediate effect. Those 'saved' policies that are listed on Appendix 2 to retain shall be retained and reviewed as appropriate through the emerging Lewes District Local Plan Part 2: Site Allocations and Development Management Policies.
-

Reasons for Recommendations

To adopt the Joint Core Strategy as part of the new Local Plan for the district (the South Downs National Park Authority will also adopt the Joint Core Strategy). This will result in up-to-date local planning policies being in place as part of the statutory development plan, against which planning applications will be determined.

1 Background

- 1.1 Lewes District Council has been working in partnership with the South Downs National Park Authority to produce the Joint Core Strategy since 2011 and LDC had been working on the early stages of the plan for several years prior to that. We have now reached the final stage in the very substantial project that will result in an up-to-date strategic development plan for Lewes District.
- 1.2 We have received the Final Report of the Planning Inspector appointed by the Secretary of State for Communities and Local Government to examine the soundness of the Joint Core Strategy. The report confirms that, subject to all of the Inspector's recommended main modifications, the Joint Core Strategy is a legally compliant and sound plan for Lewes District.
- 1.3 The required main modifications are appended to the Inspector's Report and are necessary in their entirety for the plan to be considered sound and capable of adoption. These modifications were anticipated since they are very closely based on the Proposed Modifications that the Council agreed to publish in July 2015. This means that the proposed strategic allocations at Old Malling Farm, Lewes; Land at Harbour Heights, Newhaven; and Lower Hoddern Farm, Peacehaven have been confirmed. The other allocated strategic sites are North Street Quarter and Eastgate Area, Lewes; Greenhill Way, on the edge of Haywards Heath; and Land North of Bishops Lane, Ringmer.
- 1.4 The modified district-wide housing target of 6,900 net additional dwellings between 2010 and 2030 (345 per annum) has also been confirmed, although it is acknowledged that this figure still falls short of the identified level of housing need in the district.
- 1.5 Publication of the Proposed Modifications last July was followed by a period of public consultation and subsequently the submission of the Proposed Modifications to the examination of the Joint Core Strategy. Two additional examination hearing days were held in December 2015 to consider the Proposed Modifications in detail and it is as a result of this that the Inspector

has made some minor changes to the originally proposed modifications. These changes essentially relate to updated information or are for reasons of clarity.

- 1.6 Once adopted by the Council, the Joint Core Strategy will form a key part of the development plan for the district and will be used by the Council for determining planning applications in those parts of the district outside the national park boundary. At the point when the South Downs National Park Authority adopts the Joint Core Strategy it will form a key part of the development plan for the determination of planning applications in those areas of the district that lie within the national park, for which SDNPA is the local planning authority.

2 Outcomes

- 2.1 Adoption is the final stage of plan-making for the Joint Core Strategy and will result in an up-to-date strategic plan for the district. The plan will be used for the determination of planning applications and its adoption will provide the certainty needed to facilitate the delivery of the strategic site allocations. The adopted plan will also inform the strategic planning framework that emerging neighbourhood plans will need to be consistent with.
- 2.2 The Inspector's Report confirms that a five year supply of land for housing in the district has been demonstrated. Adoption of the Joint Core Strategy will therefore put the Council in the strongest possible position to resist inappropriate proposals for housing development and reinforce the local plan-led approach to planning.
- 2.3 Adoption of the Joint Core Strategy will also provide the sound basis from which to continue to progress Part 2 of the Local Plan, which will include the detailed development management policies and non-strategic site allocations for the parts of the district outside the national park. This will help to ensure an ongoing supply of housing land through the plan period to 2030.
- 2.4 Adoption will take effect immediately upon the resolution of the Council. Following this it will be necessary to publish the adopted plan including the policies maps, an adoption statement, the sustainability appraisal (incorporating strategic environmental assessment) and a post adoption sustainability appraisal statement as soon as reasonably practicable. All interested parties on our local plan examination database will also be notified that adoption has taken place.
- 2.5 Immediately on adoption the status of the Joint Core Strategy as part of the development plan will take effect. All planning applications and appeal decisions must be determined in accordance with the development plan, unless material considerations indicate otherwise, regardless of when the application or appeal was submitted.
- 2.6 With an up-to-date plan adopted the Council will be in a much stronger position to determine where development takes place, in a plan-led way. While there may be some parts of the local community that are disappointed with elements of the Inspector's recommendations, the adoption of the plan will be a substantial benefit to the district overall, including communities that have

previously been vulnerable to speculative development proposals, particularly those on greenfield sites outside settlement planning boundaries.

- 2.7 It should also be noted that the Government are introducing measures to ensure that local planning authorities have an up to date local plan in place as soon as possible. This will mean that the Government will intervene in Local Plan production if a local planning authority has not prepared a plan by early 2017. Adoption of the Joint Core Strategy will ensure that Lewes District Council is not at risk from this measure.

3 Financial Appraisal

- 3.1 There are no significant resource implications arising from the adoption of the plan.

4 Legal Implications

- 4.1 The Council must formally adopt the Joint Core Strategy to bring it into force. Adoption must be by resolution of a full meeting of the Council (section 23(5), Planning and Compulsory Purchase Act 2004 and regulation 4(1) and (3), Local Authorities (Functions and Responsibilities) (England) Regulations 2000 (SI 2000/2853)).
- 4.2 Once adopted the Joint Core Strategy will form part of the statutory development plan for the area and be used as such for the purpose of determining planning applications in the District.
- 4.3 Adoption of the Joint Core Strategy by the council will trigger a six week period from its adoption, within which any person aggrieved by the Core Strategy may make an application to the High Court under section 113 of the said 2004 Act on limited grounds, namely that either: (a) the document is not within the appropriate power; or (b) a procedural requirement has not been complied with.
- 4.4 The adoption of the Core Strategy can only be challenged therefore on the above legal grounds and not simply because certain persons disagree with the Inspector's recommendations.
- 4.5 Through the public examination process, the Inspector has assessed the legal compliance of the Core Strategy and he has concluded that the Council has met all the legal compliance and soundness requirements (details of the legal requirements can be found at paragraph 147 of the Inspector's Report).

5 Risk Management Implications

- 5.1 A risk assessment has been undertaken. The following risk will arise if the recommendations are not implemented, for which there is no mitigation other than the preparation and adoption of a sound plan for the district:

Non-adoption would leave the Council without an up-to-date development plan and therefore at significant risk of being unable to resist speculative planning applications for inappropriate development proposals. This will inevitably lead to more 'planning by appeal', which could leave the Council susceptible to reductions in anticipated New Homes Bonus payments if the Government

introduce the proposed measure of reducing payments made on residential schemes granted permission at appeal.

While there is no legal requirement for the Council to adopt the Joint Core Strategy, since 2008/9 a very substantial amount of resources have gone into its preparation in order to achieve a sound plan that is capable of recommendation for adoption.

5.2 No new risks will arise if the recommendations are implemented.

6 Equality Screening

6.1 An Equality Analysis summary report is attached at Appendix 1. The preparation of the Joint Core Strategy was accompanied by an Equality Impact Assessment in 2012

www.lewes.gov.uk/Files/plan_EqualityImpactAssessment_2012.pdf . This report assessed the impact of the proposed Spatial Strategy and Core Policies in the emerging Joint Core Strategy on the protected equality groups recognised by the Council.

6.2 An April 2016 update to the Equality Impact Assessment has also been prepared to assess the equalities impacts of the proposed adoption version of the Joint Core Strategy, including the additional policies and other modifications to the plan that have resulted from consultations, changes in national policy and the examination in public process.

6.3 Extensive consultation has been undertaken at each key stage of preparation of the plan, ensuring that due consideration has been given to the needs of the various community organisations and groups and ethnic groups in the district.

6.4 In addition a full Equality Analysis for the preparation of plans and strategies was undertaken and adopted in 2015, which relates, among others, to this plan.

Background Papers

Proposed Main Modifications (published for consultation August 2015)

http://www.lewes.gov.uk/Files/plan_Proposed_Main_Modifications_Schedule_3_-_July_2015.pdf

Addendum to Sustainability Appraisal August 2015

http://www.lewes.gov.uk/Files/plan_Addendum_to_the_Lewes_District_Core_Strategy_Sustainability_Appraisal_-_Proposed_Modifications.pdf

Inspector's Initial Findings Letter February 2015

http://www.lewes.gov.uk/Files/plan_ID-05_Letter_to_Councils_10_Feb_2015.pdf

Submission Joint Core Strategy September 2014

http://www.lewes.gov.uk/Files/plan_CS_Submission.pdf

Submission Sustainability Appraisal September 2014

http://www.lewes.gov.uk/Files/plan_SA_Submission.pdf

Proposed Submission Focussed Amendments Joint Core Strategy May 2014
http://www.lewes.gov.uk/Files/plan_CS_FA.pdf

Other relevant documents to the examination can be found on the Core Strategy Examination webpage/library www.lewes.gov.uk/corestrategyexamination , the general Core Strategy webpage <http://www.lewes.gov.uk/corestrategy/> and the Earlier Core Strategy Work webpage www.lewes.gov.uk/planning/20616.asp

Appendices

Appendix 1 - Equality Analysis Summary

Appendix 2 - Lewes District Local Plan Part 1: Joint Core Strategy

Appendix 3 - Lewes District Local Plan Part 1: Joint Core Strategy Policies Maps

Appendix 4 - Inspector's Final Report

Appendix 5 - Appendix to the Inspector's Final Report

Appendix 1: Equality Analysis Report Template

Title:	Adoption of the Lewes District Local Plan Part 1: Joint Core Strategy
EA Lead :	Catherine Jack
EA Team:	Strategic Policy
Date Commenced:	9 March 2016
Target Completion Date:	Decision to be taken by Cabinet on 28 April and full Council on 11 May 2016
Reason for assessment:	Cabinet and Council Key Decision

Context and Scope

1. What are the main purposes and aims of the service/project/decision?

To adopt the Joint Core Strategy as part of the development plan for the parts of Lewes district for which LDC is the local planning authority (i.e. the areas not covered by the South Downs National Park).

2. What effect does it have on how other organisations operate and what commitments of resources are involved?

No impact. Although the plan has been produced in partnership with the South Downs National Park Authority, they will be making their own decision about whether to adopt the Joint Core Strategy as part of the development plan for those parts of Lewes district that lie within the national park (for which SDNPA is the local planning authority).

3. How does it relate to the demographics and needs of the local community?

No obvious impacts.

4. How does it relate to the local and national political context?

Adopting the Joint Core Strategy is a key priority for the Council. Adopting an up-to-date Local Plan (of which the Joint Core Strategy is Part 1 for Lewes district) as soon as possible once it has been found sound at examination is very strongly encouraged in the national political context.

5. Is there any obvious impact on particular equality groups?

Race (includes ethnic or national origins, colour, & nationality)	Disability (includes mental & physical)	Gender (includes gender reassignment)	Pregnancy (includes maternity & paternity)	Sexual Orientation (includes heterosexual, homosexual & bisexual)	Religion & Belief (includes all faiths, beliefs & agnostic)	Age (includes all age groups)
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Lewes District Council

Impact	Positive	Negative	None	Positive	Negative	None	Positive	Negative	None	Positive	Negative	None	Positive	Negative	None	Positive	Negative	None	Positive	Negative	None
Tick if relevant			x			x			x			x			x			x			x

6. How does it help to us meet our general duties under the Equality Act 2010?

By having no obvious impacts on particular equality groups, the general duties under the Equality Act 2010 are not being affected.

7. What is the scope of this analysis?

The scope of this analysis is focused on the decision as to whether to adopt the plan, or not.

The Joint Core Strategy itself has not been subject to this Equality Analysis. A separate specific Equality Impact Assessment has been undertaken on the Joint Core Strategy in 2012 www.lewes.gov.uk/Files/plan_EqualityImpactAssessment_2012.pdf together with a pre-adoption update addendum in March/April 2016 which has assessed the equality impacts of modifications to the plan that have arisen through the examination in public process.

In addition a full Equality Analysis has been undertaken in 2015 for the preparation of plans and strategies, of which the Joint Core Strategy is one.

Information gathering and research

8. What existing information and data was obtained and considered in the assessment?

A comprehensive baseline picture of the District, as set out in chapter 2 of the Joint Core Strategy.

9. What gaps in information were identified and what action was undertaken/is planned to address them?

None identified.

10. What communities and groups have been involved and what consultation has taken place as part of this assessment?

All consultations during the preparation of the Joint Core Strategy have been undertaken in accordance with the Council's and SDNPA's Statements of Community Involvement. These statements themselves were extensively consulted upon when prepared (including all statutory consultees, town and parish councils and the voluntary sector (e.g. 3VA). Also, see Consultation Summary Statements prepared as part of the Joint Core Strategy. See: <http://www.lewes.gov.uk/corestrategy/index.asp> and the Consultation Statement 2014 http://www.lewes.gov.uk/Files/plan_Consultation_Statement_Submission.pdf and the Consultation Statement Addendum 2015 http://www.lewes.gov.uk/Files/plan_Addendum_Consultation_Statement_Oct_2015.pdf submitted to the



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examination in public. There is not considered to be a need to consult on this equality analysis, in light of the scope and scale of previous consultations undertaken.

Analysis and assessment

11. What were the main findings, trends and themes from the research and consultation undertaken?

None identified, given the narrow scope of the decision to be made.

12. What positive outcomes were identified?

None identified, given the narrow scope of the decision to be made.

13. What negative outcomes were identified?

None identified, given the narrow scope of the decision to be made.

Action planning

14. The following specific actions have been identified: *(see paragraph 25 of the guidance)*

Issue Identified	Action Required	Lead Officer	Required Resources	Target Date	Measure of Success
None	N/A	N/A	N/A	N/A	N/A

Summary Statement

Between 9 March 2016 and 24 March 2016 Equality Analysis was undertaken by Catherine Jack on the proposed adoption of the Lewes District Local Plan Part 1: Joint Core Strategy.

Due regard was given to the general equalities duties and to the likely impact of the recommended decision to adopt that plan on people with protected characteristics, as set out in the Equality Act 2010.

The assessment identified: *(*delete as appropriate)*

~~*The policy/service/decision/project was found to have positive outcomes for *(insert the relevant protected characteristic groups)* by *(insert the key benefits)*.~~

*No major changes are required. The EA demonstrates the service/policy/decision/project is robust, there is little potential for discrimination or adverse outcomes, and opportunities to promote equality have been taken.

~~*Minor adjustment is required. There are potential problems or missed opportunities, and so actions have been identified to remove barriers and better promote equality. The EA Action Plan will be incorporated and monitored within the service/project plan.~~



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~~*Major adjustment is required. There is potential for adverse outcomes or missed opportunities to promote equality. (Insert compelling justifications for continuing the policy/service/decision/project or state that it will be discontinued until remedial action has been taken). Actions have been identified to remove barriers and better promote equality, and will be undertaken as a matter of priority. The EA Action Plan will be incorporated and monitored within the service/project plan.~~

~~*The policy/service/decision/project* needs to be immediately removed or discontinued as unlawful discrimination is likely to occur. Actions have been identified to remove barriers and better promote equality, and these will be undertaken as a matter of priority. The EA Action Plan will be incorporated and monitored within the service/project plan. Once actions have been undertaken, the position will be reassessed.~~

Approval

Director/Head of Service	Edward Sheath
Signed	
Dated	



Lewes District Local Plan

Part 1
Joint Core Strategy 2010-2030

May 2016



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

LEWES DISTRICT LOCAL PLAN PART 1

**Joint Core Strategy
2010 - 2030**

**Adoption
May 2016 (LDC)
June 2016 (SDNPA)**

www.lewes.gov.uk/corestrategy

This document can be made available in large print, audiotape, disc, or in another language upon specific request.

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Foreword

Lewes District is predominantly rural and renowned for its diverse character and high quality environment and landscape. It comprises a collection of distinct settlements which straddle several employment and housing market areas. With the coast forming the southern boundary, the South Downs National Park encompassing 56% of the district, close proximity to the vibrant university city of Brighton and Hove and excellent transport links to Gatwick and London, Lewes District is a great place to live, work, study and visit.

This Local Plan Part 1 - Joint Core Strategy has been produced by Lewes District Council and South Downs National Park Authority working in partnership. The strategy set out is the result of extensive consultation and evidence gathering. It promotes sustainable development and sets out the scale, type and location of key development proposed in the district to 2030. Important local issues are addressed, such as promoting sustainable economic growth and regeneration to support the local economy; meeting changing housing needs, including the delivery of increased levels of affordable housing; and protecting and enhancing the distinctive character of the built and natural environment.

The broad policy framework established in this Core Strategy will be supported by further more detailed and non-strategic policies, including the forthcoming Local Plan Part 2, the SDNP Local Plan, as well as Neighbourhood Plans where town and parish councils choose to produce them. Together, all these documents will form the comprehensive Development Plan for the district.

I would like to thank the many organisations and individuals who have contributed to the process of preparing this sound plan for Lewes District.



Cllr Tom Jones

Cabinet Member for Planning, Lewes District Council
Member of the South Downs National Park Authority

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Policies Maps

The Lewes District Local Plan Part 1: Joint Core Strategy includes a series of policies maps covering most settlement areas of the district. These policies maps form part of this local plan but have been reproduced separately. The maps are:

Policies Map	Area Covered
1	Lewes
2	Newhaven
2a	Norton
3	Peacehaven
4	Seaford
5a	Barcombe Cross
5b	Barcombe
6	Beddingham and Glynde
7a	South Chailey
7b	South Street
7c	North Chailey
7d	Chailey Green
7e	Sheffield Park
8a	Ditchling North
8b	Ditchling South
8c	Tidy industrial Estate
8d	Ditchling Cottage Homes
9	East Chiltington
10	Falmer
11	Firle
12a	New Cooksbridge
12b	Hamsey Brickworks
12c	Old Cooksbridge
12d	Offham
13	Iford
14	Kingston
15	Newick
16	Plumpton
17a	Ringmer West
17b	Ringmer East
17c	Ringmer The Broyle
18	Rodmell
19	Southeast
20	Streat
21	Tarring Neville
22	Westmeston
23a	Wivelsfield Green East
23b	Wivelsfield Green West
23c	Wivelsfield
23d	Wivelsfield Theobalds
23e	Land off Greenhill Way-Ridge Way

1. INTRODUCTION

- 1.1 Lewes District Council, in partnership with the South Downs National Park Authority, has prepared a plan to guide new development and change in the district for the period up to 2030. This plan, known as the Core Strategy, follows earlier consultations and incorporates the Main Modifications recommended in the Planning Inspector's Final Report¹ and Appendix² following the Examination in Public, as well as a number of additional, minor alterations by way of clarification or up-dates. This Core Strategy forms Part 1 of the new Lewes District Local Plan (see paragraphs 1.6 and 1.7 for further information on this).
- 1.2 In January 2013, the Core Strategy Proposed Submission document was published and representations were invited on the plan. All representations made have been considered by the Inspector. Prior to submitting the Core Strategy to the Secretary of State, the District Council and National Park Authority took the decision to make certain amendments to the Proposed Submission document as well as the accompanying Sustainability Appraisal report. Those amendments were published in May 2014 as 'Focussed Amendments' to the Proposed Submission Document and further representations were invited. All representations received on the Focussed Amendments were also submitted to the Examination.
- 1.3 Following receipt of the Inspector's 'Initial Findings' in February 2015, the District Council and National Park Authority responded with Proposed Modifications to address the Inspector's requirements. These Proposed Modifications were published in August 2015 and further representations were invited. All representations were submitted to the Examination and two resumed hearing days were subsequently held in December 2015 to consider the Proposed Modifications. The Inspector's Final report was published on 23 March 2016.

What is the role of the Core Strategy and other planning policy documents?

- 1.4 Since September 2007 the planning policies for all of Lewes District have been the 'saved' policies of the Local Plan that was adopted in 2003. Since 2003 the planning system has experienced significant change. Under the Planning and Compulsory Purchase Act 2004, Local Planning Authorities were required to prepare a Local Development Framework (LDF) that would replace the Local Plans they had in place. Whereas Local Plans were a single document containing all planning policies, the LDF was presented as a portfolio of documents, each covering a different aspect of planning or the administration of planning. A Core Strategy was the pivotal document in any LDF, setting out the over-arching strategy (strategic policies) to which all other documents in the LDF should conform. A Core Strategy was not intended to

¹ http://www.lewes.gov.uk/Files/plan_Inspectors_Final_Report_March_2016.pdf

² http://www.lewes.gov.uk/Files/plan_Inspectors_Final_Report_Appendix_March_2016.pdf

deal with detailed policies, which were instead expected to be covered in other Local Development Documents.

- 1.5 Since 2010, the government has made further changes to the planning system, which, in particular, has included the introduction of the Localism Act 2011 and the National Planning Policy Framework (NPPF). This has resulted in a move away from the principle of producing a portfolio of planning policy documents in the form of an LDF. Instead, the government now refers to Local Planning Authorities producing a 'Local Plan', which, where possible, will consist of a single plan for the area.
- 1.6 As these changes were introduced relatively late in the production of the Core Strategy, the Council and National Park Authority considered it appropriate to proceed with its production as a strategic level plan for the whole of the district. Therefore this Core Strategy will form 'Part 1' of the new Local Plan, with a Site Allocations and Development Management Policies DPD providing the non-strategic policies in 'Part 2' of the new Local Plan. The Local Plan Part 2 will only apply to the part of Lewes District that lies outside the South Downs National Park boundary. Within the National Park, a park-wide plan will ultimately provide a comprehensive Local Plan (see www.southdowns.gov.uk for further details).
- 1.7 On adoption, this Core Strategy replaced a number of the current 'saved' Local Plan (2003) policies. Those policies that have been replaced or retained are set out in Appendix 2 of this plan. The retained Local Plan (2003) policies will be reviewed through the Local Plan Part 2 or the South Downs Local Plan as appropriate.
- 1.8 Other planning policy documents include the Lewes District Council Community Infrastructure Charging Schedule and Neighbourhood Plans prepared under the Localism Act 2011.
- 1.9 Collectively, these policy documents set out how the district is expected to change over a period of time and reflect other relevant strategies and policies in the area. They make clear where, what, when and how development will take place and in doing so establish a clear vision for the district that will help to create sustainable communities where people want to live, work and visit, now and in the future.
- 1.10 The management of waste and production of minerals are carried out in a manner which means that these activities usually provide a service which extends beyond the boundaries of a single District or Borough Council. It is important therefore that the need for such activity is considered in a wider geographical context and for this reason, such matters occurring in East Sussex, outside of the National Park, are dealt with by East Sussex County Council (the SDNPA deals with such matters within its administrative area).
- 1.11 Local planning policy for waste and minerals is contained in plans which cover the entire County. Currently these are the East Sussex, South Downs and Brighton & Hove Waste and Minerals Plan (2013), along with certain policies

from the Waste Local Plan (2006) and the Minerals Local Plan (1999)³. Together with the Core Strategy, these plans form the development plan for the district and the two local planning authorities therefore also need to take relevant policies in these plans into account when determining planning applications. Planning applications for waste and minerals activity are considered by East Sussex County Council or by the South Downs National Park Authority (where applications are made for these activities within the Park).

How was the Core Strategy prepared?

1.12 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 has been undertaken throughout the production of the Core Strategy. The formal consultation periods are identified in *italics* in table 1.

Table 1 – Timetable for preparing the Core Strategy

Stages in preparing the Core Strategy	
<i>Issues and Emerging Options Topic Papers⁴</i>	<i>May 2010</i>
<i>Emerging Strategy (including other options considered)²</i>	<i>Autumn 2011</i>
<i>Proposed Submission Document⁵</i>	<i>January – March 2013</i>
<i>Proposed Submission Document – Focussed Amendments³</i>	<i>May – June 2014</i>
Formal Submission ⁶	September 2014
Examination	Hearings held January 2015
<i>Modifications publication and consultation</i>	<i>August – October 2015</i>
Examination	Resumed Hearings held December 2015. Inspector's Report received March 2016.
Adoption	May 2016 (LDC) June 2016 (SDNPA)

1.13 As Table 1 shows, there have been a number of key stages in preparing the Core Strategy. In May 2010, nine Topic Papers were published for consultation by the District Council. These papers included proposed

³ East Sussex County Council, the South Downs National Park Authority and Brighton & Hove City Council have now commenced work on a Waste and Minerals Sites Plan, which will allocate land for waste and minerals development. For more information go the ESCC website: <http://www.eastsussex.gov.uk/environment/planning/development/mineralsandwaste/default.htm>

⁴ These stages constitute Regulation 18 of The Town and Country Planning (Local Planning) (England) Regulations 2012

⁵ Regulations 19 and 20 of the above regulations

⁶ Regulation 22 of the above regulations

objectives for the Core Strategy, a proposed vision for the district and potential policy areas and policy options for consideration. Comments 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.

- 1.14 A background paper was prepared that identified the main views received during this consultation process and how the views expressed influenced the Emerging Core Strategy (Summary of Consultation on the Core Strategy: Issues and Emerging Options Topic Papers <http://www.lewes.gov.uk/corestrategy/index.asp>).
- 1.15 The Emerging Core Strategy was published for consultation in September 2011 for a period of 12 weeks. This document, which was accompanied by a Sustainability Appraisal report, set out the different policy options that were being considered in formulating the Core Strategy. In some cases, a preferred policy option was indicated. Consultees were invited to submit comments on all options under consideration and suggest alternatives. Details of the consultation undertaken, a summary of the representations received, and the local authority response to them has been published (Emerging Core Strategy Consultation Summary Document <http://www.lewes.gov.uk/corestrategy/index.asp>).

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

- 1.16 The Core Strategy covers the whole of Lewes District, including the area within the South Downs National Park. The map in section 2 (see page 15) identifies the extent of the National Park within Lewes District.
- 1.17 On 1 April 2011 the National Park Authority became the sole planning authority for the whole area designated as the South Downs National Park. Since then, Lewes District Council has worked in partnership with the South Downs National Park Authority to jointly prepare this Core Strategy. Therefore the Core Strategy has been approved for publication and consultation by both the District Council and the National Park Authority at every key stage after 1 April 2011.
- 1.18 The National Park Authority is in the early stages of preparing its own plan, which will cover the whole of the National Park area from Winchester in the west to Eastbourne in the east. The anticipated adoption of this plan is late 2017. Given the relatively close adoption dates of the respective plans, and that the policies in this Core Strategy look ahead to 2030, it is likely that a number of the policies that apply to the National Park area will be taken forward into the subsequent park-wide Local Plan, although some may change depending on the findings of up to date evidence and monitoring.

- 1.19 A key influence on planning policies for the National Park area will be the South Downs National Park's Partnership Management Plan, which was adopted in December 2013 and will inform the South Downs Local Plan.

How was the content of the Core Strategy determined?

- 1.20 There have been many different influences on the content of the Core Strategy, a summary of which is as follows:

National influences

- 1.21 In March 2012 the National Planning Policy Framework (NPPF) was published. It sets out the Government's planning policies for England and, together with the Planning Practice Guidance, how these are expected to be applied. The NPPF must be taken into account in the preparation of local plans, such as this Core Strategy.
- 1.22 The NPPF replaced a raft of national planning policy and guidance, which was predominantly contained within Planning Policy Statements (PPS) and Planning Policy Guidance notes (PPG). These documents were taken into consideration during the early stages of producing this plan (issues and options), although by the time the Emerging Core Strategy was prepared a draft of the NPPF had been issued and was also taken into account. Since March 2014 the NPPF has been supported by national Planning Practice Guidance, covering various topics including housing and economic development needs assessment and Local Plans.
- 1.23 Regard has been given during the preparation of this plan to UK Marine Policy Statement, the national framework for decisions affecting the marine environment to ensure integration with the marine planning regime. The local planning authority will continue to have regard, where appropriate, to the Marine Policy Statement and the emerging South Marine Plans and designations in subsequent plan making and decision taking.

Regional influences

- 1.24 The Core Strategy was prepared in the context of the South East Plan (2009), which was revoked by the Government in March 2013. Due to the uncertainty surrounding regional planning throughout much of the period of developing the Core Strategy, the District Council and National Park Authority took the decision early in the preparation process to review certain policy approaches set out in the South East Plan. This review included those policies concerned with the amount and distribution of housing to be planned for in Lewes District.

Other Strategy documents

- 1.25 There is a need to take account of local strategies and policies that are applicable to the plan area. The visioning work and compilation of the strategic objectives for this plan have been very much informed by the

Sustainable Community Strategy (SCS) for Lewes District. The priorities of this SCS were 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.

1.26 Since the Sustainable Community Strategy was prepared, the District Council also prepared and adopted a Regeneration Strategy 2012 - 2015. This Strategy outlined how the District Council and its partners will help create the conditions to sustain economic growth over the coming three years. The Regeneration ambitions are based on five priorities⁷ that this Core Strategy will have a key role in seeking to realise. In addition, regard has been given to the South Downs National Park Partnership Management Plan 2014-2019 in the development of the Core Strategy.

1.27 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 reflects. Amongst others, these strategies include East Sussex County Council's Local Transport Plan⁸, the relevant Catchment Flood Management Plans and Shoreline Management Plans, the East Sussex Economic Development Strategy, the Water Resources Management Plans prepared by South East Water and Southern Water, and the East Sussex Environment Strategy.

Evidence base studies

1.28 A key requirement in developing planning policies is that they are underpinned by robust evidence. Hence, during the course of recent years a significant number of evidence studies have been undertaken on several different subject areas. References to these studies appear throughout this document, particularly in the reasoned justification for each policy. The full extent of the evidence base studies and their content can be viewed on the Core Strategy and Background Reports pages of the District Council's website.

National Park influences

1.29 Given that a significant part of the Core Strategy plan area is within the South Downs National Park, the two statutory National Park purposes underpin the strategy and policies that will 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:

⁷ The five priorities are; attracting investment; promoting enterprise; inspiring learning; welcoming visitors, and; strengthening partnerships.

⁸ The current version of this plan is Local Transport Plan 3, which was adopted in 2011

- 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.⁹

1.30 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)

- 1.31 As the Core Strategy needs to contribute towards the achievement of sustainable development, it needed 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.
- 1.32 A Sustainability Appraisal Report, compiled through an iterative process to inform the preparation of the plan, accompanies this document. It identifies all strategy and policy options considered and details how they performed against the objectives. The chosen 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 the findings of the evidence base, stakeholder involvement and delivery of the key strategic objectives of this plan.

Habitats Regulation Assessment

- 1.33 The Core Strategy has taken into account the effect it could have on a number of protected European Sites both within Lewes District and in surrounding areas. The Habitat Regulations Assessment, produced to accompany the Core Strategy, shows that there will be no likely significant adverse effect on any of the protected sites as a result of implementing the plan.

The Duty to Co-operate

- 1.34 The NPPF (paragraphs 178 to 181) requires local planning authorities to work collaboratively to address strategic priorities and development requirements across local boundaries. Hence, the District Council and National Park Authority have had regard to the Duty to Co-operate requirements and are members of the East Sussex Strategic Planning Members Group and the Coastal West Sussex and Greater Brighton Strategic Planning Board.

⁹ In accordance with the Sandford Principle, where irreconcilable conflicts exist between the two purposes, the conservation interest (the first purpose listed) should take priority.

Background papers, including justifications for the housing strategy, and Duty to Cooperate Compliance Statements have demonstrated how the requirements of the Duty have been met. Outcomes from the collaboration undertaken are reflected within the content of a number of policies within this plan, particularly in the Spatial Strategy.

Views of individuals and organisations

- 1.35 Throughout the preparation of the Core Strategy, the views and opinions expressed by those individuals and organisations with an interest in the area have been integral to the plan's content. Obtaining such views and opinions has been undertaken in accordance with the Statements of Community Involvement using both formal consultation methods and through more informal engagement (one-to-one meetings, workshops, inputting into evidence studies, etc). Full details of the consultations undertaken have been set out in the Consultation Statement 2014 and the Addendum 2015.

The role of Neighbourhood Planning

- 1.36 Through the Localism Act 2011, a new tier in the planning system was created at the local level. This is in the form of neighbourhood planning, which consists of the production of Neighbourhood Plans and Development Orders. The District Council and National Park Authority take a very positive approach to working with, and assisting, those town and parish councils in the plan area that wish to undertake neighbourhood planning as well as other community led plans, such as Parish Plans and Village Design Statements. The adoption of this Core Strategy is a key part of this process, as it provides the strategic planning context for any neighbourhood plans prepared in this area. Therefore the neighbourhood plans prepared here are anticipated to make a substantial contribution to the delivery of some strategic elements of this plan.
- 1.37 Neighbourhood planning may not be undertaken in all areas covered by this plan (and in some cases neighbourhood planning may only focus on selected issues that this plan addresses). Therefore, a Site Allocations and Development Management Policies DPD (often referred to as the Local Plan Part 2) will also provide the detailed and local policies necessary for the delivery of strategic elements of this plan, including non-strategic site allocations. Within the South Downs National Park area of the district, the South Downs National Park Local Plan will provide these policies.

How is the Core Strategy structured?

- 1.38 This Core Strategy document describes the current characteristics of Lewes District and from this the key issues and challenges are identified (sections 2 and 3). The aspirations of the plan are described through a long term vision, with associated objectives for the district as a whole (sections 4 and 5). 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 (section 6). Core delivery policies on key issues are then provided (section 7). These policies will also be important in the delivery of the objectives. The appendices at the end of the plan cover a range of issues including the post-adoption monitoring of the plan.

2. CHARACTERISTICS OF LEWES DISTRICT

Key Diagram – Lewes District



2.1 This section of the Core Strategy provides a spatial analysis of Lewes District. This is important to identify the issues and challenges that the district faces. 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 in East Sussex, in the South East of England and is around 45 to 60 miles south of London.
- The district covers an area of 292 sq km, extending from the English Channel coast in the south, through the South Downs National Park and into the countryside of the Sussex Weald to the north.
- The total population is 97,500¹⁰, 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 1st April 2010. The population of this area of the district is approximately 24,000.
- 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 and 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 and due to their available range of employment opportunities, retail, other services and facilities, including public transport links to areas such as London and Gatwick, they exert a strong influence on the rural communities within the northern part of Lewes District.
- The more rural district of Wealden is 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. These include 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.

¹⁰ Population figures are ONS, 2011 Census unless alternatively referenced

- 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 and downland, shingle beaches, heathland, river valleys, flood plains, wetlands, 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, sixteen Sites of Special Scientific Interest, two Special Areas of Conservation, two National Nature Reserves, four Local Nature Reserves, and three Wildlife Trust Reserves.
- The district has 115 Sites of Nature Conservation Importance (SNCI). In 2011 57 of these sites were confirmed as being in positive conservation management.
- Of the 2,437 hectares of land designated as Sites of Special Scientific Interest, around 42% is considered by Natural England to be in an unfavourable condition, albeit recovering.
- 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 (Lewes 1264).
- Significant areas, including parts of Lewes town, Seaford and Newhaven, are at risk of flooding from the River Ouse and its tributaries, or inundation from the sea. In addition, there are many locations elsewhere in the district that have areas prone to surface water flooding and ground water flooding during times of intense rainfall.
- The majority of the district's water supply depends upon chalk aquifers running under the Downs and groundwater contributes to the functioning of many rivers and streams through the area.
- Coastal erosion is occurring in various places along the coastline.
- Air quality in the district is generally good, but an Air Quality Management Area (AQMA) is in operation in both Lewes and Newhaven town centres, where most of the air pollution is generated by traffic.
- Large parts of the district benefit from a highly peaceful and tranquil environment, with minimal noise and light pollution, which is much valued by residents and visitors alike.

Social Characteristics

- The district has a significantly higher percentage of residents over 65 years of age (22.7%) compared with the national average (16.4%). By contrast, it has

a smaller proportion of residents aged 15-29 years (15.2%) compared with the national average (19.9%).

- 96.6% of the population are white, compared with 86% 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 has risen steadily over recent decades and is expected to continue to do so during the plan period. The population increase, and in turn the demand for additional housing, is predominantly driven by high net levels of inward migration.
- The majority of the inward migration comes from Brighton & Hove, although those moving into the district from other neighbouring and nearby authorities, including London, also contribute towards the significant housing demand.
- The 65+ age group is expected to increase by around 45% between 2010 and 2030, as those born in the 'baby boom' of the 1950s and 1960s reach retirement age.
- By contrast, the number of children (under 16 years old) is expected to reduce by 19% between 2010 and 2030.
- One in five households in the district does not have access to a car, and over a third of these households are pensioners.
- The mean household income is £36,585, which is higher than the mean for East Sussex or Great Britain, but still well below the South East region's mean of £40,249.
- Overall levels of deprivation across the district are comparatively low, although there are small areas, mainly 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.
- 2,543 households are currently on the Council's Housing Register (as at 30 November 2013).
- 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 30,000 jobs in the district, predominantly in public administration, education and health (36%), retail (16.5%) and manufacturing (7.6%).
- Small companies of between 1 and 10 employees account for 88% of all local businesses.
- Lewes town accounts for almost half the district's jobs, 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.
- In 2001, 17,874 residents commuted out of the district to jobs elsewhere, particularly Brighton & Hove, Crawley/Gatwick and London.
- Sussex and Brighton Universities are located adjacent to the district boundary at Falmer and make an important contribution to the local economy. Part of the Sussex University campus, including the Sussex Innovation Centre, is actually 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, together with jobs in rural industrial premises, often farm-based.
- In 2012, tourism supported approximately 3,399 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 and lies entirely within the South Downs National Park.
- The Parish has a population of 17,297.

- 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 neighbourhoods. Much of the town is covered by a Conservation Area designation.
- 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 5th 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.
- Lewes 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, Brighton, Eastbourne, Ashford and Seaford. The town is also a hub for local bus services.

Newhaven

- Newhaven is located on the English Channel coast at the mouth of the River Ouse, with the South Downs National Park surrounding the town on the landward side.
- The parish has a population of 12,232.
- The historic core of the town is located on a slight spur of the Downs to the west of the river, although the rapid post-war expansion of Newhaven has seen the town extend across the valley to encompass the villages of Denton and South Heighton in the east.
- Newhaven has had a harbour for sea-faring vessels since the 16th 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 a small marina. The port has been selected as the shore base for the Rampion offshore wind farm.
- In 2010, 253,000 passengers travelled through the port, a 23% reduction in the number that travelled in 2007. The amount of freight handled declined to its lowest level for ten years at 824,000 tonnes.

- There are a number of derelict and under-utilised sites that offer significant opportunities for regeneration, near to or adjoining the harbour and there has been significant recent water-front redevelopment at West Quay.
- 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. Consequently, there are a significant number of potentially contaminated sites.
- 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 majority of retail development in recent years has occurred on former industrial land on the east of the river.
- The town has two railway stations offering direct train services to Lewes, Seaford and Brighton.
- A high proportion of jobs in the town (31%) are still in manufacturing, which is significantly above the regional and national averages.

Peacehaven & Telscombe (includes East Saltdean)

- The parishes of Peacehaven and Telscombe are located on the English Channel coast and have a population of 21,544.
- East Saltdean, which forms part of Telscombe parish, is an almost solely residential area on the administrative border of Brighton and Hove City.
- The settlement extends from the cliff tops overlooking the sea back towards open downland to the north and west, which now forms part of the South Downs National Park.
- It is characterised by low density 20th century residential development, historically laid out on a rigid grid street plan that reflects the early origins of Peacehaven as a speculative seaside resort at the turn of the century.
- Coast defences protect most areas of cliff top development from erosion by the sea.
- The town has a strong feeling of community with many local community groups and well attended local events.
- 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.
- 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 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.
- The Meridian Monument, unveiled in 1936, marks the coincidence of Peacehaven with the Greenwich meridian.

- A new public park opened in Peacehaven in 2015. Centenary Park utilised land provided in association with the new Waste Water Treatment Works and funding was provided by recent housing developments.

Seaford

- Seaford is the largest settlement in the district. It is located between the sea and the South Downs National Park, with the river valleys of the Cuckmere and the Ouse lying to the east and west of the town respectively.
- The parish has a population of 23,571.
- The historic core of the town is set back from the 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 relatively low vacancy rates.
- 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.
- The town contains significant post-war residential estate development that has 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 natural attractions the town's visitor economy is considered to have untapped potential.
- The town's railway station offers direct train services to Newhaven, Lewes, Brighton and London.
- 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, 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 (populations less than 2,000), with the exception of Ringmer, which has a wider range of facilities and services, including a secondary school and swimming pool.
- 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 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 economy of the wider area, such as Plumpton College, which specialises in land-based activities.
- 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.

3. KEY STRATEGIC ISSUES AND CHALLENGES

- 3.1 This section of the document identifies the strategic issues and challenges facing Lewes District, including those areas of the district within the South Downs National Park that the Core Strategy seeks to address. Developing the spatial character analysis identified some of the issues, as did the early work on the Core Strategy and Sustainability Appraisal process. This included the engagement work that led to the formulation of the Issues and Options Topic Papers. These issues and challenges also reflect the issues and priorities that were detailed in the Sustainable Community Strategy.
- 3.2 It is these strategic issues and challenges that needed to be addressed in planning for 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 seek to bring forward sufficient land to meet the expected need for new homes arising from the future growth in households.
- We need to determine the best way of ensuring that these new homes meet local needs, particularly the provision of affordable housing, housing for an ageing population and accommodation for other groups with particular needs, such as veterans.
- We need to balance the considerable need for new housing with the limited opportunities for growth in the district, as emphasised by the National Park designation that constrains the outward expansion of the main towns in the district.
- 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 local authorities, agencies and organisations to deliver this growth and the necessary infrastructure improvements to support it.
- 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 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 and imbalance 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 of all sizes in order to support the incubation, 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 and aspirations 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, new start-up businesses and business growth.
- 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.
- We need to grasp the economic opportunities offered by the South Downs National Park.

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, encourage healthy lifestyles, 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 character and 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.
- As well as accounting for approximately 2% of jobs in the district, agriculture also directly impacts upon the character and quality of the landscape. The challenge is therefore to ensure that agriculture and other rural enterprises can prosper in a way that benefits the character of the countryside.

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 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, the East Sussex Preliminary Flood Risk Assessment and the River Ouse Catchment Flood Management Plan 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.

- 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”, whilst also having regard to the other headline issues and challenges, and then the Core Delivery Policies address the five subsequent issues/challenges.

4. A VISION FOR LEWES DISTRICT

- 4.1 The purpose of the spatial vision for Lewes District is to set out the overarching aspiration of what the area will be like by the end of the plan period in 2030.
- 4.2 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 vision and providing the direction for the spatial strategy and policies for the plan area, as set out later in this document.
- 4.3 Early versions of this vision were influenced by the Lewes District Sustainable Community Strategy, which reflected the aims and objectives of the collaborative working of the Local Strategic Partnership. The vision has since evolved to also reflect the priorities and concerns raised through the Core Strategy consultation process.
- 4.4 As demonstrated by the characteristics and key issues chapters (see Sections 2 and 3), Lewes District is very diverse with individual areas having distinct characteristics and issues that are unique to them within the context of the whole 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.
- 4.5 To bring about the following vision, multi-agency and cross boundary working and liaison will be essential.

District wide

By 2030 the district and its residents will have made every effort to respond 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 a reinstated Lewes to Uckfield railway line) and increased production of green energy. As a consequence of these approaches, air quality levels in the towns will have improved. 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.

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 residents, businesses 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, which will have remained or, where appropriate, regenerated to become viable and vital assets for the communities that they serve. To assist with this, businesses and investment will be attracted into the area through the provision of modern business accommodation, including for small business start-ups, and high speed broadband, which is all set within an environment that offers a good quality of life.

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 households in the district and changes to the demographic profile of the population. 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. 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 adjacent 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, including those to meet local needs. The improved accessibility of the town centre will have been aided by an improved highway network, greater connectivity to the town's railway stations and a high quality sustainable transport corridor along the A259. The natural asset of the river through the town will have been maximised through redevelopment opportunities, thereby enhancing this unique area of the town for residents and visitors alike.

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 will have been enhanced and opportunities to deliver employment floorspace to help establish a greater presence of local businesses in the town will have been realised. The retail provision on offer in the town will have been improved by developments that encourage a rich and diverse mix of shops and other town centre uses.

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, by developments that encourage a rich and diverse mix of shops and other town centre uses, 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 will 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 National Park Purposes and Duty, together with Conservation Area objectives, by 2030 the town of Lewes will have had its role as a County town strengthened and will be attractive 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 central 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 retail provision on offer in the town will have been improved by developments that encourage a rich and diverse mix of shops and other town centre uses. The natural asset of the river will have been recognised in recent developments and the economic and recreational opportunities presented by the heritage assets of the town will have been utilised while 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 and distinctive character and identity. Although the majority of recent development would have been directed to the urban areas of the district, development that meets the community's needs for housing, including affordable housing, 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, further opportunities for sustainable travel, particularly to and from the stations of Plumpton and Cooksbridge will have been realised. Although travel by the private car will still be, in many instances, 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 and community facilities will have been met sensitively, acknowledging and responding to the special qualities of the National Park¹¹. 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.

¹¹ The agreed special qualities of the National Park can be viewed at:
<http://www.southdowns.gov.uk/about-us/special-qualities>

5. STRATEGIC OBJECTIVES

5.1 The eleven strategic objectives, identified in this section, outline the direction that the Local Plan (of which this Core Strategy is Part 1) will take in order to achieve its vision of Lewes District in 2030. They are not in any order of importance:

1. 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 is underpinned by a balanced sector profile.

Key to this will be for the District 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 and opportunities offered by the renewable energy sector, 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 attract and meet the needs of new and expanding local businesses. Recognising the contribution and opportunities of the rural economy, including the agricultural and self employed sectors, will also be key to ensuring a diverse economy.

2. To maintain and enhance the vitality and viability of the district's town centres, retail centres and local centres as hubs for shopping, business, entertainment, cultural and community life.

The District Council and National Park Authority, working in partnership with organisations such as the Chambers of Commerce, will seek to revitalise those centres that have experienced decline over a number of years. This will include exploring alternative uses that will help reverse this decline. For those centres that perform a vital role at either a local or district level and are seen as performing well, ways to maintain and build upon their success will be explored.

3. 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 District Council and National Park 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. As part of this work, consideration will be given to the particular housing needs of individual settlements ensuring the right mix and type of development. The District Council and National Park Authority will also seek to work in partnership with other authorities in the region to explore the issue of meeting housing need across this wider area.

- 4. 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.**

An element of this objective will be strong and continued partnership working between the District Council, and other agencies, and the 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.

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

The District Council and National Park 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 and utilities, as well as recreation and open space.

- 6. To conserve and enhance the high quality and character of the district's towns, villages, and rural environment by ensuring that all forms of new development are designed to a high standard and maintain and enhance the local vernacular and 'sense of place' of individual settlements.**

The District Council and National Park Authority will seek regular dialogue with builders, architects, designers and householders in order to raise standards of design and construction in the area, including new build development and conversions. This will include publication, as appropriate, by the District Council and/or National Park Authority of guidance on appropriate design, materials, construction methods, townscapes and key views, and the creation of safe, legible layouts that provide inclusive access to all.

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

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

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

Among other development initiatives, the District Council and National Park Authority will prioritise the redevelopment of vacant and derelict sites, particularly in existing urban areas, recognising the economic, social and environmental

benefits and challenges. 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).

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

The District Council and National Park Authority 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 broadband across the whole of Lewes District, supporting those who work, or wish to work, from home, and those who wish to have improved access to services, thereby reducing the need for travel. Achieving this objective should assist in tackling some of the areas that are currently subject to poor air quality in the district (predominantly caused by transport) and ensure that further areas do not become apparent.

10. To ensure that the district reduces causes of climate change and is proactive regarding climate change initiatives.

This objective will involve the District Council, National Park Authority 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.

11. 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 District Council and National Park Authority will work closely with the Environment Agency and East Sussex County Council (the lead local flood authority) 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.

6. THE SPATIAL STRATEGY – WHERE DEVELOPMENT AND CHANGE WILL TAKE PLACE

- 6.1 This section sets out the locations within the plan area where development and change will take place to help deliver the vision and objectives – this is the spatial strategy. This section also identifies the level of development and change that is planned to take place over the lifetime of the plan.
- 6.2 Following the spatial strategy is a set of core delivery policies that will, unless otherwise stated, apply across the whole of the plan area. The core policies set out how development and change will take place to ensure it contributes to achieving the vision, objectives and sustainable development across the plan area.
- 6.3 The spatial strategy and core delivery policies have been prepared in the context of the presumption in favour of sustainable development, which is the key underlying principle of the National Planning Policy Framework. In this regard the policies of this plan set out how this presumption will be applied in Lewes District. Proposed development that accords with up to date Local Plan policies (of which this Core Strategy is part) should be approved and proposed development that conflicts should be refused, unless other material considerations indicate otherwise. In order to meet this requirement the following policy will be applied.

Presumption in favour of Sustainable Development

When considering development proposals, the local planning authority will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will always work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.

Planning applications that accord with the policies in the Local Plan (and, where relevant, with policies in neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise.

Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the local planning authority will grant permission unless material considerations indicate otherwise – taking into account whether:

- 1. Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or**
- 2. Specific policies in that Framework indicate that development should be restricted.**

- 6.4 The following policies in this Core Strategy are linked to a Monitoring and Delivery Framework (Appendix 3), which outlines how each policy will be implemented and its effectiveness will be measured. Performance indicators will be used to monitor how the policies are working. For some policies there are also targets covering critical measures of success for the plan as a whole. The Authority Monitoring Report will detail progress and delivery against the performance indicators and targets and recommend actions where necessary to keep the plan on course to deliver the vision.

The Settlement Hierarchy

- 6.5 In developing the proposals for development and change in the Core Strategy it was essential that an understanding of the role that each of the existing settlements plays was established. This was to help ensure that development will be distributed in the most sustainable manner, particularly having regard to where the need for development exists and which are the most sustainable settlements in and around the district. A settlement hierarchy has been prepared and is detailed in this section. The purpose of the settlement 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.
- 6.6 The settlement hierarchy has been informed by the Rural Settlement Study, which identifies the key social, environmental and economic characteristics and issues in the district's rural settlements. The study identified a hierarchy of the rural settlements based on their current attributes and sustainability. The district also includes 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 utilised¹². None of the towns within Lewes District were identified as primary or secondary regional centres, although some towns within the vicinity of the district were. These towns exert a strong influence on Lewes District and are therefore identified in the hierarchy.
- 6.7 Based on this regional evidence it is not considered appropriate to place any of the towns within Lewes District in either the primary or secondary regional centre category. Similarly, none of the towns exhibit the characteristics of a rural service centre. It has therefore been decided to place all of the towns into the category of 'District Centre'. It is accepted that certain settlements in this category, particularly Lewes, maybe seen as a more self sustaining settlement than others (e.g. Peacehaven & Telscombe). However, this difference is not considered to be so marked that it merits a separate category

¹² 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 Whilst it is recognised that the South East Plan is revoked, this particular evidence is still appropriate in this case.

being created for that settlement, nor does Lewes meet the criteria of a secondary regional centre.

6.8 The table below identifies the settlement hierarchy and refers to levels of housing growth for each of the settlement categories below the District Centre level. Within the table, growth figures are not identified for the Primary, Secondary and District Centres. However, given the high sustainability ratings of those settlements it is in these locations that growth should be focused. The figures identified for the Rural Service Centres, Service Villages and Local Villages are derived from the Rural Settlement Study and are considered to be levels of growth over the plan period that are appropriate to the settlement type, based on the level of service provision, accessibility, historic growth rates, and levels of housing need. In determining these levels of growth, no detailed assessment was undertaken on the opportunities and constraints to development in specific settlements. Therefore, it needs to be appreciated that the theoretical levels of growth for the different rural settlement types may not be deliverable in certain settlements. Paragraphs 6.27 to 6.39 consider this issue in more detail.

Table 2 – Settlement Hierarchy

Settlement category	Function	Settlements within this category
Primary Regional Centre	A large settlement accessible 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 higher level services.	Brighton and Eastbourne (both settlements are outside Lewes District, but they exert a strong influence on the district)
Secondary Regional Centre	A settlement accessible 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.	Haywards Heath (this settlement is outside Lewes District, but it exerts a strong influence on the northern part of the district)

District Centre	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.	Burgess Hill (this settlement is outside Lewes District, but it immediately borders the eastern boundary and is an influence on the north western part of the district), Uckfield (outside Lewes District, but is a strong influence on the north eastern part of the district), Seaford, Lewes, Newhaven, Peacehaven & Telscombe
Rural Service Centre 100+	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.	Newick, Ringmer
Service Village 30 - 100	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.	Barcombe Cross, Ditchling, Firle, Glynde, Plumpton Green, Wivelsfield Green
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.	Broyle Side, Cooksbridge, Chailey North, Chailey South, Falmer, Kingston, Piddinghoe, Rodmell, South Street (Chailey Parish), 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

Accommodating and delivering growth

- 6.9 Over the coming years, Lewes District must evolve to accommodate new development; meet the changing housing needs of the population; support the local economy; and develop the 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. Regard has been given to how the distribution of development can help achieve the diverse visions for the individual character areas of the district. This includes the need for regeneration in areas such as Newhaven; the need to conserve and enhance the valued environment in and around Lewes town whilst delivering much needed affordable housing; and, retaining and enhancing the attractive character and identity of the Low Weald villages whilst ensuring that development to meet community needs and support the rural economy is accommodated.
- 6.10 This Core Strategy establishes the development targets for the district for a given period of time (2010 to 2030). These targets are supported by evidence and hence reference is made in this section to a number of evidence based documents and background papers.
- 6.11 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 (IDP) has been developed alongside this Core Strategy. The IDP sets out the infrastructure that will be required to support the level and location of development proposed, along with details of the infrastructure providers, timings and potential costs. The IDP is a 'live' document and will continue to be updated on a regular basis. Updates will reflect any new and amended delivery plans prepared by relevant infrastructure providers.

The amount of development

- 6.12 The focus of development is on the housing and employment sectors as this is where the greatest level of need has been identified. This does not imply that there will be no need for further provision of community, recreation and leisure facilities. The delivery of some of these facilities is specifically highlighted in some of the locational policies in the Core Strategy, as well as in the Infrastructure Delivery Plan. In addition, generic policies concerning the provision of such facilities will ensure that suitable provision is facilitated.

Housing provision

- 6.13 Since the revocation of the South East Plan, the scale of future housing growth has needed to have due regard to the policies set out in the National Planning Policy Framework, The key policy reference is paragraph 47, which states that Local Plans should meet the full objectively assessed need for market and affordable housing as far as is consistent with other policies of the

Framework. In the light of this, the District Council and the National Park Authority worked in partnership with other authorities from the Sussex Coast Housing Market Area¹³ to produce a Duty to Co-operate Housing Study. For Lewes District, this study identifies a need to deliver between 9,200 – 10,400 net additional dwellings over the plan period (equivalent to 460 – 520 dwellings per annum) as the district's full objectively assessed need. The capacity of the district to accommodate this level of housing growth, as well as any shortfall in neighbouring authorities' housing needs, is summarised below.

- 6.14 A range of factors needed to be balanced to determine the most appropriate scale of housing development, with 'drivers' for growth, such as demographic projections and housing market pressures, on the one hand and supply constraints, including environmental designations and infrastructure availability, on the other. It is also important that these considerations are balanced by the vision of local communities for their areas and the need to provide the employment opportunities that will support sustainable growth and the overall prosperity of the area.
- 6.15 The District Council and the National Park Authority have sought to explore a range of options in order to accommodate the full objectively assessed need for housing within the plan area. However, it was eventually concluded that a housing delivery target which meets the objectively assessed housing needs of the district would be not be sustainable. The main reasons for this conclusion, as supported by the Sustainability Appraisal, are related to the environmental capacity of the district to accommodate that level of housing growth as well as the capacity of existing and planned infrastructure necessary to serve it.
- 6.16 Significantly, about 56% of the district is located within the South Downs National Park, where the level of future housing provision must have regard to the two statutory purposes of the National Park and national policy guidance set out in 'English National Parks and the Broads: UK government vision and Circular 2010'. This particularly affects the outward growth of the towns of Lewes, which lies wholly within the National Park, and Seaford, which is tightly constrained by the National Park boundary. In the rural area outside of the National Park, the vision of the Core Strategy aspires to retain and enhance the distinctive character and identity of the Low Weald countryside and villages.
- 6.17 The location of new housing development is also limited by flood risk, which affects significant parts of the district, especially in and around the towns of Lewes, Newhaven and Seaford, as well as the proximity of international and national ecological designations. In terms of infrastructure, the capacity of the road network continues to be a critical issue affecting the district. This issue principally impacts upon the growth potential of Newhaven, Peacehaven and Telscombe/East Saltdean but also affects the potential for large-scale housing

¹³ The Sussex Coast Housing Market was defined in the Coastal West Sussex Strategic Housing Market assessment Update (November 2012), see <http://www.adur-worthing.gov.uk/media/media,114037,en.pdf>

development in the villages and urban fringe areas to the north or east of Ditchling.

- 6.18 In addition, any theoretical capacity for development has to be considered against the availability of suitable opportunities, as well as the willingness of the market to bring forward development. The Strategic Housing Land Availability Assessment (SHLAA) indicates a potential housing capacity that is significantly short of even the lower end of the district's objectively assessed housing requirement.
- 6.19 In the light of these considerations, it is concluded that the overall target for net additional housing in the district should be a minimum of 6,900 dwellings between 2010 and 2030 (an average of 345 dwellings per annum). This target is less than the full objectively assessed housing need for the district. However, it is considered to be the level of housing growth that most appropriately balances the objective of meeting housing needs with the aims of achieving sustainable development and sustainable communities.
- 6.20 It is also evident from the findings of the Duty to Co-operate Housing Study and Duty to Cooperate work with nearby local authorities that none of the district's shortfall in housing can be met elsewhere in the Sussex Coast Housing Market Area. Approaches have been made to other neighbouring and nearby authorities to explore the potential of their areas to meet some of the shortfall but, so far, no scope has been identified by these authorities to accommodate any of the district's unmet housing needs.
- 6.21 Whilst the housing delivery target does not fully meet the district's objectively assessed requirements, this plan identifies a number of policy measures that will be pursued to mitigate some of the potential negative impacts that could arise as a result of this policy approach. In addition, the Duty to Co-operate Housing Study identified a number of longer term strategic development options, some of which are at a sub-regional level, which could help meet housing requirements. Many of these options will be considered further, working in partnership with other local authorities and agencies.
- 6.22 A Memorandum of Understanding (MoU) has been produced and signed by all the authorities within the Sussex Coast housing market area, as well as the West Sussex authorities of Crawley, Horsham and Mid Sussex. This commits the authorities to work together to explore longer-term solutions for housing delivery. If a longer-term potential solution which affects the plan area is agreed, the District Council and the National Park Authority are committed to a review of the Core Strategy if this is necessary to deliver it.

Employment provision

- 6.23 The provision for planned employment land has been very much influenced by the findings of the Employment and Economic Land Assessment, which was partially updated in 2012. It is also influenced by the housing delivery target as it is important to balance the number of new jobs planned for and the availability of people to take those jobs. Whereas the housing delivery target

is for the period up until 2030, the provision of employment land looks slightly further ahead to 2031¹⁴.

- 6.24 The Employment and Economic Land Assessment and the subsequent spatial strategy have been produced in the context of a double-dip recession (2009 – 2012) and a relatively weak and challenging economic outlook on both a local and wider level. As a result, the economic and employment growth forecasts are somewhat lower than had been envisaged previously.
- 6.25 Despite the relatively low growth forecasts, the need remains to set a positive strategy to aid in the recovery after the recession, give flexibility for stronger economic and/or changing conditions, and at a local level achieve some of the key objectives for this plan, particularly for regeneration. Although key, such a strategy should not just focus on ensuring a suitable supply of employment land and premises. It should also examine ways to unlock the economic potential of existing employment sites and premises, as well as creating the right conditions for investment into the area. The core delivery policies within this plan, particularly Core Policy 4, address this in more detail.
- 6.26 In terms of ensuring a suitable supply of employment land and premises, the Employment and Economic Land Assessment identified a modest quantitative need for land for offices (particularly for Lewes town) and qualitative need for further industrial land in or beside Lewes town over the plan period. Subsequent policies in this spatial strategy detail what this need is and how it can be met. The 2012 EELA update found that the previously envisaged shortfall for offices is now less likely but it continues to recommend a modest (1.0 – 1.25 hectares) additional office land provision at Lewes town, primarily for qualitative reasons. The same is true for industrial land, for which a key problem faced in the district remains the lack of good quality premises. A modest provision (1.0 - 1.5 hectares) of additional good quality industrial land, in or around Lewes town, is therefore recommended to help provide choice and stimulate development. The 2012 update also identified a possible modest shortfall in industrial provision if development trends continue. The provision of some additional industrial land is therefore also considered reasonable in quantitative terms.
- 6.27 As well as identifying the quantum of development to be planned for in the housing and employment sectors, the Core Strategy has also considered the floorspace and land requirements for other sectors. Retail provision and premises for other town centre uses has been one of these sectors and in this regard the recommendations of the Shopping and Town Centres Study have been key. This study concluded that there is not a need, in quantitative terms, to plan for and allocate sites for significant retail development in the period to 2030 (although it is recognised that this position will need to be monitored, and if necessary reviewed, throughout the plan period). There is however a qualitative need for some additional provision, particularly in Lewes town. Spatial Policies 1 and 3 address this issue.

¹⁴ This is due to the update to the Employment and Economic Land Assessment looking ahead to 2031. This was due to the Experian forecasts (partly used to estimate employment land needs) only identifying outputs in five year blocks (i.e. 2026, 2031).

6.28 The Employment and Economic Land Assessment has also considered the expected requirements for the non B-class sectors (i.e. not office and industrial needs). Although the findings, in terms of retail provision, have been superseded by the more detailed findings from the Shopping and Town Centres Study, it does provide an indication of need in other non B-class sectors. For these sectors the assessment concluded that land needs over the plan period are likely to be modest. Expected areas of growth, in terms of land requirements, are anticipated in 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.

Spatial Policy 1 - Provision of housing and employment land

In the period between 2010 and 2030, a minimum of 6,900 net additional dwellings will be provided in the plan area (this is the equivalent of approximately 345 net additional dwellings per annum).

A review of Spatial Policies 1 and 2 will be undertaken by the District Council and National Park Authority on completion of cross-authority working to consider longer-term options for strategic development both within the Sussex Coast Housing Market Area and in adjoining areas if any of these options are demonstrated to be deliverable within Lewes District.

In the period between 2012 and 2031, in the region of 74,000 square metres of employment floorspace (B1, B2 and B8) will be provided in the plan area. 60,000 square metres of this floorspace will be as industrial space (B1c, B2 and B8), and 14,000 square metres will be as office space (B1a).

The distribution of development

6.29 Taking the planned levels of housing and employment growth, this plan needs to set a strategic approach to how this growth will be distributed across the district and when it is expected to take place. 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 commitment¹⁵. The tables below identify the development that can already be accounted for and the residual minimum level of housing and employment development to be planned for during the plan period.

¹⁵ Commitments include housing and employment premises that are either under construction, have an extant planning permission that is likely to be implemented, are schemes that have made sufficient progress through the planning system (generally granted consent subject to the signing of a s.106 agreement), or are existing allocations that are deemed deliverable or developable.

Table 3 – Employment floorspace requirements (to meet a quantitative need)

	Gross Floorspace requirement (sq metres)	Existing potential supply (sq metres) ¹⁶	Residual requirement (sq metres)
Industrial	60,000	69,500	0
Office	14,000	16,900	0
Total	74,000	86,400	0

Table 4 – Housing to be planned for

	(A) Total requirement	(B) Already developed in the plan period (April 2010 – April 2013)	(C) Units permitted, but not yet implemented (includes units under construction)	(D) Units considered deliverable having made sufficient progress through the planning process ¹⁷	(E) Unimplemented Local Plan allocations for housing ¹⁸	Residual requirement to plan for (A – B, C, D & E)
Housing (within the National Park)	Plan – wide requirement:	220	142	0	0	Plan – wide requirement: 4,322
Housing (outside of the National Park)	6,900	800	1131	183	102	

6.30 Table 3 does not identify any residual requirement to be met for the delivery of employment space. However, this does not paint the full picture. The Employment and Economic Land Assessment has stated that, for primarily qualitative reasons, a case can be made for a new site (1.0 – 1.25 ha) in or near Lewes town for office development. The Assessment has also concluded that, also for qualitative reasons, an additional site (1.0 – 1.5 ha) for industrial development would be appropriate in or around Lewes town. As this is primarily a qualitative demand it could be met through the redevelopment of existing employment sites. Although the Employment and Economic Land Assessment identified limited potential for this to happen, it is considered that opportunity does exist in the North Street area of Lewes town for delivering better quality office floorspace. Spatial Policy 3 (North Street Quarter and adjacent Eastgate area, Lewes) identifies this site and deals with this issue further.

¹⁶ The supply figures are taken from the 2012 update of the Employment and Economic Land Assessment and indicates the 'worst case' for supply on the basis that certain sites are discounted from this potential supply due to significant constraints on development. The supply figures are as at June 2012.

¹⁷ These are schemes granted planning permission subject to a section 106 agreement being put in place.

¹⁸ Only unimplemented allocations that are still deemed deliverable or developable through the SHLAA process have been included within this allowance.

- 6.31 In terms of meeting the qualitative (and possible quantitative) need for an additional industrial development, opportunities have proven to be extremely limited. This is predominantly due to limited scope for the outward expansion of Lewes town (recognising its setting within a National Park) and few potential sites within the existing town that could be identified for such use. This was recognised in the Emerging Core Strategy and a potential option of delivering a site at Ringmer for such purposes was identified (a possible extension to the Caburn Industrial Estate). Although the site has no obvious on or off-site constraints that would preclude its development, it was not possible to demonstrate its deliverability, particularly in terms of whether the market would deliver the site. Hence, this plan does not identify a site to meet this need, but as set out in the core policies section, a positive and flexible approach will be taken to improving the quality of the existing industrial stock across the district. Opportunities to deliver this qualitative need on non-strategic sites will also be explored through the South Downs Local Plan and/or relevant Neighbourhood Plans.
- 6.32 Although the main case for the additional employment floorspace in Lewes town is on qualitative grounds, should net additional land be provided it would also provide a greater level of choice and potentially stimulate development and attract occupiers in a part of the district with a relatively tight supply/demand balance.

The distribution of residential development

- 6.33 This Core Strategy sets the over-arching approach for how new housing will be distributed across the plan area in the period up until 2030. This approach reflects the findings of the evidence base (including where the greatest levels of housing need are), the input received from the consultation and engagement undertaken, and the findings of the Sustainability Appraisal process.
- 6.34 In identifying an over-arching policy approach, it is not the role of the Core Strategy to identify and allocate every single housing site. More detail, including the allocation of specific sites, will come through the District Council's Site Allocations and Development Management Policies DPD (Local Plan Part 2) and the South Downs Local Plan. In some areas, Neighbourhood Plans will provide this detail. In such cases the National Park Authority and District Council will support the production of these plans as they will assist in delivering some of the strategic aims of this Core Strategy.
- 6.35 However, there are certain sites and locations in the district where the delivery of housing will be fundamental to meeting many of the strategic objectives, including ensuring that housing needs are met, as far as possible. As these sites and locations are strategic in nature it is therefore appropriate to allocate them in the Core Strategy. The strategic site allocations are large sites (delivering in excess of 100 residential units, some of which are also part of a wider mixed-use development) that are deliverable in the early part of the plan period. The allocation of these sites will be important in maintaining the

supply of deliverable housing sites in the early part of the plan period, until further, non-strategic, housing allocations come forward in subsequent plans.

- 6.36 Housing delivered on strategic sites will not be the only way by which new housing is secured in the plan area. Non-strategic site allocations (generally smaller sites suitable for delivering less than 100 homes) will play an important role in helping to maintain a sufficient supply of new housing, particularly in the more rural locations in the district, as the plan period progresses. 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 would be in line with the strategic objectives, the vision for the plan area and in line with National Park Purposes, where relevant.

Spatial Policy 2 – Distribution of Housing

During the period between 2010 and 2030, a minimum of 6,900 net additional dwellings will be delivered in the district. Part of this total will be met as follows:

- **1,020 completions in the period between April 2010 and April 2015**
- **The delivery of 1,558 commitments across the plan area**
- **An allowance for 600 dwellings to be permitted on unidentified small-scale windfall sites during the plan period and subsequently delivered**
- **An allowance for 125 dwellings to be permitted on rural exception sites during the plan period and subsequently delivered.**

The remaining 3,597 net additional dwellings will be distributed as follows:

(1) Housing to be delivered on the following strategic site allocations;

- **Land at North Street, Lewes – 415 net additional units**
- **Land at Old Malling Farm, Lewes – 240 net additional units**
- **Land to the north of Bishops Lane, Ringmer – 110 net additional units**
- **Land at Greenhill Way, Haywards Heath (within Wivelsfield Parish) – 113 net additional units (this is in addition to the 62 units already granted permission at this site)**
- **Land at Harbour Heights, Newhaven – 400 net additional units**
- **Land at Lower Hoddern Farm, Peacehaven – 450 net additional units.**

(2) Planned housing growth at the following settlements;

- **Lewes – a minimum of 220 net additional units**
- **Newhaven – a minimum of 425 net additional units**
- **Peacehaven & Telscombe – a minimum of 255 net additional units which will all be contingent upon developers identifying and demonstrating to the satisfaction of the local highway authority, and delivering, a co-ordinated package of multi-modal transport**

measures required to mitigate the impacts of development on the A259

- **Seaford – a minimum of 185 net additional units**
- **Burgess Hill (within Wivelsfield Parish) – a minimum of 100 net additional units**
- **Barcombe Cross – a minimum of 30 net additional units**
- **North Chailey – a minimum of 30 net additional units**
- **South Chailey – a minimum of 10 net additional units**
- **Cooksbridge – a minimum of 30 net additional units**
- **Ditchling – a minimum of 15 net additional units**
- **Newick – a minimum of 100 net additional units**
- **Plumpton Green – a minimum of 50 net additional units**
- **Ringmer & Broyle Side – a minimum of 215 net additional units**
- **Wivelsfield Green – a minimum of 30 net additional units.**

- **(3) About 200 net additional units in locations to be determined.**

For the housing growth identified in sections (2 and 3) above, individual sites to meet the planned levels of housing provision will be identified in either the District Council’s Site Allocations and Development Management Policies DPD, or the National Park Authority’s Local Plan. Neighbourhood Plans could also be used to identify the individual sites.

For settlements or development not listed in sections (2) or (3) above new housing will be limited to affordable housing that meets a local need on exception sites and currently unidentified infill developments within the planning boundary.

6.37 The planned levels of housing growth for each settlement over the plan period is summarised in Table 5 below¹⁹. This summary sets out the homes already built, committed developments, strategic site allocations, and planned growth to be brought forward through future allocations, by settlement. The residual of about 200 homes that are yet to be attributed to any settlement will be identified through subsequent non-strategic allocations. All reasonable options for distributing these homes in the most sustainable manner will be considered. This will be achieved through subsequent allocations in Local Plan Part 2, the SDNPA Local Plan, Neighbourhood Plans or a combination of these. For some settlements this may involve some additional housing land allocations in Local Plan Part 2 or the SDNP Local Plan, beyond those identified in a Neighbourhood Plan. In considering all reasonable options regard will be had to a number of factors, including: each settlements capacity for appropriate housing development; the relative sustainability of settlements; the cumulative impacts and deliverability of existing and potential allocations; and relevant policy considerations and constraints including policy requirements of Neighbourhood Plans that are relevant to housing site selection (in such cases weight will be attributed according to how advanced the Neighbourhood Plan is at the time of site selection).

¹⁹ The summary figures in Table 5 may be represented in the policy wording of Spatial Policy 2 rounded to the nearest multiple of 5, where appropriate.

Table 5 – Planned levels of housing growth, by settlement

Settlement (NP denotes it is in the National Park)	Completions (April 2010 – April 2015)	Commitments (as at 1 st April 2015)	Housing delivered on strategic sites	Housing to be delivered through subsequent allocations	Total
Edge of Haywards Heath (within Wivelsfield Parish)	0	62	113	0	175
Seaford	216	153	0	184	553
Lewes (NP)	146	125	655	220	1146
Newhaven	66	786	400	425	1677
Peacehaven & Telscombe	332	189	450	253	1224
Edge of Burgess Hill (within Wivelsfield Parish)	70	27	0	100	197
Ringmer & Broyle Side	6	52	110	217	385
Newick	27	2	0	100	129
Barcombe Cross	2	1	0	30	33
Plumpton Green	15	5	0	50	70
Wivelsfield Green	17	76	0	30	123
Cooksbridge	5	3	0	30	38
North Chailey	3	0	0	30	33
South Chailey	3	1	0	10	14
Ditchling (NP)	10	6	0	15	31
All other settlements and areas	102	70	0	0	172
Totals	1020	1558	1728	1694	6000

The windfall sites allowance of 600 units and the rural exceptions sites allowance of 125 units are not accounted for in the table above.

6.38 In compiling the strategy for distributing housing growth 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 ratings in the Settlement Hierarchy. This is generally as a result of their accessibility and the range of retail, key services and facilities and employment opportunities they have available. Despite this, it has been

apparent in the SHLAA that some of these settlements have very limited potential to accommodate significant levels of growth, notably Seaford.

- 6.39 In the case of the District Centres within the plan area (Lewes, Newhaven, Peacehaven/Telscombe and Seaford), the National Park designation either covers the whole settlement, or 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 limited. This has been particularly evident for Seaford, which is the largest town in the plan area, where any significant expansion of development into the surrounding countryside cannot be achieved without damage to the landscape value and scenic beauty of the National Park. This has been a key contributing factor in very limited planned growth being identified for the town.
- 6.40 Although the towns within the district are the main focus for development, there is a need for the villages to accommodate new housing to help ensure their continued vitality and meet local housing needs. The Rural Settlement Study has considered the possible levels of housing growth in the various villages in the district. This exercise has factored in issues such as housing need, the level of service provision in the villages, their accessibility to higher order settlements, historical housing delivery rates and the character of the villages themselves. However, this study did not factor in whether the villages would have the physical capacity to deliver growth. The SHLAA provides an indication of the capacity of the villages to accommodate additional growth, although this needs to be tempered by other areas of evidence on issues such as transport, landscape and infrastructure.
- 6.42 At Ringmer and Broyleside, the capacity of the A26/B2192 road junction (Earwig Corner) to accommodate peak hour traffic flows represents a significant constraint on further development that would increase demand at this junction. East Sussex County Council, the local transport authority, is satisfied that an agreed improvement scheme for this junction, funded by new development, will be able to accommodate the additional traffic flows likely to arise from the planned level of housing growth in Ringmer and Broyleside set out in Table 5 above.
- 6.43 In designing this improvement scheme, the SATURN traffic model developed for the Lewes Town Transport Study²⁰ was used to generate design traffic flows at the A26/B2192 junction, applying housing growth of 385 dwellings at Ringmer & Broyleside as one of the planning inputs. East Sussex County Council has advised that the design traffic flows are the maximum acceptable for the agreed junction improvement (new traffic signals and an extended right turn lane from the A26 to the B2192) and this effectively sets a cap on further

²⁰ The Lewes Town Transport Study was undertaken by consultants to inform work on development options for the Core Strategy. Further information is set out in the background documents ‘Transport Position Statement 2011’ and ‘Lewes Town Transport Study’ available at <http://www.lewes.gov.uk/planning/backgroundreps.asp>

development in Ringmer & Broyleside beyond the planned growth of 385 dwellings over the plan period.

- 6.43 Newick village falls almost entirely within a 7km zone from the edge of the Ashdown Forest Special Area of Conservation (SAC) and Special Protection Area (SPA) (see the supporting text for Core Policy 10 and the background paper on the Habitats Regulations Assessment for further information) and thus any development within this zone needs to be alongside the provision of Suitable Alternative Natural Green Spaces (SANGs). It is considered that the figure of 100 planned houses in Newick is deliverable as the District Council and Natural England are confident that SANGs can be delivered to mitigate such development.
- 6.44 Generally the villages that are considered appropriate for some level of planned growth are capable of delivering this during the plan period. However, there are certain villages where no planned growth has been indicated within this plan, including Kingston, Falmer, Glynde and Firle. In most cases this is because no potential capacity for growth has been identified through the SHLAA. This is not to say that no development will take place in these villages over the plan period. It is expected that some new housing will be delivered on currently unidentified infill and redevelopment sites. This will be classed as windfall development and in the short-term will contribute towards the allowance that is being made for new housing delivered through windfalls. In addition, Core Policy 1 will allow for the delivery of affordable housing that meets a local need on exception sites²¹. Such schemes, as well as housing on currently unidentified infill and redevelopment sites, will also be acceptable for those settlements listed in section (2) of Spatial Policy 2.
- 6.45 The following sections and policies of this Spatial Strategy relate to the strategic site allocations and are set out on a settlement by settlement basis.

Lewes town

- 6.46 Lewes is the county town of East Sussex (parish population: 17,297). It is centrally located within the district and is classified as a district centre in the settlement hierarchy. The town and its surrounding countryside lie within the South Downs National Park. Lewes is the largest town within this designated area, and indeed, within any English National Park. Lewes is a well-preserved historic market town providing a good range of shops, employment, recreation and cultural facilities and schools and as such meets the day-to-day needs of its residents. It is also an important administrative centre. The town is accessible by a range of sustainable transport modes and is the most sustainable settlement in the district.
- 6.47 Although Lewes is in the National Park, it nevertheless has significant development needs, particularly for additional housing (both open market and

²¹ 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 2003 Local Plan for further information on Exception Sites.

affordable housing). The District Council's Housing Register has consistently shown well in excess of 400 households seeking affordable housing in the town (438 at the end of March 2012), the highest affordable housing requirement in the district by some margin. The town also experiences a relatively buoyant housing market in comparison with the other towns in the district, partly fuelled by its good transport links to employment opportunities in Brighton, Gatwick and London.

6.48 Prospects for the outward expansion of Lewes town are extremely limited, predominantly due to the sensitive and high quality National Park landscape, and the extensive floodplain of the River Ouse. Therefore, the majority of the development opportunities here are within the existing town, particularly through the redevelopment of sites. However, these redevelopment opportunities are also fairly limited, as evidenced by the SHLAA and the Employment and Economic Land Assessment. Most opportunities identified are small-scale and would be expected to come forward through the development management process, supported by other policies in this plan. Alternatively, the sites will be allocated for new/alternative uses through the emerging SDNPA Local Plan and/or the emerging Lewes Town Neighbourhood Plan.

6.49 Very few sites are suitable for strategic level growth and redevelopment within and around Lewes town. The main current opportunity for redevelopment is a centrally located site, as detailed within the following Spatial Policy 3. A further development opportunity is presented by a greenfield site on the edge of the town at Old Malling Farm, as described in Spatial Policy 4 and the associated justification.

North Street Quarter and adjacent Eastgate area, Lewes

Spatial Policy 3 – North Street Quarter and adjacent Eastgate area, Lewes

Land amounting to approximately 9 hectares at North Street and the neighbouring part of Eastgate is allocated for a mixed-use development that would create a new neighbourhood for the town of Lewes. The development mix should be based on the following uses and broad quantum of development:

- **Approximately 415 residential units, predominantly focused towards the northern part of the site;**
- **At least 5,000 sq metres of B1a office floorspace and/or B1c light industrial floorspace, subject to market needs and general viability;**
- **The redevelopment or relocation of the existing A1 food supermarket;**
- **Other uses that are deemed to aid in the successful delivery of a new neighbourhood, whilst not undermining the wider function of the town (this could include A1 Shops, A2 Financial and Professional Services, A3 Restaurants and Cafes, A4 Drinking Establishments, A5 Hot Food Takeaways, C1 hotel, D2 Assembly and Leisure uses and community floorspace);**

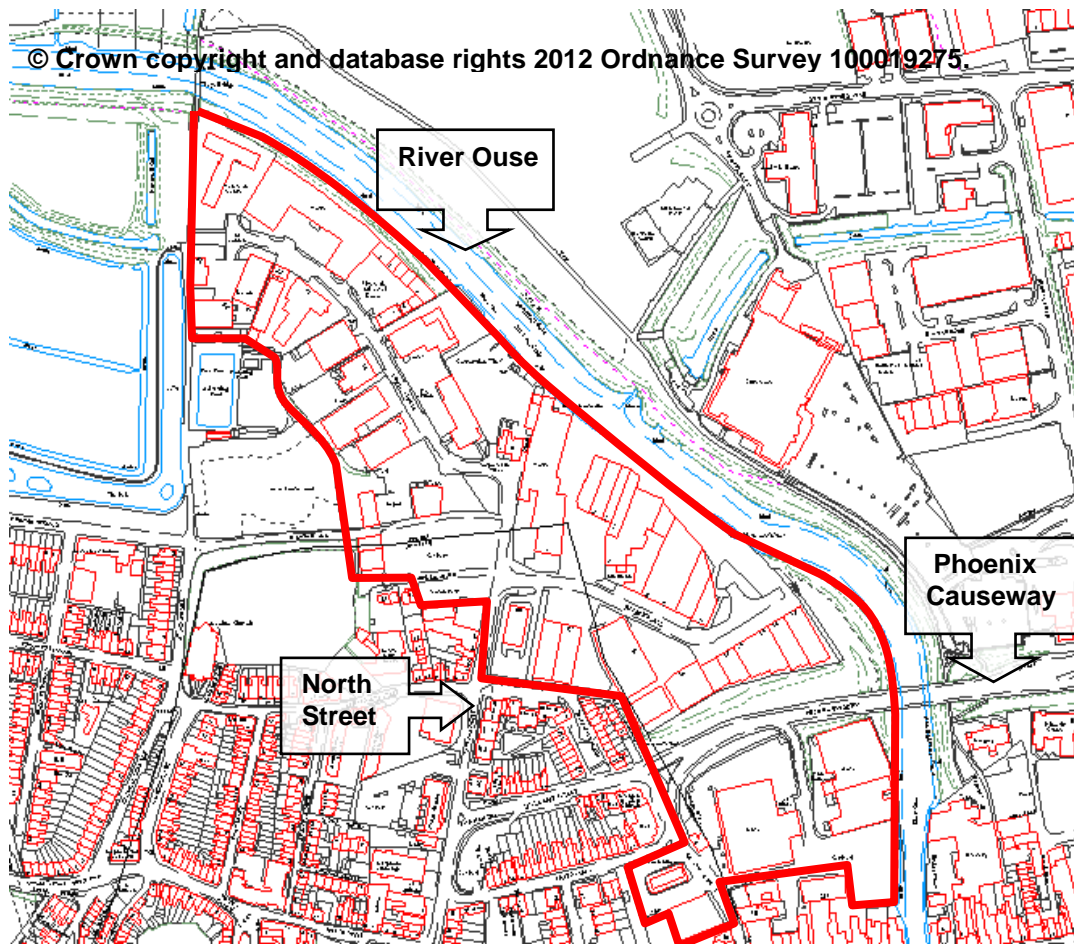
- **C2/C3 Nursing/ Care Home (self-contained units will be counted as residential within the above figure); and**
- **D1 Non-residential institutions such as medical and health services, creches, exhibition and training space.**

Development of this site will be delivered between 2016 and 2021.

The redevelopment of the North Street Quarter and the neighbouring part of Eastgate will be permitted subject to compliance with the Core Delivery Policies of this plan and the following criteria:

- i) It incorporates the early provision of flood defences to an appropriate standard and to the approval of the Environment Agency;**
- ii) It facilitates improved linkages across Phoenix Causeway and Eastgate Street to enable the improved integration of the area to the north of Phoenix Causeway with the wider town centre;**
- iii) It delivers enhancements to vehicular access and off-site highway improvements, arising from and related to the development and its phasing;**
- iv) It respects and enhances the character of the town and achieves a high standard of design, recognising the high quality built environment, on and within the vicinity of the site, and the site's setting within the South Downs National Park and adjacent to a Conservation Area;**
- v) It is subject to an analysis and appropriate recognition of the site's cultural heritage and a programme of archaeological work, including, where applicable, desk-based assessment, geophysical survey, geo-archaeological survey and trial trenching to inform design and appropriate mitigation;**
- vi) A riverside pedestrian route along the western bank of the River Ouse is incorporated to extend the town's riverside focus and contribute to its character and quality, and additional pedestrian and cycling routes are incorporated to aid in linking the site to the rest of the town;**
- vii) It results in no net loss of public parking provision;**
- viii) The retail element is incorporated into the town centre boundary (as designated by Core Policy 6) as far as possible and the amount of retail provision is informed by a Retail Impact Assessment, if necessary;**
- ix) Alternative uses on the bus station site are subject to the facility being replaced on an operationally satisfactory and accessible site elsewhere;**

- x) It makes contributions towards off-site infrastructure improvements arising from, and related to, the development; and
- xi) It provides a connection to the sewerage and water supply systems at the nearest point of adequate capacity, as advised by Southern Water, and ensures future access to the existing sewerage and water supply infrastructure for maintenance and upsizing purposes.



Justification

6.50 The site subject to this policy is located immediately to the north-west of Lewes town centre and has an extensive river frontage stretching from just south of Phoenix Causeway up to Willey’s Bridge. The site is in two distinct parts, but its redevelopment needs to be considered as one area in order for a holistic approach to be taken to this part of the town. The two parts are the North Street Quarter, which lies to the north of Phoenix Causeway (this area is wholly outside, but adjoins the Lewes Conservation Area), and the northern part of the Eastgate area, which is within the Conservation Area.

6.51 The North Street Quarter is predominantly comprised of a range of industrial and warehouse buildings dating from the 1950s and 1960s. Amongst other uses it includes a fire station, a recycling centre and surface level car parking.

In October 2000 much of the site was badly flooded and in the interim period no improved flood defences for the site have been provided. This has impeded investment in the area resulting in many of the units becoming run down and less able to meet the needs of modern businesses.

- 6.52 The northern part of the Eastgate area consists of a Waitrose store and associated parking area, the adjacent former Wenban Smith buildings and the bus interchange. The area covered by Waitrose and the Wenban Smith site was identified in the Local Plan (Policy LW7) as a potential area for redevelopment with the priority being for the retention of a major foodstore and introduction of a replacement bus interchange. Although no such proposals have been subsequently put forward and implemented, there is still interest in redeveloping this site for a mixed use development that would incorporate an enhanced foodstore. At the same time, there are still concerns over the long-term viability of operating the bus station in its current location and the possibility of a replacement facility is an option that the National Park Authority and District Council wish to see explored in any redevelopment proposals within this strategic site. However, the wider redevelopment of this area will not be contingent upon this.
- 6.53 Rather than retain the Eastgate Area policy from the Local Plan by itself, it is considered that the redevelopment opportunities at the neighbouring North Street Quarter provide an opportunity to take a more flexible approach to the Eastgate Area and explore ways in which to link the two sites together.
- 6.54 It is considered appropriate to allocate the North Street Quarter and adjacent Eastgate area for redevelopment early in the plan period for a number of reasons. Much of the redevelopment of the site is considered deliverable in the early part of the plan period, with proposals currently being progressed through the planning system. In addition, the allocation offers a number of wider benefits that will help to achieve some of the Strategic Objectives of this plan, which are deemed appropriate to realise as soon as practicably possible (this includes the provision of improved flood defences that will defend a wider area than just the North Street Quarter alone).
- 6.55 In terms of the proposed uses within the strategic site, the following paragraphs provide a summary of the reasoned justification for them.
- 6.56 As evidenced by the Shopping and Town Centres Study, there is a limited quantitative need for additional retail floorspace in Lewes during the plan period. However, the study also recognises that there is a qualitative need to provide some more modern retail floorspace in the town that would help reduce leakage of retail spending to other centres. The study considers that the location with the best potential to provide such floorspace is at the eastern end of the High Street in the area to the north extending along the River Ouse.
- 6.57 The Shopping and Town Centres Study is clear that the redevelopment should not result in a foodstore that provides a significant increase in floorspace when compared to the existing store. This is because limited

need, in quantitative terms, has been identified for additional convenience floorspace during the plan period.

- 6.58 In terms of meeting the qualitative need for comparison retail, unlike with the convenience element there are no obvious opportunities for this to be provided through the redevelopment of existing comparison retailing areas. This is because such areas in Lewes town generally have historical, townscape and/or conservation designations and value associated with them, meaning their redevelopment would undermine certain Strategic Objectives within this plan. Therefore, in order to meet the qualitative need for comparison retail, new unit(s) will be required and this strategic site is considered to offer the best potential for meeting this need.
- 6.59 The preference for where the additional retail provision, along with enhanced foodstore, is delivered is on the land to the south of Phoenix Causeway and within the defined town centre boundary. However, it is accepted that this may not be possible due to site constraints, lack of available land, and potential doubts over delivery in this location. Therefore, subject to the detailed findings of a Retail Impact Assessment, some flexibility will be provided in relation to this part of the policy.
- 6.60 Employment provision is a key consideration to the redevelopment of this strategic site, particularly so given that much of the North Street Quarter is currently utilised for employment land purposes. The Employment and Economic Land Assessment (EELA) recognises that there is not a quantitative need to provide additional employment floorspace based on the current levels of supply. However, in Lewes town there is seen to be a qualitative need to provide industrial and office floorspace in order to provide greater choice to existing and prospective businesses, including more modern business premises.
- 6.61 The EELA highlights the difficulties in finding new employment sites in the district and therefore urges caution when considering the potential loss of any existing employment land to alternative uses. However, retaining the site in its current use is not seen as an appropriate option to pursue in the Core Strategy (the Sustainability Appraisal does not recognise this as one of the better performing options that has been considered). As stated earlier, and as evidenced through the EELA, there is seen to be a qualitative need for additional office floorspace in Lewes (approximately 1 – 1.25 hectares) and the North Street site is considered to offer good potential for such use. In addition, the EELA states that the North Street site “could perform better as an office site (in comparison to industrial use) if redevelopment were possible”. The incorporation of light industry (Use Class B1c) would, in principle, be acceptable within the redevelopment of the site. This will be determined through a planning application.
- 6.62 In order to off-set the loss of the industrial units, the majority landowner for the North Street Quarter has acquired the Malling Brooks East employment allocation. This allocation is expected to be implemented imminently with an extant planning permission being in place to enable this. It is the aspiration of

the landowner to relocate a number of the current businesses in the North Street area to this site. Although it is accepted that this cannot be guaranteed (existing businesses may wish to relocate to an alternative site), it does demonstrate that a reasonable supply of modern industrial premises will shortly become available in Lewes town.

- 6.63 The re-development of this strategic site could include the provision of a hotel. The need for such a facility in the town of Lewes was identified in the Hotel and Visitor Accommodation Futures study.
- 6.64 In terms of housing, the relative levels of housing need coupled with limited suitable sites available to meet this need has already been highlighted. With this in mind, the redevelopment of this strategic site provides one of the few prospects to deliver a quantum of housing that will significantly aid in meeting the affordable and market housing needs in the town. The site's deliverability for housing has been recognised by the SHLAA, although its suitability is contingent on the prior provision of suitable flood defences. The appropriate housing mix for this site, in terms of type and size of units, will be determined through the planning application process.
- 6.65 The provision of parking is a key consideration in the redevelopment of the North Street and Eastgate area. The site, at present, contains some areas of surface level parking. As evidenced in the Survey of Lewes Car Parks http://www.lewes.gov.uk/Files/plan_Lewes_Parking_Survey_Report.pdf, the town of Lewes has an under provision of parking spaces. It is for this reason why there should be no net loss in parking provision from this scheme. In addition, opportunities will be sought and supported for providing increased provision through this redevelopment scheme, particularly as aspects of the scheme are seeking to retain and attract increased expenditure in the town, which is likely to increase the need for further parking provision.

Old Malling Farm, Lewes

Spatial Policy 4 – Old Malling Farm, Lewes

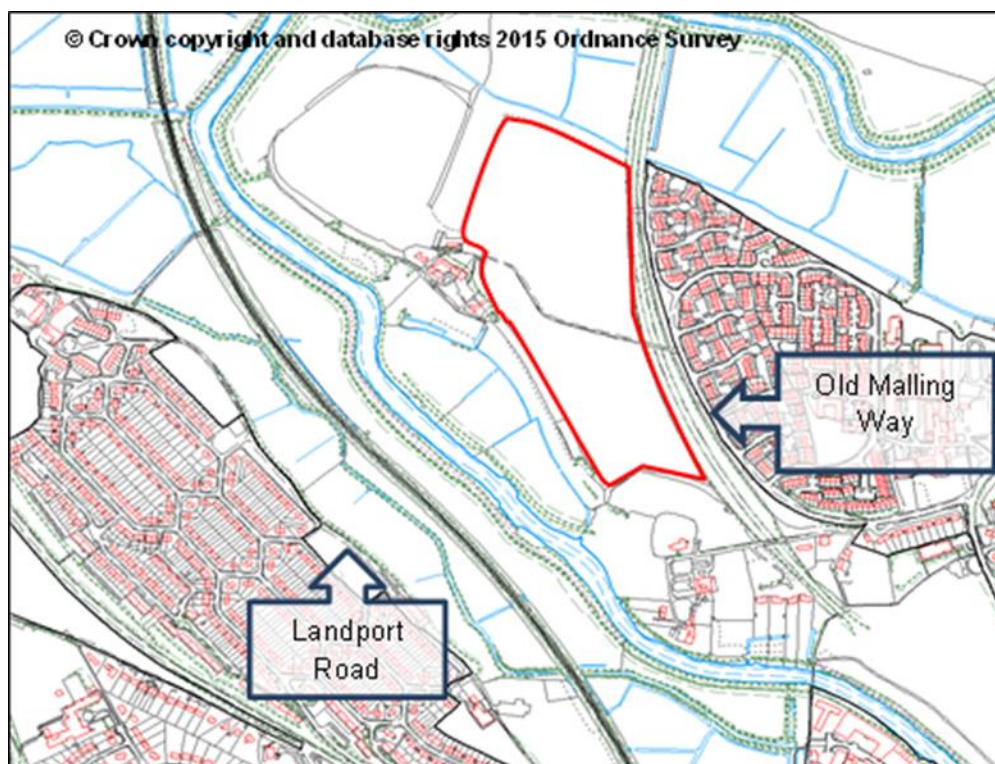
Land amounting to approximately 10 hectares is allocated for a residential development of approximately 240 dwellings. Development will be permitted subject to compliance with the Core Delivery Policies of this plan, with a Masterplan and a Design Brief to be approved by the local planning authority in advance of an application and the following criteria:

- i. 40% of dwelling units are affordable, subject to the provisions of CP1;**
- ii. Development on the western edge of the southern field is generally lower density than other parts of the site with gardens bounded by hedges rather than walls or fences;**
- iii. Appropriately designed equipped play space integrates into a multi-functional network of green infrastructure;**

- iv. **The design, layout, built form, spatial arrangements, landscaping and materials, including the pattern, scale and colour of roofs, respect and reflect the National Park location;**
- v. **The design shall incorporate views within, to and from the site to surrounding landmarks and features including the from elevated chalk hills to the east and west, from Hamsey to the north, and from Lewes itself;**
- vi. **Development is consistent with positive local character and local distinctiveness and respects the character, amenity and setting of the adjacent Malling Deanery Conservation Area and the listed Church of St Michael;**
- vii. **Impacts on tranquillity, dark night skies and biodiversity are minimised by restricting access to some areas of floodplain outside the site and by providing only limited night lighting and the use of low level lighting where required;**
- viii. **An ecological survey is undertaken and appropriate measures are implemented to mitigate adverse impacts on the South Malling Disused Railway SNCI and Offham Marshes SSSI;**
- ix. **The primary access point is to be off Monks Way at a point opposite Mantell Close the design of which should minimise impacts on views from the north; the existing former railway bridge forms a secondary access point for emergency use and an access for pedestrians and cyclists and to the existing farm buildings;**
- x. **Development respects the amenity of the existing dwellings adjoining the site;**
- xi. **A site specific flood risk assessment is undertaken and an appropriate surface water drainage strategy as advised by the appropriate body and implemented as agreed;**
- xii. **A survey is undertaken of existing trees and hedgerows and appropriate measures are implemented for their protection in accordance with a schedule to be agreed with the local planning authority;**
- xiii. **Development is subject to a geophysical survey and trial trench evaluation of the archaeological potential in the area and any resulting measures are implemented;**
- xiv. **Contributions are made towards other off-site infrastructure improvements arising from and related to the development, including complementary measures in keeping with the landscape setting to reduce the attractiveness to existing traffic of Church Lane/Mayhew Way/Brooks Road as an alternative to Malling Hill and to improve the**

capacity of the junctions at the A26 /B2192 Earwig Corner, Church Lane/Malling Hill, and the Brooks Road/Phoenix Causeway roundabout;

- xv. Measures are put in place to improve access from the site to the town centre by non-car modes through the preparation and implementation of a Travel Plan to be approved by the local planning authority in consultation with the local highway authority; and
- xvi. The development will provide a connection to the sewerage system at the nearest point of adequate capacity, as advised by Southern Water.



Justification

6.66 The site subject to the above policy is a greenfield site situated on the northern side of the town in a 'green finger' between the 1970s part of the Malling Estate to the east and the River Ouse, mainline railway and Landport Estate to the west. The site lies wholly within the South Downs National Park and is currently in agricultural use. There is an existing access bridge over the disused railway cutting (a Site of Nature Conservation Importance SNCI), providing single track access to Old Malling Farm from Old Malling Way. A further double width access point onto Monks Way, which is at grade and currently used for agricultural vehicles, is situated at the northern end of the site. Monks Way would form the principal access to the site, with the railway bridge providing secondary access for pedestrians, cyclists and emergency use. To the south of the site lies the Malling Deanery Conservation Area, including the Grade II* Church of St Michael.

- 6.67 Much of the site is very good quality agricultural land (Agricultural Land Classification Grade 2, with some Sub-grade 3a) and therefore constitutes best and most versatile agricultural land. There is also ecological interest in the area, including the Offham Marshes SSSI on the opposite side of the River Ouse and the SNCI along the adjacent disused railway cutting on the east of the site. The site also lies within an area of high archaeological potential being in the vicinity of a medieval settlement and the ruins of a college of Benedictine Canons.
- 6.68 While current information would suggest that these interests do not override the principle of development on the site, further survey work will be required and appropriate mitigation measures implemented. The loss of best and most versatile land is to be avoided where possible. However in this case the few alternative options for strategic level residential development around Lewes town have been ruled out for other reasons, such as being of even greater great landscape sensitivity within the National Park.
- 6.69 Development of the site could adversely impact the Special Qualities of the National Park, for instance on landscape and views, on recreational activities (the Ouse Valley Way), on tranquillity (including dark night skies), on historical features and cultural heritage (including the Conservation Area, Listed Building and archaeological remains), and on nearby wildlife and habitats. Nevertheless a sensitively designed scheme could be accommodated at Old Malling Farm, which takes into account the range of significant constraints and impacts on the SDNP and its Special Qualities and incorporates an appropriate range of mitigation measures.
- 6.70 Landscape mitigation measures must address the following sensitivities (as identified by the SDNPA's landscape consultant²²):
- Views from the site to local landmark features including chalk hills, church towers and Lewes Castle give this site a strong sense of place.
 - The strong rural, tranquil and natural character of the Ouse Valley with no development apparent on its eastern banks, save for historic settlement associated with Old Malling Farm and Lewes Malling Deanery.
 - The visually sensitive western edge of the site above the Ouse Valley floor where development would intrude into the valley.
 - The site is seen in the context of the wider Ouse Valley floodplain when the site is viewed from elevated locations to the east and west.

²² Landscape and Visual Assessment: Old Malling Farm, Lewes, Allison Farmer Associates, May 2012

- From elevated locations to the west the entire site is clearly visible and visually separates the historic settlement of Old Malling Farm and Lewes Malling Deanery.
 - From elevated locations to the east the northern field of the site is visually prominent and is seen as part of the wider Ouse Valley corridor.
 - The Ouse corridor to the north of Lewes was included in the South Downs National Park as providing a high quality setting to Lewes town for reasons of its intrinsic scenic attraction, cultural heritage and nature conservation.
- 6.71 Various measures were suggested to address these, including development on parts of the site only and at a lower density, and pulling development back and away from the western, southern and northern parts of the site. Other suggestions include: providing only limited night lighting on the site and the use of low level lighting where required, ensuring the use of dark colours for roofs, retaining views out of the site to surrounding landmarks, retaining some areas of floodplain with no access, and ensuring that any improved access to the floodplain does not unduly extend urbanising influences, including that signage and surfaces, gates and fencing are low key.
- 6.72 These various measures will be reviewed and considered for inclusion in a Design Brief to be undertaken for the site either by the SDNPA or by the applicant and subject to the SDNPA's approval. This will be informed by a detailed site appraisal, which shall include as 3D computer modelling of the site and its context; appropriate Verified Photomontages; and Zone of Theoretical Visibility plots from appropriate locations within the site.
- 6.73 Transport evidence shows that significant development of this site should be contingent on highway improvement works at the Earwig corner junction of the A26 with the B2192 on the edge of the town to the east of the site. This is a junction that already experiences congestion, particularly at peak times, and therefore the further strain from new development (including from other development in Lewes town and at Ringmer) will need to be mitigated. Development consistent with this policy, as well as other development in the area will enable this mitigation to occur, possibly through a traffic light system to improve the flow of traffic through the junction.
- 6.74 In addition, mitigation measures associated with the impact of development at Old Malling Farm will be required at the critical junction of Church Lane/Malling Hill and at the Brooks Road/Phoenix Causeway roundabout, in agreement with the local highway authority. Traffic calming measures are also required to reduce the amount of existing traffic using the access roads to the site so that they can accommodate the additional traffic movements that will be generated by the development.

- 6.75 Contributions to infrastructure, including green infrastructure and equipped play space, will be sought initially through a Section 106 agreement and would be specified further as part of that agreement. However, depending on the date of permission being granted, some of these contributions would be made through the Community Infrastructure Levy, once introduced.
- 6.76 Core Policy 1 seeks to achieve a district-wide target of 40% affordable housing. This district-wide target is supported by robust viability evidence, as well as evidence of a significant need for affordable housing. As evidenced through the District Council's Housing Needs Register, this need is particularly high in Lewes town, which has a particular shortage of affordable housing provision.
- 6.77 Due to the high number of affordable houses that will be delivered on this site it will be important to consider the mix of these houses, particularly in terms of type and tenure. With this being the case, the National Park Authority and District Council (as the Housing Authority) may seek/accept a tenure split for the affordable housing that delivers a greater proportion of intermediate housing than the 25% guideline in Core Policy 1.

Haywards Heath – Wivelsfield Parish

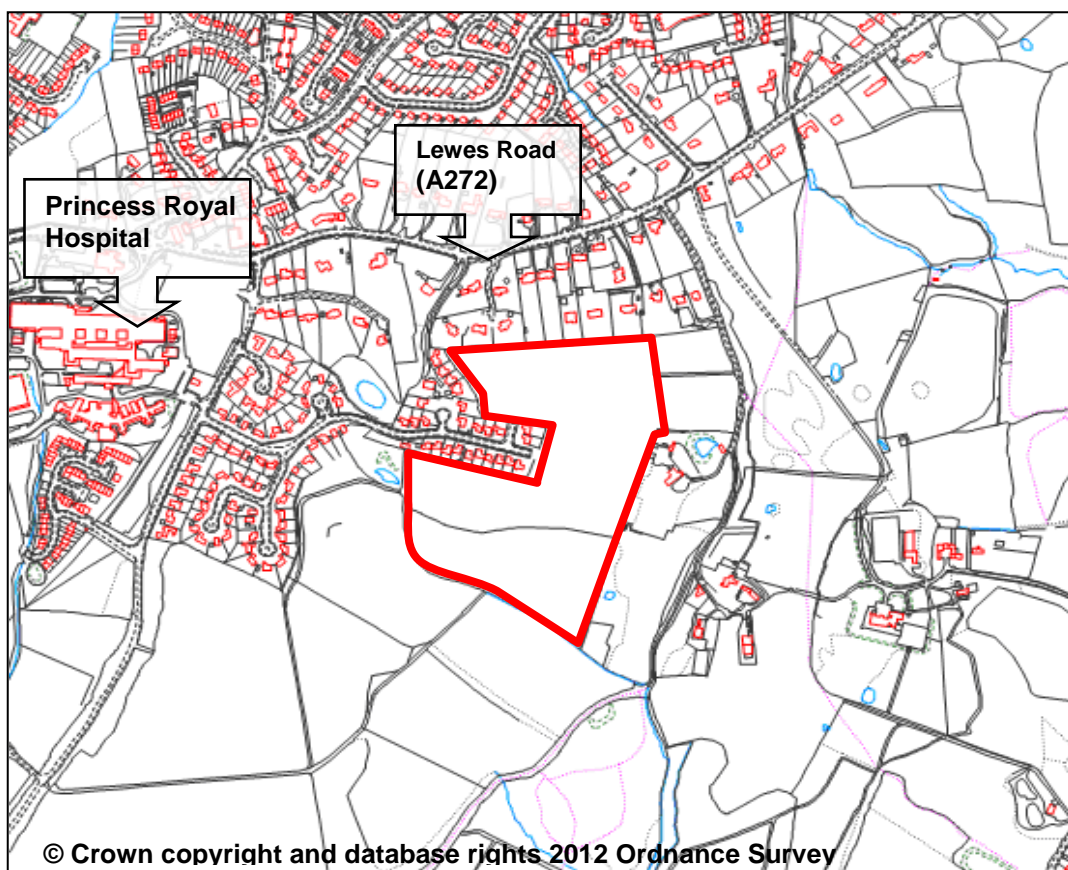
- 6.78 The town of Haywards Heath (population: 27,000) is the administrative centre of Mid Sussex District within the county of West Sussex. The county and district boundary runs around the south-eastern edge of the town. This also represents the parish boundary of Wivelsfield Parish with Haywards Heath.
- 6.79 The town is well provided for with a range of shops and services, including schools and a hospital with an Accident and Emergency department, and has frequent mainline train services to London and Brighton. The town exerts a strong influence over the northern part of Lewes District, with many residents in areas such as Wivelsfield and Chailey using the town to access key services, shopping and employment.
- 6.80 The site at Greenhill Way lies within Wivelsfield Parish, immediately adjacent to the existing administrative boundary, and beside the existing residential area of Greenhill Way/Ridge Way in Haywards Heath.

Land at Greenhill Way/Ridge Way

Spatial Policy 5 – Land at Greenhill Way/Ridge Way, Haywards Heath (within Wivelsfield Parish)

Land amounting to 8.5 hectares is allocated for residential development of approximately 175 dwellings (of which 62 net units already have planning permission on this strategic site). Development will be permitted subject to compliance with the Core Delivery Policies of this plan and the following criteria:

- i) Access including provision for pedestrians and cyclists to be provided from Ridge Way and/or Greenhill Way;
- ii) A site specific flood risk assessment is undertaken and an appropriate surface water drainage strategy is agreed by the appropriate body and implemented accordingly;
- iii) Contributions towards off-site infrastructure improvements arising from and related to the development.
- iv) A Travel Plan that includes measures to improve access from the site to Haywards Heath town centre and railway station by non-car modes;
- v) Development respects the amenity of the existing dwellings adjoining the site;
- vi) Development respects the character and amenity of the adjacent Lewes Road Conservation Area;
- vii) Ecological and tree surveys and appropriate measures to mitigate adverse impacts on nearby Tree Preservation Orders and Ancient Woodland; and
- viii) The development will provide a connection to the sewerage and water supply systems at the nearest point of adequate capacity, as advised by Southern Water, and ensure future access to the existing sewerage and water supply infrastructure for maintenance and upsizing purposes.



Justification

- 6.81 It is considered appropriate to allocate the land at Greenhill Way/Ridge Way for development in the early part of the plan period for a number of reasons. The site is considered deliverable in the early part of the plan period and it will therefore aid in the required continuous supply of housing during this period.
- 6.82 The site subject to the above policy is a greenfield site situated on the south-eastern side of Haywards Heath, adjacent to residential development in the Greenhill Way/Ridge Way vicinity. Lewes Road Conservation Area lies to the north. The county, district and parish boundary runs between the existing residential development and the site.
- 6.83 The site is currently in agricultural use as grassland ley on crop rotation and categorised as Grade 3 (good to moderate) agricultural land but not sub-graded (assumed to be sub-grade 3a (good) and therefore best and most versatile agricultural land). The many development constraints across the district have made it inevitable that a number of greenfield strategic sites are required in order to meet the local, objectively assessed, housing target. While this site has been assumed to constitute 'best and most versatile agricultural land' it is considered that on balance the economic and social benefits of the development of these 8.5 hectares of land outweigh the loss of the agricultural land. This site has poorer quality agricultural land than some others under consideration that feature some or all Grade 2 or 1 land. The site is included in a temporary environmental stewardship scheme between the agricultural tenant of the land and Natural England. This maintains certain permissive access rights around the edge of the site whilst it remains undeveloped and in agricultural use. This scheme is not legally binding on the land and will come to an end when and if the agricultural tenancy of the land is terminated following the grant of planning permission for development of the land. There are no formal public rights of way on the land.
- 6.84 There are two potential access points, from the end of Greenhill Way and from the end of Ridge Way. It is proposed that the principal access will be from Ridge Way with any secondary access being taken from the end of Greenhill Way. This is due to a number of protected trees in the vicinity of the Greenhill Way point of access, which may restrict the achievability of a suitable width for an access point. Taking into account the outputs of a Transport Assessment, to be undertaken at the planning application stage, will ensure a safe and suitable access can be achieved for all people.
- 6.85 The traffic impact of development at land at Greenhill Way has been considered in principle by West and East Sussex County Councils as local highway authorities. This analysis found that development of this scale could be accommodated in the local transport network subject to the Haywards Heath Relief Road having been completed (it has subsequently been completed and opened) in order to alleviate pressure on the A272 in particular. In addition, to ensure that the site is not excessively reliant on private car usage, measures to improve accessibility to the town centre and train station by sustainable transport modes will be necessary. As such, a

comprehensive sustainable travel plan will also be required, which is to be agreed with the local highway authorities and implemented accordingly.

- 6.86 Landscape analysis shows that this area has medium/high capacity for change in landscape sensitivity and value terms. The site is well contained between wooded areas and existing residential developments. There are a number of trees subject to Tree Preservation Orders (TPO) along the site boundary in residential gardens of properties on Greenhill Way and Ridge Way. There are also two areas of TPO woodland adjacent to parts of the eastern and western boundaries of the site that will need appropriate protection from development. The TPO group to the west is part of Asylum Wood, which is designated Ancient Woodland. These designations are not seen as a significant constraint on development of this site. However, informed by ecological and tree survey work, ways to avoid any negative impacts upon these features will need to be implemented. This could include the provision of appropriate buffer zones around these features, although the exact extent of these will only be determined once the survey work has been undertaken at the planning application stage.
- 6.87 The site lies within Flood Zone 1 (the least at risk of flooding). Despite this, a site specific flood risk assessment will be required to determine any localised flood risk issues. Any necessary mitigation measures will need to be implemented along with appropriate sustainable drainage systems to mitigate any risk of surface water flooding resulting from the development.
- 6.88 Given the position of this site on the outskirts of Haywards Heath, it is very likely that new residents would access most services and facilities, such as education, recreation and healthcare, from within the Mid Sussex/West Sussex administrative area. As a result it is considered that developer contributions should be allocated accordingly between services likely to be accessed on either side of the administrative boundary. Lewes District Council and Mid Sussex District Council will liaise closely in this regard and this liaison will also involve the two County Councils, Haywards Heath Town Council and Wivelsfield Parish Council.

Ringmer

- 6.89 Although the spatial strategy seeks to focus the majority of growth towards the district centres (towns such as Newhaven and Lewes), there is a need to focus some growth at the villages to help meet local needs. Some villages, such as Ringmer, have a greater need and capacity to accommodate growth, particularly housing, than others. Ringmer is the largest village in the plan area (the parish population, including Broyle Side, is approximately 4,600) and it is classed as a Rural Service Centre in the Settlement Hierarchy. The village is centrally located within the plan area and, as evidenced by the Rural Settlement Study, it contains a good range of community services and facilities, as well as a number of local shops.
- 6.90 Additional housing at Ringmer will assist in maintaining and enhancing the village's community services and facilities, as well as meeting a housing need

for the area. However, in accommodating additional housing, it is important to ensure that the character of the village and valued areas of countryside are not compromised. Such areas of countryside include the National Park, which closely envelopes the village to the west and south east.

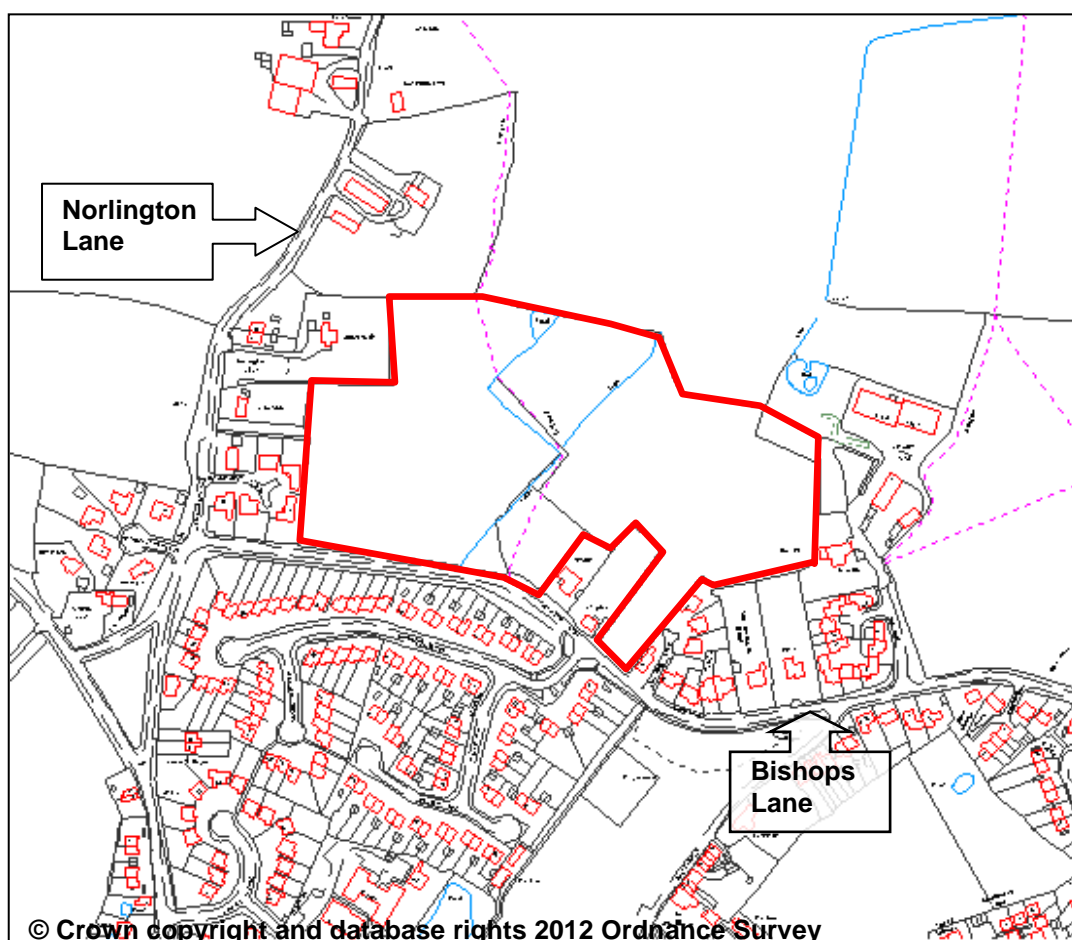
- 6.91 Through the evidence collected for the Core Strategy, a case can be made for the delivery of a strategic housing allocation at Ringmer during the early part of the plan period. The identification of such an allocation will help maintain a sufficient supply of deliverable housing sites during this period and up until the point further allocations are made in subsequent plans.

Land north of Bishops Lane, Ringmer

Spatial Policy 6 – Land north of Bishops Lane, Ringmer

Land amounting to 4.4 hectares is allocated for residential development of approximately 110 dwellings. Development will be permitted subject to compliance with the Core Delivery Policies of this plan and the following criteria:

- i) The primary and secondary access points will be off Bishops Lane, to enable ease of access into the village centre and aid in the integration of the development into the existing village.**
- ii) The development facilitates the removal of the culverted sections of watercourse that are within the site, as far as feasibly possible, thereby assisting in the improvement of ecological corridors.**
- iii) The development will wherever possible allow for the retention and enhancement of important existing hedgerows. Mitigation will be required in the event that the removal of a hedgerow, or parts, is needed to facilitate development;**
- iv) An appropriate surface water drainage strategy is agreed by the appropriate body and implemented accordingly.**
- v) The development incorporates and/or makes a contribution towards the provision of equipped play space and sports pitches.**
- vi) Development is subject to a geophysical survey and trial trench evaluation due to the high archaeological potential in the area.**
- vii) Development respects the amenity of the existing dwellings adjoining the site.**
- viii) Contributions towards off-site infrastructure improvements arising from and related to the development. This will include off-site highway improvements being made to the Earwig Corner junction as well as in the immediate vicinity of the site, particularly along Bishops Lane and its junction with the B2192; and**
- ix) The development will provide a connection to the sewerage system at the nearest point of adequate capacity, as advised by Southern Water.**



Justification

- 6.92 The site subject to the above policy lies on the northern edge of the village of Ringmer. Despite this edge of village location the site is within close proximity to the majority of local services and facilities, many of which are within the village centre that is within 600 metres to the south.
- 6.93 At present the site is in agricultural use and is primarily used for grazing purposes. The site lies within an area with some archaeological (from Medieval pottery production) and ecological interest, although the site itself is not subject to any formal biodiversity designations such as SSSI's, SNCI's and Ancient Woodland. With regards to these interests a Phase 1 Habitat Survey and an Archaeological Desk Based Assessment have already been undertaken. This survey and assessment demonstrate that these ecological and archaeological interests will not preclude development of this site, although further survey work will be required and any mitigation measures appropriately implemented. In addition, preliminary hedgerow surveys have been undertaken on the existing boundary and internal hedgerows. The surveys concluded the existence of potentially 'important' hedgerows. It is not considered that this would preclude development of this site, including access on to Bishops Lane, but should form part of the detailed planning consideration at the planning application stage.

- 6.94 Particular attention will need to be given to a surface water drainage strategy for this development. This will need to ensure that existing drainage problems that are experienced within the vicinity of the site are not exacerbated and, where possible solutions are found. Although the site is within Flood Zone 1, it does contain a couple of drainage ditches. Therefore, as well as making sure that no dwellings are placed in an area of flood risk associated with these ditches, every effort should be made to make these ditches into an ecological asset for the site. It is for this reason why the part of the policy criteria relates to the removal of the culvert.
- 6.95 The policy makes reference to the need for off-site highway improvements. Through the transport evidence undertaken it has been demonstrated that significant development at Ringmer, and to a lesser extent Lewes, is contingent on highway improvement works being made to the Earwig Corner junction, which lies to the south west of the development site. This is a junction that already experiences congestion, particularly at peak times, and therefore the predicted further strain on this junction from new development in the area will need to be mitigated. Development consistent with this policy, as well as other development in the area will enable this mitigation to occur, in order to improve the flow of traffic in this area.
- 6.96 Ringmer is recognised as having a shortfall in equipped play space and sports pitches. Although it is unreasonable to expect this development to make up this shortfall, it is proposed that the provision of, or contribution towards open space and sport and recreation provision should be focused on providing the facilities that are currently under-supplied in the area.

Newhaven

- 6.97 Newhaven is the smallest of the four towns in the district (parish population: 12,232), despite being located in a strategically important position on the south coast at the mouth of the River Ouse. Newhaven is a port town which still has an active industrial and commercial river frontage. This includes a harbour with a cross-channel ferry service to Dieppe.
- 6.98 Regeneration of the district's coastal towns is a key objective of this plan. Key to this will be regeneration at Newhaven and growth will have a significant role to play in achieving this transformation. In this regard, the District Council supports the Port Authority's plans for the continued use of the port for freight and passengers, which includes plans for expansion and modernisation. The District Council is also seeking to make better use of the current employment sites in the town and Core Policy 4 will be key to achieving this.
- 6.99 Housing growth is considered pivotal in helping to achieve regeneration at Newhaven. As well as supplying much needed housing within an area of need, additional housing in Newhaven will also bring about significant investment into the town, including improvements to infrastructure and the creation of jobs, and a larger population base to support the existing businesses, including town centre retailers, which operate in the town.

6.100 Spatial Policy 2 has identified Newhaven as the town to have the highest level of housing growth during the plan period. The Strategic Housing Land Availability Assessment has identified significant potential for housing growth during the plan period, both through redevelopment opportunities within the existing town and some outward expansion. It will be for the District Council's Site Allocations and Development Management Policies DPD, or a Neighbourhood Plan, to specifically allocate the majority of sites for housing. However, it is already clear that redevelopment opportunities within the existing town alone will not meet the overall housing target. In order for this target to be met, a strategic site that involves the outward expansion of the town will need to come forward.

6.101 The allocation of Land at Harbour Heights will be considered by the local planning authority as a single development. In the event that the site comes forward through multiple applications it is important that these are guided by and accord with a masterplan, infrastructure delivery strategy and phasing strategy. This will help ensure a comprehensive approach for the delivery of the allocated site as a whole as well as ensure that any proposals for part of the site help deliver a cohesive development that meets the Core Strategy's policy objectives and do not prejudice the delivery of the remainder of the site or infrastructure provision.

Spatial Policy 7 – Land at Harbour Heights, Newhaven

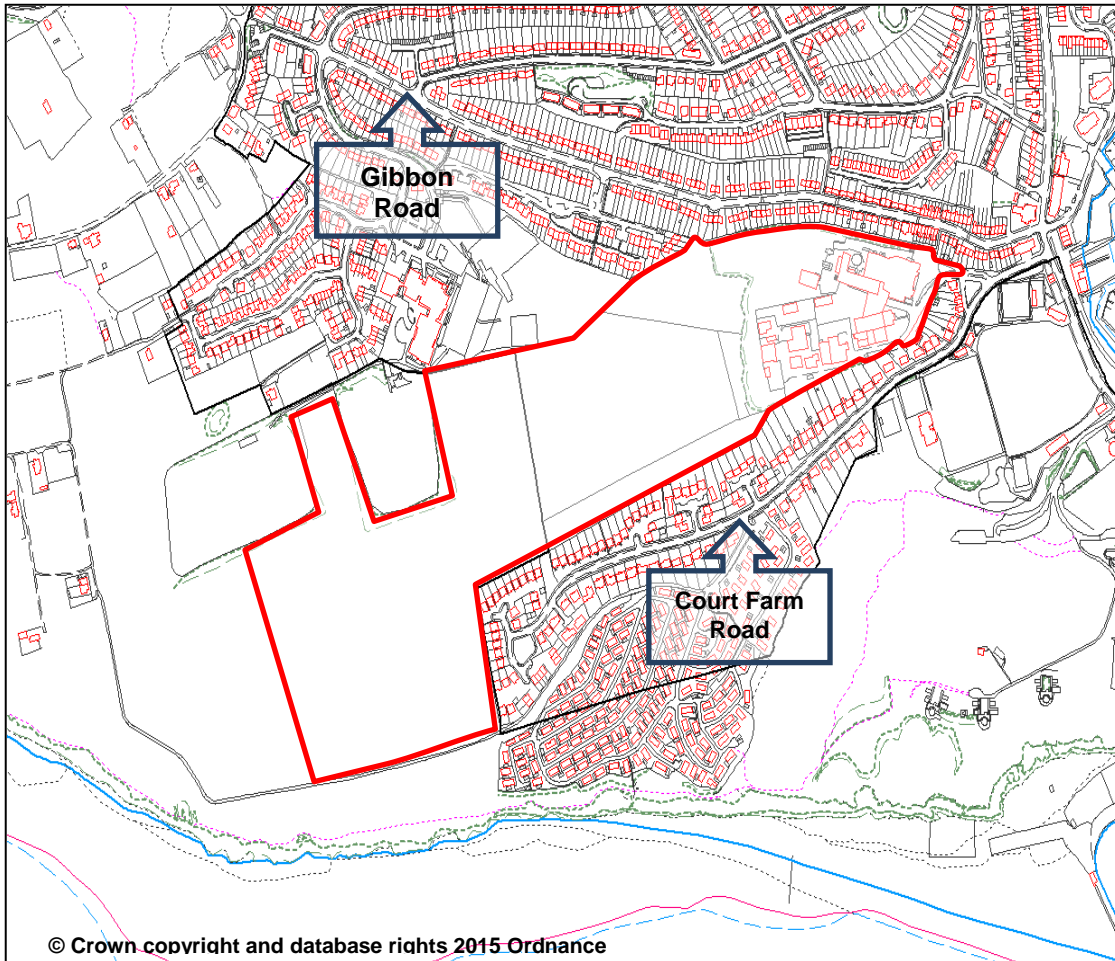
Land amounting to 20 hectares is allocated for a mixed-use development including employment units and approximately 400 dwellings. Development will be permitted subject to compliance with the Core Delivery Policies of this plan and the following criteria:

- i) Progress in accordance with a detailed Masterplan, infrastructure delivery strategy and phasing strategy to be agreed with the local planning authority;**
- ii) Primary and secondary accesses including provision for pedestrians and cyclists to be provided from Court Farm Road and Quarry Road;**
- iii) Development delivers at least 30% affordable housing in accordance with the relevant criteria of Core Policy 1;**
- iv) The development maintains the undeveloped nature of the cliff top coastline, and avoids exposing new development to coastal erosion risk, by ensuring a sufficient undeveloped area from the cliff edge to the most southerly point of development. This area will be utilised for informal open space and will respect the Beachy Head to Selsey Bill Shoreline Management Plan;**
- v) Development respects the amenity of the existing dwellings adjoining the site;**

- vi) Contributions towards off-site infrastructure improvements arising from and related to the development. This will include off site highway improvements being made to the South Road/ South Way junction;
- vii) Subject to a proven need and viability considerations, any loss of employment units will be compensated for by the provision of modern business units that are appropriate for a predominantly residential area;
- viii) Robust landscaping, which is appropriate to a coastal location, is provided within and around the site to mitigate the impacts of this edge of town site on the surrounding landscape, having particular regard to views from and into the National Park;
- ix) Development is subject to an appropriate assessment and evaluation of the archaeological potential and historic interest of the site;
- x) Development is subject to an ecological impact assessment and appropriate measures are undertaken to mitigate adverse impacts on biodiversity. Development will also allow for the protection and enhancement of biodiversity, where possible; and
- xi) The development will provide a connection to the sewerage system at the nearest point of adequate capacity, as advised by Southern Water.

Should a planning application be submitted that only relates to part of the site it must be accompanied by:

- A Masterplan and Infrastructure Delivery Statement that sets out:
 - a) Site specific infrastructure requirements and how these relate to the full allocation Infrastructure Delivery Strategy;
 - b) Details of proposed development phasing, proposed triggers for the delivery of associated infrastructure and how these relate to the full allocation Phasing Strategy; and
 - c) Details of how proposed publicly accessible space and facilities would be managed and maintained and related to the wider site and surroundings.
- A Financial Appraisal in a format to be agreed in advance with the local planning authority, reporting on financial viability issues and justifying the form and content of the proposals. This will include the amount and type of affordable housing and amount and phasing of employment provision and details of how this relates to the delivery of the wider site.



Justification

6.102 The area subject to the above policy is in the south western part of Newhaven and is bordered to the north by Gibbon Road and to the south by Court Farm Road. The area extends from the Meeching Quarry Industrial Estate site in the east to land known as Harbour Heights in the west.

6.103 The majority of the area subject to this policy is in agricultural use. The land is considered low grade agricultural land. Meeching Quarry Industrial Estate, covering approximately 3 hectares of the eastern part of the policy area, currently contains a mix of B2, B8 and Sui Generis uses. The Economic and Employment Land Assessment (EELA) scores the site low with regards to market attractiveness due to the poor quality and age of units, a number of which are currently vacant (including the Artex unit that covers a significant proportion of the site). The EELA identifies a need for the provision of smaller, high quality premises within Newhaven, particularly move-on office units suitable to accommodate businesses seeking to move-on from the Enterprise Centre. The redevelopment of this Industrial Estate offers a good opportunity to meet this need and help off-set the loss of the existing employment floorspace.

6.104 A site specific affordable housing requirement has been included for this strategic site in recognition of known and potential site constraints, including

local topography, potential land contamination and infrastructure mitigation. An initial viability assessment indicates that affordable housing delivery at 40% (as sought by Core Policy 1) is unlikely be deliverable. Therefore, the level of affordable housing has been reduced to at least 30%, with the final level of affordable housing to be provided on site being informed by further detailed viability work. The development would be expected to be consistent with all other relevant aspects of CP1.

- 6.105 There are two potential access points, from Court Farm Road (between 128 and 138) and Quarry Road. Opportunities to create linkages between the development and surrounding area should be explored, particularly linking the development to the primary and secondary schools to the north.
- 6.106 Previous consideration of development in this part of Newhaven, as well as the findings from the evidence base (particularly the Landscape Capacity Study) identifies that parts of this area are quite prominent in landscape terms, particularly with the site being visible from a number of locations in and around Newhaven. However, existing and planned (the 2003 Local Plan land west of Meeching Quarry allocation) development in this part of the town has provided an urban feel to this area, which would not be exacerbated by development in accordance with this policy. To ensure that this is the case, careful consideration will still need to be given to the development's layout, design and landscaping. This will need to ensure that visual impacts on the landscape, including views of the site from vantage points such as the cliff top and Newhaven Fort/ Castle Hill, are not compromised and that a suitable gap is maintained between Newhaven and Peacehaven (in this regard the development should not be located any further west than the western end of Hill Top Way and should provide a soft landscape interface between the town and countryside).
- 6.107 In considering the impact of development on the landscape, special regard will need to be given to the undeveloped nature of the coastline, which needs to be retained. This should ensure that no development is located within the indicative cliff top erosion zone where no active intervention, to prevent erosion, is planned within the Shoreline Management Plan.
- 6.108 The policy makes reference to highway mitigation measures and improvements to sustainable transport options. The justification for this is that the transport evidence indicates that an increase in traffic from development in this part of Newhaven will have an adverse impact on southern access junctions of the Newhaven Ring Road (A259) in that they would be at or above their operating capacity. The additional strain from the development of this site will need to be mitigated. These mitigation measures will be in the form of junction improvements at South Road and South Way and by substantially improving sustainable transport options in this part of the town, especially a good quality and high frequency bus service, which will reduce the need to utilise the private car. As such, a sustainable travel plan will be required, which will need to be agreed by the local planning authority, in consultation with the local highway authority, and implemented accordingly.

- 6.109 Newhaven is currently recognised as having a shortfall in equipped children's play space and sports pitches. Although it is unreasonable to expect this development to make up the entire shortfall, it is proposed that the provision of, or contribution towards, open space and sports and recreation provision should be focussed on providing the facilities that are currently under-supplied in the area.
- 6.110 The site lies in an area of archaeological potential and as a result an appropriate assessment and evaluation of the site's archaeological and historic interest through desk-based assessment, geophysical survey, geo-archaeological survey and trial trenching will be expected to inform appropriate mitigation by design and recording.
- 6.111 The site is adjacent to the Brighton to Newhaven Cliffs SSSI and there are SNCIs to the east and west. There are also multiple records of protected and notable species from the local area. As a result an ecological impact assessment will be required together with appropriate mitigation where necessary, as informed by the ecological impact assessment.

Peacehaven and Telscombe

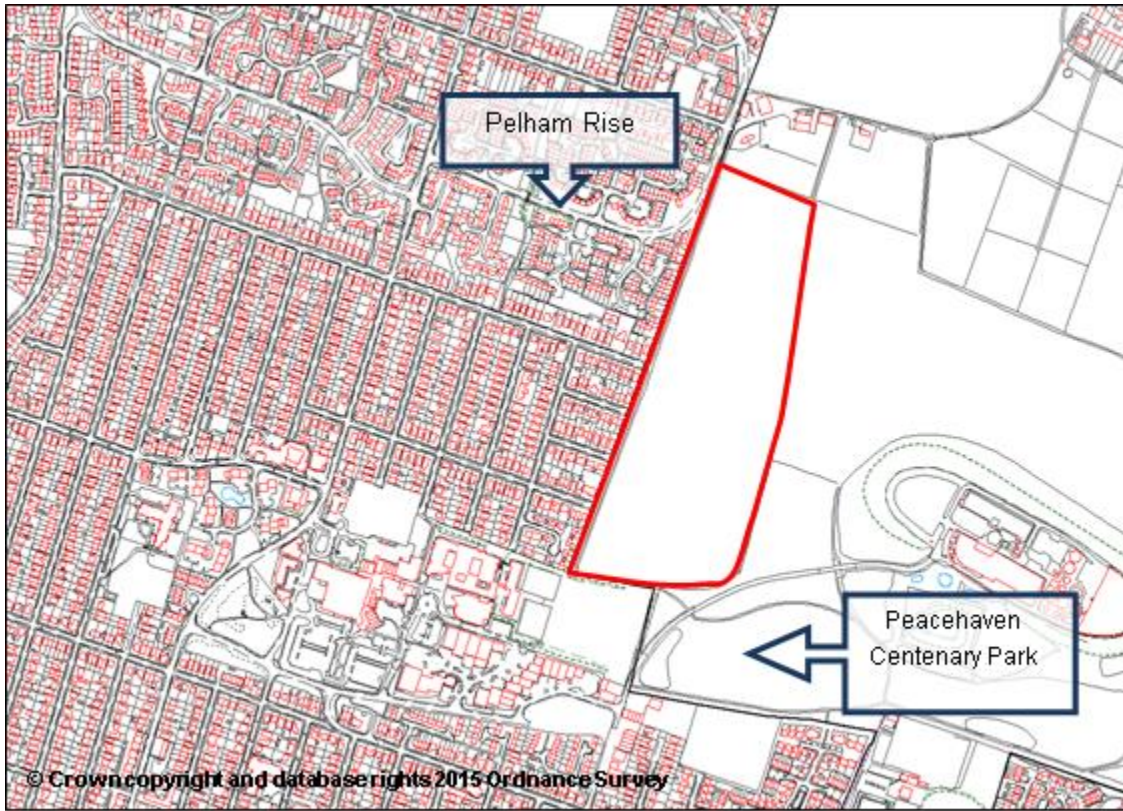
- 6.112 Peacehaven and Telscombe (combined parish population: 21,544) are located on the coast between Newhaven and the city of Brighton & Hove. The combined areas are classified as a district centre in the settlement hierarchy and offer a range of shops and services, together with a leisure centre, health facilities, library, and secondary school.
- 6.113 Peacehaven and Telscombe offer only limited employment opportunities and there is significant out-commuting to work, particularly to the adjacent city of Brighton & Hove. The proximity of the city is also reflected in a fairly buoyant local housing market, which is supported by significant levels of in-migration from Brighton & Hove.
- 6.114 The A259 coast road is the only vehicular route in and out of the urban area and ESCC, as the local transport authority, has concerns about the ability of this road to accommodate further increases in demand. Accordingly, the County Council's transport policies and strategy for district's coastal towns focus on improvements to, and increasing usage of, public transport to meet future demands along the A259 corridor.
- 6.115 Peacehaven and Telscombe benefit from an extensive network of green spaces, including the cliff top and Telscombe Tye, which offers important recreational opportunities for residents. The Peacehaven Centenary Park, a 12 hectare site incorporating both formal and informal recreational facilities, was opened in 2015, funded primarily by recent housing development and the adjacent Waste Water Treatment Plant.
- 6.116 Opportunities for expansion of the built-up area are limited by the sea to the south and the boundary of the South Downs National Park to the north. However, a strategic housing development opportunity exists on agricultural

land at Lower Hoddern Farm, located north-west of the new Peacehaven Centenary Park, as detailed in the following policy.

Spatial Policy 8 - Land at Lower Hoddern Farm, Peacehaven

Land amounting to 11 hectares is allocated for residential development of approximately 450 dwellings. Development will be permitted subject to compliance with the Core Delivery Policies of this plan and the following criteria:

- i) The primary vehicular access point shall be taken from Pelham Rise;**
- ii) The provision of safe and convenient pedestrian and cycle access to Southview Road, Firle Road and the Peacehaven Centenary Park;**
- iii) The provision of equipped children's play spaces throughout the development;**
- iv) The provision of 2 hectares of public amenity space at the south east corner of the site, allowing for the potential expansion of the Peacehaven Centenary Park;**
- v) The provision of a comprehensive landscaping scheme, incorporating a significant new tree belt along the eastern boundary of the site;**
- vi) The identification, delivery and funding of a co-ordinated package of multi-modal transport measures to mitigate the impacts of development on the A259 coast road to the satisfaction of the local planning authority, in consultation with the local highway authority and adjacent highway authority;**
- vii) The development will provide a connection to the sewerage system at the nearest point of adequate capacity, as advised by Southern Water;**
- viii) The development is subject to a programme of archaeological works in order to enable any archaeological deposits and features to be recorded;**
- ix) Contributions to other off-site infrastructure improvements arising from and related to the development; and**
- x) The provision of a comprehensive noise and odour assessment in consultation with the utility provider which confirms that acceptable noise and odour standards can be met within the proposed homes and amenity areas.**



Justification

6.117 This housing allocation comprises a tract of open, relatively flat agricultural land which abuts the existing built-up area of Peacehaven on its western boundary. Peacehaven Community School and Centenary Park are located on the southern boundary, with Peacehaven Waste Water Treatment Works to the south east. A small group of residential properties and industrial units are located to the north, whilst elsewhere open countryside extends eastwards from the boundary of the allocated site towards the National Park.

6.118 The site is in single ownership and is currently classified as Grade 2 agricultural land (i.e. the best and most versatile agricultural land). However, the site is within easy walking distance of the Meridian Centre, Peacehaven Leisure Centre, Peacehaven Community School, primary schools, and local employment opportunities. It is therefore considered that the economic and social benefits of housing development in this location outweigh the loss of valuable agricultural land.

6.119 The development of the site also provides an opportunity to improve the urban edge of Peacehaven in this location, which is currently highly visible in views from the adjacent countryside of the National Park. This will be achieved through the requirement for a significant tree belt along the eastern edge of the allocation in order to help assimilate the development into the surrounding downland landscape.

6.120 Approximately 2 hectares of the southern section of the site was allocated for public open space in the adopted Lewes District Local Plan 2003. This was

part of a wider allocation to help address the significant shortfall of outdoor playing space in Peacehaven and Telscombe. Notwithstanding the recent completion of the Centenary Park, a shortfall in outdoor playing space still exists in the towns and it is therefore considered appropriate for the housing allocation to include at least 2 hectares of public amenity space to meet the needs of the new residents. Provision should also be made for equipped and informal children's play spaces in accordance with the Councils' adopted standards.

- 6.121 Due to local highway capacity constraints, an essential requirement of the development will be the identification and delivery of a co-ordinated package of multi-modal transport measures to mitigate the impacts on the A259 coast road. This will include effective enhancements to the existing bus service levels and infrastructure in the A259 corridor, thereby increasing the share of total person demands by bus for the whole area, not just arising from the new development itself.
- 6.122 The development would also be 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. The development should also demonstrate overall sustainable accessibility, including good connections to the adjacent street network in order to encourage walking and cycling.
- 6.123 The allocated site is located within an Archaeological Notification Area, defining an area of prehistoric activity and settlement. The developer will therefore be required to record and advance understanding of the significance of any archaeological deposits and features within the site and should make this evidence publicly accessible.

7. CORE DELIVERY POLICIES

7.1 The Spatial Strategy has addressed the challenge of accommodating and delivering growth in Lewes District. Section 3 identifies five other key strategic issues and challenges that are to be addressed through the Core Strategy and subsequent associated documents. These issues and challenges have informed the vision and key strategic objectives for the plan, which has, in turn, informed the policy areas to be covered. For each of the policies identified in this chapter, the key strategic objectives, which the policy is seeking to achieve, are identified. Except where specifically stated, these core delivery policies will apply, where relevant, to all development across the whole of the plan area.

Key Strategic Issue/Challenge: Improving access to housing

7.2 The core delivery policies that are considered integral to addressing this key issue/challenge are identified in this section.

Core Policy 1 – Affordable Housing

Key Strategic Objective:

- **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.**

7.3 A sufficient supply of housing of all tenures, including affordable housing, is essential to meet the objectives of the Core Strategy and to meet the wide range of housing needs that will be experienced in the district over the plan period as far as sustainably possible.

7.4 As identified in Section 6 (The Spatial Strategy), the objectively assessed need for housing over the plan period will not be fully met. Much of this housing need is generated from internal migration pressures and such pressures will not significantly subside as a result of not being accommodated. The reality is that older households who have built up equity in existing houses, potentially elsewhere in the country, will be in a position to out-compete other groups in the housing market. This may include younger households, or those with comparatively low levels of income. Pushing such groups out of the housing market in the district could have significant consequences, particularly in terms of sustaining an economically active population and supporting the local economy.

7.5 The Duty to Co-operate Housing Study identifies the provision of affordable housing as one way of avoiding the above scenario. The delivery of the highest feasible levels of affordable housing is a clear way of mitigating the potential negative impacts of not delivering the full objectively assessed housing needs. The provision of such housing will be integral in achieving the

key objective relating to this policy, as it will assist in delivering homes and accommodation that meets the needs of those within the district. Such an approach is also consistent with the District Council's corporate priority of increasing the provision of affordable housing throughout the district. This priority is also shared by the National Park Authority in its area.

- 7.6 Putting aside the argument that there is a need for affordable housing to mitigate against the wider housing needs not being met, there is still significant evidence of a considerable need for affordable housing in the district. The migration pressures, highlighted in Section 2 (Social Characteristics), are not new to the district. Such migration pressures have been a contributing factor to property prices in the district, which are significantly higher than national and regional averages. This is reflected in Lewes District having one of the highest house price to income ratios (the 'affordability gap') in the country, which is having a marked impact upon the availability and affordability of housing for those on low to modest incomes who wish to live locally. Both the Strategic Housing Market Assessment (2008) and the Assessment of the Local Need for Housing (2011) recognise this situation.
- 7.7 The Strategic Housing Market Assessment, produced in 2008, found that the district had an annual requirement for affordable housing, after allowance was made for re-lets, of 230 units per annum. More recently (Autumn 2013) an Affordable Housing Needs Assessment has been undertaken for Lewes District. This demonstrates that in order to meet the level of affordable housing need in the district over the next 5 years (both current backlog and newly arising need) an additional 389 affordable homes would need to be provided per annum, on top of those already expected to be delivered.
- 7.8 The Strategic Housing Market Assessment suggested initial percentage figures for the level of affordable housing that might be sought on new residential development. These percentage figures formed the basis for a preferred policy approach in the Emerging Core Strategy. However, the Emerging Core Strategy recognised that the draft policy approach was not based on any financial viability assessment, which would need to be undertaken before determining the appropriate policy requirements for the district. The recommendations in the Strategic Housing Market Assessment were also made in the light of the prevailing economic conditions and national planning policy requirements in 2008. This was the best available information at the time of the consultation on the Emerging Core Strategy and therefore that policy approach included a caveat regarding the need to undertake more up to date evidence, particularly in terms of viability testing.
- 7.9 The Affordable Housing Viability Assessment took the Strategic Housing Market Assessment's suggested requirements as the starting position for testing affordable housing viability in the district and then, finding them all to be comfortably viable, tested various other targets and thresholds across the district. The Viability Assessment also included viability based consideration of the relationship between affordable housing provision and the potential implications of a future Community Infrastructure Levy Charging Schedule

and meeting at least the full Level 4 requirements of the Code for Sustainable Homes.

- 7.10 The Affordable Housing Viability Assessment recommended a flexible approach to affordable housing delivery, with a district wide target (rather than requirement) of 40% and a graduated threshold for delivery as set out in the core policy below.
- 7.11 The graduated threshold for developments of less than 10 units is to reflect the increased build costs and generally somewhat reduced viability demonstrated for the smaller development sites.
- 7.12 The recommendation for a target percentage rather than a requirement is to allow appropriate flexibility in the policy to respond to variations in the housing market, land values and build costs which could result in reduced development viability on any given site. This is considered essential given the continuing economic uncertainty. The viability evidence tested a 10% fall in market values, which resulted in development remaining broadly viable. However, this would start to become marginal or unviable if the market fell much more than 10%. Monitoring of delivery rates and for significant changes in house prices and/or build costs would allow for a reassessment of the policy in the event of, for example, a 10% or more fall in the market, or persistent under-delivery.
- 7.13 No affordable housing requirement was recommended on developments of one or two units as the viability evidence shows that these smaller developments generally would not be able to bear both the cost of CIL and a commuted payment towards affordable housing. Housing proposals will be expected to make efficient use of land in accordance with Core Policy 2. Any proposal that appears to have an artificially low density as a possible measure to avoid the required thresholds for affordable housing will be scrutinised and may be refused planning permission where they fail to make efficient use of land and provide appropriate levels of affordable housing.
- 7.14 The actual affordable housing requirement may be determined on a site by site basis, taking into consideration market and site conditions. The target levels shown in the policy below will be expected to be provided by all developments of 3 (net) or more dwelling units (including conversions and subdivisions) unless the local planning authority is satisfied by robust financial viability evidence that development would not be financially viable at the relevant target level. Such evidence is required to be submitted by the applicant with the planning application to justify any reduced levels of affordable housing provision proposed and may be subject to independent assessment (by the Valuation Office Agency or other appropriately qualified independent assessor). An open-book approach will be taken and with the onus being on the applicant to clearly demonstrate the case for the reduced level of affordable housing proposed. Applicants intending to make a planning application with a reduced level of affordable housing provision below the relevant identified target are strongly advised to raise this with planning officers in pre-application discussions.

- 7.15 There is a very strong presumption that affordable housing will be provided by the developer on the development site. In exceptional circumstances, where justified by robust evidence, the local planning authority will consider provision on an alternative suitable and serviced site provided by the developer in the first instance. Failing that, the local planning authority will exceptionally consider accepting a financial contribution in lieu, which will be used to enable further affordable housing provision in the district, and may be pooled as appropriate.
- 7.16 The affordable housing tenure split will generally be expected to be 75% affordable rented and 25% intermediate tenure. However the tenure split may vary on a site by site basis depending upon the identified needs of the local area at the time. Applicants should discuss tenure requirements with the Council's Housing Services section before submitting a planning application.
- 7.17 For the purposes of this policy affordable housing is defined as in the National Planning Policy Framework Annex 2 (and in the glossary section of this document – see appendix 1).
- 7.18 In rural parts of the district, Local Plan Policy RES10 'Affordable Homes Exception Sites' has achieved relatively good success rates for the delivery of affordable homes for local needs on sites outside the planning boundary of the villages. The National Planning Policy Framework makes provision for the continuation of a rural exception sites policy and, as a result, it is proposed that Policy RES10 is carried forward.
- 7.19 For clarity, the affordable housing policy applies to sheltered, extra care and assisted living residential development in the same way as it does to general dwelling houses, where each residential unit has its own kitchen and bathroom facilities and therefore falls within the C3 Use Class. It also applies to conversions and subdivisions where there is a net residential gain of 3 or more dwelling units in accordance with the target and thresholds set out in the policy below.
- 7.20 June 2011 average house prices are taken as the baseline position for this policy because this was the latest information at the time of the Affordable Housing Viability Assessment. This is the baseline from which a 10% market fall buffer was tested.

Core Policy 1 - Affordable Housing

1. A district wide target of 40% affordable housing, including affordable rented and intermediate housing, will be sought for developments of 10 or more dwelling units. For developments of less than 10 units, affordable housing will be sought according to the stepped target and threshold below:

Affordable Housing Target/Threshold	
Scheme size (Units)	Affordable housing (Units)
1 - 2	0
3 - 4	1
5 - 7	2
8 - 9	3
10+	40%

2. The affordable housing requirement may exceptionally be determined on a site by site basis where justified by market and/or site conditions. The target levels will be expected to be provided by all developments of 3 or more (net) dwelling units (including conversions and subdivisions) unless the local planning authority is satisfied by robust financial viability evidence that development would not be financially viable at the relevant target level. Such evidence will be required to be submitted with the planning application to justify any reduced levels of affordable housing provision proposed for assessment using an open-book approach and may be subject to independent assessment (e.g. by the Valuation Office Agency or equivalent).
3. The guideline affordable housing tenure split will be 75% affordable rented and 25% intermediate (shared ownership). The local planning authority will negotiate the appropriate tenure split on a site by site basis based upon the latest evidence of needs in the site locality.
4. Affordable housing units will be integrated throughout the development site, be indistinguishable in design and materials from the market housing on the site and remain affordable in perpetuity.

The strong presumption is that affordable housing will be provided on the development site. In exceptional circumstances, the local planning authority may, at its discretion, consider accepting in lieu an off site contribution on another suitable serviced site provided by the developer in the first instance or a financial contribution of broadly equivalent value. In such circumstances the local planning authority will have particular regard to the need to develop mixed and balanced communities and will need to be persuaded that the affordable housing cannot satisfactorily be provided on the development site itself. In the National Park the focus will be on the provision of affordable housing to ensure that the needs of local communities in the National Park are met.

Where sites are allocated in a Development Plan Document a different affordable housing requirement may be specified (either higher or lower), taking into consideration any site specific factors that may affect financial viability and/or the wider planning benefits of the development of that site.

The local planning authority will monitor the delivery of affordable housing through the Authority Monitoring Report. In the event of persistent under delivery against this policy target and the Housing Strategy annual target the Council will review the targets and thresholds of this policy. In the event of a fall of 10% or more in East Sussex average house prices (Land Registry House Price Index June 2011 baseline) the local planning authority will review the thresholds and targets of this policy.

Due to the largely rural nature of the district, Rural Exception Sites for local needs affordable housing outside the planning boundary of rural settlements will continue to be considered according to the requirements of Policy RES10 carried forward from the Lewes District Local Plan 2003.

Core Policy 2 – Housing Type, Mix and Density

Key Strategic Objectives:

- **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.**
- **To conserve and enhance the high quality and character of the district's towns, villages, and rural environment by ensuring that all forms of new development are designed to a high standard and maintain and enhance the local vernacular and 'sense of place' of individual settlements.**
- **To maximise opportunities for re-using suitable previously developed land and to plan for new development in the highly sustainable locations without adversely affecting the character of the area.**

- 7.21 In order to develop and maintain sustainable, mixed and balanced 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 over the plan period. 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.

- 7.22 There has been a general 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 in the district. The Local Housing Needs Assessment has identified that the main growth in demand to 2030 will be for dwellings for older people and small homes for single person households and couples with no dependents. However, there will also be a need for family homes, particularly due to the level of under-occupation of larger family homes in the district, creating pressures of demand (and therefore on affordability) for homes of this type. Dwellings suitable for older people 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 homes; and specialist accommodation such as nursing homes and extra care homes. The Council and the National Park Authority are currently working in partnership with East Sussex County Council (ESCC) and all other East Sussex local planning authorities in preparing and updating guidance on housing for older people. This work will include assessing in detail the specific future accommodation needs of older people within the district. The findings of this work will then feed into identifying sites and local requirements through the Site Allocations and Development Policies DPD, SDNPA Local Plan or Neighbourhood Plans where relevant.
- 7.23 With an ageing population it is particularly important to accommodate the needs of the elderly with suitably designed accommodation within an environment that provides an appropriate level of care. Traditionally older persons housing has been aimed at a particular stage in an older person's life, e.g. care homes and sheltered housing, but new models of provision (e.g. continuing care retirement communities) can support older peoples' housing needs through a range of stages of later life. Paragraph: 3-037 of the PPG says: "Local planning authorities should count housing provided for older people, including residential institutions in Use Class C2, against their housing requirement. The approach taken, which may include site allocations, should be clearly set out in the Local Plan." In monitoring the provision of housing development to meet the requirements of Spatial Policy 2, the local planning authority will include against the housing target individual units of C2 accommodation where they provide self-contained homes with private kitchen and bathroom facilities, living area and own front door (including where the front door is accessed from a communal and/or internal hall or corridor).
- 7.24 Specific standards 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. However the need for smaller units (1 and 2 bed) is a repeated theme in the supporting evidence. In March 2012 the proportion of households on the Housing Register seeking 1 bed units was 53%, 2 bed units 29% 3 bed units 14% and 4+ bed units 3%. Affordable and market housing would equally be expected to provide an appropriate mix of housing types and sizes, based on identified local needs.
- 7.25 The SHMA also identifies the need to set out policy relating to the scale and location of housing for the local ageing population, including care homes. The local planning authority acknowledges the importance of providing an

appropriate range of housing types for all sectors of the community, particularly housing for older people in recognition of the ageing population of the district. This may include specialist accommodation such as supported and extra-care housing as well as residential care homes and nursing homes.

- 7.26 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 but 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 the anticipated average density is set out to provide guidance for developers, whilst still allowing for higher or lower densities where individual circumstances merit them, such as the character and local context of the site.
- 7.27 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 from 2007 to 2011. For the towns the average density has been 52 dwellings per hectare and the equivalent figure for the villages has been 25.
- 7.28 Neighbourhood Plans could provide more details on the appropriate housing type, mix and density for the relevant plan area, for instance where there is an identified need in the locality for a particular type or size of dwelling or there is a definable local character that may influence density requirements.

Core Policy 2 – Housing Type, Mix and Density

In order to deliver sustainable, mixed and balanced communities, the local planning authority will expect housing developments (both market and affordable) to:

- 1. Provide a range of dwelling types and sizes to meet the identified local need, based on the best available evidence. This need will generally include 1 and 2 bedroom homes for single person households and couples with no dependents. Account will also need to be given to the existing character and housing mix of the vicinity and, where appropriate, the setting of the National Park and its Purposes and Duty.**
- 2. Provide flexible, socially inclusive and adaptable accommodation to help meet the diverse needs of the community and the changing needs of occupants over time. This need will include accommodation appropriate for the ageing population and disabled residents.**
- 3. Reflect the site context including the character of the surrounding area, site accessibility, and the size and type of dwellings needed in the locality, to achieve densities in the region of 47 to 57 dwellings per hectare for the towns and 20 to 30 dwellings per hectare for the villages. Higher or lower densities may be justified by the specific character and context of a site. Densities to be achieved on strategic sites are indicated in the capacity and development principles of each strategic allocation in this Core Strategy. Densities to be achieved on non-strategic allocated sites will be similarly identified in the development principles that accompany each site allocation in the relevant subsequent DPD.**
- 4. Where appropriate, the local planning authority will identify sites and local requirements for special needs housing (such as for nursing homes, retirement homes, people with special needs including physical and learning disabilities, specific requirements of minority groups etc) in a Site Allocations and Development Management Policies DPD and/or the SDNPA Local Plan.**

Core Policy 3 – Gypsy and Traveller Accommodation

Key Strategic Objectives:

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

- 7.29 In order to develop and support mixed and sustainable communities within the district an appropriate mix and type of accommodation needs be provided. This includes ensuring that there are suitable and sufficient, local authority and private, permanent and transit pitches to meet the needs of Gypsies and Travellers²³.
- 7.30 National planning policy for traveller sites²⁴ notes the importance of local planning authorities assessing accommodation needs based on robust evidence to inform the preparation of local plans and planning decisions. An update²⁵ of accommodation needs for Gypsies, Travellers and Travelling Showpeople has been undertaken for East Sussex.
- 7.31 The 2014 Gypsy and Traveller Accommodation Assessment (GTAA) sets out the recommended level of permanent pitch provision for each of the local planning authorities within East Sussex, including the area of the SDNP that falls within the County. The GTAA sets out an overall figure of 13 net additional permanent pitches to be delivered within Lewes district. The figure for Lewes district has been disaggregated in the GTAA between those areas that fall within and outside the SDNP, 8 and 5 net additional permanent pitches respectively, in order that each local planning authority is able to plan for their authority area. These disaggregated figures are reflected in Core Policy 3 below.
- 7.32 The local planning authorities will consider how best to meet the identified additional permanent pitch needs of the district. This may mean making allocations within the area outside the National Park to serve some or all of the disaggregated needs of the National Park area of the district. Conversely, it may mean making allocations within the National Park area to serve the disaggregated needs of the part of the district outside the national park. These allocations will be provided in Local Plan Part 2 and the SDNPA Local Plan, or Neighbourhood Plans, as relevant.
- 7.33 There is currently one formal transit site in East Sussex, Bridie's Tan, located within the National Park area of Lewes district. This accommodates 9 transit pitches. The 2014 GTAA concludes that currently there is a need for 8 net additional transit pitches within the GTAA area. No preferred location for the transit provision has currently been identified. However, the District Council and National Park Authority will work with the other East Sussex local planning authorities and relevant parties to determine the appropriate location(s) within the County and type of transit provision required. In the event that an allocation is required within Lewes district, or a planning

²³ For the definition of Gypsies and Travellers, see Appendix 1:Glossary

²⁴ DCLG *Planning policy for traveller sites* (March 2012 then August 2015).

²⁵ The 2014 Gypsy and Traveller Accommodation Assessment (GTAA) updates the accommodation needs position of the 2005 GTAA. A separate GTAA was undertaken at the same for the Brighton and Hove and applicable areas of the SDNP.

application submitted, any proposal will be assessed against the below criteria taking into consideration the short term nature of transit accommodation.

- 7.34 Provision of 8 net additional transit pitches in East Sussex, including the area within the National Park, will be made over the Plan period having regard to the criteria below. This work will be progressed with the other East Sussex local planning authorities.
- 7.35 No accommodation needs for Travelling Showpeople have been identified for the areas of the Lewes District either within or outside the SDNP for the Plan period. Based on current available evidence it is unlikely that a need will arise over the Plan period. In the event that a need is demonstrated in the short term, then any proposal would be assessed against the criteria below.
- 7.36 No specific deliverable sites have been identified in the Site Assessment work undertaken to date²⁶. In the absence of deliverable sites allocated in the Core Strategy, a range of criteria will be used in preparing future allocations and determining planning applications. These criteria should be used proportionately taking into consideration the type of pitch / site being sought (i.e. small permanent site, larger transit site etc.).

²⁶ Gypsy and Traveller Site Assessment (Parker Dann, 2010) and subsequent update (2012)

Core Policy 3 – Gypsy and Traveller Accommodation

Provision will be made for a net total of 13 additional permanent pitches for Gypsies and Travellers to serve the needs for the period 2014 to 2030. Of these 5 pitches will serve the needs of the area outside the National Park and 8 will serve the needs within the National Park area of the district. The local planning authority will allocate specific, deliverable sites through the Local Plan Part 2 and the SDNPA Local Plan, unless allocated through Neighbourhood Plans. These allocations will be informed by appropriate Site Assessment work and take into account any planning permissions granted for permanent use in the interim.

In guiding the allocation of permanent Gypsy and Traveller sites and/or considering planning applications for sites for Gypsies and Travellers and Travelling Showpeople, proposals will be supported where the following criteria have been met and they are in conformity with other relevant district wide policies:

- 1. Avoid locating sites in areas at high risk of flooding or significantly contaminated land, or adjacent to existing uses incompatible with residential uses, such as waste tips and wastewater facilities;**
- 2. The site is well related to, or has reasonable access to settlements with existing services and facilities such as schools, health services and shops;**
- 3. The proposal does not compromise the special features of national historical, environmental or landscape designations such as the South Downs National Park, Lewes Downs and Castle Hill Special Areas of Conservation (SAC) and Sites of Special Scientific Interest (SSSI);**
- 4. There is safe and convenient vehicular access to the road network**
- 5. There is capacity to provide appropriate on-site physical and social infrastructure such as water, power, drainage, parking and amenity space; and**
- 6. Adequate levels of privacy for residents on and adjacent to the site are provided through planning considerations such as site layout, scale and landscaping.**

Proposals for sites for Travelling Showpeople should also include adequate space for storage and/or keeping and exercising any animals associated with Travelling Showpeople's needs.

Key Strategic Issue/Challenge: Promoting sustainable economic growth and regeneration

7.37 The core delivery policies that are considered integral to addressing this key issue/challenge are identified in this section.

Core Policy 4 – Encouraging Economic Development and Regeneration

Key Strategic Objectives:

- **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 is underpinned by a balanced sector profile.**
- **To maintain and enhance the vitality and viability of the district's town centres, retail centres and local centres as hubs for shopping, business, entertainment, cultural and community life.**
- **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.**
- **To maximise opportunities for re-using suitable previously developed land and to plan for new development in the highly sustainable locations without adversely affecting the character of the area.**

7.38 The Spatial Strategy section of this document identifies the level and location of employment land and premises required for the plan period. In addition to the Spatial Strategy, further approaches to economic development and regeneration are required in order to ensure that the objectives are deliverable.

7.39 To inform this part of the Core Strategy, an Employment and Economic Land Assessment (EELA) and associated partial update in 2012 have been undertaken. These assessments have recognised the need for Lewes District to retain its existing business premises and aim to 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. Unusually, the District Council is a member of two Local Enterprise Partnerships (LEPs), the South East LEP and the Coast to Capital LEP, in order to ensure that the district is best placed for the promotion of local economic prosperity.

7.40 The EELA and the 2012 update, together with the East Sussex Local Economic Assessment were undertaken at a time of ongoing economic uncertainty and a double-dip recession. Nonetheless the evidence found the district to have a reasonably buoyant local economy in which tourism plays an important part. The relative resilience of the local economy is at least in part due to the attractive local environment and good quality of life factors in the

district. However, despite 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 sites being at risk of flooding and that the National Park designation 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.

- 7.41 The EELA recognises that 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 some rationalisation of manufacturing accompanied by movement into higher value sectors.. 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. The anticipated movement into higher value sectors may reduce the need for residents to commute out of the district for employment opportunities.
- 7.42 Currently the district experiences high levels of net out-commuting. Whilst a significant change to this pattern is unlikely, a partial reduction will lead to a higher proportion of those residents who are economically active working within the district. This is important given that the projected levels of housing need are not likely to be met. In turn, and due to the impact of an ageing population, this is likely to result in a reduction in those who are economically active in the district (an example of this is that if existing commuting patterns were to remain the same, in order to retain the current number of jobs in the district there would need to be approximately 345 dwellings delivered per annum).
- 7.43 In the rural areas the conversion of redundant farm buildings for small businesses has been identified as an important element of the local economy, providing a range of types and sizes of business accommodation around the district. This has assisted in both farm diversification and in the wider diversification of the local rural economy where, although agriculture is still the key element, other businesses also now have an important role. Moving forward it will be important to recognise that agriculture will have a key role in how the rural economy performs, as well as how the valued landscape is managed and the biodiversity of the district is maintained and enhanced. To aid in this, farming enterprises, including diversification schemes, need to be supported to help maintain the viability of this important economic sector and secure the sustainable management of the land.
- 7.44 Existing employment sites in the district need to be safeguarded from encroachment by other uses, except where there are demonstrated economic viability or environmental amenity reasons for not doing so. This safeguarding

is required in order to maintain an adequate supply and choice of employment land for the plan period, to encourage employment development and to avoid the lack of supply and/or choice being a barrier to economic growth in the district. Such safeguarding, as well as the intensification of existing employment sites, will also aid in the retention and potential increase in the number of job opportunities on the district's employment sites (the move away from the traditional manufacturing sector, which often has a high ratio of employment space to jobs, to the service sector, where the ratios are significantly lower, is also likely to increase the number of jobs on existing employment sites).

- 7.45 Where an application is made to change the use of an employment site to another use it will need to be supported by appropriate and robust evidence to demonstrate the economic viability or environmental amenity case proposed for not retaining the site for employment use. A demonstrated lack of developer or tenant/occupier interest would include, as a minimum, evidence of at least 12 months of active and continuous marketing, including advertising, for employment use at an appropriate market level and evidence of no unreasonable barriers to potential employment tenants/occupiers. Details of the numbers and types of interested parties and reasons for not pursuing their interest in the site for employment use will be expected.
- 7.46 A qualitative need for additional office and industrial space, particularly for Lewes town, was identified in the EELA. This relates to the need for more modern, flexible facilities and for improved choice in the market. The Spatial Strategy addresses part of this need, whilst recognising that further provision will be sought through the allocation of sites in the Site Allocations and Development Management Policies DPD or the SDNPA Local Plan. The need for more modern and flexible start-up and move-on facilities is echoed throughout the district (both industrial and office). This is a qualitative need, and not quantitative or significant, and hence there is not a need to allocate specific sites at this stage. Nevertheless, an appropriate policy framework needs to be in place to facilitate this qualitative need, and the following core policy seeks to address this.
- 7.47 Newhaven has benefited from significant regeneration in recent years: West Quay has been redeveloped; a thriving Enterprise Centre for new and small businesses has been established; and significant investment has been made in improving the skills of local residents. There is a strong community and a sense of pride in the town with over 150 active community groups and a successful community development association. However, there are more challenges to be addressed in the ongoing regeneration of Newhaven and the town has been badly affected by the recession and more than one in eight (13%) of its adult residents is claiming out of work benefits. The Regeneration Strategy for Lewes District 2012-2015 identifies that the town has numerous opportunities for further regeneration. This includes the availability of land for development, the energy renewal facility, its rail and sea connections, its technical and marine skills base, and its links with Brighton and Sussex universities, all of which can help it become a centre for green industries and innovation.

- 7.48 Newhaven Port is an important strategic asset both for the district and the wider region. Development and job-creation opportunities related to the Port are considered vital to the regeneration of Newhaven and the surrounding coastal area and to improve the continental 'gateway' to the South Downs National Park. Newhaven Port has been selected as the onshore base for the Rampion offshore windfarm, which will be a key element in the town developing as a centre for green industries and innovation.
- 7.49 The following policy has been compiled within the context set out in the previous paragraphs, but also with a view to assisting with the achievement of the five priorities from the District Council's Regeneration Strategy. The five priorities are: attracting investment; promoting enterprise; inspiring learning; welcoming visitors; and strengthening partnerships.

Core Policy 4 – Encouraging Economic Development and Regeneration

In order to stimulate and maintain a buoyant and balanced local economy through regeneration of the coastal towns, support for local and key strategic businesses and the rural economy and ensuring that the district's economy does not become reliant on one or two sectors, the local planning authority will take a flexible and supportive approach to economic development through the following measures:

- 1. When and where appropriate, identify sufficient sites in sustainable locations to provide for a flexible range of employment space to meet current and future needs. Within the South Downs National Park the pursuit of National Park Purposes will be paramount.**
- 2. Safeguard existing employment sites from other competing uses unless there are demonstrable economic viability or environmental amenity reasons for not doing so. This will include:**
 - i. A demonstrated lack of tenant/occupier interest.**
 - ii. A demonstrated lack of developer interest.**
 - iii. Serious adverse environmental impacts from existing operations.**
 - iv. Where the site is otherwise unlikely to perform an employment role in the future.**
 - v. Where the loss of some space would facilitate further/improved employment floorspace provision.**

Guidance on the interpretation of i. and ii. in the determination of planning applications is set out in paragraph 7.45 of the supporting text.

In such circumstances, there will be a strong preference for a mixed use alternative development in order to facilitate the retention or delivery of an appropriate element of employment use on the site.

There is a presumption in favour of retaining the unimplemented employment site allocations from the Local Plan (2003) towards meeting the District's employment land requirements over the plan period. 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 and Development Management Policies DPD or the SDNPA Local Plan.

- 3. Support the appropriate intensification, upgrading and redevelopment of existing employment sites for employment uses. Where appropriate, mechanisms such as Local Development Orders and 'value added' mixed use schemes will be used.**
- 4. Support the delivery of new office space to meet modern requirements.**

- 5. Encourage and support small, flexible, start-up and serviced business units (including scope for accommodating business expansion). This would include support for economic growth in rural areas through the conversion of existing buildings and appropriate, well designed new buildings for suitable business uses and for sustainable tourism developments. In addition, support will be given for farm diversification schemes and enterprises that help maintain the viability of farm businesses engaged in sustainable land management.**
- 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, both within and outside the National Park boundary.**
- 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. Support will also be provided to the delivery of onshore infrastructure and support services for the Rampion offshore windfarm.**
- 8. Promote modern and high speed e-communications and IT infrastructure.**
- 9. Encourage sustainable working practices (eg. homeworking and live/work).**
- 10. Support opportunities for the improvement of the skills and educational attainment levels of the district's labour supply, including new education and training facilities.**

Core Policy 5 – The Visitor Economy

Key Strategic Objectives:

- 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.**
- 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 is underpinned by a balanced sector profile.**
- To reduce the need for travel and to promote a sustainable system of transport and land use for people who live in, work in, study in and visit the district.**

7.50 Tourism will continue to be an important sector of the local economy, currently 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 such as the Cuckmere Haven, the Seven Sisters, Glyndebourne Opera House, Lewes Castle, Ditchling Beacon and Mount Caburn as well as attractions outside the National Park such as Seaford seafront, Newhaven Fort, Sheffield Park and Garden, the Bluebell Railway and Barcombe Mills. 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.

- 7.51 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 to address. As a result one of the key 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 is also central 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 quantitative and qualitative lack of appropriate visitor accommodation of all types and budget levels has been identified in the district.
- 7.52 The Camping and Caravanning Study concluded that there is market potential for the modest expansion of existing touring caravan and camping sites in the district and that the 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. However, Local Plan Policy E16 is no longer in use as it applies to the area within the Sussex Downs Area of Outstanding Natural Beauty, which no longer exists following the designation of the South Downs National Park. As a result, replacement policy content for Local Plan Policy E16 is now proposed within Core Policy 5. Within the National Park there may be a need for additional small scale camping facilities, particularly to serve the South Downs Way long distance path, which can help retain visitors in the area for longer with benefits for the local economy. Within the National Park it is anticipated that only small scale campsites and touring caravan operations will be likely to be acceptable in landscape terms. All proposals for new camping and caravan sites within the National Park should demonstrate that they need to be located within the National Park boundary and that an appropriate site could not be found outside the designated landscape. In the countryside, tourism development in general will be expected to show that it

needs a rural location and that the identified need for the development cannot be met in the villages or through other existing facilities.

- 7.53 While tourism is a key sector of the local economy, its growth may 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.
- 7.54 The evidence supports the reduction of seasonal restrictions on visitor attractions and accommodation, to provide operators with greater flexibility and ability to encourage longer stays and the opportunity to provide attractions and jobs all year round. With regard to visitor accommodation, care will be taken to ensure that the relaxation of seasonal restrictions does not facilitate the residential occupation of visitor accommodation.

Core Policy 5 – The Visitor Economy

Opportunities for the sustainable development of the visitor economy will be supported where they are of a scale, type and appearance appropriate to the locality and provide local employment, through the following measures:

- 1. Support for the high quality provision of new, and the upgrading/ enhancement of existing sustainable, visitor attractions; a wide range of accommodation types; encouraging emerging and innovative visitor facilities and accommodation offers; and giving flexibility to adjust to changing market trends.**
- 2. Presumption in favour of the retention and improvement of existing visitor accommodation stock, including camping and caravan sites and existing visitor attractions/facilities.**
- 3. Encourage sustainable tourism in rural areas, both within and outside the National Park boundary. This will include better linkages between the towns and rural surroundings; and 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, including the relaxation or removal of seasonal planning restrictions wherever appropriate, while ensuring the facility remains for visitor use.**
- 5. Support the improvement of sustainable transport opportunities for visitors and encourage the use of sustainable transport modes to reduce the impact of visitors on the highway network.**
- 6. Encourage local crafts, food and produce and appropriate tourism development that supports rural business and farm diversification.**
- 7. Continue to use saved Lewes District Local Plan policies E15 and E17 for Development Management purposes until such time as the Lewes District Council Development Management DPD and/or the South Downs National Park Local Plan is adopted.**
- 8. Ensure that any new camping and touring caravan sites proposed in the South Downs National Park require a location within the National Park; respond sensitively to the National Park Purposes, including in design, location and scale; and meet the requirements of Local Plan Policy E17.**

Core Policy 6 – Retail and Sustainable Town and Local Centres

Key Strategic Objectives:

- **To maintain and enhance the vitality and viability of the district's town centres, retail centres and local centres as hubs for shopping, business, entertainment, cultural and community life.**
- **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 is underpinned by a balanced sector profile.**
- **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.**

- 7.55 High streets should provide customer choice, a diverse retail offer and meet the needs of the community, but many can no longer wholly rely on retail in order to remain vibrant and vital. Nationally, less than half of retail spending is taking place in the high street with home shopping, including internet shopping, changing the way people shop.
- 7.56 To put the heart back into high streets including encouraging them to become destinations and hubs for socialising, the National Planning Policy Framework emphasises the need for local plans and neighbourhood plans to support the vitality and viability of town centres, not just for retailing but for a range of activities. The aim is to provide sustainable shops whilst also ensuring other commercial, leisure, tourist, residential and community uses are supported to encourage more people into town centres for longer, multi-purpose visits.
- 7.57 The local evidence base for retail and other related town centre policies consists primarily of the Lewes District Shopping and Town Centres Study (2012). This is a comprehensive assessment of retail activity within the district, which identifies how the local shopping market operates; assesses gaps and deficiencies in shopping provision; identifies the extent of the town centres and the primary and secondary shopping frontages; and considers the quantitative and qualitative need for additional shopping floorspace during the plan period.
- 7.58 As well as planning to meet the retail need, it is also important to identify a hierarchy of the existing role of the district's retail centres and set appropriate policy approaches, including indicating acceptable uses, for those areas. This will allow the type and scale of retail and town centre development proposals to be tested to ensure they are commensurate with the role and function of the relevant centre and the appropriate development types.

Lewes District Retail Hierarchy

Classification	Role
<p><u>Main Town Centre</u></p> <p>Lewes Seaford</p>	<p>Main town centres are the prime focus for a range of retail units including high street chains, other business, cultural and leisure uses. These towns are not reliant upon other centres to meet day to day needs. Retail activity will be focused on the primary shopping areas. A high proportion of retail uses will be retained in the primary shopping frontages. Also:</p> <p><u>Lewes centre</u> - the focus for additional, predominantly comparison, floorspace to meet a qualitative need, together with appropriate leisure facilities, restaurants, offices, arts, culture and tourism facilities in order to diversify the town centre and retain expenditure.</p> <p><u>Seaford centre</u> – a range of appropriate uses including leisure facilities, restaurants, offices, arts, culture, and tourism facilities will be encouraged in the area peripheral to the primary shopping area in order to maintain and enhance the diversity of the town centre and improve linkages with the seafront.</p>
<p><u>District Retail Centre</u></p> <p>Peacehaven (Meridian Centre) Newhaven town centre (within the ring-road)</p>	<p>District retail centres provide a range of convenience and comparison retail goods, but rely on larger retail centres such as Lewes, Seaford and Brighton to provide a wider range of retail goods and services. The local planning authority will seek to support and retain a predominance of retail units in district retail centres.</p>
<p><u>Local Centre</u></p> <p>Peacehaven (South Coast Road/Telscombe Cliffs) Ringmer Ditchling Newick</p>	<p>Local centres provide for more limited needs and provide a level of basic goods to support the day to day needs of the residents but do not perform a 'self-sufficient' function. In these areas the local planning authority will seek to retain important local shops and community facilities (such as meeting places, sports facilities, public houses, places of worship and cultural assets) and ensure local shopping areas/parades remain a vibrant focus for the local community, this may include a range of retail, employment, leisure and community uses.</p>

7.59 The county town of Lewes offers a unique shopping environment, with many shops and services occupying listed buildings and lying in the Lewes Conservation Area. The historic units have generally been retained and there are few modern, purpose-built retail units. This has facilitated the established

character in the town centre of smaller, independent and niche retailers and may have discouraged larger multiple chain stores from locating in the town. The independent shops are intrinsic to the town's character and benefit the local economy through attracting tourism visits and expenditure. However, the evidence shows that there is also some qualitative need for additional purpose built retail units in order to claw back expenditure that is currently being leaked to bigger centres outside the district, such as Brighton and Eastbourne. This is primarily for comparison goods, but there is also a limited, largely qualitative, need for convenience floorspace. An improved retail offer should attract additional shopping visits to the town, to the benefit of both the new and existing facilities. Appropriate linkages to/from new retail and leisure development will be required to ensure good accessibility between the established town centre facilities and any new facilities.

- 7.60 The role of Lewes town as the district's principal leisure, cultural and visitor destination will be maintained and enhanced. This will include through appropriate development that seeks to reinforce and enhance the distinctive and diverse character and eclectic mix of independent specialist/niche retailers and service providers.
- 7.61 Seaford is the second largest retail centre in the district and has a relatively strong and 'self-sufficient' retail performance. Much of the town centre is covered by a conservation area and the centre is distinct in character with a mix of commercial premises, community uses and clusters of residential properties. The town centre displays the diverse mix of retail, retail services and other town centre provisions of a healthily broad-based local economy. There are also further opportunities at the edges of the town centre to strengthen the town's economic base with such uses whilst retaining the historic fabric. In addition, the location of the town adjacent to the sea and surrounded by the South Downs National Park, presents opportunities for building on tourist and leisure focused retail provision and other facilities. There is also potential for improving links between the town centre and the promenade and beach, whilst not losing the special understated identity of the town and its seafront.
- 7.62 In Newhaven town centre (the area within the ring road) there has been a marked decline in the range of retail and retail services available and the area has struggled further through the recent adverse economic conditions. However, it is envisaged that with the wider regeneration of the town, including a revitalised and more accessible town centre, the vibrancy and vitality of the town centre will increase, befitting of its classification as a District Retail Centre. In addition, Newhaven occupies an important geographic location between Seaford and Peacehaven whereby it offers the ideal strategic position to service the surplus retail needs of Seaford and Peacehaven that cannot be met within those towns, as well as its own needs.
- 7.63 In order to support the remaining retail function within Newhaven town centre, which fulfils an important local role, a diversity of commercial and community/cultural uses will be encouraged in the town centre to encourage greater footfall in the area and more linked trips with the retail units. In the

Primary Shopping Area retail use will be supported and encouraged in order to maintain as high a proportion of retail as possible. However, in order to arrest the decline and high levels of vacancy rates a flexible approach will be taken in Newhaven town centre and alternative uses such as cafes, financial services, and cultural and community uses will also be permitted in vacant units in the Primary Shopping Area. Residential use may be appropriate within Newhaven town centre when other alternative uses are not forthcoming. Residential use could result in more people in the town centre to support the remaining local shops and facilities and encourage new businesses and facilities into the town. However, residential use at street level in the Primary Shopping Area will not generally be acceptable as it is desirable to retain these units for retailing and other uses to ensure that the town centre is able to continue to provide shops and services for local people and ensure it is best placed to benefit from the wider regeneration of the town and improved access and opportunities for linkages with regeneration projects.

- 7.64 The edge of centre and out of centre shopping facilities, to the east of the river in Newhaven, enjoy relative success. Measures to maximise the potential for linked trips and spending attracted into the town centre from the edge of centre and out of centre retail provision will be important in securing the future vitality and viability of the town centre. Developments in edge of centre and out of centre locations district wide will be expected to provide appropriate and proportionate improvements to pedestrian and cycle accessibility to the town, district or local centre to allow for linked trips between the new development and the existing centre.
- 7.65 The purpose-built Peacehaven Meridian Centre functions as a District Centre and operates largely independently from the Local Centre identified along South Coast Road, which mainly serves residents in the vicinity, with a certain level of passing trade.
- 7.66 The Shopping and Town Centres Study identifies a limited quantitative retail need, particularly for comparison goods, in the district over the plan period. However, it is not recommended that new retail land allocations in the Core Strategy are made as it is expected that the identified level of need will be met through the more efficient trading of existing retail floorspace and/or modest extensions to existing units. A qualitative need, particularly for comparison goods, has also been identified for Lewes town, which is addressed in the Spatial Strategy section of this document.
- 7.67 As no substantial need for retail development has been identified (notwithstanding a qualitative need in Lewes), any further significant retail development would probably divert trade from existing retail locations. As a result it is considered that there is a local requirement for retail capacity and impact analysis at lower thresholds than the NPPF default position of 2,500sqm (gross). This is due to the relatively modest scale of the existing centres in the district, upon which developments considerably smaller than the default threshold could have a substantial effect on the role and function of the centres. As a result locally derived thresholds for proposed retail

developments in edge of centre and out of centre locations are proposed. The thresholds set are dependent on the role of the centre within the hierarchy.

- 7.68 Local shopping and community facilities in the smaller villages, local shopping parades, farm and rural shops and other community facilities and services provide a valuable local shopping and social function and the local planning authority will seek to retain and enhance such existing facilities. Where such facilities become redundant or are demonstrated to be unviable a flexible approach will be taken to the re-use of those facilities. The local planning authority will have a strong preference for the alternative use to be of benefit to the local community and maintain the vitality of the local centre or neighbourhood where relevant.
- 7.69 In order to demonstrate that a shop or community facility is financially or otherwise unviable and therefore justify any proposal for a change of use to uses other than retail or community facilities the following will be required as a minimum: evidence of at least 12 months of active and continuous marketing, including advertising, for retail and or community use (as relevant) at an appropriate market level and evidence of no unreasonable barriers to potential retail or community occupants. Details of the numbers and types of interested parties and reasons for not pursuing their interest in the site for retail and/ or retail use will be expected. For this purpose a shop or community facility being considered otherwise unviable would mean that it is shown to be no longer needed, which would include a requirement for appropriate marketing as described for demonstrating a lack of financial viability. Where a shop is shown to be financially or otherwise unviable, a community reuse will be the strong preference. Where a community facility is shown to be financially or otherwise unviable an alternative community re-use will be the first preference unless the local planning authority is satisfied that it is unsuitable for such purposes and/or no that no alternative community use could be found.
- 7.70 Proposals for new small scale rural facilities and shops will be encouraged where they provide for local needs as they can provide a valuable social and economic contribution to the local community.
- 7.71 The extents of the town centres, primary shopping areas, primary shopping frontages and secondary shopping frontages are defined on the relevant policies maps.
- 7.72 The retail policy approach will be monitored and will be subject to periodic review as appropriate, particularly in respect of data inputs such as population change, local spending estimates, expenditure growth rates, quantum of shopping floorspace, trading densities and shopping patterns. In this regard, a fully or partially updated Shopping and Town Centres Study will be periodically undertaken, as required (expected to be approximately every 5 years).

Core Policy 6 – Retail and town centres

In order to promote and enhance the vitality and viability of retail and town centres in the district the local planning authority will:

- 1. Support development that reinforces or enhances the identified role of the centre in the retail hierarchy:**

Main Town Centres

The district's primary focus for retail activity, particularly within the defined Primary Shopping Areas and Primary Shopping Frontages where a predominance of retail units will be retained. The loss of retail units that are within these defined areas and frontages will be resisted. Other appropriate uses within Main Town Centres will include appropriate leisure facilities; restaurants; offices; arts, culture and tourism facilities. A diversity of such uses will be particularly encouraged in the Secondary Shopping Frontages and more peripheral areas of the town centres where they support the wider function, vitality and viability of the town.

District Centres

A predominance of retail units will be retained within the defined Primary Shopping Areas and Primary Shopping Frontages in order to maintain a range of convenience and comparison retail goods to serve the local area. The loss of retail units that are within these defined areas and frontages will be resisted. A range of other supporting uses and services such as cafes, financial and professional services and offices will be encouraged in the more peripheral areas of the town centres where they support the wider function, vitality and viability of the town centre.

In Newhaven town centre a diverse range of retail and other uses such as cafes, restaurants, financial and professional services, employment, arts, cultural and community facilities will be encouraged in order to support the retail function. Such uses will also be permitted in vacant retail units within the Newhaven Primary Shopping Area. Changes of use to residential will be supported in Newhaven town centre, except at street level in the Primary Shopping Area, where other appropriate alternative uses such as retail, cafés, restaurants, financial and professional services, arts, cultural or community facilities cannot be identified.

Local Centres

In order to ensure local shopping centres remain a vibrant focus for the local community a range of retail, employment, leisure, cultural and community uses will be encouraged. Local shops and community facilities (such as meeting places, sports facilities, public houses, places of worship and cultural assets) will be retained unless it can be demonstrated that they are financially or otherwise unviable.

- 2. Apply the Sequential Test for edge of centre or out of centre retail development proposals and require Retail Impact Assessments where the following thresholds are exceeded:**

<i>Retail Impact Assessment – Trigger Thresholds (gross)</i>	
<i>Main Town Centre</i>	<i>750sqm</i>
<i>District Centre</i>	<i>500sqm</i>
<i>Local Service Centre</i>	<i>250sqm</i>

The Retail Impact Assessment will need to comply with paragraph 26 of the National Planning Policy Framework (NPPF) and applications and their associated assessments will be determined against paragraph 27 of the NPPF.

3. Require developments in edge of centre or out of centre locations to provide, enhance, or make contributions to, improved pedestrian and cycle linkages to the town centre.
4. Support and retain local shops in locations not identified in the retail hierarchy unless:
 1. a viability appraisal, including a marketing exercise, demonstrates that continued use as a shop is no longer feasible; or
 2. an alternative facility of equivalent or better quality will be provided in an accessible location within the same locality.

Where such uses are demonstrated to be unviable alternative community uses will be sought in the first instance. Proposals for new small scale rural retail and community facilities will be encouraged where they provide for local needs.

Key Strategic Issue/Challenge: Creating healthy, sustainable communities

7.73 The core delivery policies that are considered integral to addressing this key issue/challenge are identified in this section.

Core Policy 7 – Infrastructure

Key Strategic Objective:

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

7.74 Access to community facilities is essential to social cohesion and the quality of life of the district's residents. The availability of such facilities and services reduces the need to travel, particularly benefiting the less mobile and more deprived members of the community. Working in partnership with other providers and the voluntary sector, the local planning authority will seek to ensure that community facilities and services are provided in the most effective and accessible way and will support the retention of existing

facilities, particularly where their loss would leave gaps in provision and disadvantage local residents.

- 7.75 Providing additional homes and employment opportunities, together with the projected demographic changes, will place additional pressures on the district's infrastructure capacity (for a definition of the term infrastructure, see the glossary in appendix 1). Investment will be required for improvements to existing infrastructure and the provision of new infrastructure to support development growth and 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.
- 7.76 National planning policy requires developments to make appropriate provision for the infrastructure and services that will be needed by that development, either on-site or via an appropriate financial contribution towards off-site provision. It is important to ensure that infrastructure provision keeps pace with new development; the timely provision of the infrastructure requirements associated with growth is critical to ensuring that the district is a place where people want to be – whether to live, work, study or visit.
- 7.77 The infrastructure required to support the level and broad distribution of development proposed by the Core Strategy is identified in the Infrastructure Delivery Plan (IDP). This sets out the means, broad cost and timing of infrastructure provision in relation to development and who will be responsible for delivery. The IDP will be regularly reviewed and updated through partnership working with infrastructure providers as the Core Strategy and associated DPDs progress.
- 7.78 The District Council and the National Park Authority will each introduce a Community Infrastructure Levy (CIL) in order that the cumulative costs of new infrastructure provision are shared by all developments in a proportionate manner. Contributions from CIL can be used to deliver both local and sub-regional infrastructure, but are unlikely to raise the whole cost of the infrastructure required to support new development in the district. Site specific infrastructure requirements will also continue to be secured through legal agreements at the time of granting planning permission, to ensure that the impact of new development is mitigated, and the quality of the built environment is enhanced.
- 7.79 The Local Plan Part 2 Site Allocations and Development Management Policies DPD, or the SDNPA Local Plan, will identify and seek to protect appropriate infrastructure and essential community services/facilities located within the district that are required to ensure the delivery of the spatial strategy and help meet the requirements of the region where appropriate e.g. the provision of water supply. These documents will also include policies that support any appropriate new infrastructure required to meet the needs of the district and the region.

Core Policy 7 - Infrastructure

The creation of sustainable communities in the district where residents enjoy a high quality of life will be achieved by:

- 1. Protecting, retaining and enhancing existing community facilities and services, including facilities which serve older people. New community facilities should be located within the defined planning boundaries where they will be most accessible. In exceptional circumstances, such facilities may be located outside of these areas where it can be demonstrated that this is the only practicable option and the site is well related to an existing settlement.**
- 2. Resisting proposals involving the loss of sites or premises currently, or last, used for the provision of community facilities or services unless:**
 - i) a viability appraisal, including a marketing exercise where appropriate, demonstrates that continued use as a community facility or service is no longer feasible; or**
 - ii) an alternative facility of equivalent or better quality to meet community needs is available or will be provided in an accessible location within the same locality; or**
 - iii) a significant enhancement to the nature and quality of an existing facility will result from the redevelopment of part of the site or premises for alternative uses.**
- 3. Preparing, regularly updating and facilitating the implementation of an Infrastructure Delivery Plan that will set out how necessary physical and social infrastructure provision for the district will be achieved with key delivery partners in a timely manner to support growth.**
- 4. Ensuring that land is only released for development where there is sufficient capacity in the existing local infrastructure to meet the additional requirements arising from the proposed development. Where development would create the need to provide additional or improved community facilities, services or infrastructure, a programme of delivery will be agreed with the relevant infrastructure providers to ensure that these improvements are provided at the time they are needed.**

The local planning authorities will each produce and implement a Community Infrastructure Levy (CIL) to provide for wider infrastructure and community needs within their respective areas. Arrangements for the provision or improvement of infrastructure that is not intended to be wholly or partly funded by CIL and is required to make the development acceptable in planning terms, will be secured by means of planning obligations via a legal agreement, or by conditions attached to the planning consent or by any other appropriate mechanism.

Core Policy 8 – Green Infrastructure

Key Strategic Objectives:

- **To work with other agencies to improve the accessibility to key community and facilities and to provide the new and upgraded infrastructure that is required to create and support sustainable communities.**
- **To conserve and enhance the natural beauty, wildlife and cultural heritage of the area.**
- **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.**
- **To conserve and enhance the high quality and character of the district's towns, villages, and rural environment by ensuring that all forms of new development are designed to a high standard and maintain and enhance the local vernacular and 'sense of place' of individual settlements.**

7.80 Green infrastructure refers to a multi-functional linked network of green spaces that provide opportunities for biodiversity and recreation. It includes:

- parks and gardens
- natural and semi-natural urban greenspaces – including woodlands, scrub, grasslands, wetlands, open and running water, cliff tops and foreshore, disused quarries and pits.
- green corridors – including river banks and rights of way
- outdoor sports facilities (with natural or artificial surfaces, either publicly or privately owned) and cycleways
- amenity greenspace (most commonly, but not exclusively, in housing areas)
- provision for children and teenagers
- allotments and community gardens
- cemeteries and churchyards
- accessible countryside in urban fringe areas
- river corridors
- green roofs and walls

7.81 Green infrastructure is essential for conserving and enhancing biodiversity and for meeting a wide range of social and environmental needs. It plays a vital role in terms of contributing to the distinctive character of the district and enhancing the quality of life for residents, workers and visitors. It also helps to promote healthy living and social inclusion by increasing opportunities for recreation, exercise and relaxation. In the district's towns, green spaces perform an important function in terms of mitigating the impacts of climate change. In the National Park, green infrastructure can also provide opportunities for greater appreciation and enjoyment of the landscape and cultural heritage of the Downs.

- 7.82 In order to maximise the multiple community and environmental benefits that can be delivered by green infrastructure, it is considered important that the existing green infrastructure network within the district is protected, enhanced and appropriately managed where possible. Opportunities need to be assessed for new or enhanced green infrastructure assets and how they can be delivered. It is also important to improve the connectivity of the existing green infrastructure network and increase its accessibility for the benefit of both residents and visitors.
- 7.83 Whilst access to green infrastructure in Lewes district is generally adequate, the Lewes District Outdoor Playing Space Review 2004, the Lewes District Informal Recreation Study 2005, the East Sussex Strategic Open Space Study 2011 and the Access Network and Accessible Natural Green Space Study 2014 identified localities where there are deficiencies in provision compared to identified needs/demand. Most of the towns, for example, are deficient in terms of children's equipped play areas and access to natural and semi-natural green space. New development cumulatively contributes towards the community's need for green space and, in areas with an identified shortfall, will exacerbate the pressure on existing assets. The District Council has adopted standards for the provision of outdoor playing space in relation to new housing development, based on the Fields in Trust recommended level of provision.

Core Policy 8 – Green Infrastructure

The local planning authority will promote a connected network of multi-functional green infrastructure by protecting and enhancing the quantity, quality and accessibility of open spaces throughout the district. This will be achieved by:

- 1. Identifying in the Site Allocations and Development Management Policies DPD or SDNPA Local Plan areas where there is potential for the enhancement or restoration of existing green infrastructure and opportunities for the provision of new green space.**
- 2. Ensuring that development maintains and/or manages identified green infrastructure, where appropriate.**
- 3. Requiring development to contribute to the green infrastructure network and make provision for new green infrastructure and/or linkages to existing green infrastructure, where appropriate.**
- 4. Resisting development that would undermine the functional integrity of the green infrastructure network or would result in the loss of existing green spaces, unless either mitigation measures are incorporated within the development or alternative and suitable provision is made elsewhere in the locality.**
- 5. Working in partnership with other organisations to increase walking, cycling and public transport access to the countryside.**

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

7.84 The core delivery policies that are considered integral to addressing this key issue/challenge are identified in this section.

Core Policy 9 – Air Quality

Key Strategic Objective:

- **To reduce the need for travel and to promote a sustainable system of transport and land use for people who live in, work in, study in and visit the district.**
- **To ensure that the district reduces locally contributing causes of climate change and is pro-active regarding climate change initiatives.**

7.85 In general, air quality in the district is good. However, there are concerns with regard to nitrogen dioxide emissions in certain areas. In 2005 an Air Quality Management Area (AQMA) was declared in Lewes town centre for nitrogen dioxide, mainly due to emissions from traffic. In 2014 an AQMA was declared in Newhaven town centre, also as a result of nitrogen dioxide emissions from transport. Declaration of an AQMA is necessary under Part 4 of the Environment Act 1995, when certain statutory air quality thresholds are breached.

7.86 Addressing these problematic areas, and ensuring that further pockets of poor air quality do not become prevalent, will be a key part in achieving the above strategic objectives, including the desire to reduce locally contributing causes of climate change.

7.87 Air quality is closely controlled by European Directives that set out statutory health-based objectives for key air pollutants that Member States are expected to achieve by certain dates. These targets have been transposed into minimum national standards for certain air pollutants, which are set out in the Air Quality Standards Regulations 2010. 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 and Newhaven town centres, leading to the AQMAs being declared.

7.88 An Air Quality Action Plan (AQAP) has been produced for the Lewes town centre AQMA, including a number of measures that aim to improve air quality. It is expected that development will aid in the delivery of the AQAP by either providing measures set out in the AQAP or by funding their delivery, thereby mitigating the development's potential negative impacts. An AQAP will be produced for Newhaven in 2016.

- 7.89 Applicants for development within or adjacent to an AQMA should discuss requirements with the District Council's Environmental Health Team before a planning application is submitted, to determine whether a proposed development could impact upon the AQMA and therefore require mitigation measures.
- 7.90 Saved Local Plan Policy ST30 aims to protect both air and land quality. That policy has been retained, despite being originally based on legislation that has since been superseded. This is because it is considered to conform to the NPPF and will continue to protect land quality in the district. However, the policy on air quality has been strengthened in Core Policy 9 to reflect current legislation and guidance and the requirements of the AQMA and AQAP.

Core Policy 9 – Air Quality

The local planning authority will seek to improve air quality, having particular regard to any Air Quality Management Area (AQMA) designations. Applications for development that by virtue of their location, nature or scale could impact on an AQMA will be required to:

- 1. Have regard to any relevant Air Quality Action Plans (AQAP) and to seek improvements in air quality through implementation of measures in the AQAP.**
- 2. Provide mitigation measures where the development and/or associated traffic would adversely affect any declared AQMA.**

All applications for development will be required to:

- 3. Provide mitigation measures where the development and/or its associated traffic could lead to a declaration of a new or extended AQMA.**
- 4. Ensure that the development will not have a negative impact on the surrounding area in terms of its effect on health, the natural environment or general amenity, taking into account cumulative impacts.**
- 5. Promote opportunities for walking, cycling and public transport and congestion management to reduce traffic levels in areas of reduced air quality, particularly in town centre locations, and promote the opportunity for cycling through the provision of cycleways.**
- 6. Secure 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.**

Core Policy 10 – Natural Environment and Landscape Character

Key Strategic Objectives:

- **To conserve and enhance the natural beauty, wildlife and cultural heritage of the area.**
- **To conserve and enhance the high quality and character of the district's towns, villages, and rural environment by ensuring that all forms of new development are designed to a high standard and maintain and enhance the local vernacular and 'sense of place' of individual settlements.**

- 7.91 Lewes District contains high quality and diverse landscapes, including 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 covers much of the southern part of the district, and although it excludes the coastal towns it provides a strong and stunning landscape setting for them. The National Park Authority has statutory National Park purposes²⁷ as specified in the Environment Act 1995, which will be fundamental as the SDNPA implements the National Park Management Plan and develops its Local Plan.
- 7.92 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, ancient woodland and shaws, ponds and streams which collectively form an enclosed and intimate landscape. There are also areas of ancient common land with a rich diversity of plant and animal life (e.g. Chailey Common and Markstakes Common). Although not afforded the same national level of recognition as the South Downs, the Low Weald is a landscape that is highly valued. Of particular value, are the extensive views that are obtained from the escarpment on the South Downs looking north over the Low Weald area. These landscapes and the natural environments that have evolved in the district, continue to be a resource for agricultural practices, forestry, tourism, healthy activity and recreation.
- 7.93 National planning policy for conserving and enhancing the natural environment is set out in the National Planning Policy Framework. This states that the planning system should protect and enhance natural landscapes, biodiversity, geological interests and soils and should take account of the different roles and character of different areas, recognising the intrinsic character and beauty of the countryside. It requires that great weight should be given to conserving landscape and scenic beauty in National Parks, which

²⁷ - (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.

have the highest status of protection in relation to landscape and scenic beauty.

- 7.94 East Sussex County Council has produced a County Landscape Assessment, which identifies a number of different landscape character areas, a number of which relate to Lewes District. This assessment identifies the characteristics of each character area and describes 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”.²⁸
- 7.95 As well as protecting the significant landscape qualities in the district, stewardship of natural habitats is of prime importance and ensuring that development is sustainable in environmental terms, is a central theme in planning. In this role, Lewes District Council and the South Downs National Park Authority will develop programmes, projects and strategies which aim to conserve, restore and enhance biodiversity and promote improved access to and understanding of biodiversity and the landscape. Current examples of this include working with neighbouring authorities and other partners, to contribute to the delivery of biodiversity improvements and the ‘South Downs Way Ahead Nature Improvement Area’ and the ‘Brighton and Lewes Downs Biosphere project’, which encompasses much of the downland within the district.
- 7.96 The district is 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 Inventory²⁹.
- 7.97 Two sites in the district are designated as a Special Area of Conservation (SAC), 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 rare orchids. In addition to the two SACs 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 both a SAC and Special Protection Area (SPA), and the Pevensey Levels, designated as a Ramsar Site (wetland of international importance) and also a candidate SAC.
- 7.98 A Habitats Regulation Assessment (HRA) of the Core Strategy has been undertaken. The assessment has concluded that the Core Strategy will not

²⁸ Landscape Character Assessment (LCA) guidance, Countryside Agency and Scottish Natural Heritage (2002)

²⁹ http://www.lewes.gov.uk/Files/plan_Lewes_ancient_woodland_survey_report.pdf

generate any significant negative effects in relation to the Lewes Downs SAC, Castle Hill SAC and the Pevensey Levels Ramsar Site and candidate SAC.

- 7.99 With regard to the Ashdown Forest, the HRA found that the Core Strategy would not have a significant negative effect in relation to air pollution resulting from additional traffic generated by new development in the district. However, the HRA concluded that development in the part of Lewes District within 7km of the Ashdown Forest, in combination with development in neighbouring districts, could have a significant negative effect on protected birds in the site, caused by increasing recreational pressure.
- 7.100 As such, additional residential development within the 7km zone will be required to mitigate their potential harm by aiding in the delivery of Suitable Alternative Natural Greenspaces (SANGs) and the Ashdown Forest Strategic Access Management and Monitoring Strategy (SAMMS). The District Council and National Park Authority, working in partnership with neighbouring authorities, will develop guidance that details the costs that will be sought from such development towards mitigation measures.
- 7.101 As a consequence of the need to protect the Ashdown Forest from such potential harm, development in the 7km zone will be resisted until a sufficient area of SANGs is delivered. In order to ensure a consistent approach, a rate of provision of 8ha of SANGs per additional 1,000 residents is being applied across the 7km zone by all the relevant planning authorities. This rate reflects the one set out for the Thames Basin Heaths SPA in retained Policy NRM6 of the South East Plan. The District Council and Natural England are confident that such a suitable area of SANGs can be delivered at an appropriate location. A site(s) will be allocated in the Site Allocations and Development Management Policies DPD. A background paper to the Habitats Regulations Assessment has been prepared in support of this policy. It provides further details on the HRA in relation to the Ashdown Forest, including the reasons behind the SANG ratio rate.
- 7.102 Watercourses are integral to biodiversity, health and landscape character of the district. A River Basin Management Plan for the South East³⁰ has been prepared by the Environment Agency under the European Water Framework Directive. The plan focuses on the protection, improvement and sustainable use of the water environment. The way that land is managed has given rise to complex pollution issues and planning policies can be used to facilitate enhancements to watercourses. This can be through amongst other things; preventing deterioration of aquatic ecosystems, protecting and improving the ecological condition of waters; conserving habitats and species that depend directly on water and contributing to mitigating the effects of floods and droughts.

³⁰ <http://publications.environment-agency.gov.uk/PDF/GESO0910BSTA-E-E.pdf>

Core Policy 10 – Natural Environment and Landscape Character

- 1. The natural environment of the district, including landscape assets, biodiversity, geodiversity, priority habitats and species and statutory and locally designated sites, will be conserved and enhanced by:**
 - i. Maintaining and where possible enhancing the natural, locally distinctive and heritage landscape qualities and characteristics of the district including hedgerows, ancient woodland and shaws, as informed by the East Sussex County Landscape Assessment and the Lewes District Landscape Capacity Study;**
 - ii. Ensuring that new development will not harm nature conservation interests, unless the benefits of development at that location clearly outweigh the harm caused. In such cases appropriate mitigation and compensation will be required;**
 - iii. Maintaining and where possible enhancing local biodiversity resources including through maintaining and improving wildlife corridors, ecological networks and avoiding habitat fragmentation in both rural and urban areas;**
 - iv. Working with neighbouring local authorities to contribute to the delivery of biodiversity improvements within the South Downs Way Ahead Nature Improvement Area and the Brighton and Lewes Downs Biosphere Project, as well as other projects and partnerships that are established during the plan period.**

- 2. The highest priority will be given to the first purpose of the South Downs National Park and the integrity of European designated sites (SACs and SPAs) in and around Lewes District. Within and in the setting of the South Downs National Park, development will be resisted if it fails to conserve and appropriately enhance its rural, urban and historic landscape qualities, and its natural and scenic beauty, as informed by the South Downs Integrated Landscape Character Assessment.**

- 3. To ensure that the Ashdown Forest (SAC and SPA) is protected from recreational pressure, residential development that results in a net increase of one or more dwellings within 7km of the Ashdown Forest will be required to contribute to:**
 - i. The provision of Suitable Alternative Natural Greenspaces (SANGs) at the ratio of 8 hectares per additional 1,000 residents; and**
 - ii. The implementation of an Ashdown Forest Strategic Access Management and Monitoring Strategy (SAMMS).**

Until such a time that appropriate mitigation is delivered, development that results in a net increase of one or more dwellings within 7km of Ashdown Forest will be resisted. Applicants may consider mitigation solutions other than SANGs in order to bring forward residential development. Such solutions would need to be agreed with the District Council and Natural England.

4. Ensure that water quality is improved where necessary or maintained when appropriate (including during any construction process) and that watercourses (including groundwater flows) are protected from encroachment and adverse impacts in line with the objectives of the South East River Basin Management Plan. Where appropriate, the local planning authority will seek the enhancement and restoration of modified watercourses.

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

Key Strategic Objectives:

- **To conserve and enhance the high quality and character of the district's towns, villages, and rural environment by ensuring that all forms of new development are designed to a high standard and maintain and enhance the local vernacular and 'sense of place' of individual settlements.**
- **To conserve and enhance the natural beauty, wildlife and cultural heritage of the area.**
- **To ensure that the district reduces locally contributing causes of climate change, and is proactive regarding climate change initiatives.**

7.103 The quality of the district's historic and built environment is highly valued and enjoyed by residents and visitors alike throughout the countryside, towns and villages. Buildings and the spaces around them contribute significantly to the quality of life for those living and working in the district, which in turn is essential to the continued economic and social well-being of the area. The local planning authority therefore attaches great importance to protecting and enhancing the built heritage of the district's towns, villages and countryside for future generations. This means encouraging good quality design, respecting the historic environment, and enhancing local character and distinctiveness whenever the opportunity arises.

7.104 There is growing recognition of the need to achieve a high standard of design in all forms of development. Good design is essential in order to produce attractive and sustainable places in which people will want to live, work, study and relax. It can help to reinforce community identity, create a sense of place, reduce crime, improve accessibility, and contribute to energy efficiency and biodiversity. The National Planning Policy Framework clearly establishes the responsibility of local planning authorities to secure good design and the importance of achieving high quality development that respects the environment.

- 7.105 Buildings and areas of architectural or historic interest are particularly important to protect since, by definition, they are impossible to replace. Lewes District has a rich and valued legacy of listed buildings and conservation areas, as well as historic parks and gardens, scheduled ancient monuments, and sites of archaeological importance. Such assets contribute to the district's cultural identity and unique sense of place and they need to be protected and treated with due sensitivity and care. The NPPF urges local planning authorities to give great weight to the conservation of designated heritage assets in considering the impact of development proposals.
- 7.106 Development is never too small to be considered in design terms. It is often the cumulative effects of extensions and alterations, rather than major new buildings, which impact on people's perceptions of a place. The local planning authority will seek to ensure that development at every scale responds appropriately to its context, protecting what is of value whilst enhancing the environmental qualities of the district for future generations. It will encourage the creation of functional, accessible, safe and sustainable development, which utilises its siting, layout, orientation and design to achieve the highest practicable degree of resource and energy efficiency.
- 7.107 The purpose of Core Policy 11 is to ensure a consistency of approach, whilst providing scope for innovative and imaginative design. In the consideration of development proposals, the local planning authority will also have regard to the *Manual for Streets* (DCLG/DETR 2007) and the *Lewes District Public Realm Framework* (LDC 2013).

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

The local planning authority will seek to secure high quality design in all new development in order to assist in creating sustainable places and communities. This will be achieved by ensuring that the design of development:

- i. Respects and, where appropriate, positively contributes to the character and distinctiveness of the district's unique built and natural heritage;**
- ii. Within the South Downs National Park is in accordance with the National Park purposes and outside the SDNP has regard to the setting of the National Park and its purposes;**
- iii. Adequately addresses the need to reduce resource and energy consumption;**
- iv. Responds sympathetically to the site and its local context and is well-integrated in terms of access and functionality with the surrounding area;**
- v. Is adaptable, safe and accessible to all and, in relation to housing development, is capable of adapting to changing lifestyles and needs;**
- vi. Incorporates measures to reduce opportunities for crime or anti-social behaviour, including the provision of active ground floor frontages in town, district and local centres to assist with the informal surveillance of the public realm;**
- vii. Makes efficient and effective use of land, avoiding the creation of public space which has no identified use or function;**
- viii. Provides a satisfactory environment for existing and future occupants including, in relation to housing development, adequate provision for daylight, sunlight, privacy, private outdoor space and/or communal amenity areas;**
- ix. Minimises flood risk in accordance with Core Policy 12.**

The local planning authority will safeguard historic assets, including scheduled ancient monuments, listed buildings (both statutory and locally listed), registered parks and gardens, the Lewes Battlefield (1264), and archaeological remains. Proposals which conserve or enhance the historic environment, including the sensitive use of historic assets through regeneration, will be encouraged and supported.

The local planning authority will seek opportunities to enhance the character and appearance of designated Conservation Areas, in accordance with the Conservation Area character appraisals.

Key Strategic Issue/Challenge: Tackling Climate Change

7.108 The core delivery policies that are considered integral to addressing this key issue/challenge are identified in this section.

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

Key Strategic Objective:

- **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.**

7.109 Flood risk is a significant concern for the district, with particular risk identified at the towns of Lewes, Newhaven and Seaford. The Strategic Flood Risk Assessment (SFRA) 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.

7.110 Flood risk was most recently highlighted in October 2000, when Lewes Town 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 the Core Strategy and aligns with the River Ouse Catchment Flood Management Plan (CFMP).

7.111 Fluvial flooding from the River Ouse and inundation from the sea are the primary flood risks in the district. However, there are also other more limited flood risks that nonetheless can have a significant impact on homes and businesses, such as surface water flooding and groundwater flooding, with some areas more susceptible than others. Many of these areas of surface water flood risk have been identified in the East Sussex Preliminary Flood Risk Assessment. This has been prepared by East Sussex County Council, which is the Lead Local Flood Authority. As part of this role, ESCC is responsible for the management of surface water flood risk and is a statutory consultee on surface water drainage matters for major development proposals. All development proposals will be required to demonstrate how they will manage surface water drainage in line with the hierarchy of drainage options set out in the national Planning Practice Guidance and the non-

statutory Technical Standards³¹. Proposed drainage systems will be required to be supported with a maintenance schedule, including the identification of the body responsible for maintenance and demonstrating the ongoing funding and maintenance of drainage systems. The local planning authority will use planning conditions or planning obligations, as appropriate, to secure the ongoing maintenance and operation of approved drainage systems.

- 7.112 The provision of measures to prevent flood risk can have far-reaching positive impacts. The Newhaven Flood Alleviation Strategy is key to achieving the economic and regeneration goals for Newhaven and the wider area and will help to deliver part 3 of Core Policy 4 and the employment land targets of Spatial Policy 2, more generally.
- 7.113 The district features 14.5km of coastline, along which there is a typical rate of coastal erosion of 0.3m per year. However, erosion rates vary from year to year and at different points along the coast. Sections of the coast at Peacehaven and Telscombe are protected by hard coastal defences, which has recently been repaired and upgraded, and the beach at Seaford is managed to provide protection from sea flooding.
- 7.114 The Beachy Head to Selsey Bill Shoreline Management Plan First Review (SMP2) updated in 2006 contains high level policy for the district's coastline and aims to continue the protection of the coast around the populated areas. The Lewes DC coastline extends across eight flood management cells from Saltdean in the west to Seaford Head in the east. The clifftop settlements of Saltdean and Peacehaven for the short to medium term (the next 50 years) will be protected by holding the existing defences at the base of the cliffs. For the undeveloped cliffs at Telscombe and between Peacehaven Heights and Newhaven the adopted short to medium term strategy is no active intervention. A long-term policy of 'hold the line' applies to Newhaven Harbour and Seaford to protect residential and commercial properties. However, managed realignment of the low-lying Tide Mills area between the Ouse and Seaford is planned for the long term. For the short to medium term a policy of no active intervention is being applied to Seaford Head.
- 7.115 The policy for managing flood risk, coastal erosion and for sustainable drainage reflects the SFRA, SMP and CFMPs, as well as national and regional policy.

³¹ Sustainable Drainage Systems non-statutory technical standards for sustainable drainage systems March 2015 DEFRA www.gov.uk/government/uploads/system/uploads/attachment_data/file/415773/sustainable-drainage-technical-standards.pdf

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

The local planning authority will seek to reduce the impact and extent of flooding and damage from slope failure. This will be achieved by:

- 1. Steering development away from areas of flood risk (as identified in the latest Environment Agency and SFRA flood risk and climate change maps) where possible. Development in areas of flood risk will be required to meet the national Sequential and Exception tests, where relevant.**
- 2. Where site specific flood risk assessments are required, directing applicants to demonstrate that the development and its means of access will be safe from flooding without increasing the risk of flooding elsewhere. Development should seek to reduce overall flood risk where possible.**
- 3. Requiring flood protection, resilience, resistance and mitigation measures appropriate to the specific requirements of the site. Such measures will be expected to have regard to the character of the natural and built environment of the site and surroundings, to climate change implications and to biodiversity.**
- 4. Liaising closely with the Environment Agency and East Sussex County Council on development and flood risk.**
- 5. Seeking the appropriate management of surface water run-off and ensuring there is no increase in surface water run-off from new developments. This will include requiring new development to incorporate Sustainable Drainage Systems (SuDS), unless it is demonstrated that SuDS are not technically appropriate. The local planning authority will consult East Sussex County Council, the lead local flood authority, on the whole life management and maintenance of SuDS.**
- 6. Ensuring development avoids areas of undeveloped coastline unless it specifically requires a rural coastal location, meets the sequential test and does not have other adverse impacts.**
- 7. Preventing development on unstable areas of coastline and areas at risk of erosion and slope failure, such as those identified in the South Downs Shoreline Management Plan.**

The local planning authority will work with partners and applicants to implement the current Shoreline Management Plan, Catchment Flood Management Plan and other relevant flood/coastal protection strategies and plans.

Core Policy 13 – Sustainable Travel

Key Strategic Objectives:

- **To reduce the need to travel and promote a sustainable system of transport and land use for people who live in, work in, study in, and visit the district**
- **To ensure the district reduces locally contributing causes of climate change and is proactive regarding climate change initiatives**
- **To work with other agencies to improve the accessibility to key community services and facilities and to provide the new and upgraded infrastructure that is required to create and support sustainable communities**

7.116 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 is one of the key issues that the Core Strategy needs to address. 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 assist in achieving this goal.

7.117 Transport issues remain a major concern for many local people. The rate of road casualties in the district is above the national average and 43% of residents in the Place Survey 2008 identified traffic congestion as a priority issue that needs to be addressed. 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. On the A27, traffic levels are expected to reach capacity in the near future, particularly west of the Ashcombe Roundabout where the Highways Agency is forecasting 'highly stressed' road conditions by 2026.

7.118 Growth in the number and distance of journeys made by private car will therefore increasingly conflict with the local planning authority's aspirations for environmental enhancement, economic growth, and a better quality of life for residents. At the same time, accessibility issues for the district's rural communities are widely recognised, in particular the needs of the elderly, the disabled and young people in terms of accessing employment, education, health and entertainment facilities. The limited availability and frequency of public transport in the rural areas of the district has been identified as a key issue. Additionally, people on lower incomes are more likely to be reliant on public transport to access jobs and services.

7.119 An integrated approach to transport provision is therefore required to ensure that travel demand is managed in an effective and sustainable way, and that

major new developments help to enhance travel choices and mitigate any adverse impacts they may otherwise have on the district's transport network. The local planning authority will work in partnership with East Sussex County Council, the local transport authority, to agree joint transport priorities in order to achieve these outcomes.

- 7.120 Car and cycle parking requirements at new developments will be determined by taking into account the accessibility of the site and characteristics of the development, in accordance with parking guidance approved by the local planning authority, or as set out within a relevant Neighbourhood Plan.
- 7.121 Transport Assessments and Travel Plans will be expected to support development proposals where they are likely to result in a significant demand for travel or have significant transport implications. The threshold criteria and current guidance is available from East Sussex County Council.

Core Policy 13 – Sustainable Travel

The local planning authority will promote and support development that encourages travel by walking, cycling and public transport, and reduces the proportion of journeys made by car, in order to help achieve a rebalancing of transport in favour of sustainable modes by:

- 1. Ensuring that new development is located in sustainable locations with good access to schools, shops, jobs and other key services by walking, cycling and public transport in order to reduce the need to travel by car (unless there is an overriding need for the development in a less accessible location).**
- 2. Ensuring that the design and layout of new development prioritises the needs of pedestrians, cyclists and users of public transport over ease of access by the motorist.**
- 3. Ensuring that new residential developments are designed to achieve speeds of 20 mph or less.**
- 4. Ensuring that new development minimises the need to travel and incorporates appropriate measures to mitigate for any transport impacts which may arise from that development.**
- 5. Requiring new development to provide for an appropriate level of cycle and car parking in accordance with parking guidance approved by the local planning authority.**
- 6. Requiring development which generates a significant demand for travel, and/or is likely to have other transport implications to:**
 - i. Be supported by a Transport Assessment/Transport Statement and sustainable Travel Plan, where appropriate;**

- ii. **Contribute to improved sustainable transport infrastructure, including the provision of safe and reliable sustainable transport modes; and**
- iii. **Provide facilities and measures to support sustainable travel modes.**

The local planning authority will work with East Sussex County Council and other relevant agencies to encourage and support measures that promote improved accessibility, create safer roads, reduce the environmental impact of traffic movements, enhance the pedestrian environment, or facilitate highway improvements. In particular, the local planning authority will:

- a. **Support the expansion and improvement of public transport services, particularly those providing links between the rural and urban areas;**
- b. **Encourage improvements to existing rail services, new or enhanced connections or interchanges between bus and rail services, and improvements to the quality and quantity of car and cycle parking at railway stations; and**
- c. **Support the development of a network of high quality walking and cycling routes throughout the district.**

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

Key Strategic Objective:

- **To ensure that the district reduces locally contributing causes of climate change and is proactive regarding climate change initiatives.**

7.122 Lewes District is particularly vulnerable to the impacts of climate change, with significant areas at risk from flooding and coastal erosion. While other policies in this plan include measures to address these impacts, there is still a pressing need for the district to make its own contribution towards reducing the causes of climate change, in particular CO₂ emissions. Whilst the Spatial Strategy and certain core policy areas within this plan seek to do this, none of them directly address the use of renewable and low carbon energy and the sustainable use of resources.

7.123 Efficient and sustainable energy use in new development is one particular area that can help in the achievement of this objective. With the district containing around 42,000 dwellings, together with buildings used for industry/commerce and additional development planned, the contribution that the existing and planned build stock can make to reducing CO₂ emissions is quite significant. Nationally, a number of initiatives were introduced to address this, including the stepped tightening of energy efficiency standards in the Building Regulations.

- 7.124 A Renewable Energy & Low Carbon Development Study was prepared as part of the evidence for the Core Strategy. Part of the output from this study is an Energy Opportunities Map, which identifies the renewable and low carbon technologies that are most viable in different parts of the plan area. The map is included in Appendix 5. 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.
- 7.125 Taking the identified resource potential that is summarised in the Energy Opportunities Map, it is considered that targets of 12% renewable heat and 30% renewable energy are appropriate for the district by 2020³².
- 7.126 Achieving lower or zero carbon buildings is only one aspect of building sustainability. The use of appropriate building materials, minimising waste and improving water efficiency are all additional aspects that can improve the sustainability of buildings. The Code for Sustainable Homes covered all of these matters and was in place during the development of the Core Strategy. The Government's Housing Standards Review set out that the Code for Sustainable Homes would be wound down and the Code Levels have accordingly become largely integrated into the Building Regulations since March 2015.
- 7.127 The Environment Agency has identified the whole of the South East, including Lewes District, as an area of "serious water stress" and it is therefore imperative that water resources are managed efficiently within the region. . Accordingly, all new homes in the district will be required to achieve water consumption of no more than 110 litres per person per day. This target is equivalent to that proposed as an optional requirement of the Housing Standards Review, which in itself corresponds with Code Level 4 in relation to water efficiency. It is not considered that this will place an undue financial burden upon developers. The Affordable Housing Viability Assessment, which was primarily undertaken to inform Core Policy 1 on affordable housing, factored in a number of assumptions, which included all new houses being constructed to meet the full Code Level 4, and not just Code level 4 in respect to water efficiency, as a minimum. The Viability Assessment concluded that alongside affordable housing contributions and contributions towards new infrastructure, constructing new homes in Lewes District to at least Code Level 4 standards will generally be viable.
- 7.128 The Housing Standards Review and the new technical standards for housing only apply to residential development and there will also be new non-residential development coming forward in the district. Therefore, the core policy sets building sustainability standards for non-residential development, as supported by the Renewable Energy & Low Carbon Development Study.

³² See Section 4.11 of the Renewable Energy & Low Carbon Development Study for further information about these targets.

7.129 The following policy addresses the issue of the sustainable use of resources in new development, but it is important that it is not read in isolation when considering this issue. The East Sussex, South Downs and Brighton & Hove Waste and Minerals Plan includes policies on minimising and managing waste during the construction, demolition and excavation stages of development (Policy WMP2d), as well as sustainable waste management (Policy WMP20). These policies will also be important in achieving the strategic objective that is associated with this policy area.

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

In order to reduce locally contributing causes of climate change, including through the implementation of sustainable construction techniques in new developments, the local planning authority will:

- 1. Encourage renewable and low carbon energy in all development, with proposals responding to the potential identified in the Energy Opportunities Map. Development location and design that takes advantage of opportunities for decentralised, renewable and low carbon energy will be encouraged.**
- 2. Support applications for low carbon and renewable energy installations, subject to the following matters being satisfactorily assessed and addressed:**
 - i. Appropriate contribution to meeting national and local renewable heat and energy targets;**
 - ii. Protecting the special qualities and setting of the South Downs National Park, in accordance with national park purposes and the duties of regard by relevant authorities;**
 - iii. Landscape and visual impact;**
 - iv. Local amenity impact;**
 - v. Ecology impact; and**
 - vi. Cultural heritage impact, including the need to preserve and enhance heritage assets.**
- 3. Require planning applications relating to Core Strategy strategic site allocations to be accompanied by an Energy Strategy. The Energy Strategy will seek to incorporate decentralised and renewable or low carbon technologies into the development proposal. Where a strategic site is developed in phases, the Energy Strategy will guide the development of infrastructure for renewable and/or low carbon technologies in a coordinated way.**
- 4. Require all new dwellings to achieve water consumption of no more than 110 litres per person per day, unless it can be demonstrated that it would not be technically feasible or financially viable. All new non-residential developments over 1,000 square metres (gross floorspace) will be expected to achieve the BREEAM 'Very Good' standard and developers will be expected to provide certification evidence of the levels achieved in the relevant requirements/standards at the planning application stage.**

APPENDIX 1 - GLOSSARY

Affordable housing – housing provided by a council or housing association which is available below the market cost level. This can include homes rented at rent levels at approximately 50% of the local market level (social rented), homes rented at affordable rent levels at approximately 80% of the market rent (affordable rent), homes that are sold as a part buy/ part rent (shared ownership) or homes that are sold as a part equity purchase (shared equity). See also, **Intermediate housing** below.

Agricultural Land Classification (ACL) – method for assessing the quality of farmland to enable informed decisions to be made about its future use within the planning system. Defra guidelines on the classification are as follows:

Grade 1 - Excellent
Grade 2 - Very Good
Grade 3a - Good
Grade 3b - Moderate
Grade 4 - Poor
Grade 5 - Very Poor

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.

Ancient Woodland – woodland that has been continuously wooded for 300 - 400 years. They do not have a statutory designation within the planning system.

Authority 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 Authority 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.

Brownfield Site – land that has been previously developed.

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 Facilities and Services - facilities or services which meet the needs of communities, including open space, sport and recreational facilities, community halls, doctor's surgeries, libraries, public houses, places of worship, local shops and post offices, and cultural buildings.

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. The Core Strategy will form part of the Local Plan.

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) – The statutory component parts of the LDF. 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. These were intended to replace the Local Plan and have the same status for decision-making, however since the Localism Act 2011, the emphasis on 'Local Plans' has been reinstated.

Duly Made – duly made representations are those which are received within the consultation timeframe. Non-duly made representations, received after the consultation deadline, are not legally required to be considered.

Duty to Cooperate – proposed in the Localism Bill (which abolished regional strategies) and recognises the need for coordination at a spatial level higher than individual local planning authorities. The duty includes a duty to consult and engage with neighbouring authorities when preparing local plans.

Employment Land and Sites - 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 the Local Plan, 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).

Greenfield Site – land that has not been previously developed.

Gypsies and Travellers - Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependants' educational or health needs or old age have ceased to travel temporarily or permanently, but excluding members of an organised group of travelling showpeople or circus people travelling together as such.

Housing Association - a non-profit making, independent organisation that provides housing; generally they provide accommodation for people in housing need who cannot 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, including water supply, sewage disposal, flood prevention, surface water drainage, highways, sustainable transport measures, play space, amenity space, education and learning facilities, libraries, health and social care facilities, leisure facilities, recycling facilities, etc.

Intermediate housing - homes for sale and rent provided at a cost above social rent, but below market levels subject to the criteria in the Affordable Housing definition in the National Planning Policy Framework. These can include shared equity (shared ownership and equity loans), other low cost homes for sale and intermediate rent, but not affordable rented housing.

Reference is often made to ‘low cost housing’ when the term affordable housing is used. It is important to note that such housing does not usually involve any form of public subsidy (unlike the products highlighted in the previous paragraph) and is often housing such as small starter units and homes with low cost specifications. Such housing would not be classed as affordable housing when implementing the policies of this plan. See also, **Affordable housing** above.

Landscape Capacity Study – an assessment of land located adjacent to main settlements that considers the ability of a landscape to accommodate different amounts of change without significant effects on its character or overall change of landscape character type.

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.

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

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 Development Framework (LDF) – a loose leaf folder, prepared by each Local Planning Authority, containing Local Development Documents which deliver the spatial planning strategy for the Local Planning Authority area. Since the Localism Act 2011, the emphasis has been shifted back to the production of Local Plans and away from the LDF approach.

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 Enterprise Partnership (LEP) – partnerships between local authorities and businesses. They decide the priorities for investment in roads, buildings and facilities in the LEP area.

Local Plan - the plan for the future development of the local area, drawn up by the Local Planning Authority in consultation with the community. Since the introduction of the Localism Act 2011, the emphasis has been shifted back to Local Plans (rather than a portfolio of development plan documents as exemplified by the LDF).

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 that 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) – the new national planning policy that was published on the 27th March 2012 and has replaced Planning Policy Statements and Guidance notes. The Local Plan needs to conform to the NPPF.

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.

Neighbourhood Plan - a plan prepared by a Parish Council or Neighbourhood Forum for a particular neighbourhood area (made under the Planning and Compulsory Purchase Act 2004).

Objectively Assessed Need (OAN) – in the NPPF the government set the requirement for local planning authorities, in their Local Plan, to boost significantly the supply of housing and to plan to meet the full, objectively assessed needs for market and affordable housing in the housing market area (so far as is consistent with other policies set out in the NPPF). While no formal definition of OAN is provided, nor any definitive guidance on how it should be assessed, it is essentially a raw assessment of the overall demand for affordable and market housing in the plan area, over the plan period. It is based on fact and evidence; all other constraints to housing delivery such as environmental designations and infrastructure capacity are not applied when calculating OAN.

Planning Policy Statement (PPS) / Planning Policy Guidance (PPG) – Statements that previously set out the Government's policy framework at the national level on planning issues such as housing, employment and rural areas. These have been superseded by the NPPF.

Planning Practice Guidance – a web-based resource of national planning guidance covering a range of topics and linked to the National Planning Policy Framework.

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.

Primary Shopping Area – key areas within town centres where there is a high concentration of retail uses.

Primary Shopping Frontage – key areas within Primary Shopping Areas where a high proportion of retail uses are located and will generally be retained in preference to other uses.

Proposed Submission – the version of the Core Strategy submitted to the Secretary of State which includes supporting documents such as the Sustainability Appraisal.

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.

Secondary Shopping Frontage – areas generally adjacent to Primary Shopping Areas where retail uses are present, together with a range of other town centre uses such as cafes, financial and professional services, leisure, cultural and community facilities. Secondary Shopping Frontages generally provide more opportunity for non-retail town centre uses, which support the retail function of the Primary Shopping Frontages and the vibrancy and vitality of the town centre.

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

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.

Sound – the NPPF requires Local Planning Authorities to submit plans which are ‘sound’. The NPPF further defines this as a plan which is positively prepared, justified, effective and consistent with national policy.

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.

Sustainable Development – Sustainable development has been defined in many ways, but the most frequently quoted definition is from ‘Our Common Future’, also known as the Brundtland Report, which provides the following definition: “Sustainable development is development that meets the needs of the present without compromising the ability of future generations to meet their own needs.

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.

Strategic Housing Market Assessment (SHMA) – provides evidence of strategic housing need and demand and is a key part of the evidence base. The SHMA is not a policy document.

Super Output Area (SOA) – a geographical area designed for the collection and comparison of small area statistics. Each SOA can then be further defined into Lower Super Output Areas (LSOA) which are measured in the Indices of Multiple Deprivation.

Sustainability Appraisal (SA)/Strategic Environmental Assessment (SEA) – Local Planning Authorities are required to assess the environmental and sustainability impact of policies and proposals in the Local Plan and any 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.

Test of Soundness – considers the soundness of the development plan to ensure it has been prepared in line with the correct procedure and that it will do the job the authority intends.

Town Centre – area defined on the local authority's proposal map, including the primary shopping area and areas predominantly occupied by main town centre uses within or adjacent to the primary shopping area.

Travel Plan – a long-term management strategy for an organisation or site that seeks to deliver sustainable transport objectives through action and is articulated in a document that is regularly reviewed.

Travelling Showpeople - Members of a group organised for the purposes of holding fairs, circuses or shows (whether or not travelling together as such). This includes such persons who on the grounds of their own or their family's or dependants' more localised pattern of trading, educational or health needs or old age have ceased to travel temporarily or permanently, but excludes Gypsies and Travellers as defined above.

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.

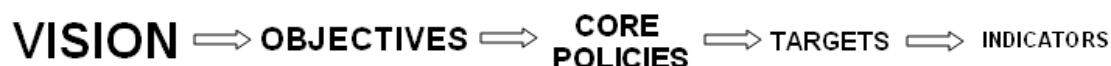
APPENDIX 2 – STATUS OF SAVED 2003 LOCAL PLAN POLICIES

Core Policy	'Saved' 2003 Local Plan policies that the Core Policy replaces.	'Saved' 2003 Local Plan policies to retain.
Spatial Strategy	RES1, RES2, RES3, ,	
CP1 – Affordable Housing	RES9	RES10
CP2 – Housing Type, Mix and Density	ST5, ST6	ST3, ST4
CP3 – Gypsy and Traveller Accommodation	RES21, RES22	
CP4 – Encouraging Economic Development and Regeneration	E1, E9	
CP5 – The Visitor Economy	E10, E11, E12, E13, E16, E18	E14, E15, E17
CP6 – Retail and Sustainable Town and Local Centres	E3, E4, E5, E6, E7, E8	ST3
CP7 - Infrastructure	ST1, ST2, E8, RES20, RE2, RE3, RE9, RE10, T16	
CP8 – Green Infrastructure	RE9	ST3, ST11, RES19, RE1, RE6, RE7,
CP9 – Air Quality		ST30
CP10 – Natural Environment and Landscape Character	CT2	CT5, CT1, RE8
CP11 – Built and Historic Environment and High Quality Design		ST3, ST4, ST11, ST20, ST21, ST25, ST29, , RES8, RES13, RES14, RES18, H2, H3, H4, H5, H7, H12, H13, H14, RE8
CP12 – Flood Risk, Coastal Erosion and Sustainable Drainage		
CP13 – Sustainable Travel	T1, T2, T7, T8, T9, T10, T13, T14,	ST5, ST6, T3, T4, T16
CP14 – Renewable and Low Carbon Energy and Sustainable Use of Resources		ST14, ST20, ST21

Lewes Town	LW7, LW12	LW1, LW3, LW4, LW5. LW6, LW8, LW9, LW10, LW11, LW13, LW14
Newhaven	NH8	NH2, NH4, NH6, NH7, NH10, NH12, NH13, NH14, NH15, NH16, NH17, NH18, NH19, NH20, NH21, NH22, NH23, NH24
Peacehaven	PT1, PT2, PT3, PT7, PT8, PT16, PT21, PT23	PT5, PT6, PT9, PT10, PT11, PT12, PT13, PT15, PT17, PT18, PT19, PT20.
Seaford	SF1, SF10	SF5, SF8, SF9, SF11, SF12, SF14, SF15, SF16
Barcombe		BA1
Beddingham/Glynde		BG1
Chailey		CH1
Falmer		FL1
Hamsey		HY1
Newick		NW1, NW2
Ringmer		RG1, RG3, RG4
Wivelsfield	WV1	

APPENDIX 3 – MONITORING AND DELIVERY FRAMEWORK

The Core Strategy will be subject to continuous and regular monitoring over the plan period. This will assess its impact and whether or not the delivery of the vision and strategic objectives is being achieved. To aid in this the performance of the policies will be measured through the use of targets and indicators, which reflect issues of national and local importance. The diagram below shows how the monitoring framework relates to the Core Strategy’s overarching vision and subsequent objectives.



This appendix sets out which objectives each Core Strategy policy relates to, the targets set out to achieve the policies and the individual indicators that will be used to measure the performance. Each table also includes the current performance of each indicator. Some of the indicators used in this monitoring section are new indicators that have not been measured before and so in some cases the current position is not available. Where a new indicator is proposed, the Council and National Park Authority will be establishing a way to collect the data in order to report against the indicator. Where possible indicators have been selected that can be monitored on an annual basis. However, this is not possible in all instances and in a few cases Census data will be utilised for monitoring purposes (although every effort will be made to establish indicators that can be more regularly monitored).

The monitoring process will be carried out on an annual basis and reported in the respective Council/National Park Authority Monitoring Reports (AMR). Where a policy is not achieving its desired outcome, and therefore undermining the achievement of the strategic objectives, the AMR will identify this. This will enable the Council and/or National Park Authority to take appropriate action, which could include a review of the relevant policy (although accepting that in some cases the desired outcome may not be achieved due to factors outside the influence of the planning policies).

Spatial Policies 1 – 8 (all policies collectively monitored)		
Collectively, the Spatial Policies are expected to make a contribution towards all of the strategic objectives (Note: targets identified for subsequent core policy areas will also be used to monitor the effectiveness of the spatial strategy).		
Target	Indicators	Current Position
To deliver a minimum of 6,900 net additional dwellings between 2010 and 2030 (345 per annum) and maintain a sufficient housing land supply.	Cumulative number of dwelling completions (net)	As at April 2013: 626 net completions (209 p/a average for plan period)
	Total number of housing completions for previous monitoring year (net)	2012/13: 218
	Housing land supply – position	As at April 2015: 106.46% of a 5 year housing land supply requirement (+5%) when calculated against the

	<p>Number of dwellings permitted on unidentified windfall sites per annum.</p> <p>Number of dwellings permitted on rural exception sites</p> <p>A review of the Spatial Policies 1, 2 and 8 will be triggered in April 2022 if the required transport mitigation measures to accommodate additional homes at Peacehaven/Telscombe have not been identified to solve capacity constraints on the A259 to the satisfaction and agreement of the local highway authority.</p>	<p>Core Strategy housing requirement</p> <p>Not monitored yet – to be monitored</p> <p>Not monitored yet – to be monitored</p>
<p>To explore opportunities for increasing housing delivery so that the projected level of housing need is more closely met.</p>	<p>A review of Spatial Policies 1 and 2 will be undertaken in the event that the current cross-authority work examining housing potential within the Sussex Coast Housing Market Area and adjoining areas identifies sub-regional housing delivery options that could be delivered within or partially within the Lewes District plan area. The timetable for this work is expected to be agreed in 2016.</p>	<p>N/A</p>
<p>To deliver 74,000 sq metres of employment floorspace (gross) between 2012 and 2031</p>	<p>Amount of floorspace developed for employment land (gross)</p> <p>Cumulative amount of floorspace developed for employment land (gross)</p>	<p>2012/13: 1,597m²</p> <p>Not monitored yet – to be monitored</p>

Core Policy 1: Affordable Housing		
Core Policy 1 will aim to meet the following the Objectives		
<ul style="list-style-type: none"> Objective 2 		
Target	Indicators	Current Position
District wide target of 40% Affordable Housing provision (on developments exceeding 10 dwellings or more)	Gross number of affordable housing completions per annum	2012/13: 38
	Percentage of affordable dwellings completed	2012/13: 45.78%
	Percentage of applications of 10 units or more meeting 40% affordable housing target	2012/13: 50%
	Average house price by type	2014 Q2: All – £299,435 Detached - £389,632 Semi-detached - £276,114 Terraced - £251, 436 Flat/maisonette - £198,584
	Average construction cost by development type (construction cost £/m ²)	Not yet monitored on a regular basis – to be monitored on an annual basis using the most cost-effective source available. Current position is available: 4th Q 2013 - Residential, 2-5 bed, code 4 - £1,021
A review of Core Policy 1 will be considered in the event of a greater than 10% drop in house prices and/or a significant increase in build costs. In such an event, any decision with reasoning as to whether or not to review the policy will be published by the District Council and National Park Authority.		
To reduce the number of households on the Council Housing Register	Number of households currently on the Council Housing Register	2013: 2,543

Core Policy 2 – Housing Type, Mix and Density

Core Policy 2 will aim to meet the following the Objectives

- **Objective 1**

Target	Indicators	Current Position
Provide a range of dwelling types and sizes to meet the identified local need	Household spaces and accommodation type as a percentage % Number of C2 dwellings permitted and completed	2011: - Whole house/bungalow (detached) – 35.1% - (semi-detached) – 26.5% - (terraced) – 19.1% - Flat, maisonette or apartment (flats/tenement) – 14.3% - (part of a converted/shared house) – 3.3% - (in commercial building) – 1.3% - (caravan or mobile/temporary structure) – 0.5% Not monitored yet – to be monitored
Achieve residential densities in the region of 47 – 57 dwellings per hectare for towns and 20 – 30 dwellings per hectare for villages	Average density of new house building, dwellings per hectare (dph) Average density of residential developments over 6 units for i) towns and ii) villages (planning applications received not completions) Percentage of new dwellings completed at: less than 30dph; between 30 and 50dph; and above 50dph	2012/13: 69 dph 2012/13: Average for towns: 77 Average for villages: 28 2012/13: Less than 30 dph – 38%; Dwellings between 30 and 50 dph –31%; Dwellings above 50 dph – 31%

Core Policy 3 – Gypsy & Traveller Accommodation

Core Policy 3 will aim to meet the following the Objectives

- **Objective 1**
- **Objective 6**

Target	Indicators	Current Position
To provide a net total of 13 Gypsy & Traveller pitches between 2014 and 2030 to meet the need as identified in the GTAA Update	Pitches granted planning permission since 2014 in the area of Lewes District outside of the SDNP	Not monitored yet – to be monitored
	Pitches granted planning permission since 2014 in the area of Lewes District within the SDNP	Not monitored yet – to be monitored
	Number of pitches allocated in the Site Allocations and Development Management Policies DPD	Not monitored yet – to be monitored

Core Policy 4 – Encouraging Economic Development and Regeneration

Core Policy 4 will aim to meet the following Objectives

- **Objective 2**

- **Objective 10**

Target	Indicators	Current Position
Identify sufficient sites to meet current and future needs (including office space)	Net amount of floorspace developed for employment land	2012/13: -225m ²
No loss of employment land unless there are demonstrable economic viability or environmental amenity reasons for doing so (see policy wording).	Net and gross employment land supply (hectares that have planning permission) Loss of employment land in local authority area.	2012/13: Net 1.63 Gross 2.79 2012/13: Net loss of 225 m ²
Encourage sustainable tourism and promote growth in this sector	Number of jobs in the tourism sector Contribution to the District's economy made by visitors – turnover of local businesses	2012: 3,399 2012: £177,223,000
To bring about improvements to the condition of existing and future employment premises and to encourage sustainable working practices	Number of business enterprises by age of business: Less than 2 years old Number of Local Development Orders Percentage of residents working at or from home Percentage of all people in employment travelling less than 5km to work	2013: 500 None 2011: 14.3% 2001: 31.7%
Support opportunities for the up-skilling of the Districts labour supply	Percentage of adults with degree level (or equivalent) qualifications Numbers of Adult learners	2011: 37.3% 2008/09: 2,638

Core Policy 5 – The Visitor Economy**Core Policy 5 will aim to meet the following Objectives**

- Objective 2
- Objective 4
- Objective 5
- Objective 7
- Objective 10

Target	Indicators	Current Position
To promote the growth of the tourism sector: improving linkages; the quality and number of visitor attractions; accommodation	Contribution to the District's economy made by visitors – turnover of local businesses	2012: £171,223,000
	Number of day visitors to the district	2012: 3,034,000
	Number of jobs in the tourism sector	2012: 3,399

Core Policy 6: Retail and Sustainable Town and Local Centres		
Core Policy 6 will aim to meet the following Objectives		
<ul style="list-style-type: none"> • Objective 6 • Objective 10 		
Target	Indicators	Current Position
Ensuring town and local centres and essential services are accessible through sustainable transportation methods	Average minimum travel time (minutes) to the nearest service by public transport/walking	2011: Employment, 10; Food stores 9; FE College, 22; GP's, 11; Hospitals, 43; Primary Schools, 9; Secondary School, 14; Town Centre, 15.
	Average minimum travel time (minutes) to the nearest service by cycling	2011: Employment, 7; Food stores 6; FE College, 20; GP's, 6; Hospitals, 33; Primary Schools, 5; Secondary School, 8; Town Centre, 13.
	Access to town centres (percentage of households who have access to a town centre within 15 minutes via different transport modes)	2011: Public Transport/walking, 55.3%; Cycle, 63.3%; Car, 99.7%
To promote the vitality and viability of the district and town centres, but where local shops and facilities are no longer viable, consider for alternative uses.	Retail unit vacancy rate in town centres	2012
	<ul style="list-style-type: none"> - Lewes town centre - Newhaven town centre - Peacehaven SCR - Peacehaven Meridian Centre - Seaford town centre 	Lewes Town Centre (TC) – 5.2% Newhaven TC – 21% (2009) Peacehaven SCR – 10 % Peacehaven Meridian Centre – 6.25% Seaford TC – 7.2%
	Net amount of completed retail development (sq m)	2012/13: -819.56m ²

Core Policy 7: Infrastructure		
Core Policy 7 will aim to meet the following Objectives <ul style="list-style-type: none"> • Objective 3 • Objective 7 		
Target	Indicators	Current Position
To maintain and enhance the level of provision of community facilities/services	Net loss/gain (completions) of community services and facilities (D1 and D2) in the past year (sq m)	2012/13 – 807.66 m ²
To ensure essential infrastructure is provided for by the Community Infrastructure Levy (CIL)	List of infrastructure projects funded by CIL in the past year	Not monitored yet – to be monitored
	Amount of CIL funds received per annum	Not monitored yet – to be monitored
	Infrastructure improvements identified in Infrastructure Delivery Plan implemented	Not monitored yet – to be monitored

Core Policy 8: Green Infrastructure		
Core Policy 8 <ul style="list-style-type: none"> • Objective 2 • Objective 3 • Objective 5 • Objective 7 		
Target	Indicators	
To protect and enhance the quality of open space within the district	Number and extent of SNCIs and LNRs	2011: SNCIs – 115, 1,235 hectares (4.2% of District) 4 LNRs – 354 hectares (1.2% of District)
	Condition of internationally and nationally important wildlife and geological sites (SSSIs and SACs)	2013: SSSIs – 16 (2,437 hectares of land): 99.4% of SSSI land favourable or unfavourable but recovering, 0.4% unfavourable and stable, 0.2% unfavourable and declining. 2013: SACs – 2: Castle Hill – 114.52 hectares (both in Lewes District and Brighton & Hove). 100% of SAC land favourable. Lewes Downs – 161.29 hectares. 97.12% of SAC land favourable or unfavourable but recovering. 2.88% of SAC land unfavourable but declining.

Core Policy 9: Air Quality		
Core Policy 9 will aim to meet the following Objectives		
<ul style="list-style-type: none"> • Objective 7 • Objective 8 		
Target	Indicators	Current Position
To reduce the total number of Air Quality Management Areas (AQMAs)	Number of Air Quality Management Areas	2015: 2 (Lewes Town Centre and Newhaven Town Centre)
To ensure that annual mean Nitrogen Dioxide levels in any designated AQMA's do not rise year on year	Annual Mean Nitrogen Dioxide Levels	2013: Lewes AQMA: 19 ug/m3
To improve air quality through the promotion of suitably located new development/services and through sustainable transport	<p>Mode of travel to work</p> <p>Number of large development completions estimated to be within 30 minutes of public transport and walking/cycling journey time of services</p> <p>Average minimum travel time (minutes) to the nearest service by public transport</p>	<p>2001: Private vehicle, 63%; Public Transport, 16%; Foot or Cycle, 13%; People who work at or mainly at home, 8%; Other, 0.6%.</p> <p>2012/13: 100%</p> <p>2011: Employment, 10; Food stores 9; FE College, 22; GP's, 11; Hospitals, 43; Primary Schools, 9; Secondary School, 17; Town Centre, 15.</p>

Core Policy 10: Natural Environment & Landscape Character		
<p>Core Policy 10 will aim to meet the following Objectives</p> <ul style="list-style-type: none"> • Objective 2 • Objective 4 • Objective 5 		
Target	Indicators	Current position
To ensure that international, national and local designations are conserved and enhanced to a high quality	<p>Condition and size of internationally and nationally important wildlife and geological sites (SSSIs and SACs)</p> <p>Area of land designated as Site of Nature Conservation Interest (SNCI) - district</p> <p>Area of Land designated as Local Nature Reserve</p>	<p>2013: SACs – 2: Castle Hill – 114.52 hectares (both in Lewes District and Brighton & Hove). 100% of SAC land favourable. Lewes Downs – 161.29 hectares. 97.12% of SAC land favourable or unfavourable but recovering. 2.88% of SAC land unfavourable but declining.</p> <p>2013 - 99.4% of SSSI's considered favourable or unfavourable but recovering; 0.4% unfavourable and stable; 0.2% unfavourable and declining.</p> <p>2011 - 1235 (ha)</p> <p>2011 – 354 (ha)</p>
To seek a net gain in biodiversity resources, therefore contributing to the targets set out in the Sussex Biodiversity Action Plan	<p>Total number of SAC's, SSSI's, SNCI's and LNR's designations</p> <p>Total area (m²) of land designated as SAC's, SSSI's, SNCI's and LNR's</p>	<p>2011 – 137 (2 SAC's; 16 SSSI's; 115 SNCI's; 4 LNR's)</p> <p>2011 – 4,301 (ha)</p>

Core Policy 11: Built & Historic Environment and High Quality Design		
Core Policy 11 will aim to meet the following Objectives		
<ul style="list-style-type: none"> • Objective 4 • Objective 8 		
Target	Indicators	Current Position
To improve sustainable construction standards year on year. Adequately address the need to reduce resource and energy consumption	A new indicator has not been established at this point but the district council, and SDNP, will look to introduce an effective way of monitoring this target at the earliest opportunity	2012 Not monitored yet – to be monitored by LDC
The safeguarding of historic assets	Number of Listed Buildings part-demolished/ demolished	Not monitored yet – to be monitored by LDC

Core Policy 12: Flood Risk, Coastal Erosion, Sustainable Drainage and Slope Stability		
Core Policy 12 will aim to meet the following Objectives		
<ul style="list-style-type: none"> • Objective 9 		
Target	Indicators	Current Position
To steer development away from areas of flood risk and coastal erosion	Number of planning applications granted contrary to the advice on the Environment Agency flood defence grounds (fluvial & tidal)	2012 - 0
To incorporate Sustainable Drainage Systems into new development where appropriate	Percentage of appropriate developments incorporating sustainable urban drainage systems	Not monitored yet – to be monitored

Core Policy 13: Sustainable Travel

Core Policy 13 will aim to meet the following objectives:

- **Objective 3**
- **Objective 6**
- **Objective 7**
- **Objective 8**

Target	Indicators	Current Position
To ensure that new development is located in sustainable locations with good access to services	Average minimum travel time (minutes) to the nearest service by public transport/walking	2011: Employment, 10; Food stores 10; FE College, 22; GP's, 11; Hospitals, 43; Primary Schools, 9; Secondary School, 14; Town Centre, 15.
	Average minimum travel time (minutes) to the nearest service by bicycle	2011: Employment, 7; Food stores 6; FE College, 20; GP's, 6; Hospitals, 33; Primary Schools, 5; Secondary School, 8; Town Centre, 13.
	Amount of large residential development within 30 minutes public transport time of a GP, hospital, primary and secondary schools, areas of employment and a major health centre(s)	2012/13: 100%
Improvements to facilities allowing the uptake of sustainable travel (walking/cycling/public transport)	Percentage who travel to work by public transport	2011: 15.4%
	Net increase/decrease in rights of way	2012 – 352 miles
Year on year increase in the number of people travelling to work by sustainable modes of transport	Number of people travelling to work by public transport	2011: 6,974

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

Core Policy 14 will aim to meet the following Objectives

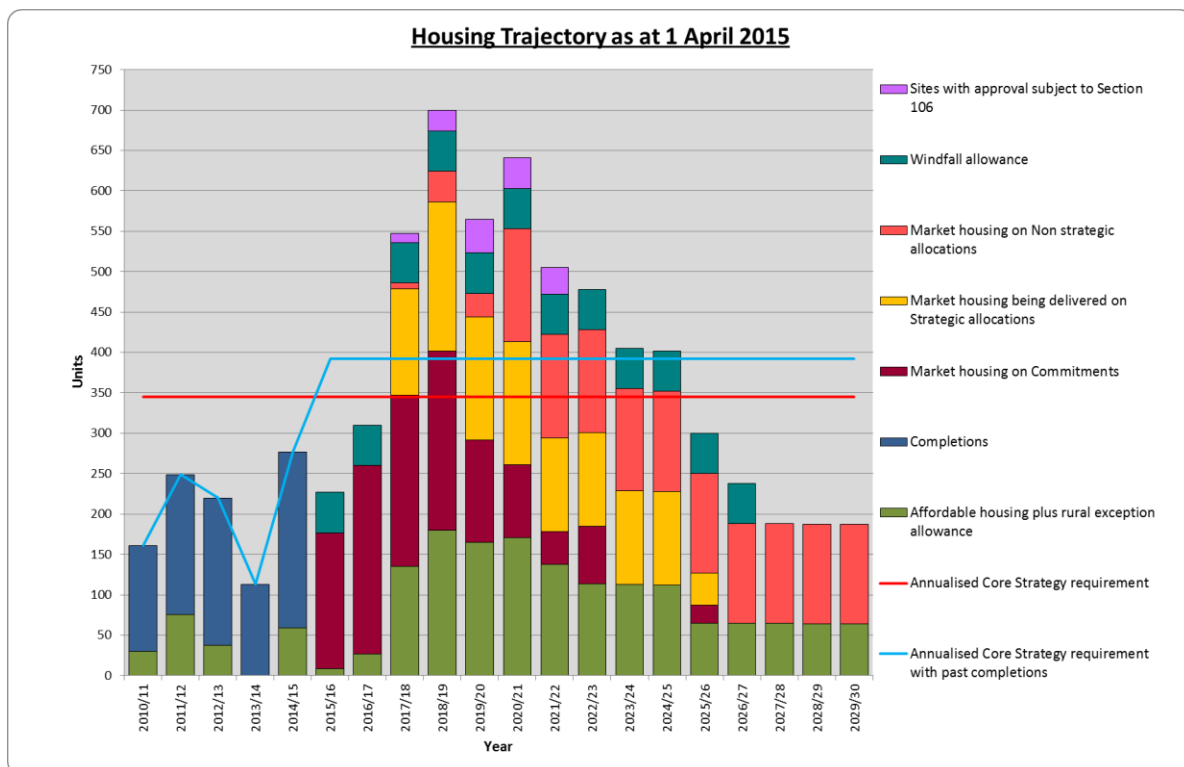
- **Objective 1**
- **Objective 6**
- **Objective 8**

Target	Indicators	Current Position
To support low carbon and renewable energy installations	Number of planning applications received and granted consent relating to renewable energy installations Carbon Dioxide emissions per capita per sector: Total emissions (kt)	2012/13: 10 (plus 1 solar related application withdrawn) 2011: 488
Require all new dwellings to achieve water consumption of no more than 110 litres per day per person	Percentage of new dwellings meeting the required water consumption standard	Not monitored yet – to be monitored
All new non-residential developments over 1,000 square metres will be expected to achieve the BREEAM ‘very good’ rating standard.	Percentage of new non-residential developments over 1,000 square metres which achieve a BREEAM design certificate rating of ‘very good’	Not monitored yet – to be monitored

APPENDIX 4 – HOUSING TRAJECTORY

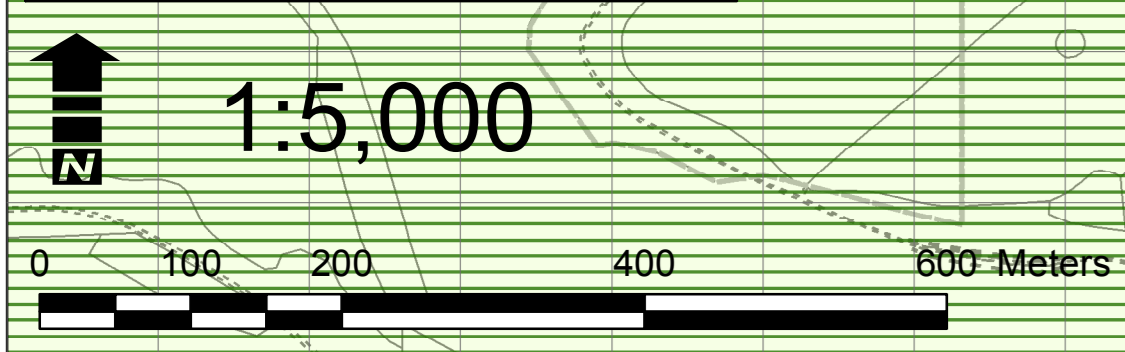
The Housing Trajectory indicates the anticipated delivery of market and affordable housing in the district over the Core Strategy Plan period (2010/11 - 2029/30). The Core Strategy sets a housing target of 6,900 net additional units up to 2029/30.

The trajectory reflects the housing trajectory position as at 1 April 2015 and is informed by the 2014 Strategic Housing Land Availability Assessment (SHLAA) and monitoring of housing commitments and completions. The trajectory consists of several elements: Completions (first three years of the Plan); commitments; strategic and non-strategic allocations; and windfall allowance. The graph below indicates the anticipated delivery of these elements. The anticipated delivery of affordable units is also shown.



APPENDIX 5 – ENERGY OPPORTUNITIES MAP





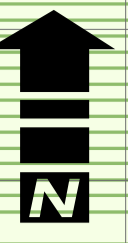
Orman
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Ringmer West
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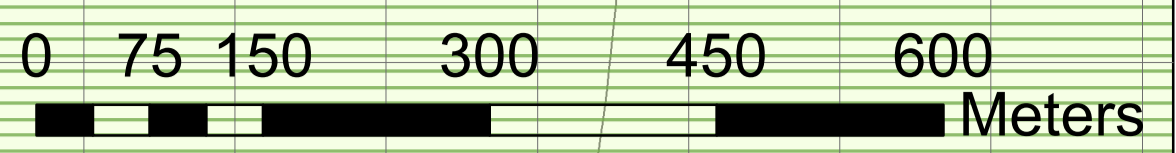
Inset Map 1: Lewes
Lewes District Council

- Key**
- Lewes/Uckfield Railway Line (See Policy T4)
 - Car Parking at/near Railway Stations (See policies CP13, T3)
 - Site Specific Policy
 - Primary Shopping Frontages
 - Secondary Shopping Frontages
 - Primary Shopping Area (See Policy CP6)
 - Town Centre Boundary (See Policy CP6)
 - Planning Boundary (See Policy CT1)
 - The River Ouse Policy (See Policy LW10, RE7)
 - Inset Map Boundaries
 - The Green Core (See Policy LW11)
 - Area of Established Character (See Policy H12)
 - Conservation Areas (See Policies CP11, H4, H5, H7, ST25, ST29)
 - Special Areas of Conservation (See Policy CP10)
 - National Park (See Policy CP11)
 - Countryside Policies (See Policies RES8, RES10, RES14, E14, E17, CT1, CT5)
 - Parish Boundaries

Kingston
Inset Map 14



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Tarring Neville
Inset Map



Inset Map 2: Newhaven

- Key**
- Site Specific Policy
 - Car Parking at/near Railway Stations (See policies CP13, T3)
 - Primary Shopping Area (See Policy CP6)
 - Primary Shopping Frontages
 - Secondary Shopping Frontages
 - Town Centre Boundary (See Policy CP6)
 - Planning Boundary (See Policy CT1)
 - The River Ouse Policy (See Policy RE7)
 - Inset Map Boundaries
 - Area of Established Character (See Policy H12)
 - Countryside Policies (See Policies RES8, RES10, RES14, E14, E17, CT1, CT5.)
 - Conservation Areas (See Policies CP11, H4, H5, H7, ST25, ST29)
 - National Park (See Policy CP11)
 - Parish Boundaries








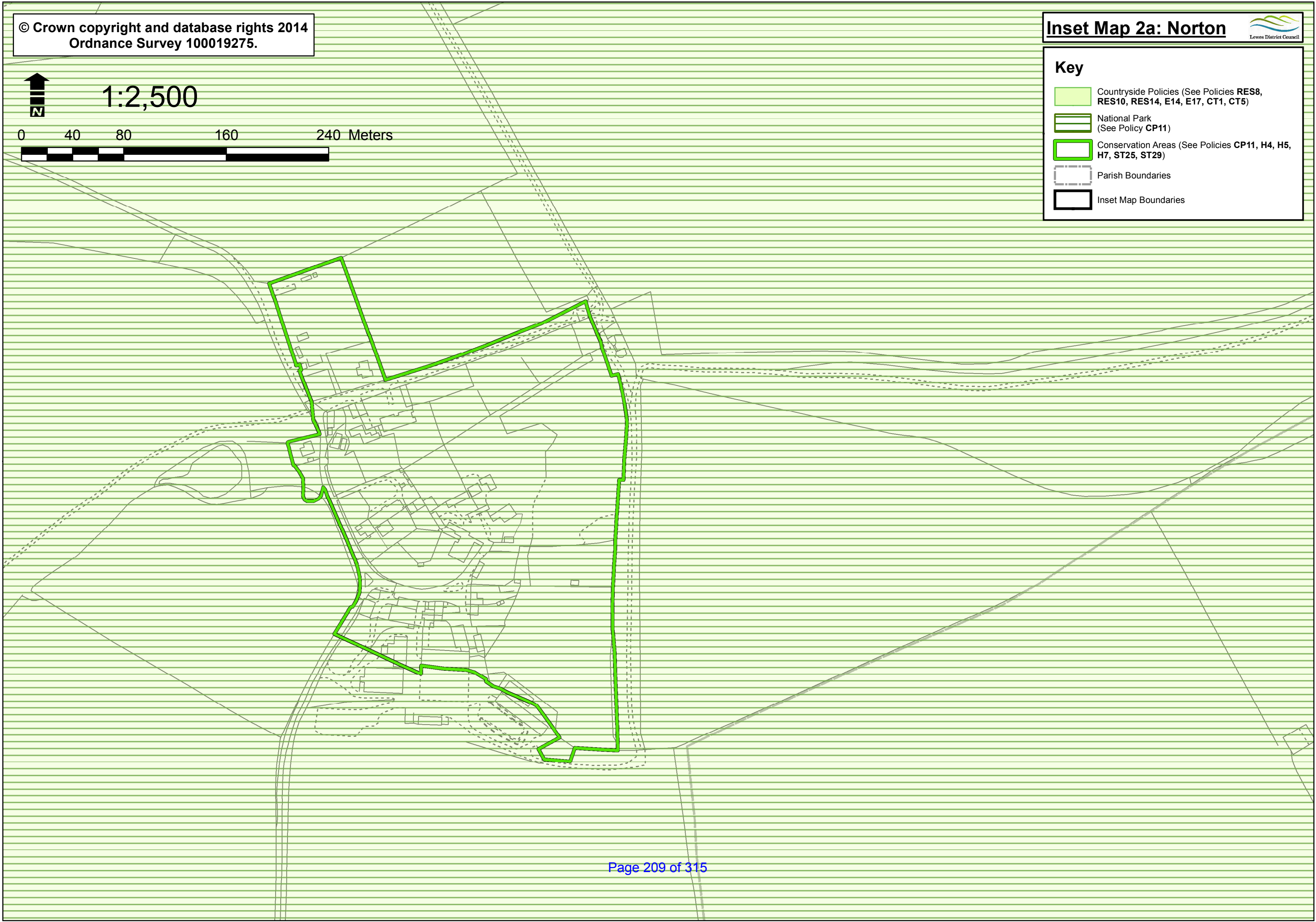
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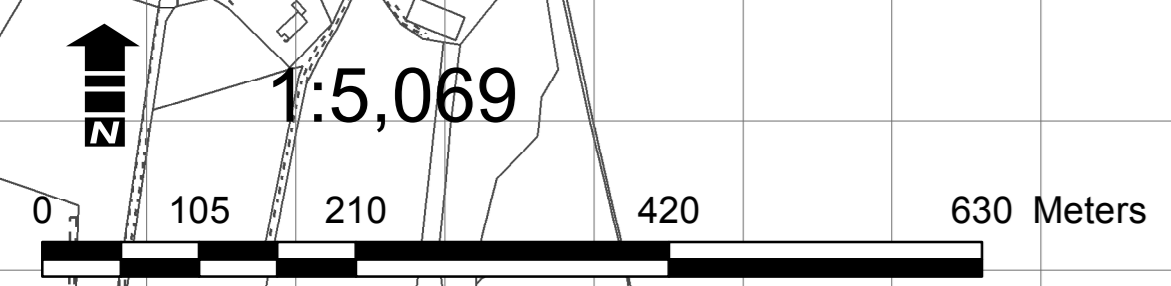
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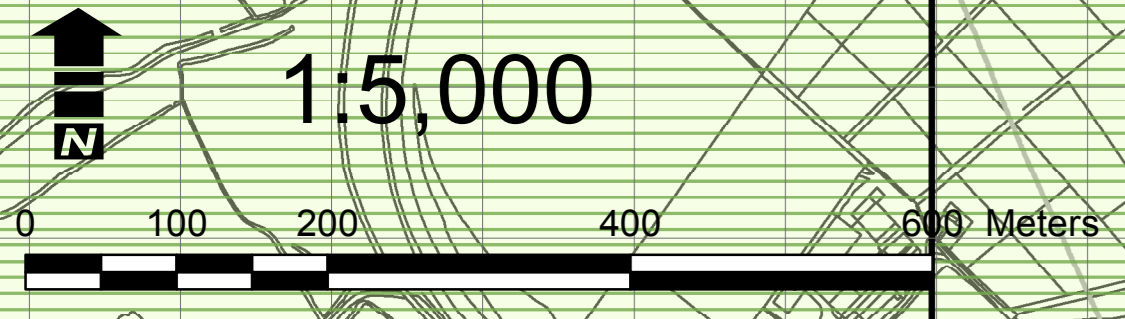
-  Countryside Policies (See Policies **RES8**, **RES10**, **RES14**, **E14**, **E17**, **CT1**, **CT5**)
-  National Park (See Policy **CP11**)
-  Conservation Areas (See Policies **CP11**, **H4**, **H5**, **H7**, **ST25**, **ST29**)
-  Parish Boundaries
-  Inset Map Boundaries





**Inset Map 3:
Peacehaven**

- Site_Specific_Policy
- Planning Boundary (See Policy CT1)
- Countryside Policies (See Policies RES8, RES10, RES14, E14, E17, CT1, CT5)
- National Park (See Policy CP11)
- Conservation Areas (See Policies CP11, H4, H5, H7, ST25, ST29)
- Primary Shopping Area (See Policy CP6)
- Primary Shopping Frontages
- Secondary Shopping Frontages
- Town Centre Boundary (See Policy CP6)
- Parish Boundaries
- District Boundary
- Inset Map Boundaries

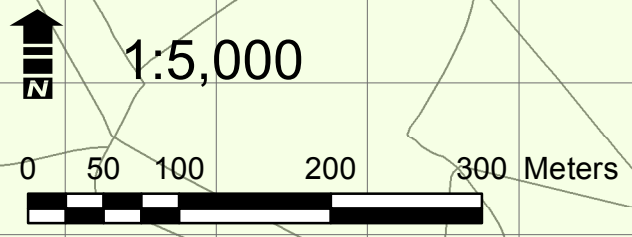


NH10
NH20 Area a NH21 Z2
NH20 Area b


Newhaven
Inset Map 2

**Inset Map 4:
Seaford**
Seaford District Council

Key	
	Car Parking at/near Railway Stations (See policy CP13, T3)
	Secondary Shopping Frontages
	Primary Shopping Frontages
	Car Parking at/near Railway Stations (See policies CP13, T3)
	Site Specific Policy
	Primary Shopping Area (See Policy CP6)
	Town Centre Boundary (See Policy CP6)
	Planning Boundary (See Policy CT1)
	Inset Map Boundaries
	Area of Established Character (See Policy H12)
	Countryside Policies (See Policies RES8, RES10, RES14, E14, E17, CT1, CT5)
	Conservation Areas (See Policies CP11, H4, H5, H7, ST25, ST29)
	National Park (See Policy CP11)
	District Boundary
	Parish Boundaries








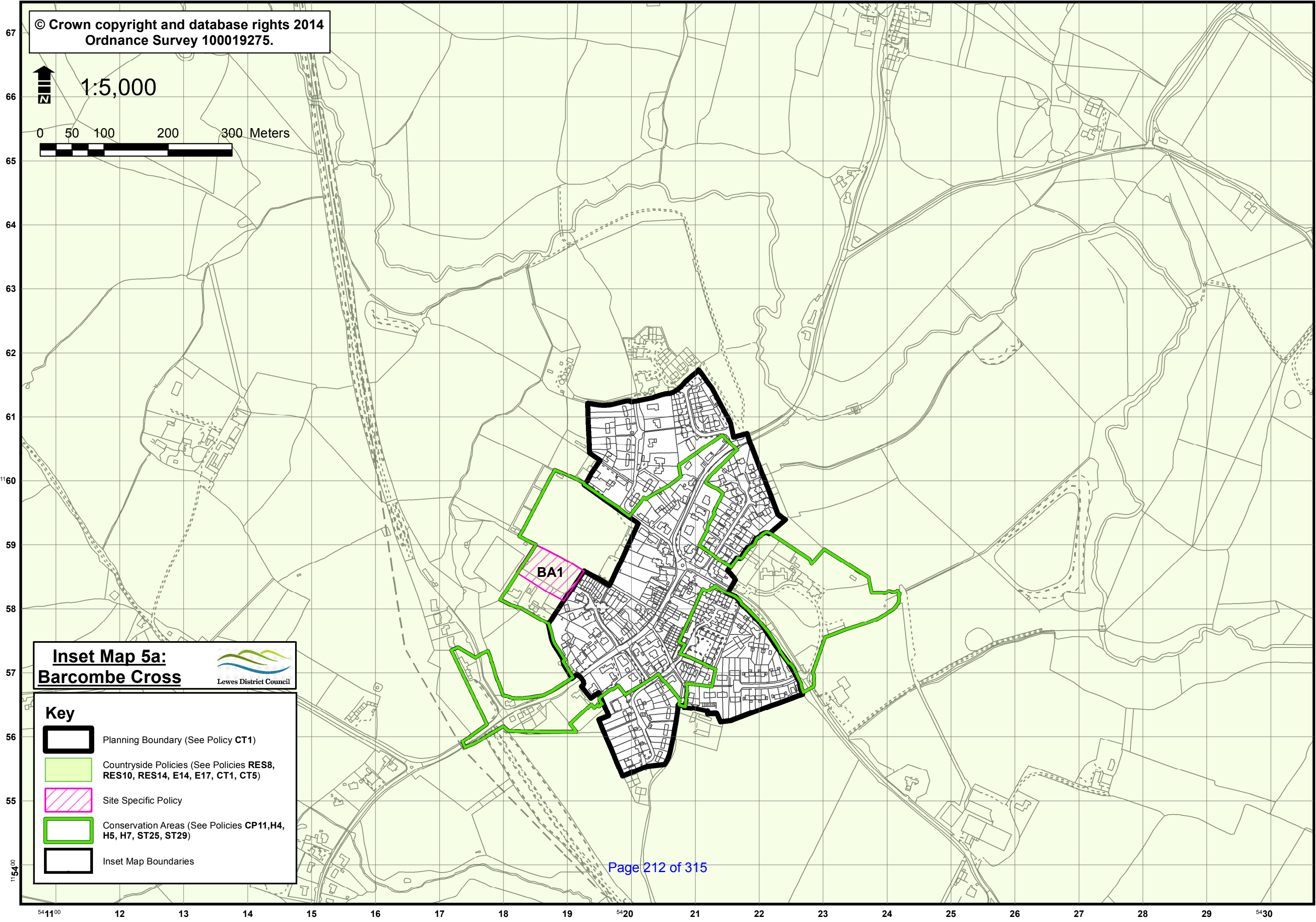
Inset Map 5a:
Barcombe Cross



Lewes District Council

Key

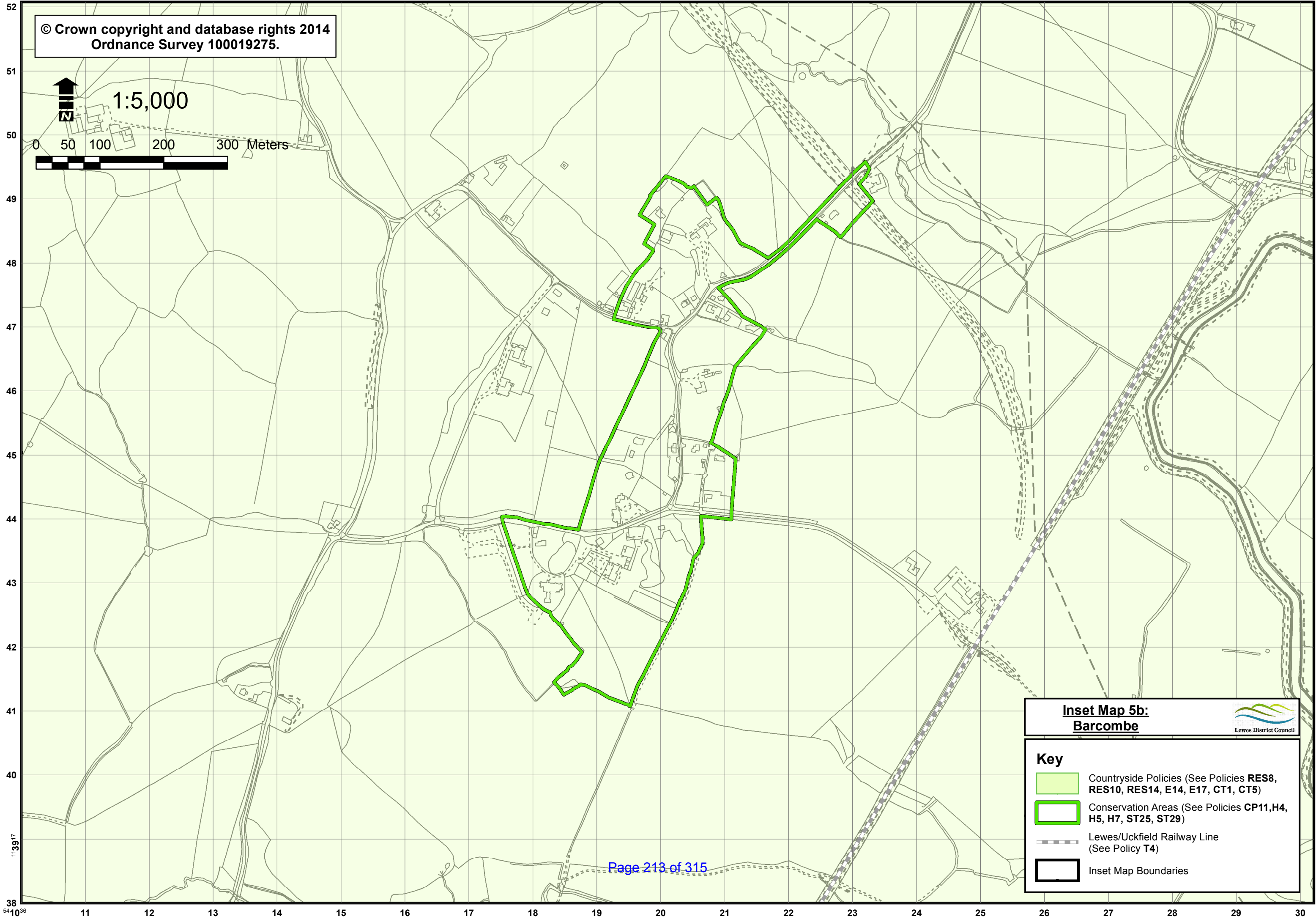
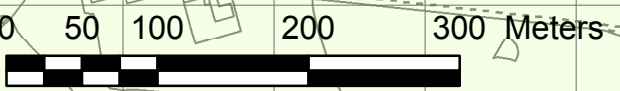
-  Planning Boundary (See Policy CT1)
-  Countryside Policies (See Policies RES8, RES10, RES14, E14, E17, CT1, CT5)
-  Site Specific Policy
-  Conservation Areas (See Policies CP11, H4, H5, H7, ST25, ST29)
-  Inset Map Boundaries



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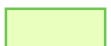





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**Inset Map 5b:
Barcombe**



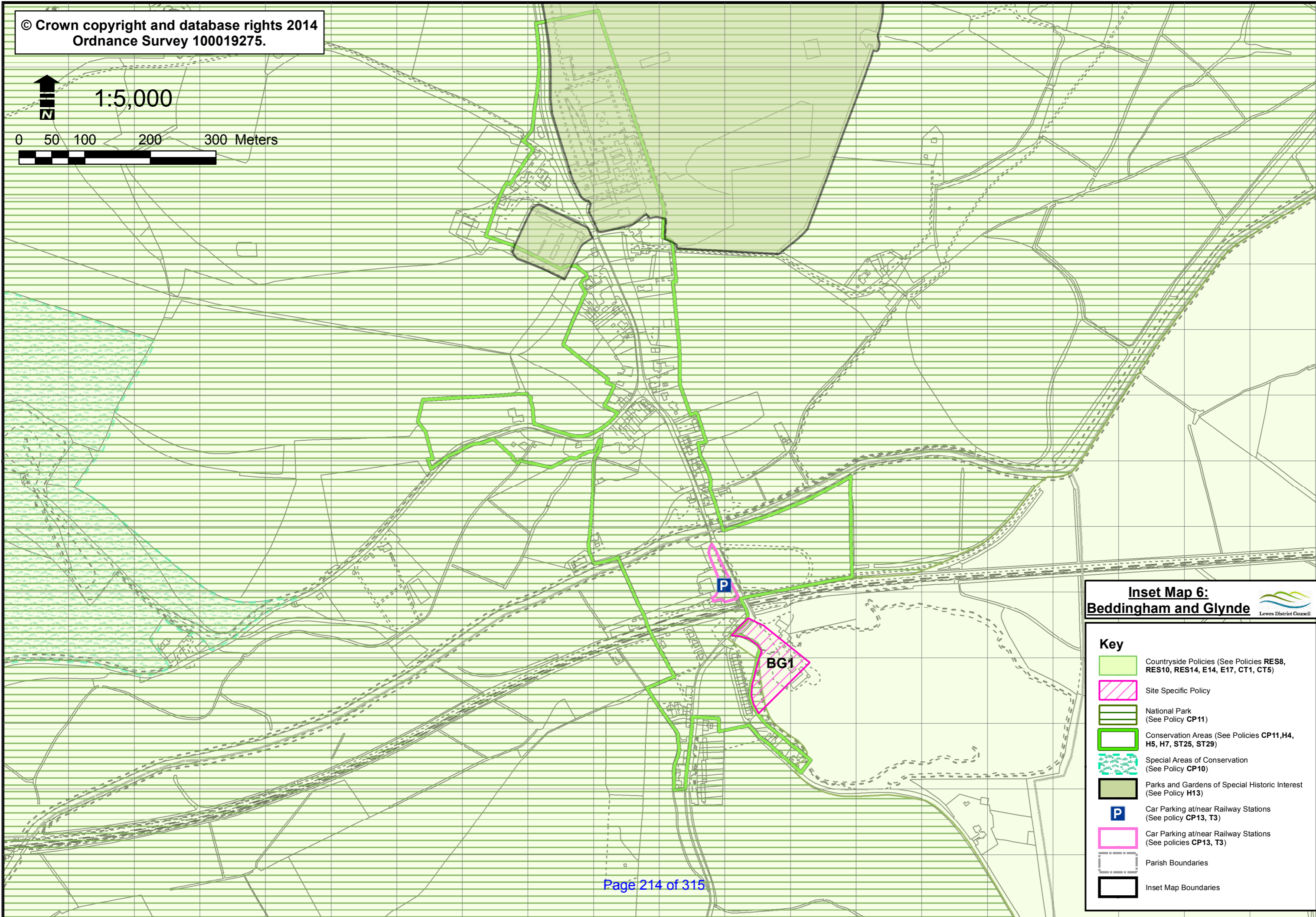
- Key**
-  Countryside Policies (See Policies RES8, RES10, RES14, E14, E17, CT1, CT5)
 -  Conservation Areas (See Policies CP11, H4, H5, H7, ST25, ST29)
 -  Lewes/Uckfield Railway Line (See Policy T4)
 -  Inset Map Boundaries



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**Inset Map 6:
Beddingham and Glynde**



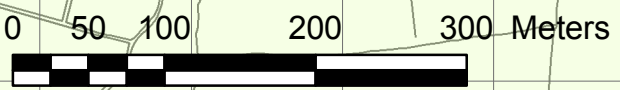
- Key**
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 -  Site Specific Policy
 -  National Park (See Policy CP11)
 -  Conservation Areas (See Policies CP11, H4, H5, H7, ST25, ST29)
 -  Special Areas of Conservation (See Policy CP10)
 -  Parks and Gardens of Special Historic Interest (See Policy H13)
 -  Car Parking at/near Railway Stations (See policy CP13, T3)
 -  Car Parking at/near Railway Stations (See policies CP13, T3)
 -  Parish Boundaries
 -  Inset Map Boundaries

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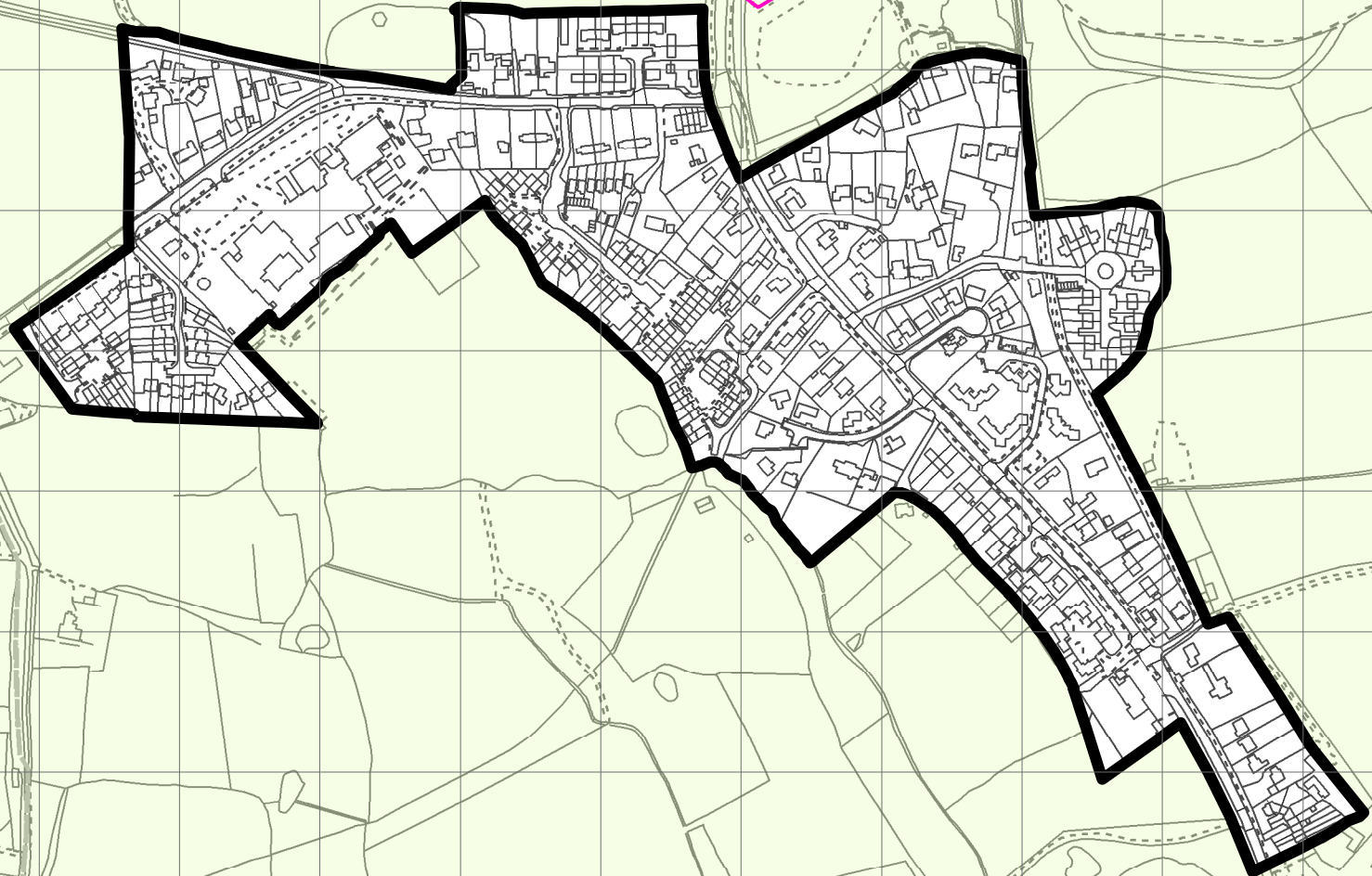
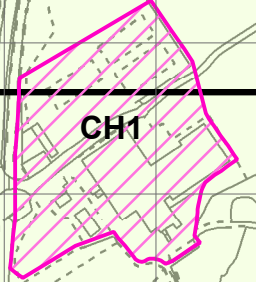
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South Street
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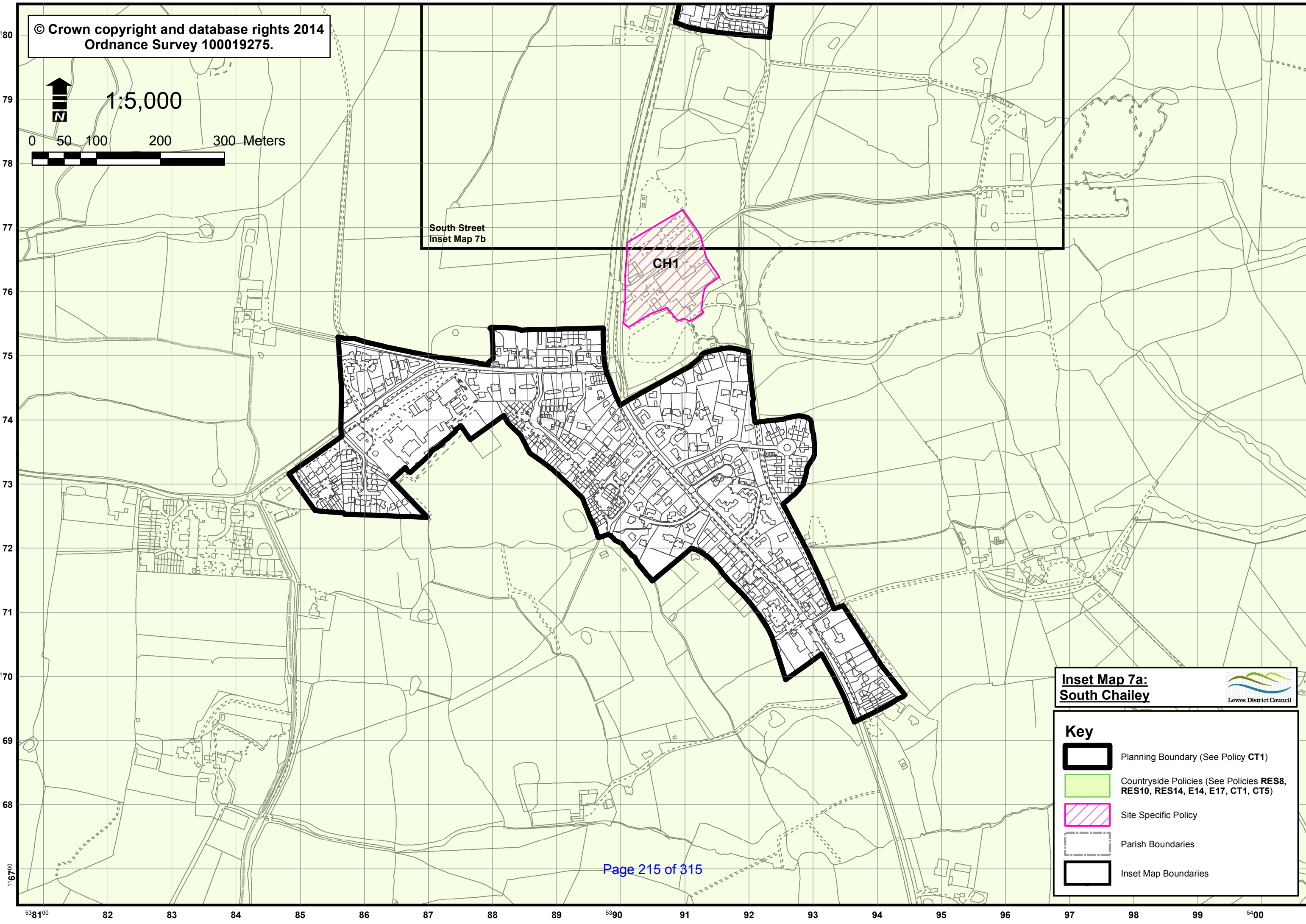


**Inset Map 7a:
South Chailey**



Key

-  Planning Boundary (See Policy CT1)
-  Countryside Policies (See Policies RES8, RES10, RES14, E14, E17, CT1, CT5)
-  Site Specific Policy
-  Parish Boundaries
-  Inset Map Boundaries



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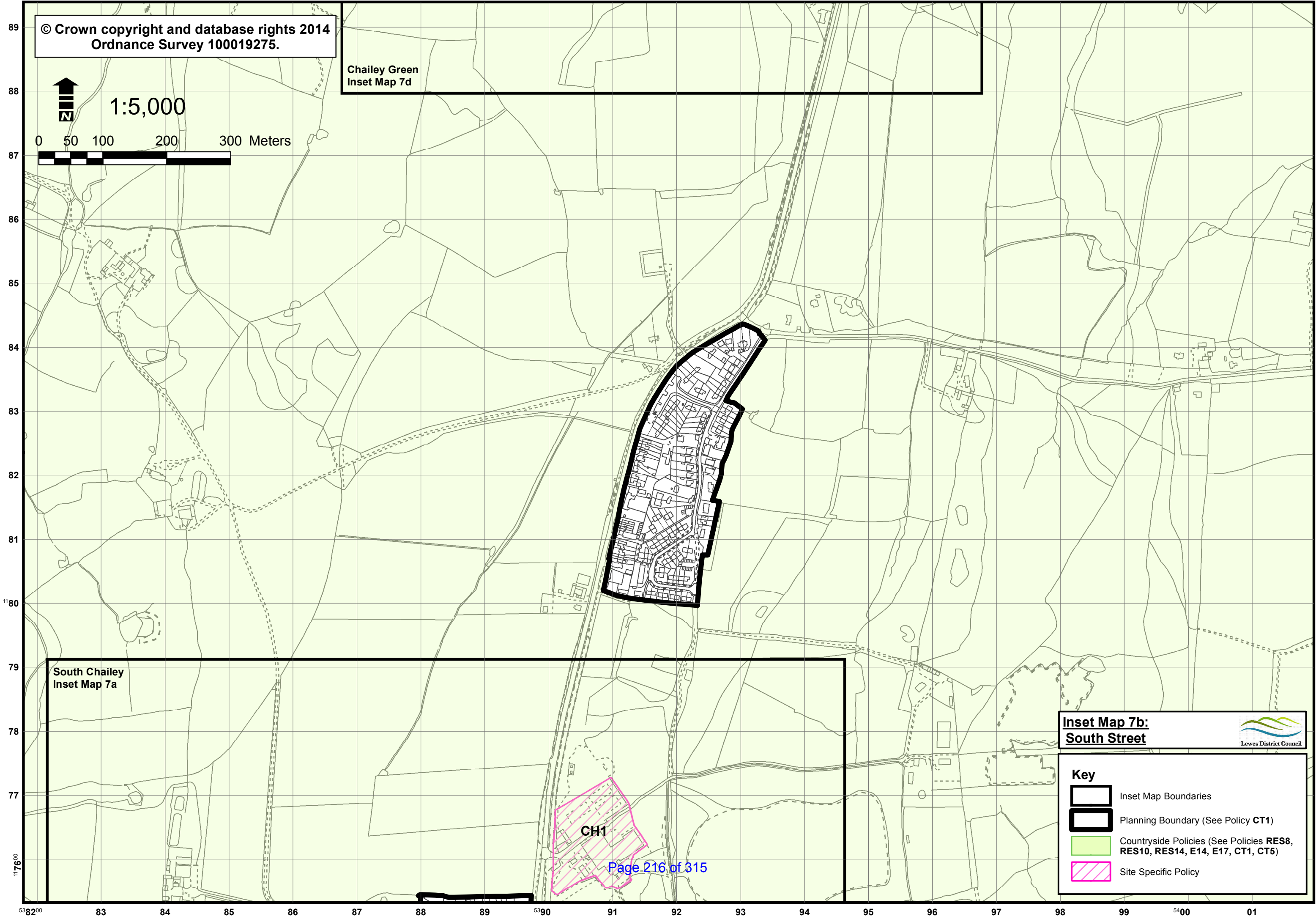
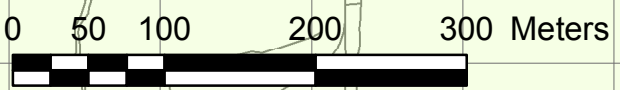
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Chailey Green
Inset Map 7d



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South Chailey
Inset Map 7a

Inset Map 7b:
South Street

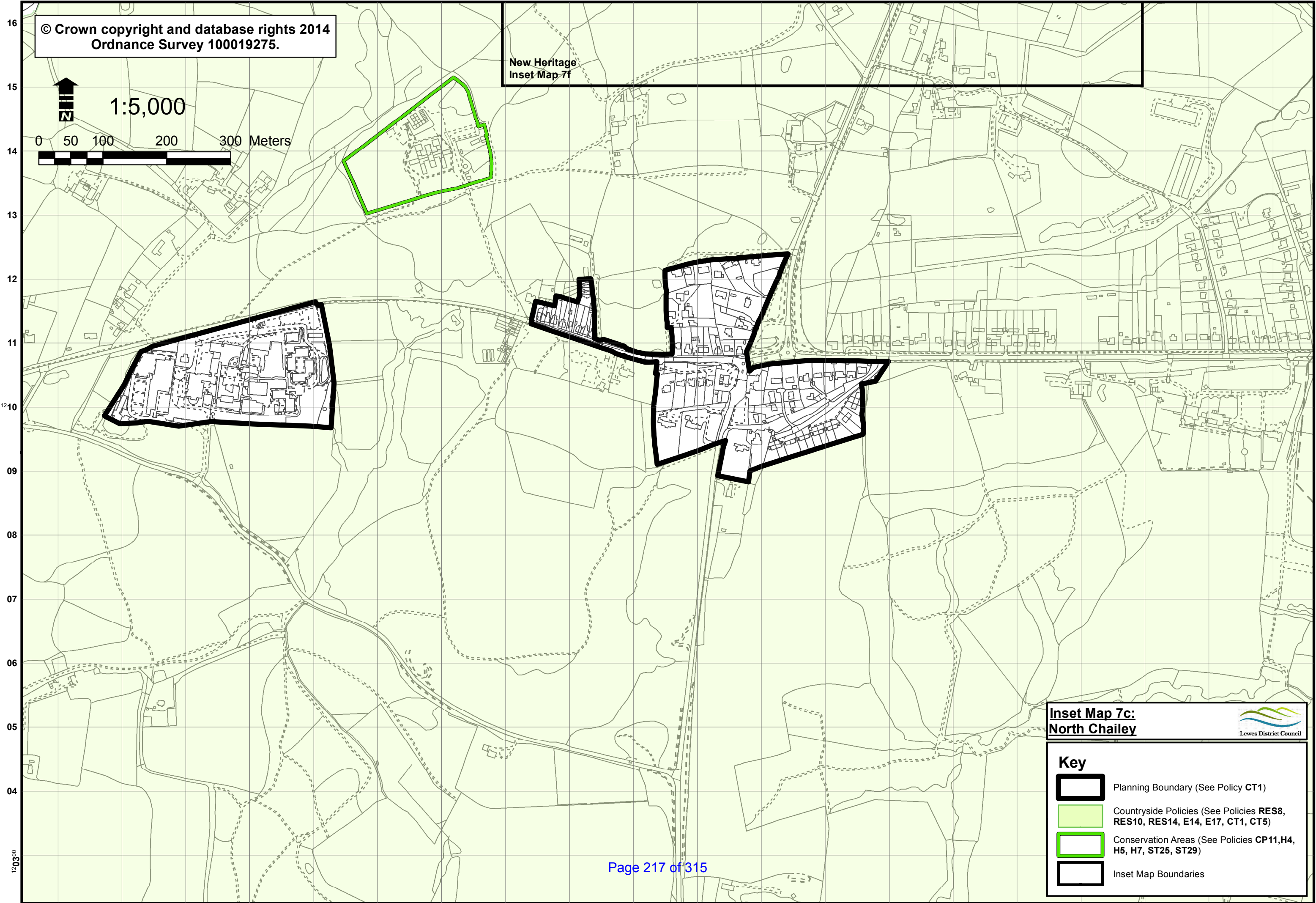
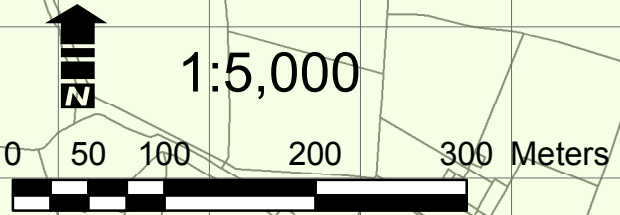


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-  Inset Map Boundaries
-  Planning Boundary (See Policy CT1)
-  Countryside Policies (See Policies RES8, RES10, RES14, E14, E17, CT1, CT5)
-  Site Specific Policy

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New Heritage
Inset Map 7f



**Inset Map 7c:
North Chailey**



Key

- Planning Boundary (See Policy CT1)
- Countryside Policies (See Policies RES8, RES10, RES14, E14, E17, CT1, CT5)
- Conservation Areas (See Policies CP11,H4, H5, H7, ST25, ST29)
- Inset Map Boundaries

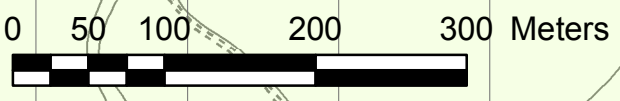
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South Street
Inset Map 7b

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Inset Map 7d:
Chailey Green



Key

-  Countryside Policies (See Policies **RES8**, **RES10**, **RES14**, **E14**, **E17**, **CT1**, **CT5**)
-  Conservation Areas (See Policies **CP11**, **H4**, **H5**, **H7**, **ST25**, **ST29**)
-  Inset Map Boundaries

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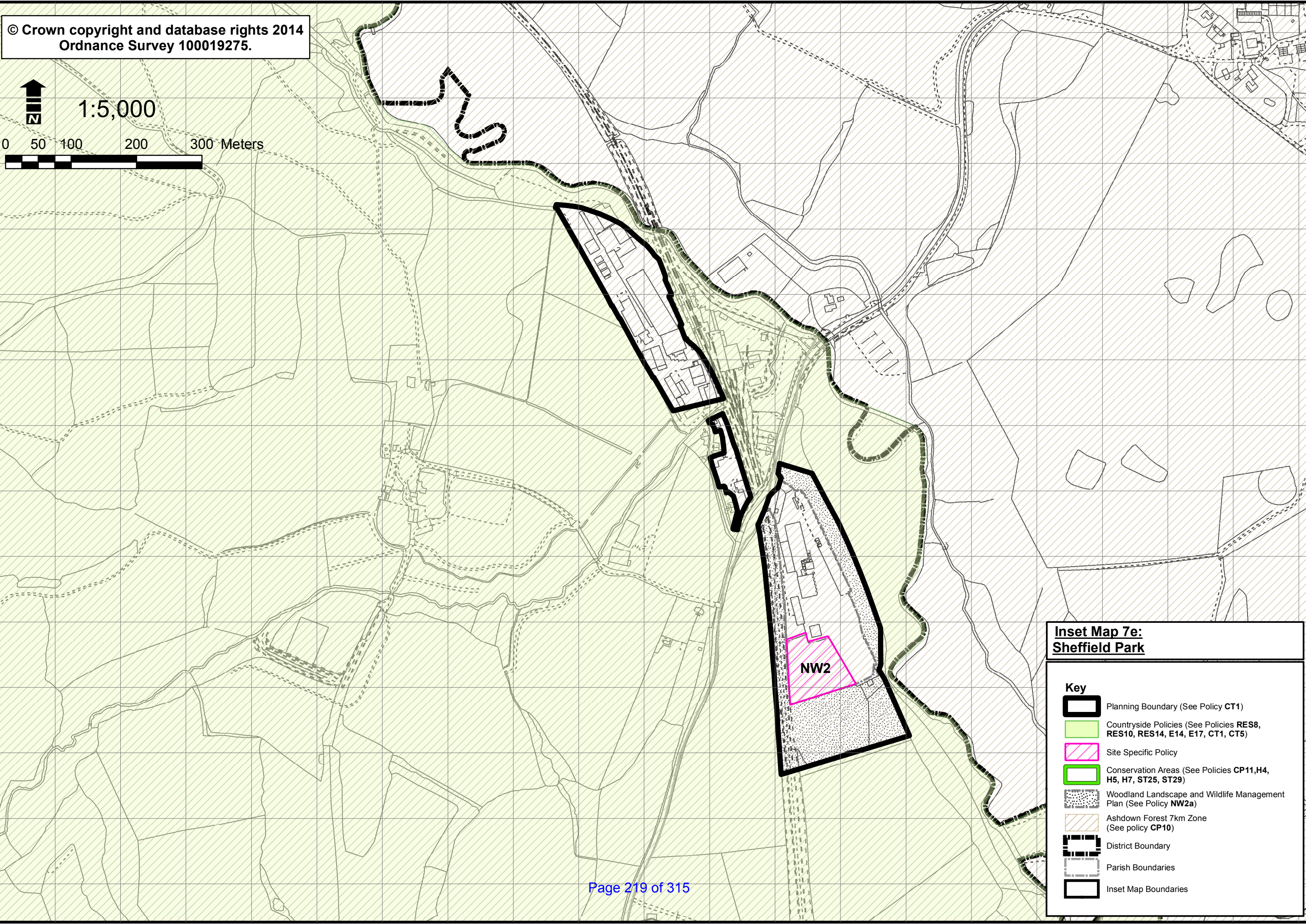
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0 50 100 200 300 Meters

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**Inset Map 7e:
Sheffield Park**

Key


- Planning Boundary (See Policy CT1)
- Countryside Policies (See Policies RES8, RES10, RES14, E14, E17, CT1, CT5)
- Site Specific Policy
- Conservation Areas (See Policies CP11, H4, H5, H7, ST25, ST29)
- Woodland Landscape and Wildlife Management Plan (See Policy NW2a)
- Ashdown Forest 7km Zone (See policy CP10)
- District Boundary
- Parish Boundaries
- Inset Map Boundaries

53⁹⁴⁰⁰ 95 96 97 98 99 54⁰⁰ 01 02 03 04 05 06 07 08 09 54¹⁰ 11 12 13

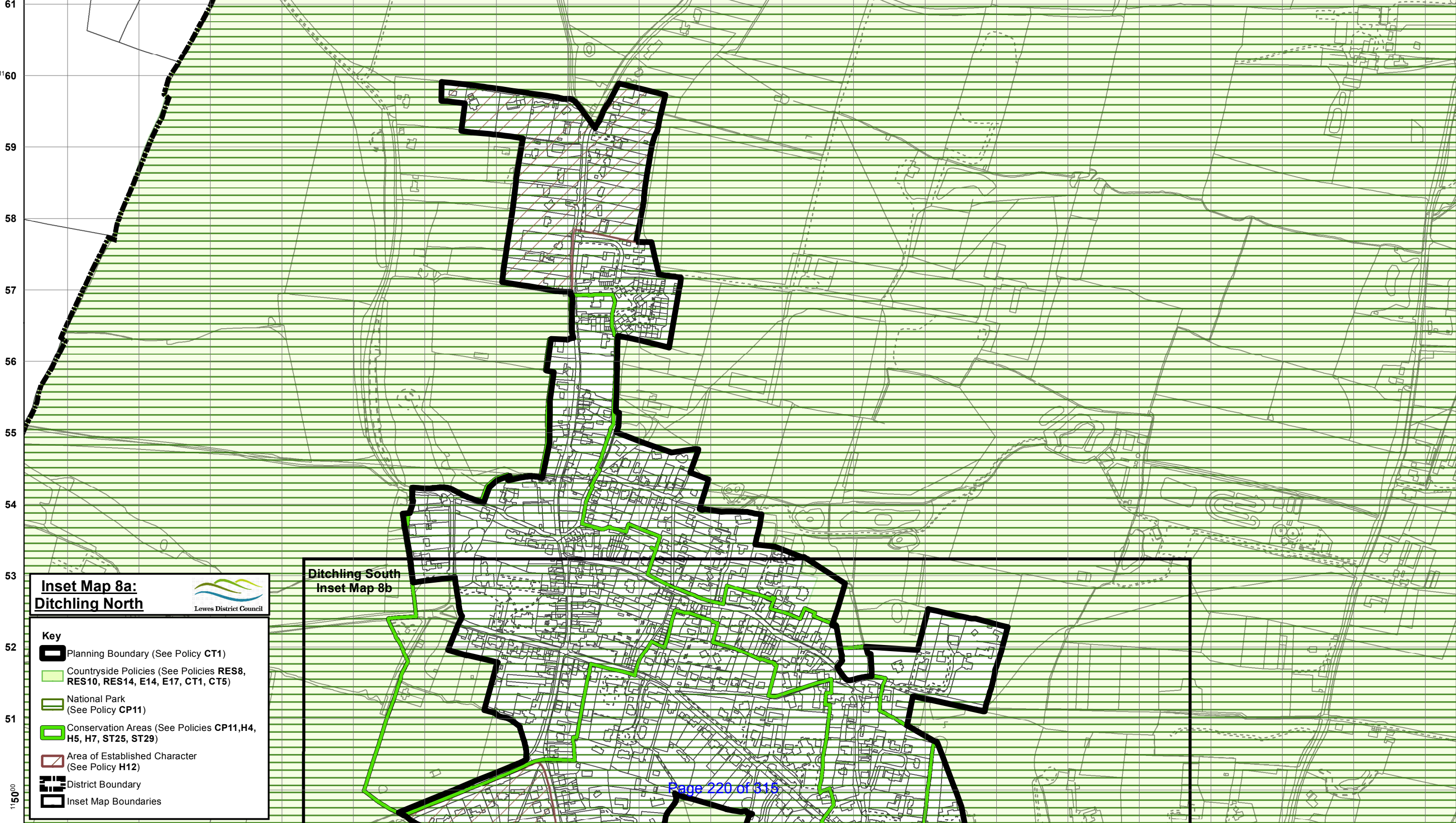

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Cottage Homes
Inset Map 8d

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0 50 100 200 300 Meters



**Inset Map 8a:
Ditchling North**



**Ditchling South
Inset Map 8b**

- Key**
-  Planning Boundary (See Policy CT1)
 -  Countryside Policies (See Policies RES8, RES10, RES14, E14, E17, CT1, CT5)
 -  National Park (See Policy CP11)
 -  Conservation Areas (See Policies CP11, H4, H5, H7, ST25, ST29)
 -  Area of Established Character (See Policy H12)
 -  District Boundary
 -  Inset Map Boundaries

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Ditchling North
Inset Map 8a

**Inset Map 8b:
Ditchling South**



- Key**
- Planning Boundary (See Policy CT1)
 - Countryside Policies (See Policies RES8, RES10, RES14, E14, E17, CT1, CT5)
 - National Park (See Policy CP11)
 - Conservation Areas (See Policies CP11, H4, H5, H7, ST25, ST29)
 - Area of Established Character (See Policy H12)
 - Parish Boundaries
 - Inset Map Boundaries

Westmeston
Inset Map 22

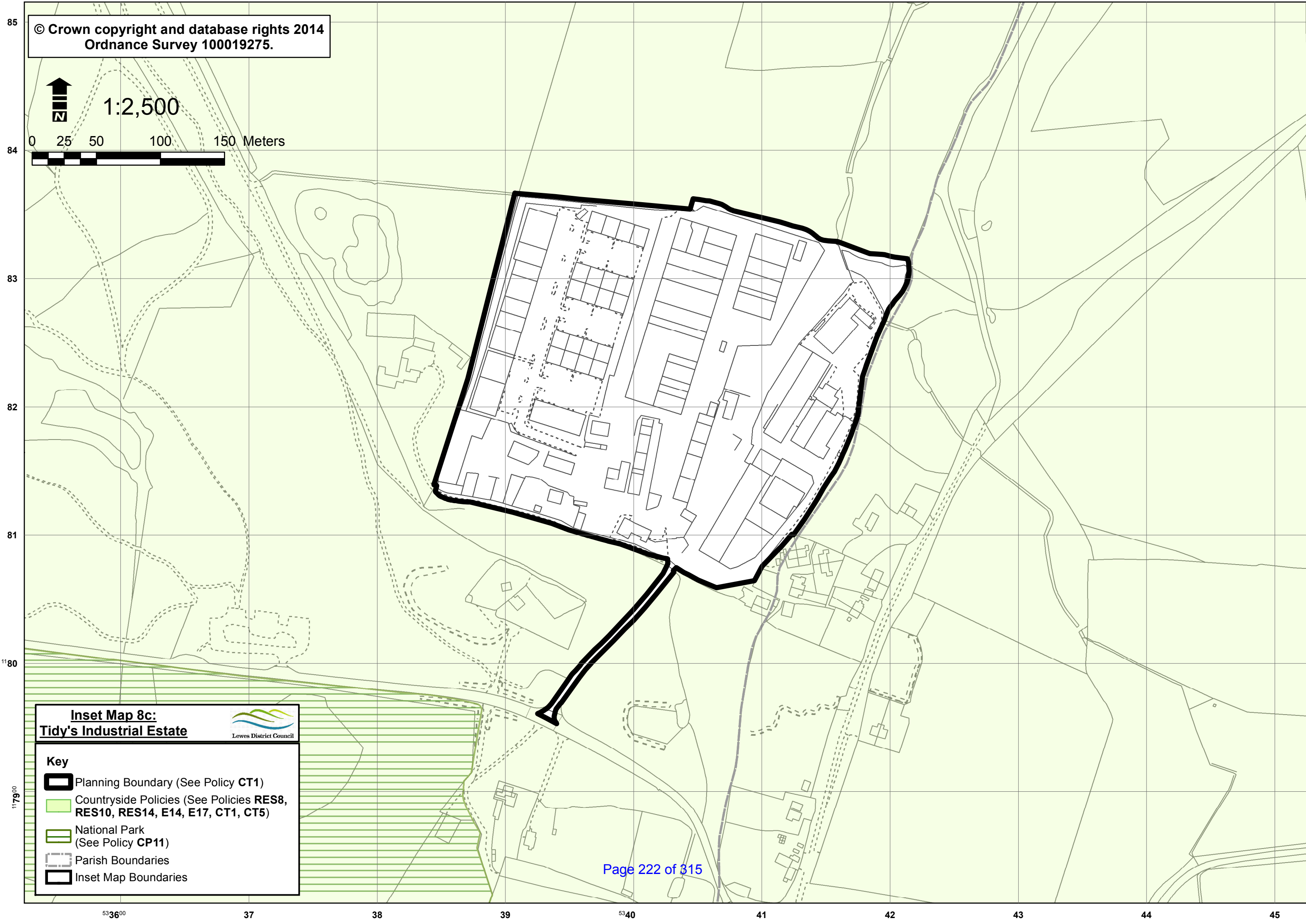
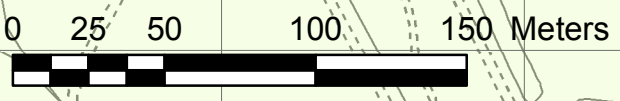
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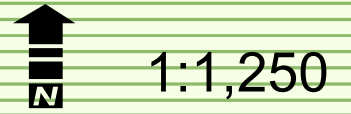
Inset Map 8c:
Tidy's Industrial Estate



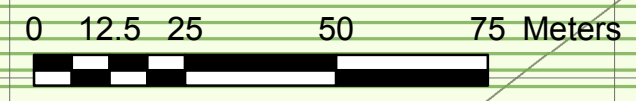
- Key**
- Planning Boundary (See Policy CT1)
 - Countryside Policies (See Policies RES8, RES10, RES14, E14, E17, CT1, CT5)
 - National Park (See Policy CP11)
 - Parish Boundaries
 - Inset Map Boundaries

1179⁰⁰

536⁰⁰ 37 38 39 5340 41 42 43 44 45



1:1,250







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Inset Map 8d:
Cottage Homes



- Key**
-  Countryside Policies (See Policies **RES8**, **RES10**, **RES14**, **E14**, **E17**, **CT1**, **CT5**)
 -  National Park (See Policy **CP11**)
 -  Conservation Areas (See Policies **CP11**, **H4**, **H5**, **H7**, **ST25**, **ST29**)
 -  Inset Map Boundaries

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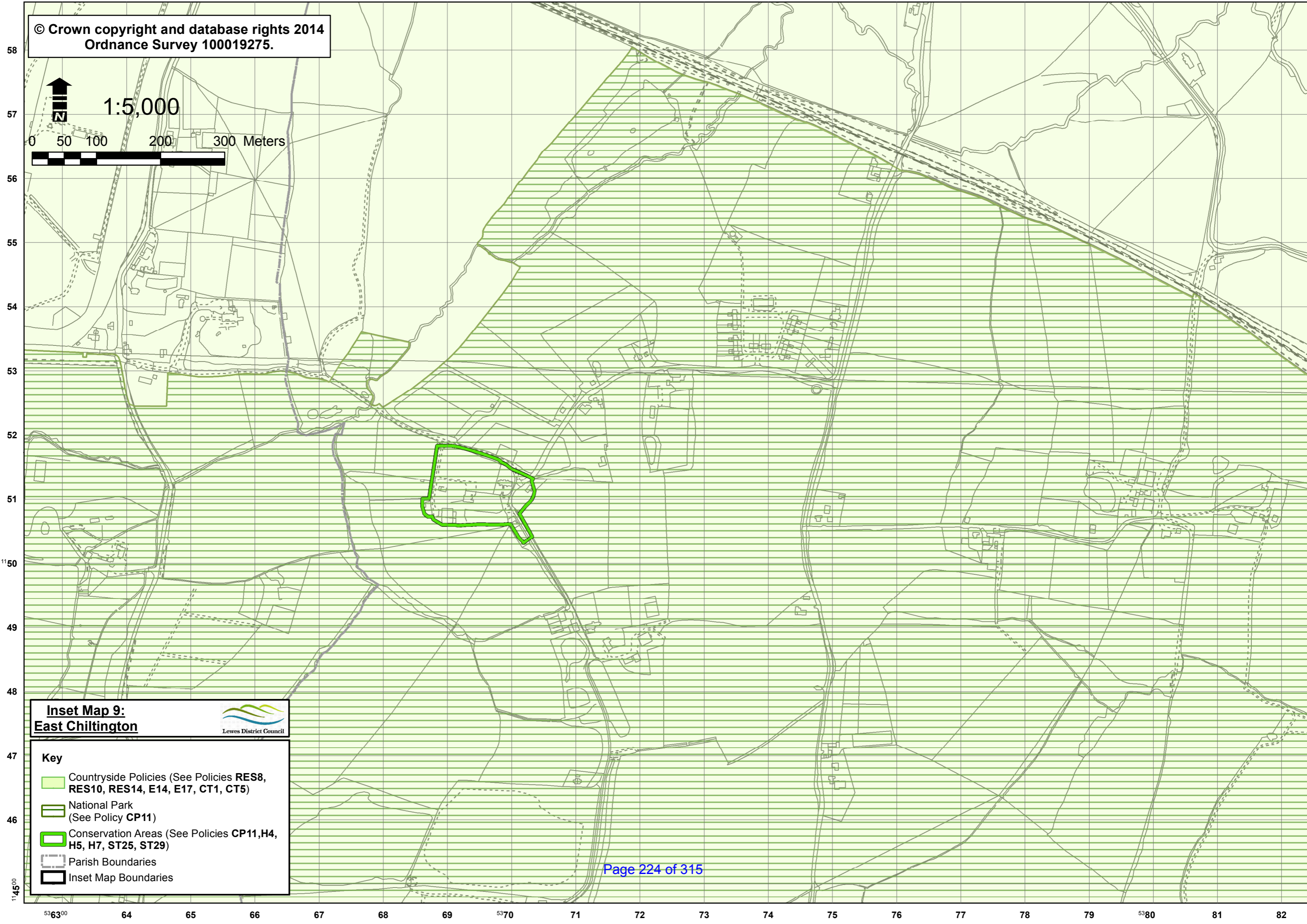
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**Inset Map 9:
East Chilington**



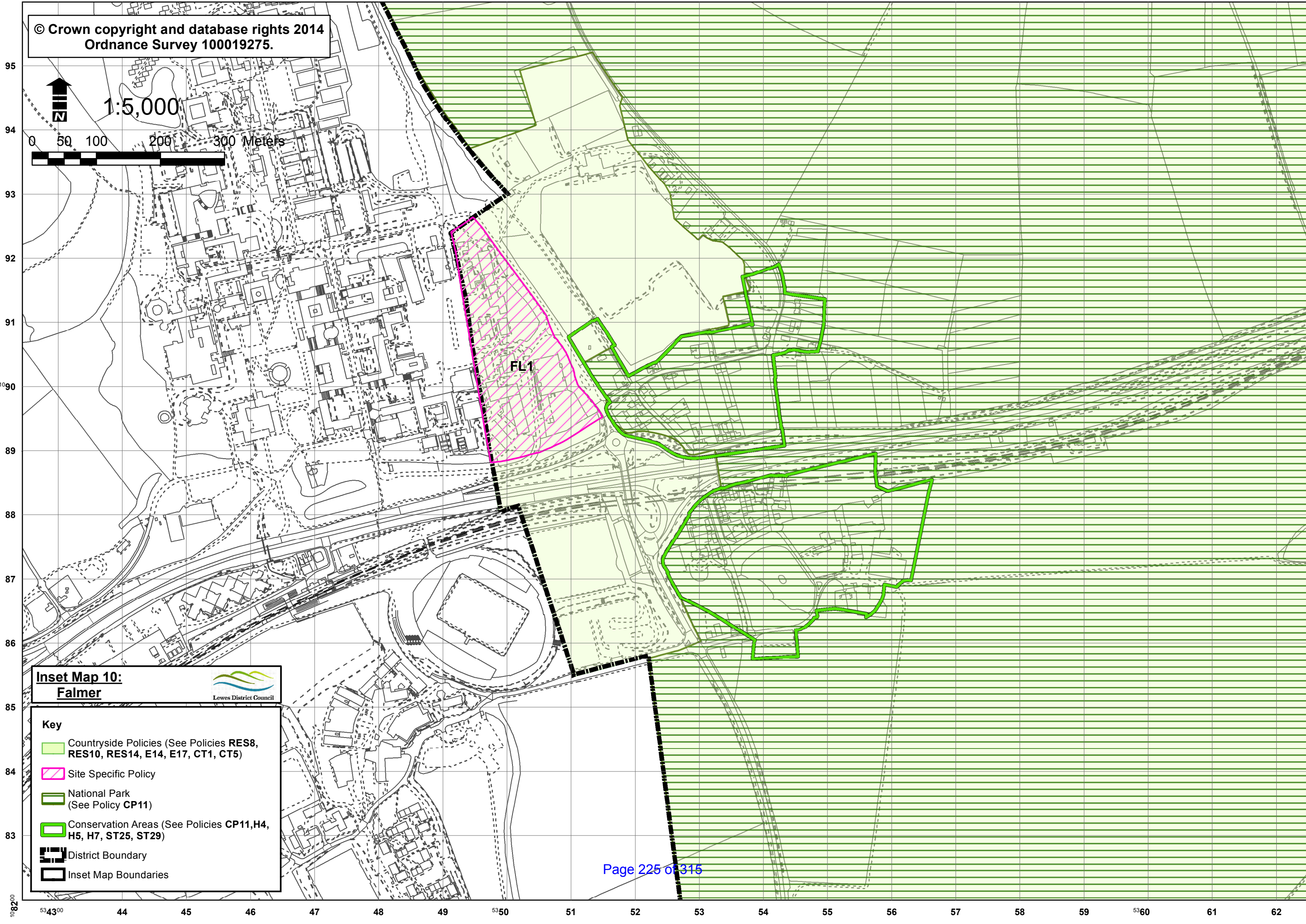
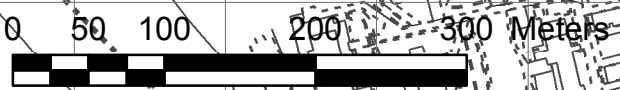
- Key**
-  Countryside Policies (See Policies RES8, RES10, RES14, E14, E17, CT1, CT5)
 -  National Park (See Policy CP11)
 -  Conservation Areas (See Policies CP11, H4, H5, H7, ST25, ST29)
 -  Parish Boundaries
 -  Inset Map Boundaries

536300 64 65 66 67 68 69 6370 71 72 73 74 75 76 77 78 79 5380 81 82

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







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Inset Map 10:
Falmer



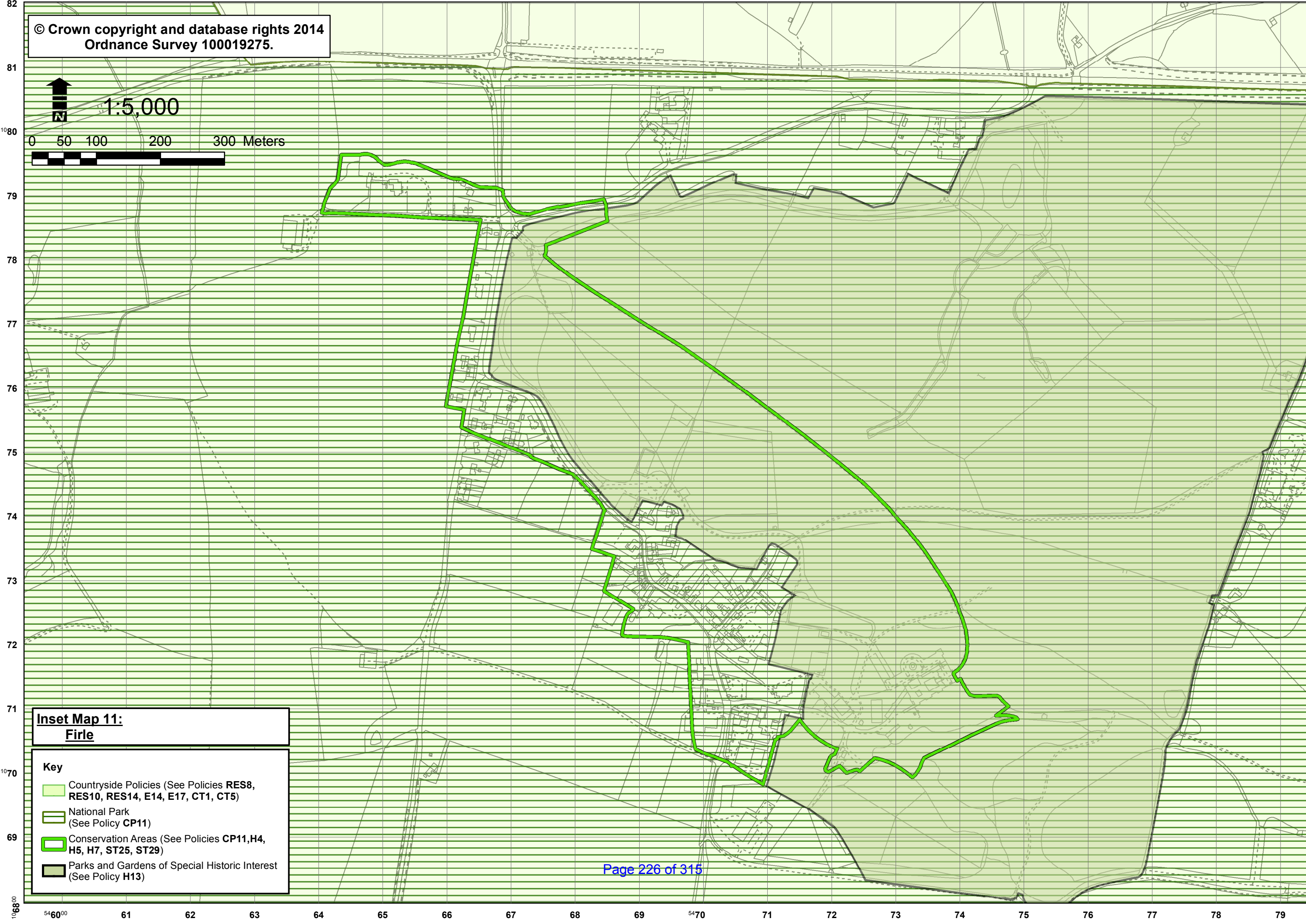
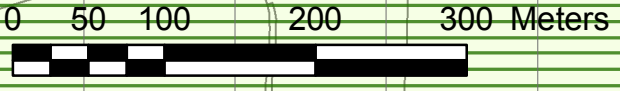
- Key**
-  Countryside Policies (See Policies RES8, RES10, RES14, E14, E17, CT1, CT5)
 -  Site Specific Policy
 -  National Park (See Policy CP11)
 -  Conservation Areas (See Policies CP11, H4, H5, H7, ST25, ST29)
 -  District Boundary
 -  Inset Map Boundaries

108200 53 43 00 44 45 46 47 48 49 50 51 52 53 54 55 56 57 58 59 60 61 62

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**Inset Map 11:
Firle**

Key

- Countryside Policies (See Policies RES8, RES10, RES14, E14, E17, CT1, CT5)
- National Park (See Policy CP11)
- Conservation Areas (See Policies CP11, H4, H5, H7, ST25, ST29)
- Parks and Gardens of Special Historic Interest (See Policy H13)

60 61 62 63 64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79

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Old Cookbridge
Inset Map 12c

Inset Map 12a:
"New" Cooksbridge



- Key**
- Planning Boundary (See Policy CT1)
 - Inset Map Boundaries
 - Area of Established Character (See Policy H12)
 - Conservation Areas (See Policies CP11,H4, H5, H7, ST25, ST29)
 - Car Parking at/near Railway Stations (See policies CP13, T3)
 - Parish Boundaries
 - National Park Boundary (See Policy CP11)
 - Countryside Policies (See Policies RES8, RES10, RES14, E14, E17, CT1, CT5,)

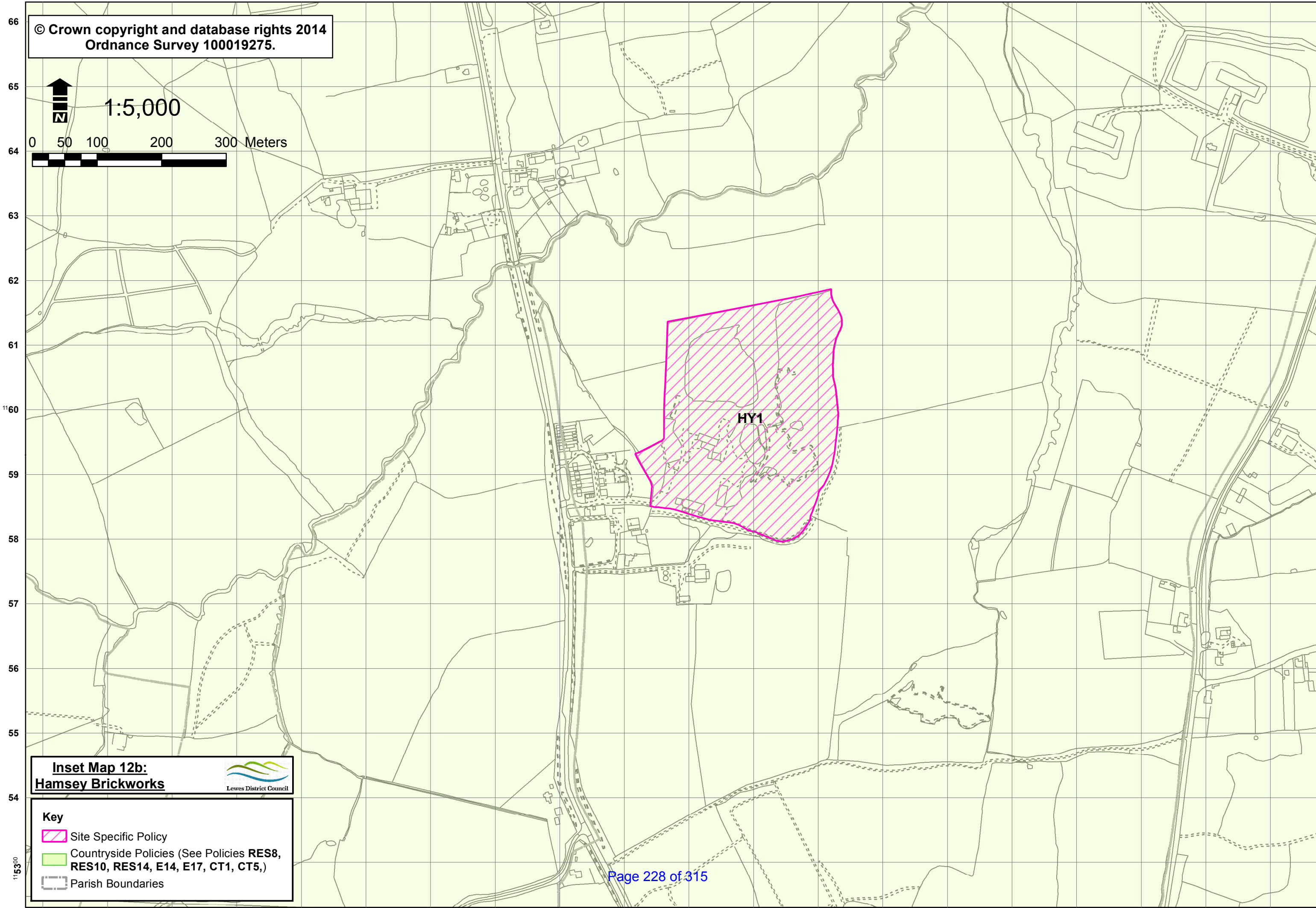
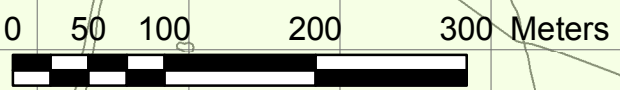
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

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Inset Map 12b:
Hamsey Brickworks



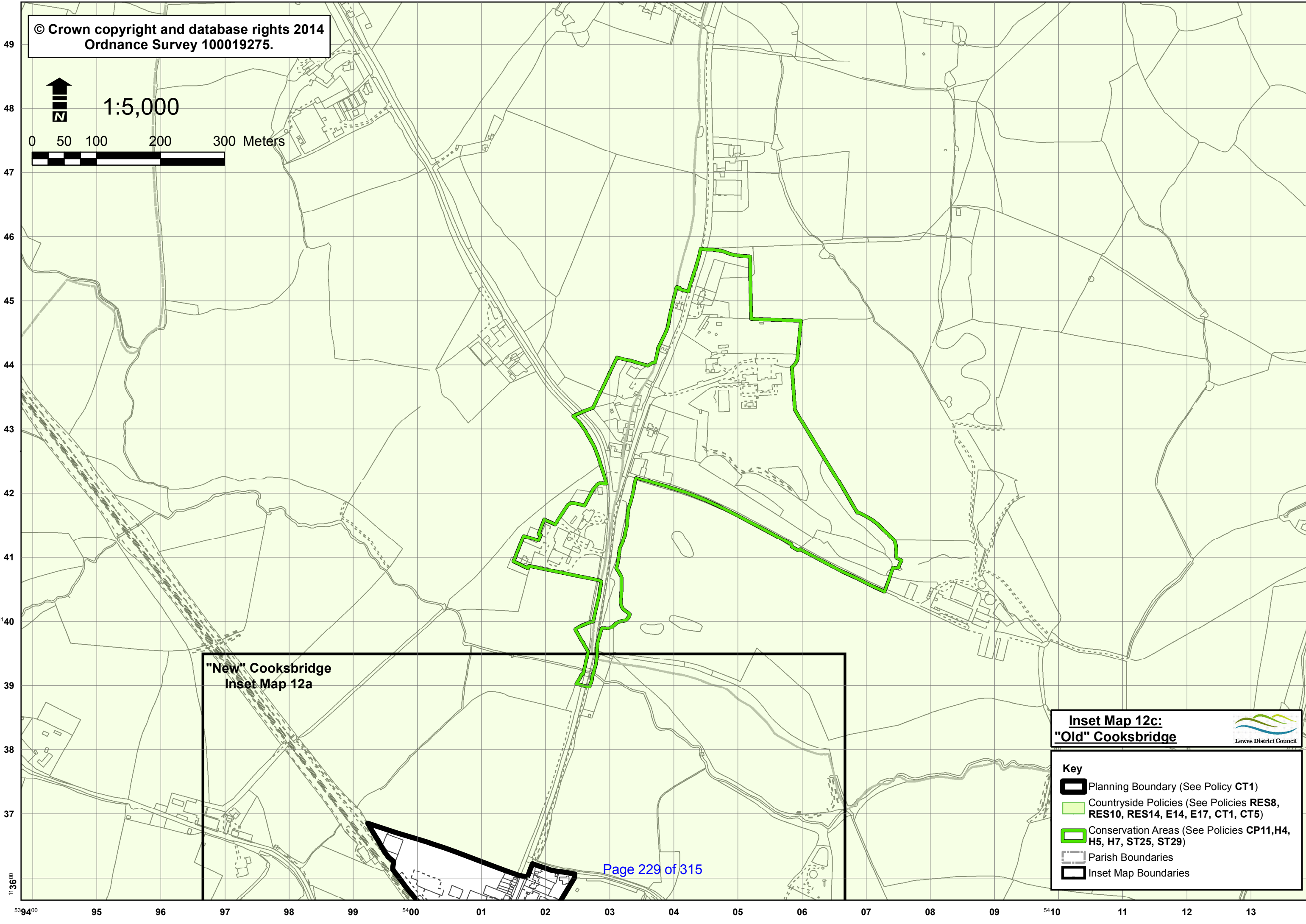
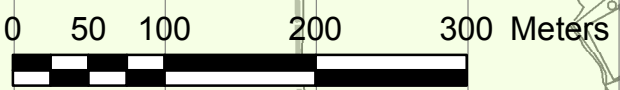
Key

-  Site Specific Policy
-  Countryside Policies (See Policies **RES8**, **RES10**, **RES14**, **E14**, **E17**, **CT1**, **CT5**.)
-  Parish Boundaries

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"New" Cooksbridge
Inset Map 12a

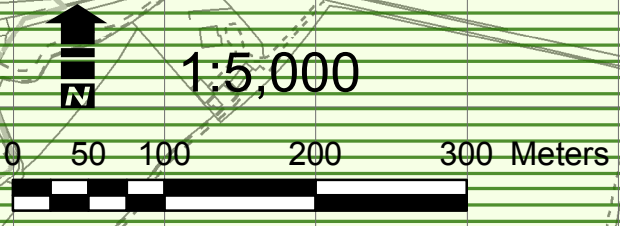
Inset Map 12c:
"Old" Cooksbridge



- Key**
- Planning Boundary (See Policy CT1)
 - Countryside Policies (See Policies RES8, RES10, RES14, E14, E17, CT1, CT5)
 - Conservation Areas (See Policies CP11, H4, H5, H7, ST25, ST29)
 - Parish Boundaries
 - Inset Map Boundaries


539400 95 96 97 98 99 5400 01 02 03 04 05 06 07 08 09 5410 11 12 13

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"New" Cooksbridge
Inset Map 12a

**Inset Map 12d:
Offham**

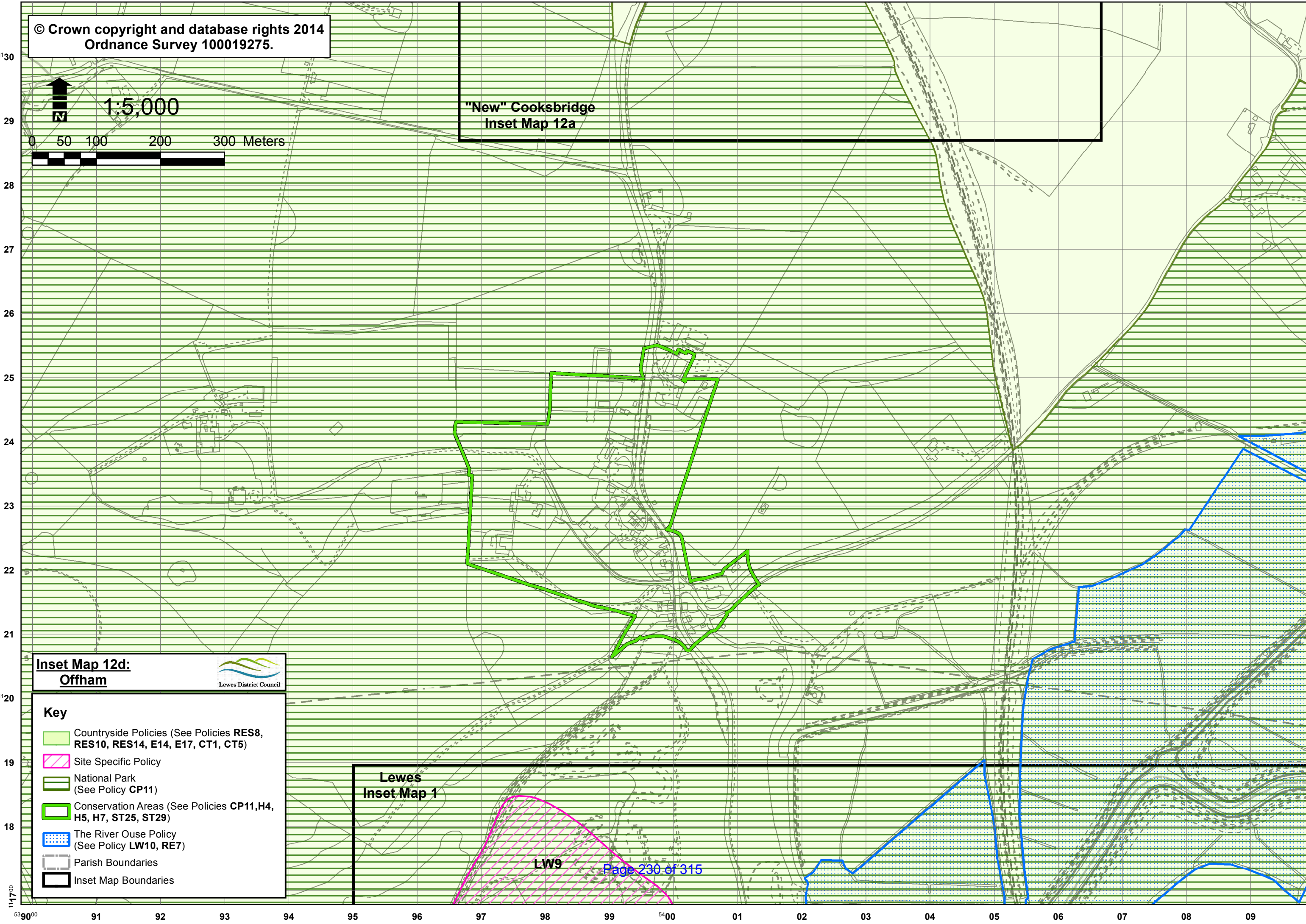


- Key**
- Countryside Policies (See Policies RES8, RES10, RES14, E14, E17, CT1, CT5)
 - Site Specific Policy
 - National Park (See Policy CP11)
 - Conservation Areas (See Policies CP11, H4, H5, H7, ST25, ST29)
 - The River Ouse Policy (See Policy LW10, RE7)
 - Parish Boundaries
 - Inset Map Boundaries

**Lewes
Inset Map 1**

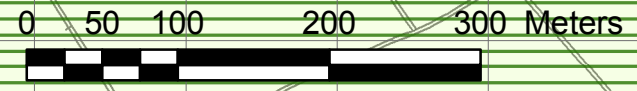
LW9

Page 230 of 315










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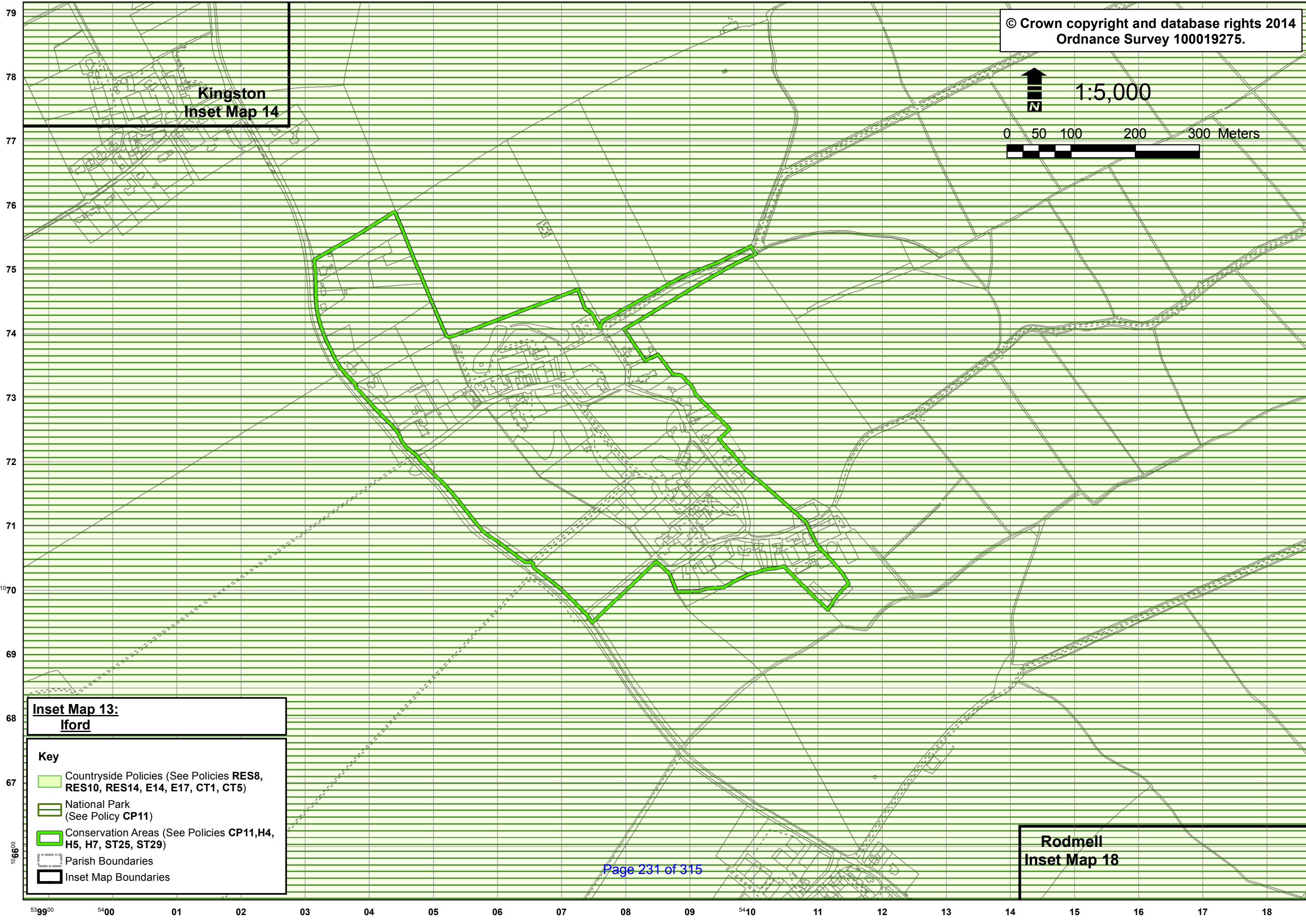


**Kingston
Inset Map 14**

**Inset Map 13:
Iford**

- Key**
-  Countryside Policies (See Policies RES8, RES10, RES14, E14, E17, CT1, CT5)
 -  National Park (See Policy CP11)
 -  Conservation Areas (See Policies CP11, H4, H5, H7, ST25, ST29)
 -  Parish Boundaries
 -  Inset Map Boundaries

**Rodmell
Inset Map 18**



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Lewes
Inset Map 1

Inset Map 14:
Kingston



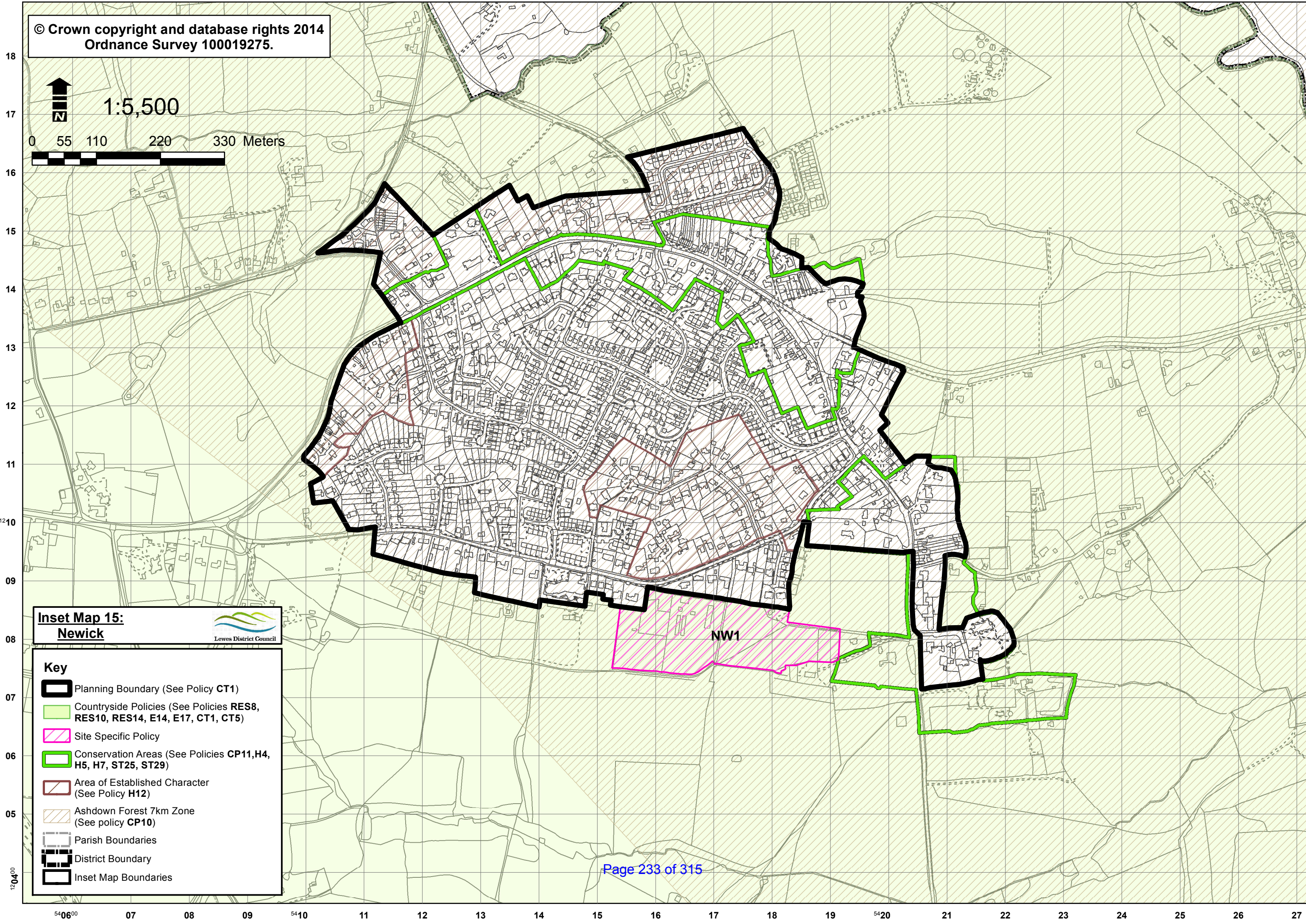
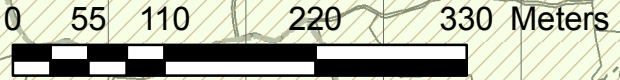
- Key**
- Planning Boundary (See Policy CT1)
 - Countryside Policies (See Policies RES8, RES10, RES14, E14, E17, CT1, CT5)
 - National Park (See Policy CP11)
 - Conservation Areas (See Policies CP11, H4, H5, H7, ST25, ST29)
 - Area of Established Character (See Policy H12)
 - Parish Boundaries
 - Inset Map Boundaries

Iford
Inset Map 13

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









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Inset Map 15:
Newick



- Key**
-  Planning Boundary (See Policy CT1)
 -  Countryside Policies (See Policies RES8, RES10, RES14, E14, E17, CT1, CT5)
 -  Site Specific Policy
 -  Conservation Areas (See Policies CP11, H4, H5, H7, ST25, ST29)
 -  Area of Established Character (See Policy H12)
 -  Ashdown Forest 7km Zone (See policy CP10)
 -  Parish Boundaries
 -  District Boundary
 -  Inset Map Boundaries

NW1

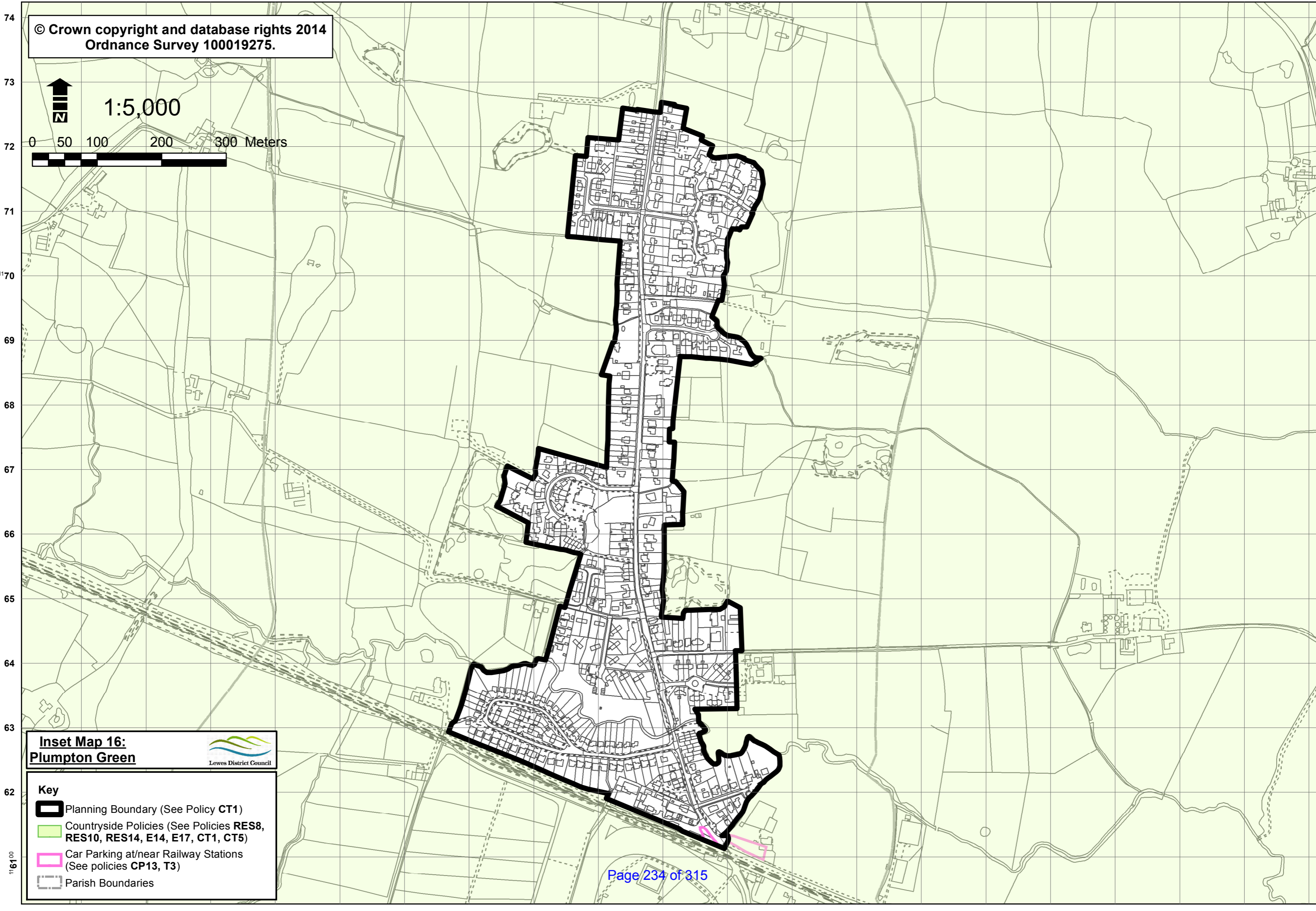
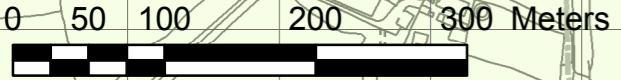
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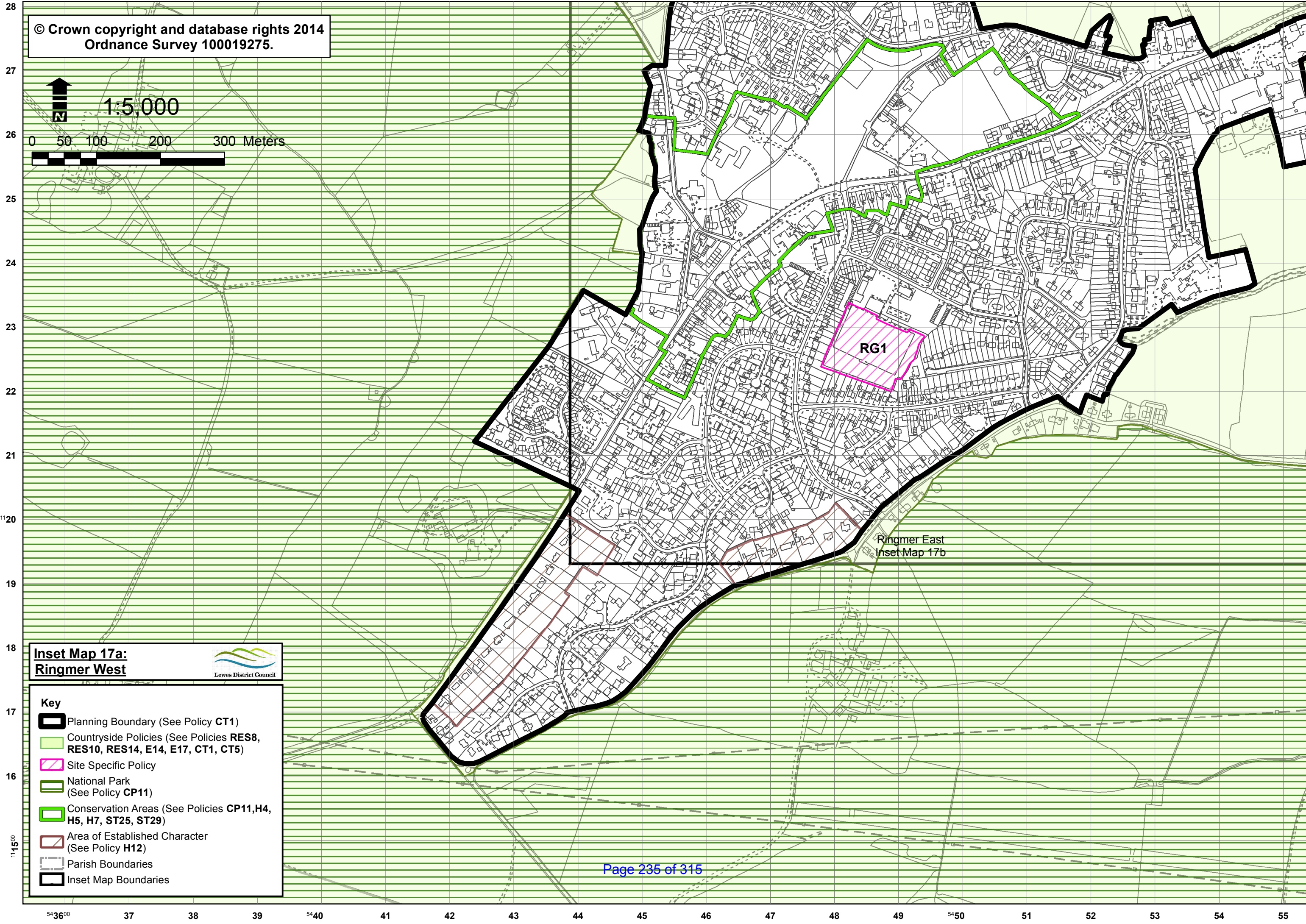
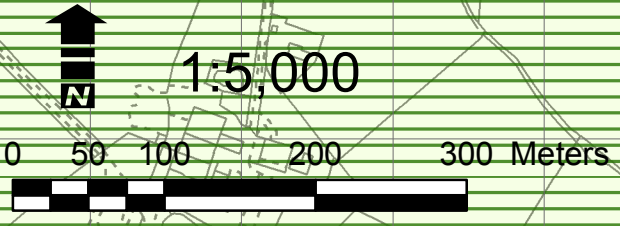


Inset Map 16:
Plumpton Green



- Key**
- Planning Boundary (See Policy CT1)
 - Countryside Policies (See Policies RES8, RES10, RES14, E14, E17, CT1, CT5)
 - Car Parking at/near Railway Stations (See policies CP13, T3)
 - Parish Boundaries

535500 56 57 58 59 5360 61 62 63 64 65 66 67 68 69 5370 71 72 73 74



**Inset Map 17a:
Ringmer West**

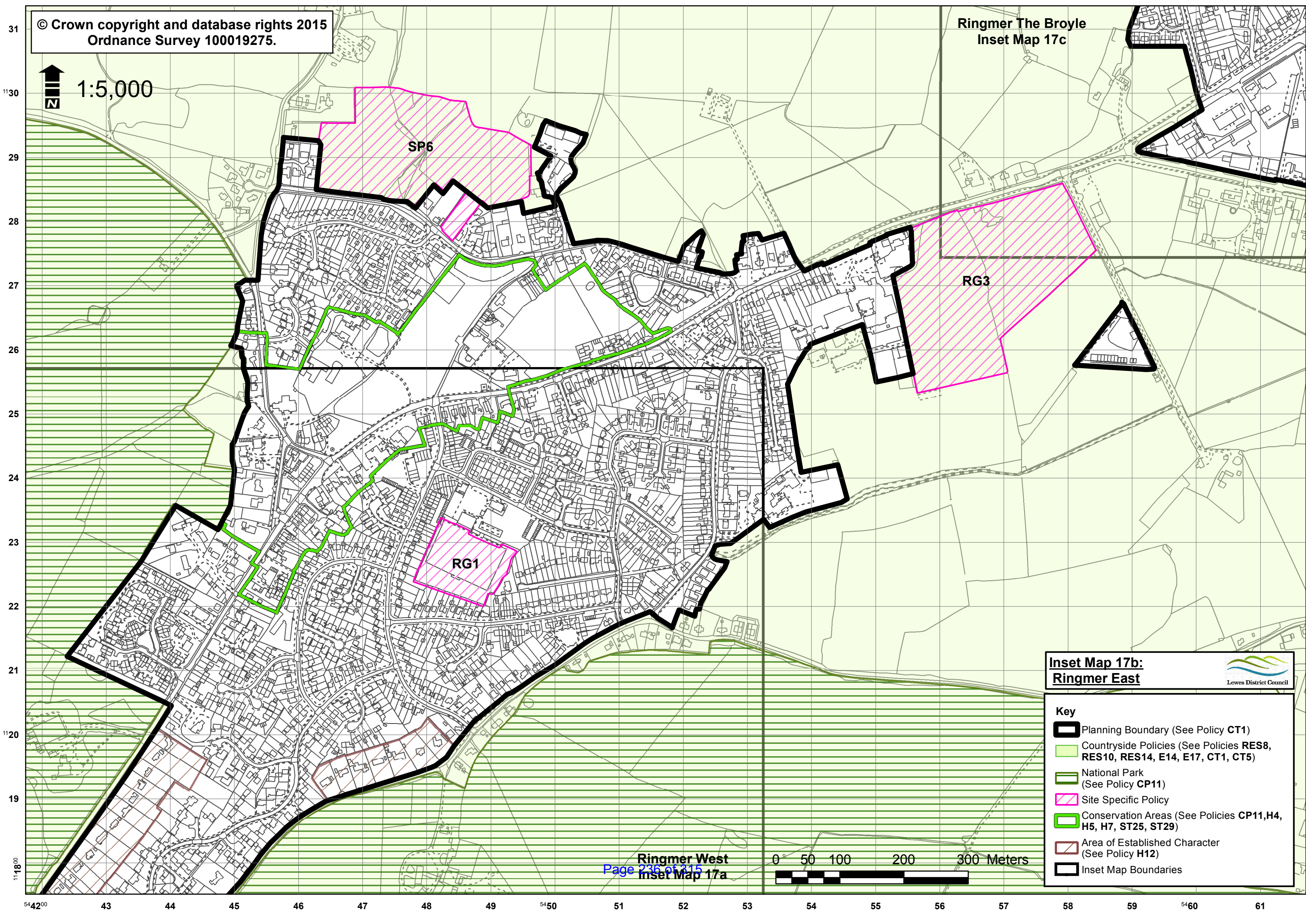


- Key**
- Planning Boundary (See Policy CT1)
 - Countryside Policies (See Policies RES8, RES10, RES14, E14, E17, CT1, CT5)
 - Site Specific Policy
 - National Park (See Policy CP11)
 - Conservation Areas (See Policies CP11, H4, H5, H7, ST25, ST29)
 - Area of Established Character (See Policy H12)
 - Parish Boundaries
 - Inset Map Boundaries

Ringmer East
Inset Map 17b

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Ringmer The Broyle
Inset Map 17c



Inset Map 17b:
Ringmer East



- Key**
- Planning Boundary (See Policy CT1)
 - Countryside Policies (See Policies RES8, RES10, RES14, E14, E17, CT1, CT5)
 - National Park (See Policy CP11)
 - Site Specific Policy
 - Conservation Areas (See Policies CP11, H4, H5, H7, ST25, ST29)
 - Area of Established Character (See Policy H12)
 - Inset Map Boundaries

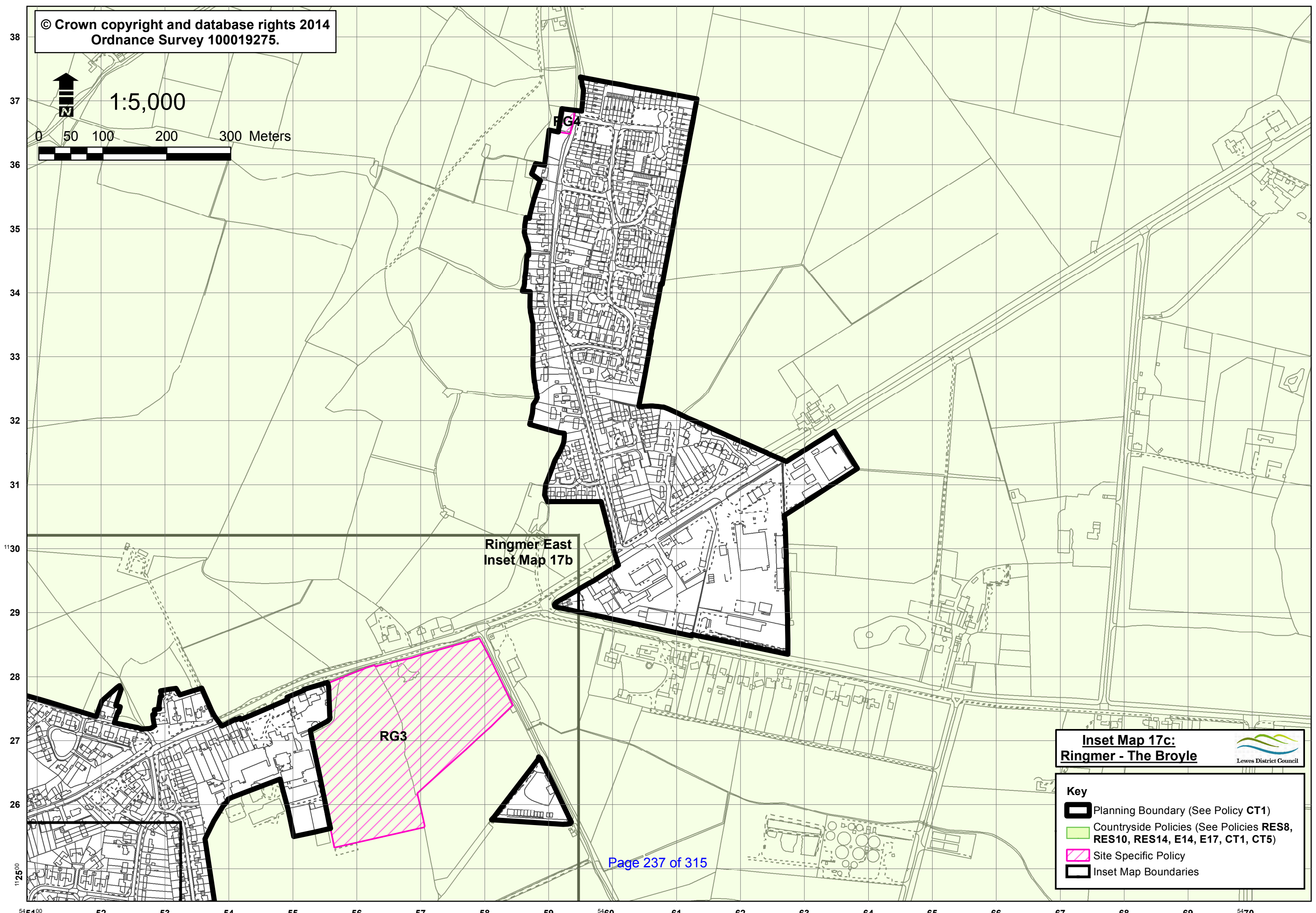
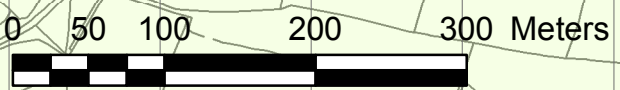
Ringmer West
Inset Map 17a



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Ringmer East
Inset Map 17b

Inset Map 17c:
Ringmer - The Broyle

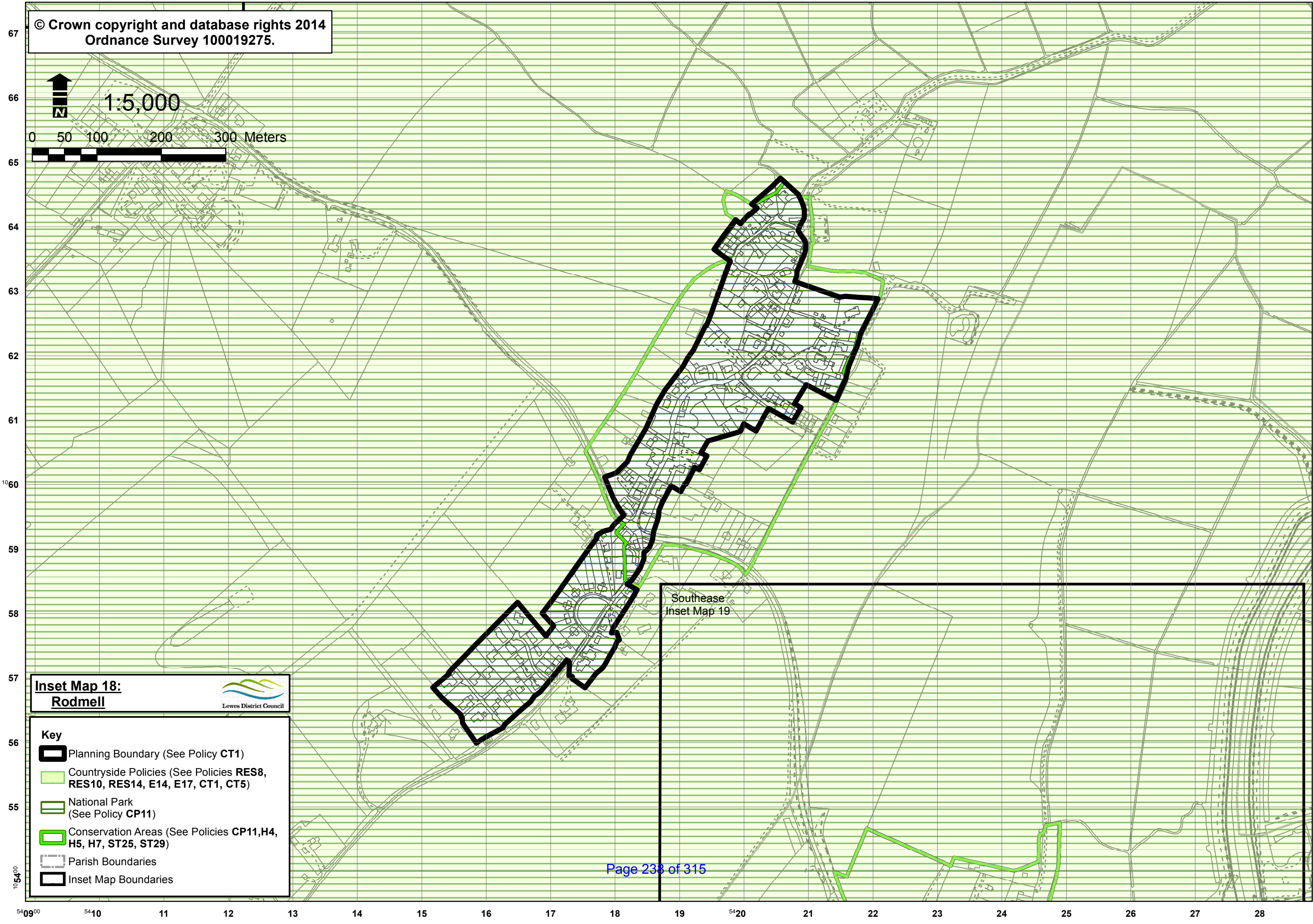


- Key**
- Planning Boundary (See Policy CT1)
 - Countryside Policies (See Policies RES8, RES10, RES14, E14, E17, CT1, CT5)
 - Site Specific Policy
 - Inset Map Boundaries

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Inset Map 18:
Rodmell




- Key**
-  Planning Boundary (See Policy CT1)
 -  Countryside Policies (See Policies RES8, RES10, RES14, E14, E17, CT1, CT5)
 -  National Park (See Policy CP11)
 -  Conservation Areas (See Policies CP11, H4, H5, H7, ST25, ST29)
 -  Parish Boundaries
 -  Inset Map Boundaries

Southeast
Inset Map 19







Rodmell
Inset Map 18

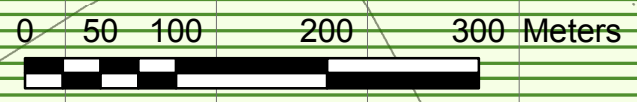
**Inset Map 19:
Southeast**



Lewes District Council

Key

-  Countryside Policies (See Policies **RES8**, **RES10**, **RES14**, **E14**, **E17**, **CT1**, **CT5**)
-  National Park (See Policy **CP11**)
-  Conservation Areas (See Policies **CP11**, **H4**, **H5**, **H7**, **ST25**, **ST29**)
-  The River Ouse Policy (See Policy **RE7**)
-  Parish Boundaries
-  Inset Map Boundaries



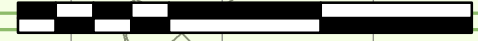
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Inset Map 20:
Streat



Key

-  Countryside Policies (See Policies RES8, RES10, RES14, E14, E17, CT1, CT5)
-  National Park (See Policy CP11)
-  Conservation Areas (See Policies CP11, H4, H5, H7, ST25, ST29)
-  Parish Boundaries

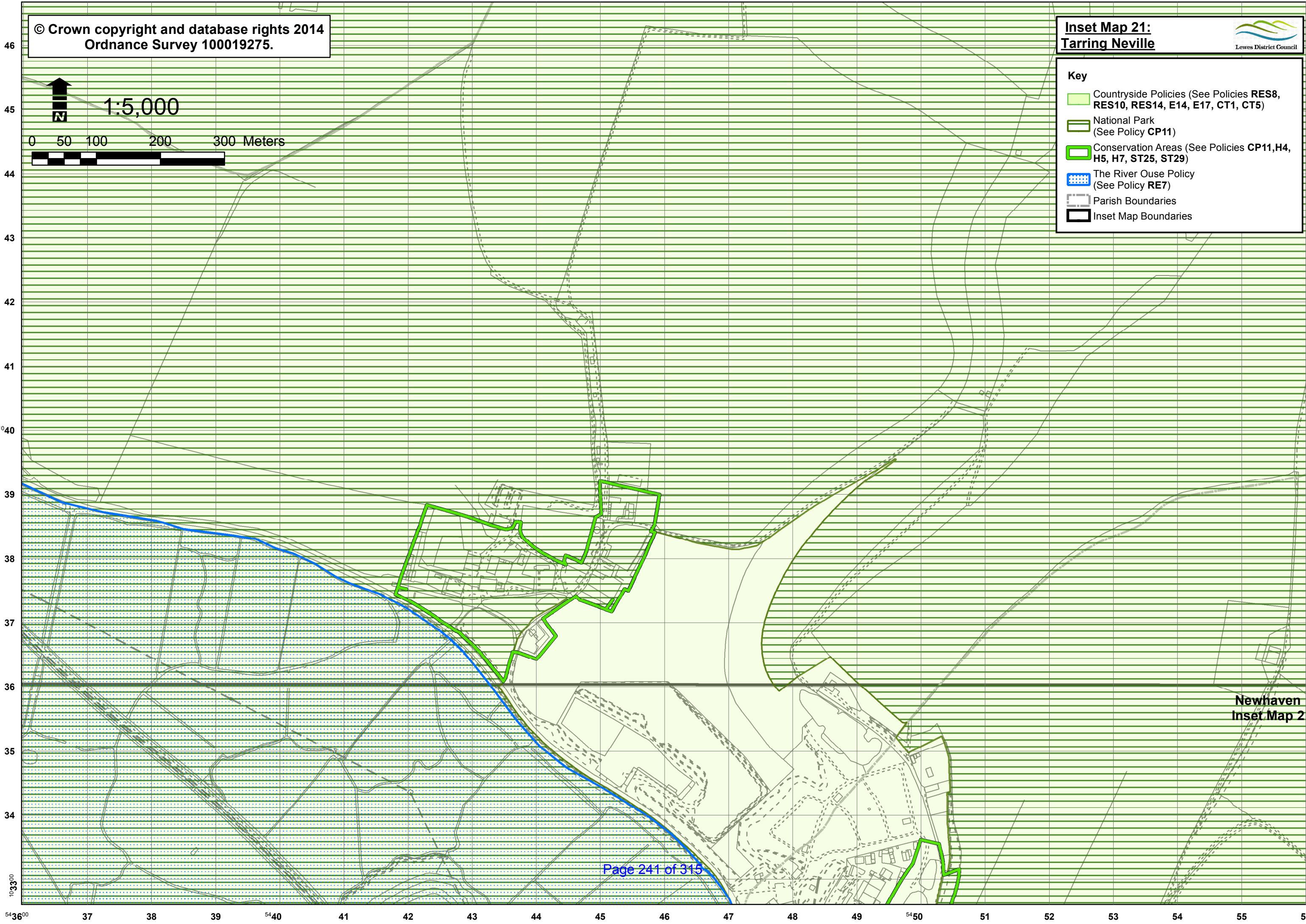
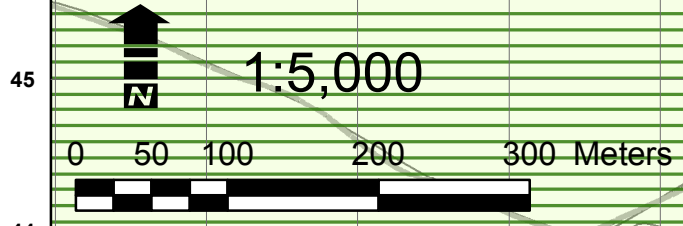
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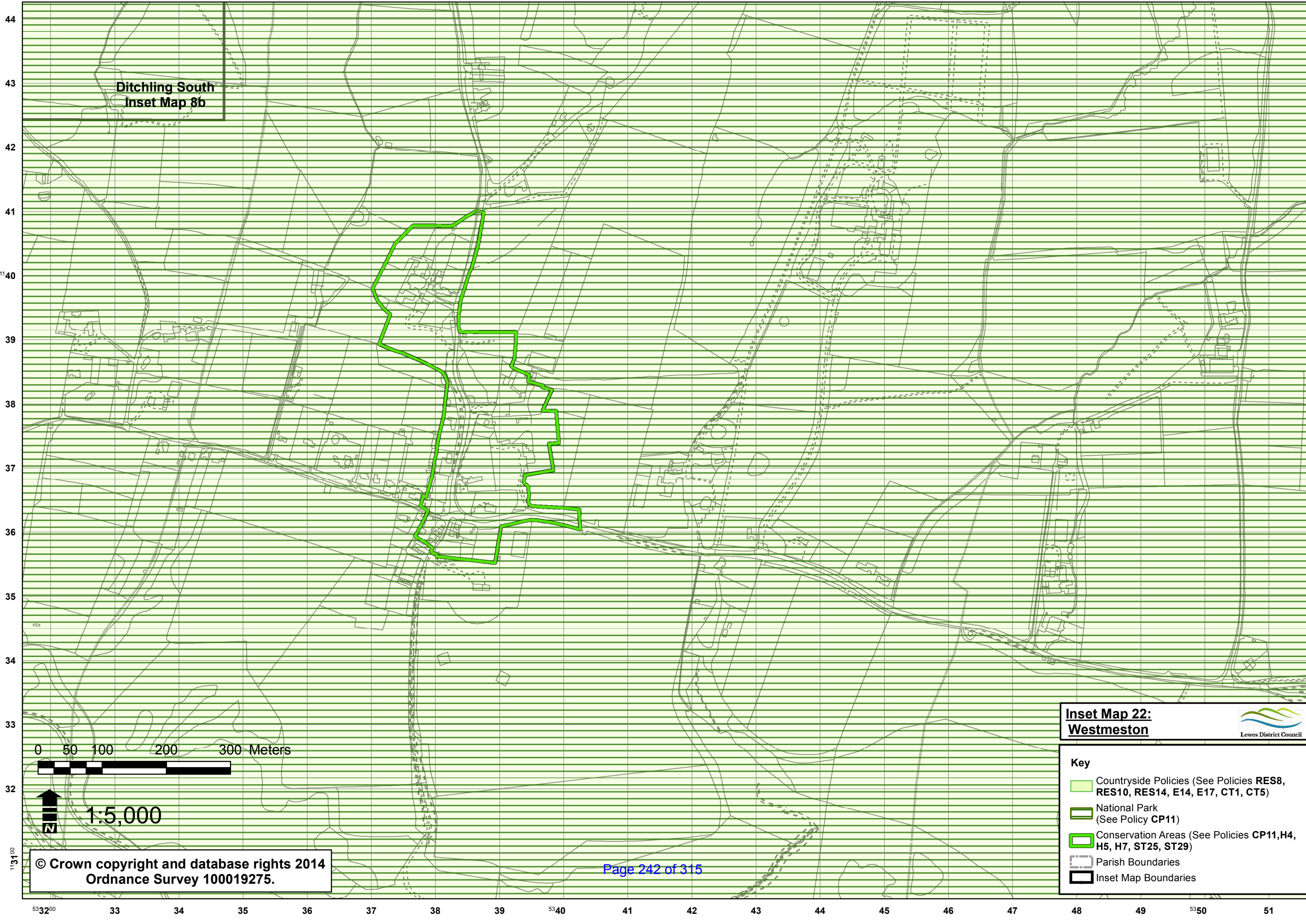


**Inset Map 21:
Tarring Neville**

- Key**
- Countryside Policies (See Policies RES8, RES10, RES14, E14, E17, CT1, CT5)
 - National Park (See Policy CP11)
 - Conservation Areas (See Policies CP11, H4, H5, H7, ST25, ST29)
 - The River Ouse Policy (See Policy RE7)
 - Parish Boundaries
 - Inset Map Boundaries








Newhaven
Inset Map 2



Ditchling South
Inset Map 8b

**Inset Map 22:
Westmeston**



- Key**
-  Countryside Policies (See Policies RES8, RES10, RES14, E14, E17, CT1, CT5)
 -  National Park (See Policy CP11)
 -  Conservation Areas (See Policies CP11, H4, H5, H7, ST25, ST29)
 -  Parish Boundaries
 -  Inset Map Boundaries

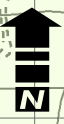
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



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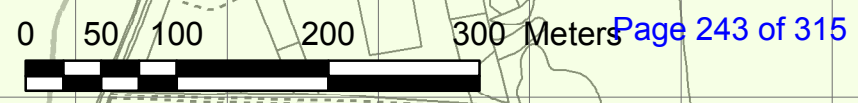
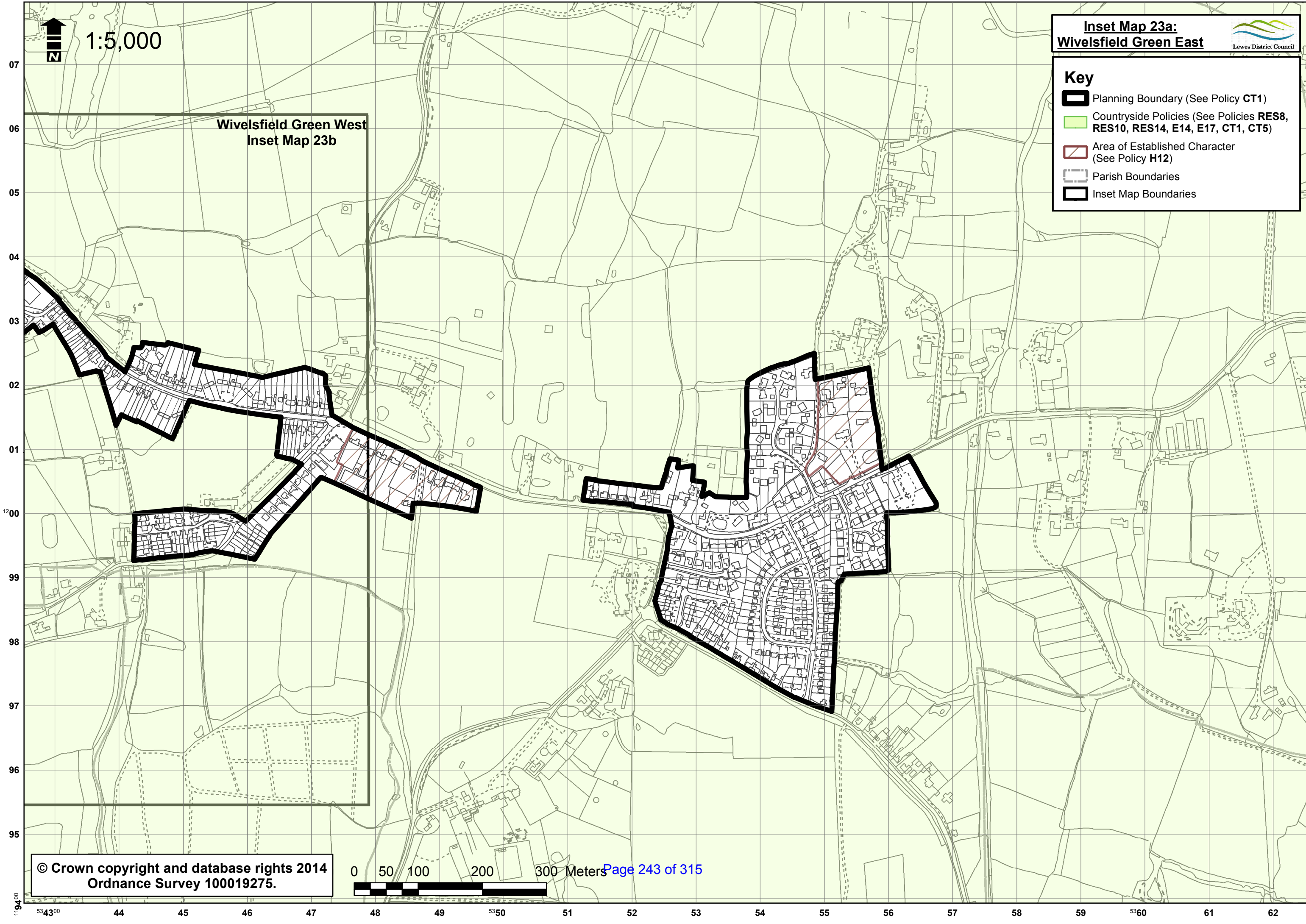
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Key

-  Planning Boundary (See Policy CT1)
-  Countryside Policies (See Policies RES8, RES10, RES14, E14, E17, CT1, CT5)
-  Area of Established Character (See Policy H12)
-  Parish Boundaries
-  Inset Map Boundaries

Wivelsfield Green West
Inset Map 23b

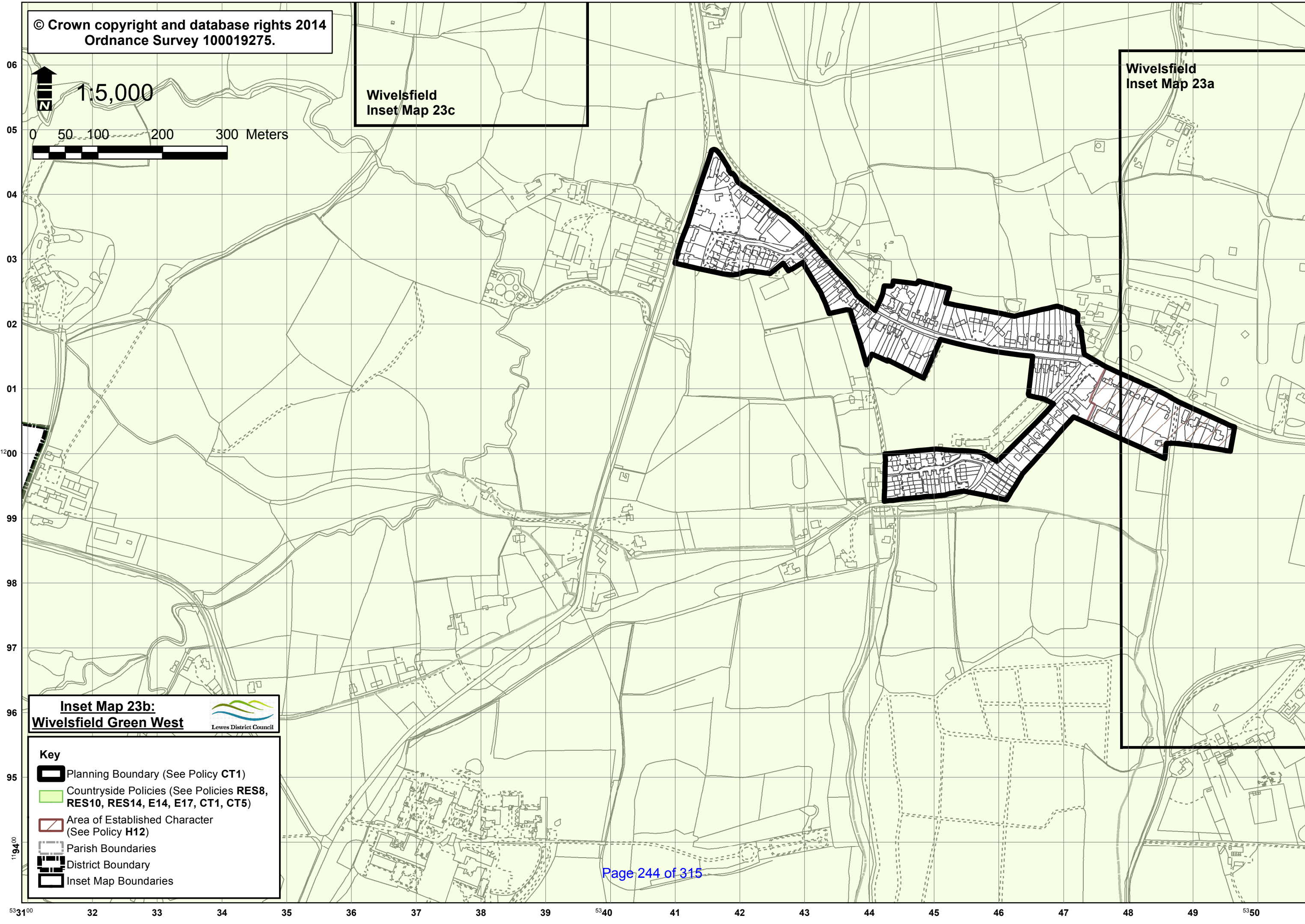
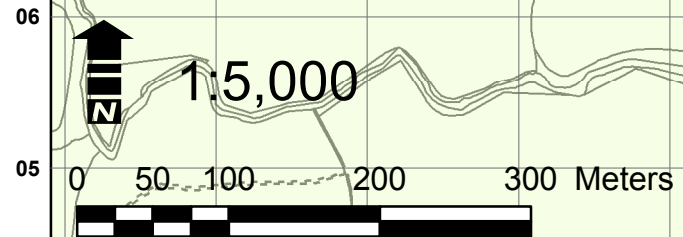


53 43⁰⁰ 44 45 46 47 48 49 50 51 52 53 54 55 56 57 58 59 60 61 62

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Wivelsfield
Inset/Map 23c

Wivelsfield
Inset Map 23a




Inset Map 23b:
Wivelsfield Green West

- Key**
- Planning Boundary (See Policy CT1)
 - Countryside Policies (See Policies RES8, RES10, RES14, E14, E17, CT1, CT5)
 - Area of Established Character (See Policy H12)
 - Parish Boundaries
 - District Boundary
 - Inset Map Boundaries

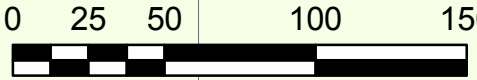
53100 32 33 34 35 36 37 38 39 5340 41 42 43 44 45 46 47 48 49 530

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09
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07
06
05
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Wivelsfield Green West
Inset Map 23b

Inset Map 23c:
Wivelsfield



Key

-  Planning Boundary (See Policy CT1)
-  Countryside Policies (See Policies RES8, RES10, RES14, E14, E17, CT1, CT5)
-  Conservation Areas (See Policies CP11, H4, H5, H7, ST25, ST29)
-  Inset Map Boundaries

533600 37 38 39 5340 41 42 43 44 45

**Inset Map 23d:
Theobolds**



Key

- Planning Boundary (See Policy CT1)
- Countryside Policies (See Policies RES8, RES10, RES14, E14, E17, CT1, CT5)
- District Boundary
- Inset Map Boundaries

08

07

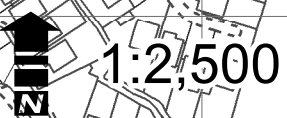
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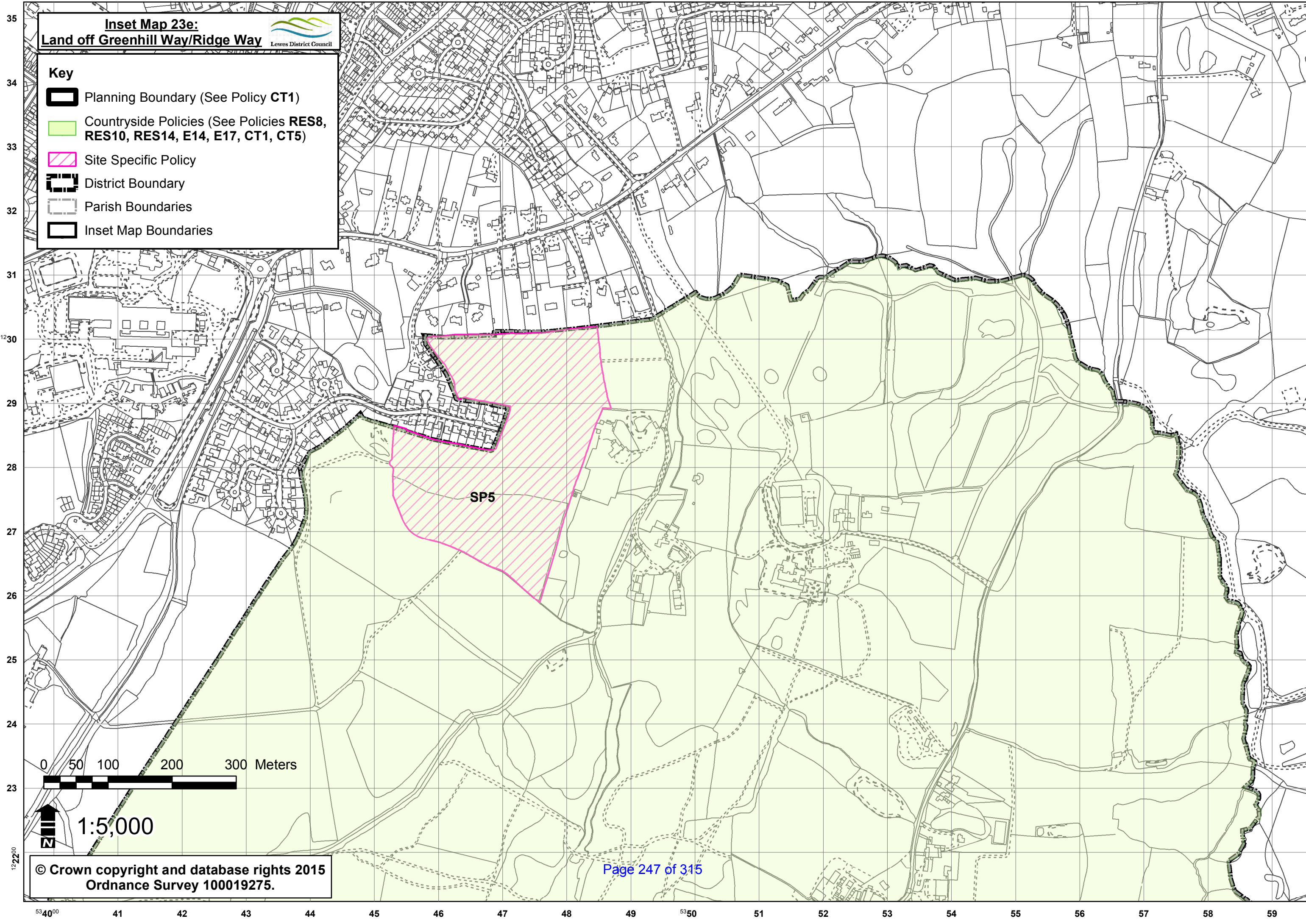
29

Inset Map 23e:
Land off Greenhill Way/Ridge Way



Key

- Planning Boundary (See Policy CT1)
- Countryside Policies (See Policies RES8, RES10, RES14, E14, E17, CT1, CT5)
- Site Specific Policy
- District Boundary
- Parish Boundaries
- Inset Map Boundaries



SP5

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53 40 00 41 42 43 44 45 46 47 48 49 53 50 51 52 53 54 55 56 57 58 59



Report to Lewes District Council and the South Downs National Park Authority

by Nigel Payne BSc (Hons), Dip TP, MRTPI, MCMi

an Inspector appointed by the Secretary of State for Communities and Local Government

Date: 22nd March 2016

PLANNING AND COMPULSORY PURCHASE ACT 2004 (AS AMENDED)

SECTION 20

REPORT ON THE EXAMINATION INTO THE LEWES DISTRICT LOCAL PLAN - PART 1 – JOINT CORE STRATEGY

Document submitted for examination on 19 September 2014

Examination hearings held between 20 January and 17 December 2015

File Ref: PINS/P1425/429/12

Abbreviations Used in this Report

AA	Appropriate Assessment
AHVA	Affordable Housing Viability Assessment
AQAP	Air Quality Action Plan
AQMA	Air Quality Management Area
CA	Conservation Area
CIL	Community Infrastructure Levy
CS	Core Strategy
DtC	Duty to Co-operate
EA	Environment Agency
EELA	Employment and Economic Land Assessment
ESCC	East Sussex County Council
HE	Highways England
HMA	Housing Market Area
IDP	Infrastructure Delivery Plan
LDC	Lewes District Council
LDS	Local Development Scheme
LP	Local Plan
MM	Main Modification
NE	Natural England
NP	National Park
NPPF	National Planning Policy Framework
PPG	Planning Practice Guidance
OAN	Objectively Assessed Need
SA	Sustainability Appraisal
SAC	Special Area of Conservation
SCI	Statement of Community Involvement
SDNPA	South Downs National Park Authority
SHLAA	Strategic Housing Land Availability Assessment
SHMA	Strategic Housing Market Assessment
SPA	Special Protection Area
WWTW	Waste Water Treatment Works

Non-Technical Summary

This report concludes that the Lewes District Local Plan Part 1 – Joint Core Strategy provides an appropriate basis for the planning of the area, providing a number of modifications are made to the plan. Both Lewes District Council and the South Downs National Park Authority (the Councils) have specifically requested me to recommend any modifications necessary to enable the plan to be adopted.

All of the modifications to address soundness were proposed by the Councils but where necessary I have amended detailed wording. I have recommended their inclusion after considering all the representations from other parties on these issues.

The Main Modifications can be summarised as follows:

- Increase the minimum net number of new houses to 6,900, 2010 to 2030 (345 per year), from 5,600 (280 per year) in the submitted plan, to help meet the identified needs of the district, including for affordable housing;
- Formally allocate, rather than just identifying the potential for, strategic housing sites at Ringmer (policy SP6) and Newhaven (policy SP7), as well as additional strategic site allocations at Old Malling Farm, Lewes (policy SP4) and Lower Hoddern Farm, Peacehaven (policy SP8), using the sustainable opportunities available to improve the delivery of new homes in accord with an amended Housing Trajectory (Appendix 4).
- Clarify the wording of various Core Policies for consistency with the NPPF and PPG and to facilitate implementation in practice.

Introduction

1. This report contains my assessment of the Lewes District Local Plan Part 1 – Joint Core Strategy (the Plan) in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004 (as amended). It considers first whether the Plan’s preparation jointly by Lewes District Council (LDC) and the South Downs National Park Authority (SDNPA), hereafter called the Councils, has complied with the duty to co-operate, in recognition that there is no scope to remedy any failure in this regard. It then considers whether the Plan is sound and whether it is compliant with the legal requirements. The National Planning Policy Framework (NPPF) (para 182) makes it clear that to be sound, a Local Plan should be positively prepared; justified; effective and consistent with national policy.
2. The starting point for the examination is the assumption that the local planning authorities have submitted what they consider to be a sound plan. The basis for my examination is the submitted draft plan of September 2014, which is essentially the same as the document published for consultation in May – July 2014.
3. My report deals with the main modifications that are needed to make the Plan sound and legally compliant and they are identified in bold in the report (**MM**). In accordance with S20(7C) of the 2004 Act, the Councils requested that I should make any main modifications needed to rectify matters that make the Plan unsound/not legally compliant and thus incapable of being adopted. These are set out in the Appendix.
4. The main modifications that are necessary for soundness all relate to matters that were discussed at the Examination hearings. Following these discussions, the Councils prepared a schedule of proposed main modifications and carried out sustainability appraisal and this schedule has been subject to appropriate public consultation.
5. I have taken account of all the consultation responses in coming to my conclusions in this report and in this light have made some amendments to the wording of the main modifications where these are necessary for soundness, consistency and/or clarity. None of these amendments significantly alters the content of the modifications as published for consultation, or undermines the participatory processes and sustainability appraisal that has been undertaken. Where necessary I have referred to these amendments in the report.
6. The Councils also prepared a series of additional minor modifications, largely addressing matters of clarification, updating and corrections of text, on which they also sought public comments alongside the main modifications. The Councils will take all responses into account before finalising the plan’s text for adoption, but these are not directly relevant to my examination of the plan for soundness and thus most are not referred to further in this report.

Assessment of Duty to Co-operate

7. Section 20(5)(c) of the 2004 Act requires that I consider whether the Councils complied with any duty imposed on them by Section 33A of the 2004 Act in relation to the Plan’s preparation. It is a requirement that the Councils engage constructively, actively and on an on-going basis with the County Council, neighbouring local authorities and a range of other organisations, including Highways England (former Highways Agency) (HE), the Environment Agency (EA) and Natural England (NE). All relevant bodies listed in Regulation 4 have been engaged, albeit some more than others depending on the extent of their involvement in the plan’s proposals.
8. In the Duty to Co-Operate Compliance Statement (September 2014) and elsewhere, including in para 1.33 of the plan itself, the Councils have satisfactorily documented where and when co-operation has taken place, with whom and on what basis, as well as confirming that these discussions have influenced the plan preparation process. The Councils have established effective and on-going working relationships with neighbouring and nearby local planning authorities, particularly through the East Sussex Strategic Planning Members Group and the Coastal West Sussex and Greater Brighton Strategic Planning Board.
9. This includes regular contacts with East Sussex County Council (ESCC) and Brighton and Hove Council, amongst others, the outcomes of which demonstrate constructive engagement by the Councils on a continuing basis, including in relation to the proposed modifications and on future development prospects in the county and wider sub-region. They have also provided later evidence that positive engagement has continued since submission.
10. The fact that no adjoining or nearby authorities are able to help the Councils to meet their full objectively assessed needs (OAN) for new housing at present and that Lewes is not currently in a position to assist anyone else is clearly acknowledged. Nevertheless, the duty to co-operate is not a duty to agree and thus this does not alter the above conclusion. Therefore, I am satisfied that the duty to co-operate has been met.

Assessment of Soundness

Main Issues

11. Taking account of all the representations, written evidence and the discussions that took place at the examination hearings, I have identified 12 main issues upon which the soundness of the Plan depends.

Issues 1 and 2 - Vision, Objectives, Strategy

1) Does the Plan, as modified, provide an appropriate vision, objectives and spatial strategy consistent with national policies and guidance and 2) will it provide the development needed to meet the objectives over the plan period ?

12. Part 2 of the submitted Plan paints a portrait of the district and sets out its general, environmental and economic characteristics, before describing those of the four main towns, as well as the rural area of the Low Weald. Apart from the visual portrait in map form needing to be retitled as a Key Diagram and

annotated accordingly (**MM 33**), this part of the Plan is clear and requires no further main modifications.

13. Similarly, part 3 lists a series of key strategic issues and challenges to be met over the plan period that are appropriately defined and lead to a challenging but realistic spatial vision described in part 4 of the Plan. This is underpinned by a list of eleven strategic objectives in part 5, all of which are essentially consistent with the requirements of the NPPF and the PPG. The strategy also defines a logical settlement hierarchy in Table 2 that reflects the influences on the district of both Brighton and Eastbourne, as primary regional centres nearby, as well as that of Haywards Heath as a secondary regional centre.
14. In addition to stating the presumption in favour of sustainable development, the Plan’s strategy in part 6 also recognises the district’s location with the sea to the south and around 56% of its area within the South Downs National Park (NP) as important constraints. It therefore sustainably focuses new development largely on the main towns of Lewes, Seaford, Newhaven and Peacehaven (and Telscombe). Some additional growth is also directed to Ringmer and Newick as Rural Service Centres to help meet local needs, including for the rural areas outside the main towns and the NP.
15. I am entirely satisfied that this is the most suitable and appropriate strategy for the district up to 2030 and that no reasonable alternatives exist that would be more so. For example, the suggestion that with the NP covering 56% of the district and the sea to the south the majority of new development needed to meet the full OAN of the district should instead be concentrated in the villages of the Low Weald is neither reasonable nor realistic. It would lead to an unsustainable pattern of development as well as unnecessary and unacceptable impacts on local services, facilities and infrastructure, including the largely small scale road network of that area.
16. The selected strategy properly takes into account not only the Sustainable Community Strategy (SCS) for the district, and the relevant plans of other organisations, such as East Sussex County Council’s (ESCC) Local Transport Plan, but also the spatial vision set out in part 4 of the Plan. This includes a set of locally specific strategic objectives, such as the regeneration of Newhaven, widening the economic base of Seaford and improving accessibility, services and employment opportunities in Peacehaven. Importantly, it also incorporates strengthening the role of Lewes as the county town and as the economic, service and transport hub of the area, given that it is effectively agreed by all to be the district’s most sustainable settlement.
17. I am also satisfied that, overall, the Plan’s vision, objectives and strategy should protect and enhance the highly valued character of the NP, as well as meeting the two statutory purposes of designation, set out in para 1.28, and the duty to foster the economic and social wellbeing of the local communities within the NP (para 1.29). In summary, it is clear that the Plan’s vision, objectives and strategy are sound, with good prospects of delivery by 2030.

Issue 3 - Employment Scale/Distribution (Policy SP1)

3) Are the employment policies consistent with the NPPF/PPG and/or justified by clear and robust evidence ?

Policy SP1 – Provision of Employment Land

18. The first key objective of the Plan appropriately seeks to stimulate and maintain a buoyant and balanced local economy. This includes through regeneration of the coastal towns, notably at Newhaven where the port is an important strategic asset for the district and the wider area. In pursuance of those aims the planned provision of employment land in policy SP1 is based on the Employment and Economic Land Assessment (EELA) that was last updated in 2012 and remains a robust basis on which to plan. It identifies a need for around 74k sq. m of new employment floorspace in the district over the plan period, of which about 60k would be for industry (B1c, B2 and B8 use classes) and roughly 14k for offices (B1a).
19. Essentially, this requirement is already accounted for by existing commitments, albeit the EELA also says that, for qualitative reasons, some small additional site provision is needed for both industry and offices in or around Lewes. Given the very limited scale of this identified need up to 2030, I am satisfied that this is not a strategic scale matter that this Plan needs to directly address. Instead, it should be dealt with in the Part 2 LP and South Downs LP to follow, and/or by alternative means as and when demand arises. Accordingly, the employment element of policy SP1 is sound, consistent with national policies/guidance and does not require modification.

Issue 4 - Housing Scale/Distribution (Policies SP1 and SP2)

4a) Is the number of new dwellings proposed based on clear and robust evidence of the full, objectively assessed, local need for new (including affordable) housing ?

Policy SP1 – Provision of Housing Land

20. Unsurprisingly, the main focus of debate over this Plan concerns the provision of new housing in the plan period to 2030. This should comply with the National Planning Policy Framework (NPPF) (March 2012), including by first setting out the full objectively assessed needs (OANs) for both market and affordable housing (para 47 NPPF). Only then can it move to assess whether or not this can be delivered in practice, taking into account relevant national and important local constraints, such as the National Park (NP) and flood risks.
21. Based on the Coastal West Sussex Strategic Housing Market Assessment update of November 2012 that defined the Sussex Coast Housing Market Area, the Councils worked with other relevant local authorities to produce a Duty to Co-operate Housing Study (2013) (CD 058) that identified the full OANs for this district to be between 9,200 and 10,400 net new homes from 2010 to 2030. This was based largely on the 2011 Census figures, as well as the 2011-based DCLG household projections, and equivalent to 460 – 520 new dwellings per annum (dpa).
22. There has been a noticeable degree of unanimity from representors that, as noted in my preliminary findings letter of 10 February 2015, at the top of the range identified, the figures agreed by the Councils represent the full OANs for the plan period. This includes taking account of the local need for affordable housing and “market signals”, in respect of the present relatively strong state of the local housing market, as required by the NPPF.

23. Both the Strategic Housing Market Assessment (SHMA) (2008) (CD 098) and the more up to date Assessment of Local Need for Housing (2011) (CD 082) have identified a considerable need for affordable housing in the district, reflecting that it has one of the highest house price to income ratios in the country and leading to a significant “affordability gap” for people on lower incomes. More recently, an Affordable Housing Needs Assessment (2014) (CD 053) shows that to meet the present level of need in the district (including both the current backlog and newly arising needs) over the next 5 years, a further 389 homes per year would be required, in addition to those already expected to be provided.
24. This scale of delivery over the first 5 years of the plan period is clearly unrealistic and simply impractical in a district of this size and nature at present. Nevertheless, particularly in circumstances where the full OAN for housing over the plan period will not be met, it is even more important that the best possible provision of affordable housing is made in an attempt to mitigate the potential negative effects on the local community and economy that might otherwise arise. Both Councils share this priority.
25. However, it is effectively common ground between the Councils, the HBF, the CPRE and others, including numerous Parish Councils and major house builders active in the locality, that the agreed OAN figures cannot be met in full in this district at present. This is so, even at the lowest end of the range identified, without unacceptable environmental consequences that would be contrary to the policies and guidance in the NPPF and PPG. This takes into account the constraints of the NP, the flood risks locally and other significant factors, including the capacity of the road network, notably on the A27 and A259, and coastal erosion, amongst other things, such as the two Special Areas of Conservation (SAC) and the Heritage Coast designation. As noted in respect of the DtC, there is no realistic prospect of any material help in achieving new housing delivery from nearby Councils in the near future, pending further work on a sub-regional basis and a potential plan review.
26. Notwithstanding all of the above, many respondents expressed serious doubts that the Councils had in fact sought and identified in the submitted plan as many suitable and appropriate sites for new housing as possible that are realistically deliverable in sustainable locations across the plan area. This includes by reference to sites identified in the various iterations of the Strategic Housing Land Availability Assessment (SHLAA). I have shared some of these concerns during the examination process, as reflected in my preliminary findings, including that the Councils had not left “no stone unturned” in this regard and were not planning to deliver as many new homes as would be reasonably and realistically possible without materially conflicting with the relevant constraints referred to above.
27. The Councils responded positively by reconsidering their figures and the strategic site allocations in the proposed main modifications of August 2015 to more closely accord with the NPPF and to provide a higher number of new homes, including affordable homes. The Plan as modified would thereby get materially closer to meeting the full identified OANs over the plan period in the wider interests of sustainable development, particularly its social and economic aspects.

28. Consequently, the Plan as modified now includes a significant increase in the level of new housing provision, from 5,600 as originally submitted, to a minimum of 6,900 in total, or at least 345 new dwellings per year on average. This is approximately equivalent to zero employment growth across the district, but at least not “planning for failure” in economic terms. It would represent essentially Option F in the submission Sustainability Appraisal (SA) (para 10.11c, p.60, CD 002) and not a great increase (around 19%) on the total in the submitted plan, but an important and critical one in this instance for the reasons given. The Habitat Regulations Assessment Addendum (2015) (LDC 070) confirms that although the extra 1,300 homes will lead to some increased traffic flows and air quality impacts on the Lewes Downs SAC this would not amount to a likely significant effect; a conclusion endorsed by Natural England (NE).
29. The need for more new housing and for greater certainty over its delivery has also meant the formal allocation, as distinct from general identification, of some of the strategic scale housing sites to help meet the OANs of the district to 2030, plus the allocation of two new ones at Old Malling Farm, Lewes (policy SP4) and Lower Hoddern Farm, Peacehaven (policy SP8). The Councils also expect to make other new non-strategic housing land allocations in the Part 2 LP and South Downs LP. In addition, there will also be a continuing contribution from “windfalls” (para 48 NPPF), as well as from sites brought forward through Neighbourhood Plans, a number of which are at various stages towards completion across the district, and a small number of new homes on rural exception sites.
30. Overall, I am satisfied that the proposed modifications are not so extensive or so significant as to constitute a rewrite of the originally submitted version or, effectively, a new plan, particularly as the strategy, vision and objectives remain essentially unchanged. Nevertheless, they are sufficient to address the previous concerns that the delivery of new housing over the plan period would not even ensure the retention of the current numbers of jobs in the district, as referenced in para 7.41 of the Plan.
31. This modified level of growth would also be consistent with the findings of the latest SHLAA (CD 097) regarding the capacity of the district to absorb new housing development without material harm to the nationally important landscape character of the NP, and that of the Low Weald. It would also be within the capabilities of the local road network to cope, albeit with some planned and realisable improvements, as well as taking into account other relevant local constraints including flood risk and the impacts on designated sites of nature conservation interest, amongst other things. In the light of all of the above, Policy SP1 would be sound as modified to refer to a minimum of 6,900 (not 5,600) net additional dwellings and 345 (not 280) per annum, with consequential amendments to Table 4 and paras 6.14, 6.18, 6.19 and 6.22 of the text accordingly (**MM 01**).

4b) Is the scale and distribution of housing and are the strategic allocations consistent with the Plan’s objectives and realistically deliverable ?

Policy SP2 – Distribution of Housing

32. The distribution of new housing over the plan period logically follows the

settlement hierarchy of the district, set out in Part 6 of the Plan and in Table 2, in general terms, which should act to reinforce a sustainable pattern of development in the area. It largely directs growth to and allocates strategic sites in Lewes, Newhaven and Peacehaven, as well as one on the edge of Haywards Heath; a secondary regional centre.

33. Although also a District Centre/main town, Seaford is tightly constrained by the NP and by the sea and consequently no opportunity for a strategic site has been identified there. At the next level of the hierarchy some limited additional housing is sustainably directed to Ringmer and Newick, including a strategic site at the former, as Rural Service Centres, both to help meet their own needs and those of the rural areas outside the main towns and the NP.
34. Various representors, including the relevant Parish Councils in some instances, have questioned the individual levels of new housing specified for particular settlements in Policy SP2 and Table 5 of the Plan. However, in the main, these largely reflect dwellings built since 2010, existing commitments, allowances for windfalls and rural exception sites and, where relevant, strategic sites. As a result, the limited numbers of additional dwellings needed to meet the overall requirements of the Plan are not large in relation to the existing size of the settlements concerned in any instance. They should all be readily capable of identification in the Part 2 LP and South Downs LP and/or Neighbourhood Plans, without compromising the Plan’s other strategic objectives, including in relation to the NP and the relevant environmental aspects of sustainable development, as evidenced in the latest iteration of the SHLAA.
35. Suggestions that higher levels of growth should take place in Seaford and lower level settlements such as Cooksbridge, Wivelsfield Green and North Chailey, amongst others, largely relate to sites that are not of a strategic scale. They are matters for consideration in the Part 2 LP and South Downs LP, whereas re-development opportunities on urban brownfield sites can come forward anyway, if suitable, under other national and local planning policies, to potentially provide a boost to the district’s housing supply.
36. Bearing in mind all of the above, policy SP2 is essentially sound and consistent with national policies and guidance. It provides a suitable basis on which to plan the distribution of new housing across the district to 2030 and has good prospects of delivery on a variety of size and type of site. However, it is important for clarity and to assist implementation that its wording and Table 5, as well as the text in para 6.38, are modified to reflect the up to date position as at April 2015, including regarding completions, commitments, windfalls and the formal allocation of all of the strategic sites in the Plan. Paras 6.41 and 6.42 of the text are no longer relevant as a result and need to be deleted (**MMs 02/03**).

4c) Does the Plan demonstrate that there will be a deliverable supply of housing land over the plan period in accord with the NPPF and PPG ?

(5 Year) Housing Land Supply

37. Based on the former South East Plan figures for new housing there has been no material failure to deliver the necessary numbers over recent years in the

district, with the average (235 dwellings per annum) being slightly above the target (220 dpa) since 2006/7, as referenced in the Housing Implementation Strategy (2014) (CD 046). The increased requirements arising from the NPPF and the recent work on this Plan have only been fully clarified in the last year or so and there is inevitably a time delay involved in planning a significant uplift in new housing delivery in any area.

38. Therefore, based on the Councils’ uncontested figures for the numbers of new dwellings built in the district over the last 10 years or so, taken in the round, I am satisfied that there has not been a persistent record of under delivery that would invoke the expectation of the NPPF for a 20% buffer provision in relation to the 5 year housing land supply from October 2015. A 5% buffer is therefore sufficient for consistency with national policies/guidance in this particular instance.
39. In a district where the main town and most sustainable location for new housing is within the NP and many of the other larger settlements are also constrained by their proximity to the sea and the capacity of the coastal road network, as well as by flood risks, it is not practical or realistic to seek to increase new housing delivery over and above recent and planned rates to the extent necessary to meet the full shortfall that has developed during the recent recession entirely within the first 5 years of the plan period.
40. This also takes into account that the Plan’s housing trajectory from 2015 onwards is already front loaded, to a degree. Accordingly, I am satisfied that, in all the relevant local circumstances in this district at this time, there is a specific local justification for the Councils to seek to meet the shortfall in this area over the full plan period (the Liverpool method), rather than having to try (and probably fail) to do so over the first 5 years (the Sedgefield method).
41. I acknowledge that, even on the basis of the Liverpool method and a 5% buffer, the Councils are only just able to demonstrate a 5 year housing land supply of available and deliverable sites as at October 2015 (LDC 088a). However, since that date there has been specific progress in relation to two of the new strategic housing sites (at North Street, Lewes - policy SP3 and at Ringmer – policy SP6), both of which are agreed to be capable of commencing delivery soon and delivering relatively swiftly once underway.
42. The Councils are making sustained progress with the Part 2 LP and South Downs LP and a number of Neighbourhood Plans are also underway, with good local examples at Ringmer and Newick completed. For these reasons and also taking into account that the national and local economy continues to gradually recover from the recession of the late noughties, I consider that the overall picture of housing land supply in Lewes district is noticeably better even since October 2015 to the time of writing.
43. Moreover, finding the Plan unsound on the basis that the 5 year housing land supply position is presently tight would do nothing to ease that situation in practice. In contrast, its adoption and further progress with the Part 2 LP and South Downs LP, as well as Neighbourhood Plans, with their additional non-strategic scale housing land allocations, can only help delivery on the ground, and potentially help a great deal, including in the relatively short term and within the first 5 year supply period from 2015. Accordingly, I conclude that

the Councils’ evidence satisfactorily demonstrates an up to date 5 year housing land supply, on the basis referred to above, albeit that there is very little flexibility at present so that they need to move on swiftly with the Part 2 LP and South Downs LP to ensure that the situation continues to improve, rather than deteriorates at any stage.

4d) Are the policies and proposals for growth and change in each of the specific policy areas appropriate and reasonable, including in relation to the NPPF and PPG, and in terms of environmental, economic and social impacts ?

Policy SP3 - Land at North Street, Lewes

44. Around 9ha of land between the town centre to the south and the River Ouse to the north provides by far the largest opportunity for brownfield redevelopment in Lewes. Comprising largely 1950s/1960s industrial buildings, the “North Street Quarter” has the potential to provide around 420 new homes and also leisure, retail, cultural and health facilities to serve the town and district in a highly sustainable location. It should also deliver the early provision of much needed new flood defences that will have wider benefits for the town, taking into account the local impacts of the severe October 2000 flood event.
45. Importantly, the proposals for this site that have recently received permission, subject to a legal agreement, also retain some employment provision, particularly for local small businesses that might otherwise find it difficult to relocate to and/or operate economically in premises elsewhere in the town. The scheme is being actively pursued by the two main landowners involved and all the available evidence indicates that it is not only viable, with a policy compliant level of affordable housing (CP1), but also capable of an early start to implementation to help meet local housing needs.
46. Accordingly, subject to a number of amendments to the originally submitted policy wording, criteria and supporting text to better reflect the up to date position regarding this site and to clarify detailed requirements (**MM 04**), policy SP3 is sound.

Policy SP4 - Land at Old Malling Farm, Lewes

47. The need to deliver additional housing over the plan period, particularly to help meet local needs in Lewes, notably for affordable housing, has led the Councils to allocate an additional strategic site. A 10ha greenfield site at Old Malling Farm on the northern edge of the town, between the Malling estate to the east, the Malling Deanery CA to the south and the River Ouse, railway and Landport estate to the west, has accordingly been selected. Although it is mainly of grade 2 agricultural land quality, with some ecological and potential archaeological interest, the location is a sustainable one with reasonably good access and proximity to the town centre. Moreover, its development would not materially extend the built up area of the settlement further into open countryside than the existing housing to the east and west.
48. All reasonable options for a strategic scale peripheral expansion of the town would be within the NP. Therefore, based on all other relevant factors, including its availability, deliverability and proximity to the town centre, this site stands out clearly as the most sustainable of those that could realistically

provide the necessary new housing within the plan period, particularly as the few realistic alternative options would be of greater landscape sensitivity in the NP. It is also effectively common ground that it is capable of providing a policy compliant level of affordable housing (see below), which is the focus of new housing provision in the NP.

49. Local residents have raised concerns over the impact on the town’s road network of the additional traffic likely to be generated. There are existing difficulties in the vicinity, including peak time congestion at the Earwig Corner and Church Lane/Malling Hill junctions, plus some arising from the nearby Sussex Police HQ. Nevertheless, ESCC as the local highway authority, is satisfied that with necessary improvements funded from the development by a legal agreement/the CIL, in addition to those already in the pipeline in association with other schemes, the local roads are capable of safely and satisfactorily accommodating the traffic likely to arise from the new housing.
50. However, the sustainability credentials of the site partly depend on the ability to provide good transport alternatives for new residents to minimise car use where possible. In this respect, the site is well located on the edge of the town to facilitate new and improved walking and cycling links to the town centre, including along the old railway line. Given that it is already well used by the public on foot and by cycle, as well as the significant difference in levels between it and the main part of the site, this can be achieved without material harm to the Site of Nature Conservation Interest along the disused former railway. The criteria in policy SP4 rightly require specific measures to improve access to the centre by non car modes as part of the overall scheme.
51. Importantly, this should also include improved bus services (e.g. no.129) that should also benefit existing residents, including through making their provision and expansion more viable for the operator over time. Consequently, it may be concluded that the overall accessibility of this site is essentially good and also capable of significant improvements to the benefit of both new and existing residents through the delivery of a comprehensive package of transport measures, including particularly by non car modes. This can and should be secured through a policy requirement for a travel plan to be agreed as part of any permission (**MM 05**).
52. The EA has confirmed, most recently in a letter of 29 September 2015, that the site is “largely not at risk of flooding from fluvial or tidal sources”. This was documented by aerial photography of the October 2000 serious flood event in Lewes. Nevertheless, parts of the western and northern boundaries are directly adjacent to flood zone 3 areas. Therefore, a detailed site specific flood risk assessment needs to be undertaken as part of the preparation of design proposals and to help establish the realistic extent of the developable area. This is one reason why the policy wording in this Plan should not be strictly definitive regarding the final extent of built development on the site, but rather that it should remain to be established once this and other more detailed technical work, including in respect of layout, design and landscaping, has been undertaken.
53. Old Malling Farm provides some of the small percentage of best and most versatile (grade 2) farmland in East Sussex, where there is very little grade 1 land. The direct loss of 10ha or so of such land is a disadvantage of the

scheme (para 112 NPPF). However, on balance, the many advantages and clear public benefits that would arise from it significantly outweigh this factor in this particular location. The loss of any greenfield site is to be regretted in the sense that it reduces areas of potential habitats for native flora and fauna. However, this land is not subject to any statutory definitions in respect of ecological or wildlife interests.

54. Moreover, there is an overriding need for new housing in Lewes at present that can only reasonably and realistically be viably delivered on this site in the short term, without significant adverse impacts on other important interests including the NP. Taken in the round, this is clearly the most suitable site available to help meet that need when all relevant factors are considered. Nevertheless, prior survey work should be undertaken to inform and assist the design process and seek to retain and enhance the ecological interest of the site, where possible.
55. The available evidence also indicates that all necessary services can be provided at reasonable cost to facilitate housing development on this site. Furthermore, the scale of new housing is not so large as to place an unacceptable burden on existing community facilities, including local schools and hospitals, bearing in mind the likely number of new residents in comparison with the present population of the town and the necessary contributions to be required under the relevant criteria of policy SP4. Similarly, those criteria should ensure that the detailed scheme includes appropriate on site provision of open space, including children’s play areas.
56. The location on the edge of the town and the presence of the River Ouse and the Offham Marshes SSSI to the west emphasise the importance of minimising any light or noise impacts on the wider countryside arising from the scheme through detailed design and mitigation measures, where necessary. However, there is nothing to indicate that this cannot be achieved in practice, in line with the requirements of the policy criteria, and I am satisfied that they are sufficient in this respect. Taking into account the location adjacent to the historic Malling Deanery Conservation Area (CA), it is also entirely appropriate that the policy should require a prior archaeological investigation to be carried out to inform and influence detailed proposals, irrespective of the absence of any formal designation at present.
57. As reflected in the policy, the proximity of the site to the CA and the presence of listed buildings, such as St Michael’s Church, must also be properly taken into account in detailed proposals. This is so that there is no harmful effect on their setting, and that the character and appearance of the CA is preserved or enhanced. With these provisos in place, there is no reason in principle why development may not proceed on this part of Old Malling Farm.
58. This site was considered for development during the 2003 LP process and not allocated at that time. Since then it has been included within the NP boundary after due consideration of the contribution that it makes to the landscape character and qualities of the town and its surroundings, including its setting within the Ouse valley. However, in a new plan for the next 20 years or so such matters have to be considered afresh in the context of all the relevant current circumstances and a new balance drawn. In this case this has to include the policies in the relatively recent NPPF, which have led to the

identification of a pressing need for new housing in the town and district.

59. In a town with few major brownfield redevelopment opportunities the significant growth required to meet local needs can only be achieved by peripheral expansion of the built up area into the NP because it effectively surrounds the town. In these circumstances it is essential that only the most sustainable and least harmful sites are sought to meet those needs. In this case, new housing along the eastern side of the Ouse valley will complement and largely mirror that on the western in both physical and visual terms.
60. It would also retain an undeveloped corridor alongside the river as a green wedge connecting the town’s built up area with the more open countryside to the north, albeit somewhat narrower than at present in places. New development here would not project any further north than existing housing areas and, whilst clearly visible from a number of important viewpoints within the NP, would only be seen in the same visual context as that of adjoining and nearby built form, including from the high ground to the east and west.
61. In particular, from key viewpoints along the Ouse Valley Way, from Hamsey Church and from South Malling Churchyard, the site is also largely screened by dense foliage in summer, as well as being elevated between 10 and 15m above the path for most of its length nearby. In my judgement these factors also help to obviate the need for any specific restriction on the extent of development within the site in the policy itself and at this stage, in advance of a design brief following more detailed technical analysis.
62. Accordingly, the impact of the scheme on the landscape character and visual appearance of the town and its setting within the NP will be limited. It can also be further mitigated by careful detailed design, layout and landscaping, as well as the use of locally appropriate building materials. The criteria of the policy rightly require such treatment and should ensure that the scheme is suitably designed for the locality in these important respects.
63. The site sits within a sensitive landscape on the edge of the town but its specific context, with existing development on three sides, peripheral trees and no further projection of built development northwards involved, means that new housing here need not be seriously intrusive or materially harmful to the overall character and appearance of the locality if carefully designed. Thus, there would be no significant harm arising to the generally quiet character and semi-rural appearance of the valley at this point or the recreational experience for walkers as a whole.
64. In respect of the impact of the scheme on the Ouse valley, with careful design and specific mitigation measures walkers on the long distance route would perceive no real change to the point at which they effectively encounter the built up area of the town on both sides of the valley. Similarly, public views from Lewes Castle will not be materially altered given the long distance involved and the close relationship to existing housing in which the new homes would inevitably be seen amongst the trees in the vicinity.
65. It was generally agreed in the evidence at the hearings that the most important public views of the site are from the elevated open downland to the west. I observed it from various viewpoints in this vicinity during my

extensive accompanied site visit. From all the site is seen against the backdrop of existing development adjoining and would not be perceived by the casual observer as materially extending the existing built up area of the town beyond its existing confines or framework.

66. Accordingly, I fully agree with the conclusions of the Alison Farmer Landscape and Visual Assessment report (2012) (LDC 059) to the effect that new housing development could reasonably be accommodated on this land, without material harm to the landscape and scenic beauty of the NP (para 115 NPPF), if its nature, extent and character are carefully considered so that the special qualities of the area are retained, with specific mitigation measures and sensitive design.
67. Harm to the environmental dimension of sustainable development has to be balanced against the benefits that would derive from the provision of these new homes. In all the relevant current local circumstances, I consider that the benefits of the proposals for this site in meeting the local need for new housing outweigh the likely very limited harm to the local landscape setting of this part of the NP. Therefore, faced with the overriding need to allocate additional land for new housing in Lewes, I have no doubt that the choice of Old Malling Farm is the best option at present given that development here need not be materially harmful to the landscape character of the NP or the setting of the town within it providing suitable policy criteria are imposed, including in comparison to all the other realistic local alternatives.
68. This is effectively a different conclusion than that reached by the former LP Inspector, albeit many years ago now, and in relation to the NP boundary when designated. However, the context for those decisions, particularly national policy in the NPPF and particularly local needs relating to the supply of land for new housing, has changed considerably since that time. I therefore conclude that now the Old Malling Farm site is clearly the most suitable and sustainable alternative of the potential additional allocations for new housing in Lewes over the plan period and that it should be identified as a further strategic site in this Plan (**MM 05**).
69. In my judgement, this would help provide a sound and more sustainable balance in respect of meeting the social and economic needs of the town and the district, as well as the NP, given that it is agreed to be viable, in general terms, and deliverable in accord with all other relevant Plan policies. On the evidence before me, the overall public benefits that would arise from new housing on this site, including in respect of affordable housing provision, weigh heavily in favour of its allocation for development now. Taking all of the above into account, I conclude that the proposals pass the strict tests of exceptional circumstances for major development in the NP set out in para 116 of the NPPF and referred to in para 31 of the 2010 Circular (LDC 008). Overall, the scheme would be demonstrably in the public interest (also para 31), as well as in accord with paras 76 and 78 of the Circular, including through the inclusion of a LP policy that pro-actively responds to local housing needs.
70. As a strategic site that is needed to provide a significant percentage of the local housing needs of both the town and the district it would represent an abrogation of responsibility for the SDNPA to seek to defer the formal allocation of this land for development to the South Downs LP or any other

plan. It would also involve unnecessary delay when the need is urgent.

71. The modified policy indicates the site’s capacity to be approximately 200 new units, assuming that around 6.6ha of the total 10ha site is developable. However, this assessment is not based on any detailed design, layout or site specific technical work, but rather an assumption that certain parts of the site cannot or should not be built on for flood risk and/or landscape impact considerations. In the absence of the detailed, site specific, flood risk assessment required by the EA (see above), it is at least possible that this may amount to a unnecessary pre-judgement of the full potential of the site to deliver much needed new housing in Lewes.
72. Similarly, in advance of the preparation and consideration of a design brief and masterplan for the comprehensive treatment of the site and its immediate surroundings, it is premature to seek to restrict the total number of dwellings to an arbitrary figure that does not directly relate to any infrastructure or service capacity constraint affecting the site. With no major house builder yet involved, the realistic potential and overall viability, and therefore the most likely number of new homes to be delivered on this site, is presently at an early stage towards clarification.
73. Some rewording of the policy is therefore necessary to ensure flexibility and that, subject to viability, the most effective use can be made of the land if it is developed. Subject also to full compliance with all the other policy requirements, this may also help to reduce pressures for the early release of other peripheral greenfield sites around the town for new housing in future.
74. Accordingly, no reference to “6.6ha net developable area” should be included in policy SP4, nor a criterion limiting the extent of development to the 10m contour line in the northern field and also 20m from the southern and western boundaries in the southern field. These are unnecessary and overly restrictive as put forward and may inhibit the best possible scheme in all respects being achieved in practice.
75. As referred to above, the proximity of the site to the Malling Deanery CA can be satisfactorily addressed through the detailed design process, including in respect of suitable boundary treatment and landscaping that would not compromise the overall viability of the scheme. These matters should be considered in detail in the context of an overall design brief and/or masterplan for the whole site, taking into account all relevant factors, including flood risk, landscape impact and the relationship of the site to the CA to the south, amongst others.
76. As a result, the references to “200 dwellings” should also not be included as a higher, or indeed lower, number may prove to be viable and deliverable on site, once all the necessary detailed design, layout and infrastructure/ services analysis has been carried out. Whilst this remains the case, it would be advisable to consider the site as capable of providing new housing at a locally appropriate average density and that therefore a figure of around 240 homes used for overall “accounting” purposes only in terms of dwelling numbers in the Plan, at this early stage in the site’s evolution as a new housing scheme.
77. Based on the Dec 2011 independent report (CD 052) prepared for the Councils

to support policy CP1, the Plan contains a districtwide target of 40% affordable housing. This report concluded that whilst 50% could be viable in the rural part of the district, it would be “unwise” to seek it elsewhere, including in the area defined as Lewes town. This was on the basis that to do so would not leave an adequate viability “margin” or “buffer” and risk threatening the overall viability of residential developments in that area. A later viability report in Jan 2014 (DC 133) confirmed that, based on sensitivity testing of all sizes of site, the maximum percentage that could reasonably be sought for sites of 10 dwellings or more would be 40%.

78. The agreed ability of this site to deliver that percentage is one of the key factors supporting its allocation as a new strategic scale housing site, given the acknowledged level of local need in Lewes. However, the SDNPA has subsequently commissioned a further “High Level Viability Assessment” (LDC 067/068), which suggests that 50% ought to be achievable without compromising overall viability. In contrast, evidence prepared for the landowners questions both the assumptions made and methods used in that study, as well as taking into account other site specific factors relevant to the eventual return received by the landowners providing the incentive for the scheme to proceed. The SDNPA’s recent viability work for this site is not based on any specific scheme or detailed plans and must therefore be taken as a high level generic assessment only that does not take into account relevant site specific factors, such as the potential valuation complications regarding vehicular access to the site.
79. From discussions at the hearings it is also clear that in addition to the necessary CIL contributions the acceptability of the scheme will depend on sizeable contributions being made for offsite road and other transport improvements locally, to ensure the sustainability and accessibility of the site for this level of new housing. Similarly, landscaping and other detailed design elements, including materials, are accepted as likely to require higher standards for this scheme than the local average, due to the sensitivity of the location in the NP and partly adjacent to a CA.
80. In particular, the high quality design to be properly expected of any scheme here will inevitably involve increased build costs above the normal local average level, as reflected in the BCIS figures and used in the Councils’ viability work. Whilst this is a sensitive site it is also one that needs to be used as effectively as possible if it is to be developed. Therefore, the exact extent of new built development within the overall site of 10ha should be tested and resolved at the masterplan and/or detailed design stage, including in respect of viability. This should be undertaken with full consultation involving all concerned, including local residents, rather than artificially and prematurely defined by contour lines and minimum separation distances at this strategic plan stage.
81. The SDNPA’s assessment of 50% of 200 units would result in 100 new affordable units from this site. In practice it may well still be possible to achieve that figure with the 40% requirement, that is agreed to be viable, if the total number of units reaches 240, as it may do to comply with that part of policy CP2 which properly seeks a mix of size and type of new units and a preponderance of smaller ones to help meet local needs. In the light of all of the above I am not satisfied that the available evidence properly justifies the

seeking of a 50% level of affordable housing from this scheme, given the remaining material doubts about the overall viability of the scheme if that requirement applies. Accordingly, criterion i) of the policy should refer to 40% (not 50%) (**MM 05**).

82. There is nothing in the evidence to suggest that active farming of good quality land could not continue on the remaining parts of the holding with the development in place. The landowners assert that it could and would. Therefore, it is premature at best for the policy to require that the remainder of the landholding at Old Malling Farm should be devoted to nature conservation and public access, when there is no direct necessity for this provision arising from the development of the site itself. Such a policy requirement would conflict with national guidance in respect of its lack of a direct relationship with the proposed development.
83. Accordingly, whatever may or may not have been discussed between the various interested parties during earlier stages of the Plan’s process and however desirable the provision of land primarily for nature conservation might be in principle, a criterion of the policy restricting the future use(s) of the adjoining land would not be properly justified as a requirement of the scheme and should not be included (**MM 05**).
84. As referred to above, it is necessary to alter the detailed wording of some of the policy criteria from that put forward by the Councils in the interests of soundness, clarity and so as to facilitate delivery. It is also necessary to omit some elements that are neither reasonable nor realistic, including in comparison with other plan policies. Subject to these amendments, none of which alters the basic premise or objectives of the proposals, policy SP4 is therefore sound (**MM 05**).

Policy SP5 - Land at Greenhill Way/Ridge Way, Wivelsfield

85. Although in Wivelsfield parish (and thus Lewes district), this greenfield site lies on the edge of Haywards Heath, a large town with multiple facilities and services, including a rail station and a major hospital nearby. It therefore has close links with the northern part of Lewes district, including in terms of retail and employment opportunities for residents and, in principle, constitutes a sustainable location for new housing development as a result.
86. Whilst this site comprises grade 3 agricultural land quality (good to moderate), this is a lower level than many other potential areas hereabouts and it is in Flood Zone 1 (least risk of flooding). It is also essentially well contained between existing housing and well established wooded areas in visual terms, thereby significantly reducing any potential harm from development on the local landscape in the vicinity.
87. The overall area of about 8.5 ha is capable of providing around 175 dwellings, at a density consistent with its surroundings, including an appropriate element of affordable housing in accord with policy CP1 of the Plan and on a viable basis, with no known constraints to early delivery. This judgement is reinforced by the fact that permission has been granted for 62 dwellings on the northern part of the site, with vehicular access from Ridge Way.
88. The fairly recent opening of the Haywards Heath relief road has materially

improved the accessibility of the location and reduced pressures on the rest of the local road network. The remaining understandable concerns of local residents regarding traffic generation and highway safety, including for pedestrians and cyclists, should be addressed by the policy requirement for a comprehensive travel plan, including measures to improve access from the site by non car modes in particular. The policy, supported by para 6.38 of the text, also says that any access from Greenhill Way, in addition to Ridge Way, should not result in the loss of protected trees close to the road.

89. With these provisos in place, the main modifications (**MMs 07/08/09**) also recognise that the larger site area of 8.5 ha (compared to the 6ha originally identified erroneously) albeit with no increase in the total number of homes, is appropriate and suitable for the allocation of a new housing site. The policy, as modified, is therefore sound. Any realistic potential and the suitability and acceptability of adjoining areas of land, of a non-strategic scale, for further development in the future is matter for the Part 2 LP to consider.

Policy SP6 - Land north of Bishops Lane, Ringmer

90. As the largest village in the plan area, with a good range of local services and community facilities, Ringmer is appropriately classed as a rural service centre in the Plan’s settlement hierarchy. It is therefore an essentially sustainable location and well placed for a strategic scale allocation of new housing to help meet the needs of the whole district, as well as its own self-generated ones.
91. A greenfield site of around 4.4 ha on the northern edge of the settlement, to the north of Bishops Lane, has previously been identified as potentially suitable for new housing development and is capable of delivering around 110 new homes, with a policy compliant percentage of affordable housing and at an average density that would not be out of character with the locality. The available evidence, including from the landowners, suggests that, whilst there are some on site features, such as hedges, that are worthy of retention, and that off-site highway improvements, including at Earwig Corner on the outskirts of Lewes, are also required, the scheme is economically viable and able to commence in relatively short order.
92. The site is in Flood Zone 1 and notwithstanding some current drainage problems in the locality, expert technical evidence, including advice from the EA, is that these are capable of resolution at reasonable cost as part of an overall scheme for the site’s development, as required by the policy. Similarly, whilst not subject to any formal designations, any material ecological and/or archaeological interests on the site can be taken into account, including through prior survey work and potential mitigation measures, and do not preclude development for new housing, in principle.
93. The above has recently been confirmed by the grant of permission by the Secretary of State, on appeal and subject to a legal agreement relating to the above matters, amongst others, such as the capacity of the local Waste Water Treatment Works (WWTW) at Neaves Lane. Therefore, subject to the important detailed criteria contained in the policy, as modified for clarity and to reflect the current position (**MMs 06/10/11/12**), I am entirely satisfied that policy SP6 is sound.

Policy SP7 - Land at Harbour Heights, Newhaven

94. Newhaven is the smallest of the four towns in the district, but the Plan’s strategy includes its regeneration as one of the key priorities and new housing, together with the additional population that will bring, is seen as pivotal in achieving that aim. I agree. A number of potential redevelopment opportunities have been identified by the Councils within the town, but in order to deliver strategic scale new housing an outward expansion on a greenfield site is necessary and justified in this particular local and policy context in addition to existing commitments.
95. Land in the south west of the town at Harbour Heights, largely between Court Farm Road and Gibbon Road, would be reasonably well located in relation to the town centre, with part having previously been allocated for housing development in the 2003 LP (Policy NH8) and a further 3ha or so at the Meeching Quarry Industrial Estate ripe for redevelopment for employment-led uses within a wider mixed use scheme. In total an area of around 15ha is available, which is capable of accommodating about 400 new homes.
96. Parts of the site originally identified in the 2003 LP, largely that furthest to the west, would be quite prominent in the local landscape and this would be slightly more so with the extended site now put forward. Therefore, potential impacts will require careful consideration in detailed design terms, notably in relation to the need to protect the undeveloped nature of the coast from visual intrusion in accord with policy CP 2 of this Plan. Nevertheless, the site essentially lies between existing housing areas and a new school has recently been built adjacent to the northern boundary and so the site appears as largely within the present physical boundaries of Newhaven.
97. Moreover, a limit on the western extent of the site so that it does not project beyond the western end of Hill Top Way, with its accurate name, should ensure that a suitable gap is maintained between Newhaven and Peacehaven in this vicinity. Views from various vantage points, including the cliff top and the Newhaven Fort/Castle Hill need not be significantly altered as a result.
98. Built development should also avoid areas that might be subject to cliff top erosion in the foreseeable future, but none of these factors is so significant as to preclude new housing and related development in principle in this location, given the clear opportunities for mitigation, for example through robust landscaping, judicious layout incorporating necessary open spaces and a somewhat lower density of housing to the west compared to the east.
99. The likely traffic generation from a mixed use scheme of this scale will also require highway improvements on the adjacent road network, including on the junction of South Road and South Way, as well as some junctions of the Newhaven Ring Road. Principally, however, what is needed is a travel plan delivering better links to the town centre by non car modes, as required by the policy. In practice, this is most likely to mean better bus services.
100. For sustainability reasons and to assist with the wider objectives for the overall regeneration of the town, it is also necessary that the scheme incorporates a significant element of employment provision to comply with policy CP 4 and complement the new housing and other facilities to be

provided. This would logically and most realistically be achieved through the redevelopment of the existing industrial estate at the eastern end of the site, rather than in any other location.

101. The Council’s viability work to date clearly indicates that, given all the various infrastructure provisions and contributions, including the CIL, necessary to bring this scheme forward with the important employment elements and without material delay, it is not financially viable to expect a 40% affordable housing contribution. However, the same evidence confirms that a sizeable and satisfactory viability margin or buffer would exist with a 30% contribution. Accordingly, I consider that this divergence from the normal expectations of policy CP1 is adequately justified in this case and that, bearing in mind the total number of new affordable homes to be provided, a contribution of 30% from this scheme is acceptable in principle in this particular instance for viability reasons.
102. Taking into account all of the above considerations, it is also entirely reasonable that the policy is modified to require a comprehensive masterplan for the whole site, to guide development of this major project for the town, not least in the reasonable expectation that delivery is most likely to occur in a number of stages over the plan period. Overall, I am satisfied that the proposals for this site represent a sustainable scheme that should be formally allocated in the Plan to bring forward its early delivery to help meet the local housing needs of the town and district and that, as modified, policy SP7 is sound (**MM13**).

Policy SP8 - Lower Hoddern Farm, Peacehaven

103. The submitted plan included provision for a minimum of 660 net additional residential units at Peacehaven during the plan period, over 500 of which were said to be dependent on demonstrating that a co-ordinated package of multi-modal transport measures to mitigate the impacts of such development on the A259 coast road could be delivered. This road already suffers from congestion, particularly during peak hours, as it acts as a main commuter link into Brighton from the east, and at Rottingdean, where there is an air quality management area (AQMA), mainly relating to nitrogen dioxide levels, and little realistic scope for physical highway improvements.
104. Notwithstanding, it was agreed at the hearings by ESCC, the local highway authority, that further technical assessment work since the 2011 Newhaven Transport Study, including transport modelling and a masterplan report for the 11 ha site at Lower Hoddern Farm, has satisfactorily shown that there are “reasonable prospects” of this important proviso being properly met in connection with the development of that site for around 450 new homes. In addition to improvements to the operation of the A259/Telscombe Cliffs Way junction, the Sutton Avenue roundabout and the Newhaven Ring Road, the main element of the necessary travel plan to achieve this outcome would relate to public transport improvements along the A259, notably significant enhancements of bus service no. 14, including in terms of frequency.
105. Consequently, the previous constraint affecting development on the land at Lower Hoddern Farm no longer precludes its allocation as a strategic new housing site for early delivery to help meet the local needs identified in earlier

versions of the Plan, including for affordable housing. Moreover, new policy SP8 contains suitable and appropriate criteria requiring the submission and implementation of a satisfactory travel plan, as well as specific compliance with policy CP9 in respect of air quality.

106. All of these matters would have to involve consultations with Brighton and Hove Council and Rottingdean Parish Council regarding detailed mitigation and compliance, but cannot reasonably be made subject to any form of veto exercisable by an adjacent local authority. Therefore, I am satisfied that the specific wording of the new policy is generally appropriate and requires only an addition for clarification in respect of traffic or transport matters.
107. Although greenfield, the site lies outside the NP and is adjacent to the existing built up area of the settlement with suitable points of access available, notably from the west. It also adjoins the major new Peacehaven Centenary Park to the south and is not at risk of flooding. Whilst identified as an archaeological notification area, this does not preclude development, rather that prior assessment and potential field evaluation would be necessary before any building takes place. It is clearly the most sustainable and only reliably deliverable strategic scale site available in the settlement as things stand.
108. Although the very modern and very large Peacehaven Waste Water Treatment Works (WWTW) is close by, a recent technical assessment and regular monitoring by Southern Water confirm that there are no discernible odours affecting the locality and no significant contributions from the WWTW likely to cause odour nuisance. In the light of all of the above, this site constitutes a sustainable location for new housing on a strategic scale to help meet local and district new housing needs. Its formal allocation is therefore necessary and appropriate and new policy SP8 is endorsed accordingly (**MM14**).

Housing Omission Sites

109. As modified, the Plan now fully allocates a sustainable site on land north of Bishops Lane, Ringmer (policy SP6) as a strategic scale new housing site for about 110 units. In addition, the recently adopted Neighbourhood Plan for the settlement has also identified sufficient smaller sites to almost meet the new dwelling numbers set out in policy SP2 to 2030. The level of development in policy SP2 is such that Ringmer, as one of the largest and most sustainable villages in the district, is making an equitable and reasonable contribution to the wider housing needs of the district, as well as meeting its own locally generated ones. Accordingly, there is no overriding need to identify any further strategic scale new housing sites in the settlement at present.
110. Elsewhere in the district, I do not consider that any of the alternative potential strategic sites put forward as alternatives or additions to those now allocated represents a more sustainable and therefore preferable option, justifying a change in the Plan. In some cases, including at Burgess Hill, there are also remaining doubts about capacity, availability and deliverability of possible strategic sites, including in respect of the timing of when any new housing might reasonably be expected to be built along with the necessary services and infrastructure.
111. Should the Plan fail to deliver new housing as projected such areas may need

to be considered afresh in any future review. Moreover, those sites of less than 100 units or so can also be considered in the Part 2 LP process and allocated if sustainable and suitable to help deliver the requirements set out in policy SP2. Brownfield sites can come forward in any event, if suitable in principle, under other plan policies and in accord with the NPPF. Therefore, I am satisfied that it is not appropriate or necessary to allocate any further strategic scale new housing sites in this Plan.

Issue 5 - Housing Policies (Policies CP1, CP2, CP3)

5) Are the thresholds and percentages for affordable housing justified by clear and robust evidence of local housing needs and viability, with sufficient flexibility if viability is an issue and are the housing policies suitable, appropriate and consistent with the NPPF/PPG and/or justified by robust and credible evidence ?

Policy CP1 – Affordable Housing

112. The Affordable Housing and CIL Viability Study (AHVS) (CD 053) (2011) has tested various targets and thresholds across the district, including taking into account the introduction of the Community Infrastructure Levy (CIL) and the full Level 4 requirements of the Code for Sustainable Homes as they then were. It provides robust evidence that includes sensitivity testing and which has not been seriously challenged, that a districtwide target of 40%, with a graduated threshold essentially based on the number of new units, would be viable in the vast majority of cases.

113. Accordingly, policy CP1, including an expected tenure split of 75% affordable rented and 25% intermediate tenure to reflect local needs and with a 40% affordable housing target, that is subject to viability, is considered sound in principle. Following the successful legal challenge of July 2015 to the Written Ministerial Statement of November 2014, intended to support small scale developers, custom and self-builders, the Councils have withdrawn the formerly proposed modifications (MM 15) to the relevant thresholds in parts 1 and 2 of the policy, which therefore remain as in the submitted plan.

Policy CP2 – Housing Type, Mix and Density

114. Alongside affordable housing, the Councils also properly seek to help meet identified overall local housing needs through the provision of a range of size and type of new homes across the district. The Local Housing Needs Assessment (CD 082) (2011) indicates that as well as family homes and small units for couples and single persons, there is a strong demand for dwellings for older people in an area that attracts those wishing to retire to the coast.

115. Accordingly, it is appropriate that policy CP2 (and its supporting text) should refer to the need for flexible and adaptable accommodation and flag up the need for Part 2 LPs to identify sites for special needs housing of all types over the plan period. However, Lifetime Homes Standards are no longer applicable. **(MM 16)**. Subject to the above, the policy is soundly based on robust evidence in requiring a mix of size and type of new homes to reflect local needs, albeit also taking account of site specific circumstances, including viability.

116. In respect of density, in the absence of national guidance, it is necessary to

balance the requirement to make the most efficient and effective use of the limited amount of new housing land that is available with the characteristics of the locality and its surroundings, much of which is within the sensitive landscape setting of the NP and/or subject to other important environmental considerations, such as flood risk. Therefore, also bearing in mind the average densities that have been achieved in both the towns and the villages of the district in recent years as guidelines, it is reasonable and realistic in all the relevant local circumstances to set indicative ranges only in policy CP2, rather than any more specific requirements. This allows for some flexibility so that the individual attributes and constraints of particular sites can also be taken into account. However, whilst essentially sound, the policy wording has to be clear to facilitate its application in practice to particular schemes (**MM 16**).

Policy CP3 – Gypsy and Traveller Accommodation

117. Up to date evidence of gypsy and traveller accommodation needs in East Sussex is available from the 2014 Gypsy and Traveller Accommodation Assessment. This gives a need for 13 net additional permanent pitches in Lewes district to 2030, of which 8 should be within the NP and 5 outside. In addition, there is a further requirement for 8 net additional transit pitches in East Sussex as a whole, the provision of which is a joint responsibility with the other East Sussex local planning authorities. However, no specific need for Travelling Showpeople accommodation has been found in the district at present. Policy CP3 and its accompanying wording need to be updated and clarified accordingly in the light of the above to be sound (**MM 18**).

118. The policy also sets out a list of criteria that are appropriate for a Part 1 LP that is to be followed by the Part 2 LP and South Downs LP making the relevant site allocations, both to guide the site selection process in those LPs and also against which any relevant planning applications will be judged. These are consistent with the NPPF and the PPG and require only an addition to refer also to “waste water facilities” in part 1 to be sound (**MM 17**).

Issue 6 – Employment Policies (Policy CP4)

6) *Is the policy suitable, appropriate and consistent with the NPPF and PPG and/or justified by robust and credible evidence ?*

Policy CP4 – Economic Development and Regeneration

119. Policy CP4 seeks to assist delivery of the same key strategic economic objectives as policy SP1, not just through the provision of new sites but also by improving the economic potential of existing employment sites and premises, including through encouraging new investment therein. Given the obvious constraints that severely limit the realistic potential for peripheral expansion of the district’s towns, it is appropriate and reasonable in this area to seek to safeguard existing employment sites from other competing uses, in principle at least.

120. However, the policy also needs to acknowledge that not all existing sites will remain suitable and viable for employment uses alone over the plan period, particularly as modern requirements change. In certain circumstances, as recognised in the NPPF, mixed and/or alternative uses may need to be considered to ensure that land is not left underused, vacant or derelict for any

significant period. Therefore, part 2 of policy CP4 (and para 7.44) needs to be amended to clarify the criteria that will apply to any such proposals on a consistent basis so as to facilitate operation in practice (**MM 19**).

121. This should help to ensure that existing employment sites are not “lost” to other uses unnecessarily where they remain viable, but also that they are not “held in reserve” for needs that are not realistically likely to arise and can instead be used for other purposes in the wider economic interests of the community. Otherwise, policy CP4 is considered to be consistent with the NPPF and PPG and sound.

Issue 7 – Tourism, Retail and Town Centres (Policies CP5 and CP6)

7a) Is the policy reasonable, realistic and consistent with the NPPF and PPG ?

Policy CP5 - The Visitor Economy

122. Tourism is an important part of the local economy in the district (about 7% of jobs), with recognised potential for growth, including through support for a year round visitor economy and reflecting the designation of the NP. Policy CP5 suitably sets out the measures necessary to sustainably develop tourism locally, including by improving the availability of all types and budget levels of visitor accommodation, as evidenced in the recent Hotel Futures Study. The policy wording is essentially consistent with the expectations of the NPPF and PPG in this regard and no modifications are required for soundness.

7b) Is the policy suitable and appropriate to implement the strategy for retail ?

Policy CP6 – Retail and Town Centres

123. Consistent with the NPPF, the key strategic objective for town centres is to maintain and enhance their vitality and viability, including regarding retail related uses. The Plan therefore identifies a retail hierarchy for the district. Lewes and Seaford as main town centres are at the top, given their present levels of shopping floorspace and opportunities for limited improvements in their retail offers that would reinforce their individual characters and widen their range of services. At the next level, Peacehaven (Meridian Centre) is defined as a District Retail Centre, reflecting its range of convenience and comparison shops.

124. Although there has been a recent decline in the range of retail and related services in the centre of Newhaven, largely as a result of the recent recession, regeneration of the town is one of the main aims of the plan and this seems to have strong local support. Also taking the other Plan proposals into account, including the infrastructure investment planned, policy SP7, and the town’s strategic location between Seaford and Peacehaven, where it is well placed to help meet retail needs arising in those settlements, there are at least reasonable prospects that the vitality and viability of the town centre will materially improve in the short to medium term.

125. Accordingly, I consider that Newhaven town centre (within the ring road) should be designated as a District Retail Centre, as the Councils now propose, rather than as a Local Centre only as originally, for the above reasons. Appropriate modifications to properly reflect this change are therefore required

to policy CP6 for soundness (**MM 22**). It is also necessary to clarify the intent of the policy and the purposes of identifying Primary Shopping Areas and Primary Shopping Frontages in the Plan by adding a sentence to policy CP6 confirming that the loss of retail units within those defined areas will be resisted to facilitate implementation in practice, in respect of both Main Town and District Centres (**MMs 20/21**).

126. Outside the district’s towns, the Councils seek to retain and enhance local shopping and community facilities in villages, as far as possible, as they provide valuable social and economic functions for rural communities. However, for soundness and consistency with the NPPF and PPG, part 4 of policy CP6 needs to be made more explicit as to the processes to be undertaken and the evidence provided in the event that such uses are considered to be no longer viable (**MM 23**).

Issue 8 – Infrastructure (Policy CP7)

8) Is the policy and are the proposals suitable and appropriate to deliver the necessary infrastructure improvements alongside new development ?

Policy CP7 - Infrastructure

127. The Infrastructure Delivery Plan (IDP) (LDC 071), which is a “living” document to be kept under review, was last updated in July 2015 alongside the proposed modifications to the Plan. As a result it takes into account the increased requirement for a minimum of 6,900 net new homes in the district between 2010 and 2030 as well as the implications of the other changes to the Plan in respect of likely demands for services, community facilities and the like. It concludes that there are no critical outstanding infrastructure issues (or “showstoppers”) that would prevent or delay the development proposed in the Plan and there is no substantive evidence available to indicate otherwise.

128. However, there are some schemes that are essential for delivery to particular timescales and these are listed together with details of their risks, likely implementation timings and funding/costs. Overall, the evidence is clear and robust, providing the necessary reassurance that there are reasonable prospects of delivery, when needed. Importantly, this includes in respect of each of the allocated strategic sites for new housing. Nevertheless, it remains essential that the Councils, together with ESCC as local highway authority, continue to closely monitor the long term effectiveness of measures to manage and reduce car traffic. This is particularly so on the main A27 and A259 east west roads, key strategic routes through the district, in conjunction with Highways England (HE), where some funding is already committed for improvements east of Lewes.

129. Policy CP7 of the Plan provides the planning policy basis for all of the above, including the updating of the IDP, emphasising the need to retain and enhance community facilities and services alongside new development and confirming the intention to introduce a CIL in both the NP and separately in the remainder of the district. Further details of local scale community needs for services and facilities will also be addressed in the Part 2 LP and South Downs LP. Part 2 of policy CP7 also provides suitable and sensible criteria against which proposals involving the loss of a community service or facility will be considered,

including in terms of its ongoing viability. Overall, the policy is suitable and sufficient to help deliver the infrastructure needed, consistent with national policies/guidance and sound in all respects.

Policy CP8 – Green Infrastructure

130. The available evidence, as referenced in para 7.82 of the Plan, identifies existing deficiencies in access to green infrastructure across the district. Taken together with the adopted standards for the provision of outdoor playing space, this provides a robust basis on which to plan for the management, protection and, where possible, enhancement of the district’s existing green infrastructure, alongside new housing and other development. Accordingly, policy CP8 sets out a number of reasonable and realistic measures to help provide a connected network of multi-functional spaces and facilities throughout the district by 2030, including through the identification and allocation of opportunities in the Part 2 LP and South Downs LP. This is consistent with national policies and guidance and sound without modification.

Issue 9 – Environment, Landscape, Heritage, Design (Policies CP9, CP10, CP11 and CP12)

9) Are the policies dealing with the environment, landscape, heritage and design consistent with the NPPF and PPG and likely to prove effective in protecting the district’s assets and qualities, including the South Downs National Park and the relevant SACs/SPAs, whilst facilitating appropriate development ?

Policy CP9 – Air Quality

131. This policy reflects current legislation and national guidance, as well as the Air Quality Action Plan (AQAP) for Lewes town centre, where an Air Quality Management Area (AQMA) was declared in 2005 under Part 4 of the Environment Act 1995. Nitrogen dioxide emissions from transport have also led to the more recent (2014) declaration of an AQMA for Newhaven town centre and LDC is formally committed to produce an AQAP for that area during 2016. Policy CP9 is sound, including in respect of requiring suitable mitigation measures where new development and/or its associated traffic would adversely affect any declared AQMA, not just those in Lewes district.

Policy CP10 – Natural Environment and Landscape

132. In order to conserve and, where possible, enhance the natural environment of the district, as well as apply the highest status of protection to the landscape and scenic beauty of the NP, in accord with the NPPF, parts 1 and 2 of policy CP10 suitably set out a series of tests to be met by all new development in order to achieve those objectives. Save for amendments necessary to clarify that the intention is to maintain and, where possible, enhance, as distinct from just seeking to do so, and to more clearly express the expectations of development in and in the setting of the NP (**MM 24**), those parts of the policy are sound and in line with national guidance.

133. As recognised in the Habitats Regulations Assessment and the Ashdown Forest Strategic Access Management Strategy, it is necessary to mitigate any potential harm on protected birds arising from new housing in Lewes district within 7km of the Ashdown Forest Special Area of Conservation and Special

Protection Area. In requiring the provision of Suitable Alternative Natural Green Space (SANGS) at a ratio of 8 ha per 1,000 new residents, part 3 of the policy would meet that need. This is further evidenced by the work undertaken for the Councils in August 2015, in the light of a recent legal challenge to the equivalent policy provisions in neighbouring Wealden district. This confirmed that this policy approach is the most appropriate for Lewes district, albeit some rewording (**MM 25**) is necessary for clarity and for development management purposes in relation to residential development within the 7km zone.

134. The fact that Natural England is content with policy CP10, as modified, reinforces my conclusion that the policy is sound and requires no further change or addition for effectiveness. This includes in respect of the short term pending the identification and implementation of one or more suitable SANGS sites, which I heard at the hearings from the Councils is imminent.

135. Part 4 of the policy relating to water quality also needs to refer to “improved where necessary, or maintained where appropriate” to provide the appropriate emphasis and for consistency with the Environment Agency’s River Basin Management Plan for the South East (**MM 26**).

Policy CP11 – Built and Historic Environment and Design

136. In accord with the NPPF and the Plan’s objectives, policy CP11 expects high quality design in all new development and that it should contribute positively to the character and distinctiveness of the district’s built and natural heritage. Subject to clarification of its wording in relation to the purposes of the NP in part ii) (**MM 27**), the policy is sound and should help to achieve this aim.

Policy CP12 – Flood Risk, Coastal Erosion and Drainage

137. In order to help reduce the district’s vulnerability to the impacts of climate change, amongst other things, policy CP12 addresses flood risk, coastal erosion, sustainable drainage and slope stability. This includes the need to work with partner authorities to implement the current Shoreline Management Plan, Catchment Flood Management Plan and other relevant strategies, including that for flood alleviation in Newhaven.

138. In a district where flood risk is a significant concern all of the policy’s requirements are essential in the interests of sustainable development locally. Notwithstanding, some clarification of text is desirable in paras 7.110 and 7.111 to facilitate implementation and delivery in practice (additional minor modifications list) in relation to the differing elements of flood risk and how they should be addressed in connection with development projects.

Issue 10 – Transport (Policy CP13)

10) Is the policy consistent with the NPPF and PPG and suitable to help deliver the necessary transport improvements, whilst minimising adverse environmental impacts and encouraging sustainable travel ?

Policy CP13 – Sustainable Travel

139. As part of the key strategic objective to reduce the need to travel and promote

a sustainable transport system across the district, policy CP13 seeks to encourage walking, cycling and the use of public transport, rather than private cars. Taking into account such relevant local factors as the presently increasing levels of traffic on the A27 and air quality in town centres such as Lewes and Newhaven in particular, as well as the need to work closely with ESCC, as local highway authority and other relevant agencies such as HE, the requirements of the policy are entirely consistent with the NPPF and PPG. They require no modification save in respect of omitting direct reference to delivering the priorities of the East Sussex Local Transport Plan, which is not appropriate in a LP policy (**MM 28**).

Issue 11- Energy (Policy CP14)

11) Is the policy relating to renewable energy and the use of resources consistent with the NPPF and PPG and likely to prove effective in practice ?

Policy CP14 – Renewable and Low Carbon Energy

140. Regarding energy, and climate change especially, policy CP14 seeks to help deliver a reduction in the causes of the latter and carbon dioxide emissions in particular, alongside the recently updated national Building Regulations. In furtherance thereof, the Councils have commissioned a Renewable Energy and Low Carbon Development Study, part of which has led to an Energy Opportunities Map to identify potential (Appendix 6).

141. Accordingly, policy CP14 encourages renewable and low carbon energy in all development and supports applications for such installations, subject to a list of important and relevant criteria, including the need to protect the special qualities and setting of the NP. Subject to some limited rewording so that it is up to date in relation to the national position and for clarity (**MM 29/30/31**), this part of the policy is therefore sound.

142. Part of policy CP14 deals with water consumption and, given that the district is defined as one of “serious water stress”, it is appropriate that it imposes a limit of no more than 110 litres per person per day on all new homes. The cost implications of compliance for builders, which are not great and readily assessed, were taken into account in the viability evidence supporting the Plan, e.g. the AHVA, and this part of the policy is thus also sound in principle, subject to clarification of its wording (**MM 32**).

Issue 12 – Implementation, Flexibility, Delivery, Monitoring

12) Are the mechanisms in the Plan sufficient to achieve its objectives, is the Plan reasonable flexible to enable it to deal with changing circumstances, is the necessary funding likely to be available to viably deliver the development proposed and will monitoring be suitably comprehensive to achieve its objectives ?

143. Since the examination hearings planning permission has been granted, on appeal, for the strategic housing site at Ringmer (policy SP6) and a resolution to grant permission, subject to a legal agreement, approved by the SDNPA for the North Street Quarter scheme at Lewes (policy SP4). Both reinforce the conclusion that these projects have good prospects of an early start to implementation, with no evidence of any outstanding constraints that would inhibit delivery in accord with the latest revised housing trajectory in Appendix

4 of the Plan (**MM 35**).

144. Similarly, there is nothing tangible to suggest that there are any known barriers to the other strategic housing sites allocated in the Plan coming forward as presently envisaged by the Councils. However, the site at Old Malling Farm in Lewes has not previously been identified and is less far forward in the development pipeline than others as a result. For example, there was no prospective developer involved at the time of the hearings and there is an essential need for a masterplan and/or design brief to be agreed on this sensitive site. Therefore, it may reasonably be assumed that this site will not deliver new houses as quickly as others. However, this has been accounted for in the revised housing trajectory.
145. Otherwise, the evidence from the Councils and others, including in the Infrastructure Delivery Plan (LDC/071) (June 2015) is that there are no major outstanding or significant infrastructure issues remaining to be resolved before development can proceed on the allocated strategic sites. This includes in respect of funding prospects. Notwithstanding, the Councils will need to closely monitor progress to ensure that delivery proceeds as anticipated in accord with the revised and updated Monitoring and Delivery framework in Appendix 3 (**MM 34**). They must also be prepared to take positive action, including in terms of considering the need for new/alternative sites to come forward and/or an early review of the Plan, in the event that it does not for whatever reason.
146. Additional non-strategic sites will also be allocated in the Part 2 LP and South Downs LP, to provide additional flexibility on delivery plus others in Neighbourhood Plans, many of which are presently being pursued across the district. Therefore, I see no necessity for this Plan to seek to identify any “reserve” sites, particularly as this would have inevitably led to further delay before adoption to allow for public consultation and sustainability appraisal to be undertaken.

Assessment of Legal Compliance

147. My examination of the compliance of the Plan with the legal requirements is summarised in the table below. I conclude that the Plan meets them all.

LEGAL REQUIREMENTS	
Local Development Scheme (LDS)	The Plan is identified within the approved LDS Addendum of May 2014, which sets out an expected, albeit indicative, adoption date of early 2015. The delay has arisen largely as a result of the need for main modifications and in all other respects the Plan’s content and timing are compliant with the LDS.
Statement of Community Involvement (SCI) and relevant regulations	The SCI was adopted in July 2011 and consultation has been compliant with the requirements therein, including that on the post-submission proposed ‘main modification’ changes (MM)
Sustainability Appraisal (SA)	SA has been carried out and is adequate, including in respect of the main modifications.

Appropriate Assessment (AA)	The Habitats Regulations Assessment Report (September 2014) shows that there will be no significant adverse effect on any protected sites arising from the implementation of the plan and sets out why AA is not therefore necessary, as agreed by Natural England (NE).
National Policy	The Plan complies with national policy, except where indicated and main modifications are recommended.
National Park Management Plan (NPMP)	Satisfactory regard has been paid to the NPMP.
2004 Act (as amended) and 2012 Regulations.	The Plan complies with the Act and the Regulations.

Overall Conclusion and Recommendation

148. **The Plan has a number of deficiencies in relation to soundness for the reasons set out above, which mean that I recommend non-adoption of it as submitted, in accordance with Section 20(7A) of the 2004 Act. These deficiencies have been explored in the main issues.**
149. **The Councils have requested that I recommend main modifications to make the Plan sound and/or legally compliant and capable of adoption. I conclude that with the recommended main modifications set out in the Appendix the Lewes District Local Plan Part 1 – Joint Core Strategy satisfies the requirements of Section 20(5) of the 2004 Act and meets the criteria for soundness in the National Planning Policy Framework.**

Nigel Payne

Inspector

This report is accompanied by the Appendix containing the Main Modifications

Lewes District Local Plan - Part 1

Inspector's Report - Appendix

Main Modifications



Proposed Change			
Main Modification Reference Number	Joint Core Strategy Submission Document Reference / Location	Proposed Change	
MM01	Section 6 (Spatial Strategy) Spatial Policy 1, p.41	Amend Spatial Policy 1 by deleting the first sentence and replacing it with new text to read: In the period between 2010 and 2030, a minimum of 6,900 net additional dwellings will be provided in the plan area (this is the equivalent of approximately 345 net additional dwellings per annum).	
MM02	Section 6 (Spatial Strategy) Spatial Policy 2, p.45	Amend Spatial Policy 2 as follows: Spatial Policy 2 – Distribution of Housing During the period between 2010 and 2030, a minimum of 6,900 net additional dwellings will be delivered in the district. Part of this total will be met as follows; <ul style="list-style-type: none"> • 1,020 completions in the period between April 2010 and April 2015 • The delivery of 1,558 commitments across the plan area. • An allowance for 600 dwellings to be permitted on unidentified small-scale windfall sites during the plan period and subsequently delivered. • An allowance for 125 dwellings to be permitted on rural exception sites during the plan period and subsequently delivered The remaining 3,597 net additional dwellings will be distributed as	

	<p>follows:</p> <p>(1) Housing to be delivered on the following strategic site allocations;</p> <ul style="list-style-type: none"> ○ Land at North Street, Lewes – 415 net additional units. ○ Land at Old Malling Farm, Lewes – 240 net additional units ○ Land to the north of Bishops Lane, Ringmer – 110 net additional units. ○ Land at Greenhill Way, Haywards Heath (within Wivelsfield Parish) – 113 net additional units (this is in addition to the 62 units already granted permission at this site). ○ Land at Harbour Heights, Newhaven – 400 net additional units. ○ Land at Lower Hoddern Farm, Peacehaven – 450 net additional units. <p>(2) Planned housing growth at the following settlements;</p> <ul style="list-style-type: none"> ○ Lewes – a minimum of 220 net additional units ○ Newhaven – a minimum of 425 net additional units ○ Peacehaven & Telscombe – a minimum of 255 net additional units which will all be contingent upon developers identifying and demonstrating to the satisfaction of the local highway authority, and delivering, a co-ordinated package of multi-modal transport measures required to mitigate the impacts of development on the A259. ○ Seaford – a minimum of 185 net additional units ○ Burgess Hill (within Wivelsfield Parish) – a minimum of 100 net additional units ○ Barcombe Cross – a minimum of 30 net additional units ○ North Chailey – a minimum of 30 net additional units ○ South Chailey – a minimum of 10 net additional units ○ Cooksbridge – a minimum of 30 net additional units ○ Ditchling – a minimum of 15 net additional units ○ Newick – a minimum of 100 net additional units 	
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		<ul style="list-style-type: none"> ○ Plumpton Green – a minimum of 50 net additional units ○ Ringmer & Broyle Side – a minimum of 215 net additional units ○ Wivelsfield Green – a minimum of 30 net additional units <p>- (3) About 200 net additional units in locations to be determined.</p> <p>For the housing growth identified in sections (2 and 3) above, individual sites to meet the planned levels of housing provision will be identified in either the District Council’s Site Allocations and Development Management Policies DPD, or the National Park Authority’s Local Plan. Neighbourhood Plans could also be used to identify the individual sites.</p> <p>For settlements or development not listed in sections (2) or (3) above new housing will be limited to affordable housing that meets a local need on exception sites and currently unidentified infill developments within the planning boundary.</p>													
MM03	<p>Section 6 (Spatial Strategy)</p> <p>Table 5, p.46</p>	<p>Amend Table 5 as follows:</p> <p>Table 5 – Planned levels of housing growth, by settlement</p> <table border="1" data-bbox="689 970 1720 1267"> <thead> <tr> <th>Settlement (NP denotes it is in the National Park)</th> <th>Completions (April 2010 – April 2015)</th> <th>Commitments (as at 1st April 2015)</th> <th>Housing delivered on strategic sites</th> <th>Housing to be delivered through subsequent allocations</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>	Settlement (NP denotes it is in the National Park)	Completions (April 2010 – April 2015)	Commitments (as at 1st April 2015)	Housing delivered on strategic sites	Housing to be delivered through subsequent allocations	Total							
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		Edge of Haywards Heath (within Wivelsfield Parish)	0	62	113	0	175		
		Seaford	216	153	0	184	553		
		Lewes (NP)	146	125	655	220	1146		
		Newhaven	66	786	400	425	1677		
		Peacehaven & Telscombe	332	189	450	253	1224		
		Edge of Burgess Hill (within Wivelsfield Parish)	70	27	0	100	197		
		Ringmer & Broyle Side ²¹	6	52	110	217	385		
		Newick	27	2	0	100	129		
		Barcombe Cross	2	1	0	30	33		
		Plumpton Green	15	5	0	50	70		

		Wivelsfield Green	17	76	0	30	123		
		Cooksbridge	5	3	0	30	38		
		North Chailey	3	0	0	30	33		
		South Chailey	3	1	0	10	14		
		Ditchling (NP)	10	6	0	15	31		
		All other settlements and areas	102	70	0	0	172		
		Totals	1,020	1,558	1,728	1,694	6,000		
		<p>The windfall sites allowance of 600 units and the rural exception sites allowance of 125 units are not accounted for in the table above.</p>							
MM04	Section 6, Spatial Policy 3 p50	<p>Spatial Policy 3 – North Street Quarter and adjacent Eastgate area, Lewes</p> <p>Land amounting to approximately 9 hectares at North Street and the neighbouring part of Eastgate is allocated for a mixed-use development that would create a new neighbourhood for the town of Lewes. The development mix should be based on the following uses and broad quantum of development:</p> <ul style="list-style-type: none"> • Approximately 415 residential units, predominantly focused towards the northern part of the site; 							

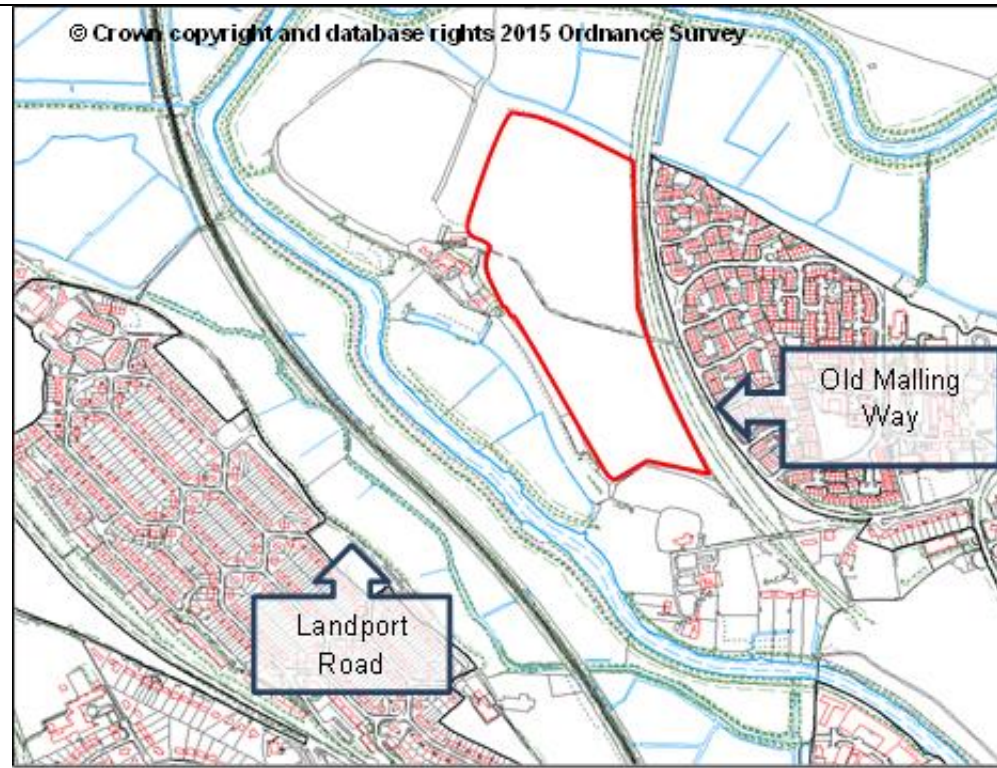
	<ul style="list-style-type: none"> • At least 5,000 sq metres of B1a office floorspace and/or B1c light industrial floorspace, subject to market needs and general viability; • The redevelopment or relocation of the existing A1 food supermarket; • Other uses that are deemed to aid in the successful delivery of a new neighbourhood, whilst not undermining the wider function of the town (this could include A1 Shops, A2 Financial and Professional Services, A3 Restaurants and Cafes, A4 Drinking Establishments, A5 Hot Food Takeaways, C1 hotel, D2 Assembly and Leisure uses and community floorspace). <ul style="list-style-type: none"> • C2/C3 Nursing/ Care Home (self-contained units will be counted as residential within the above figure) • D1 Non-residential institutions such as medical and health services, creches, exhibition and training space. <p>Development of this site will be delivered between 2016 and 2021.</p> <p>The redevelopment of the North Street Quarter and the neighbouring part of Eastgate will be permitted subject to compliance with the Core Delivery Policies of this plan and the following criteria:</p> <ul style="list-style-type: none"> i) It incorporates the early provision of flood defences to an appropriate standard as advised by the Environment Agency; ii) It facilitates improved linkages across Phoenix Causeway and Eastgate Street to enable the improved integration of the area to the north of Phoenix Causeway with the wider town centre; iii) It delivers enhancements to vehicular access and off-site highway improvements, arising from and related to the development and its phasing; iv) It respects and enhances the character of the town and achieves a high standard of design, recognising the high quality built environment, on and within the vicinity of the site, and the site's setting within the South Downs National Park and adjacent to a Conservation Area; 	
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		<p>v) It is subject to an analysis and appropriate recognition of the site's cultural heritage and a programme of archaeological work, including, where applicable, desk-based assessment, geophysical survey, geo-archaeological survey and trial trenching to inform design and appropriate mitigation.</p> <p>vi) A riverside pedestrian route along the western bank of the River Ouse is incorporated to extend the town's riverside focus and contribute to its character and quality, and additional pedestrian and cycling routes are incorporated to aid in linking the site to the rest of the town;</p> <p>vii) It results in no net loss of public parking provision;</p> <p>viii) The retail element is incorporated into the town centre boundary (as designated by Core Policy 6) as far as possible and the amount of retail provision is informed by a Retail Impact Assessment, if necessary;</p> <p>ix) Alternative uses on the bus station site are subject to the facility being replaced on an operationally satisfactory and accessible site elsewhere;</p> <p>x) It makes contributions towards off-site infrastructure improvements arising from, and related to, the development; and</p> <p>ix) It provides a connection to the sewerage and water supply systems at the nearest point of adequate capacity, as advised by Southern Water, and ensures future access to the existing sewerage and water supply infrastructure for maintenance and upsizing purposes.</p>	
MM05	<p>Section 6 (Spatial Strategy)</p> <p>Additional Strategic allocation - Spatial Policy 4 p54</p> <p>NB subsequent</p>	<p>Insert additional strategic site allocation for Old Mallig Farm, Lewes, after paragraph 6.66 as follows:</p> <p><u>Old Mallig Farm, Lewes</u></p> <p>Spatial Policy 4 – Old Mallig Farm, Lewes</p> <p>Land amounting to approximately 10 hectares is allocated for a residential development of approximately 240 dwellings. Development will be permitted subject to compliance with the Core Delivery Policies of</p>	

	<p>spatial policies will be renumbered to reflect the insertion of this policy into the <u>Lewes town section</u></p>	<p>this plan, with a Masterplan and a Design Brief to be approved by the local planning authority in advance of an application and the following criteria:</p> <ul style="list-style-type: none"> i) 40% of dwelling units are affordable, subject to the provisions of CP1; ii) Development on the western edge of the southern field is generally lower density than other parts of the site with gardens bounded by hedges rather than walls or fences; iii) Appropriately designed equipped play space integrated into a multi-functional network of green infrastructure; iv) The design, layout, built form, spatial arrangements, landscaping and materials, including the pattern, scale and colour of roofs, respect and reflect the National Park location; v) The design shall incorporate views within, to and from the site to surrounding landmarks and features including from the elevated chalk hills to the east and west, from Hamsey to the north and from Lewes itself; vi) Development is consistent with positive local character and local distinctiveness and respects the character, amenity and setting of the adjacent Malling Deanery Conservation Area and the listed Church of St Michael; vii) Impacts on tranquillity, dark night skies and biodiversity are minimised by restricting access to some areas of floodplain outside the site and by providing only limited night lighting and the use of low level lighting where required; viii) An ecological survey is undertaken and appropriate measures are implemented to mitigate adverse impacts on the South Malling Disused Railway SNCI and Offham Marshes SSSI; 	
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		<ul style="list-style-type: none"> ix) The primary access point is to be off Monks Way at a point opposite Mantell Close the design of which should minimise impacts on views from the north; the existing former railway bridge forms a secondary access point for emergency use and an access for pedestrians and cyclists and to the existing farm buildings; x) Development respects the amenity of the existing dwellings adjoining the site; xi) A site specific flood risk assessment is undertaken and an appropriate surface water drainage strategy as advised by the appropriate body and implemented as agreed; xii) A survey is undertaken of existing trees and hedgerows and appropriate measures are implemented for their protection in accordance with a schedule to be agreed with the local planning authority; xiii) Development is subject to a geophysical survey and trial trench evaluation of the archaeological potential in the area and any resulting measures are implemented; xiv) Contributions are made towards other off-site infrastructure improvements arising from and related to the development, including complementary measures in keeping with the landscape setting to reduce the attractiveness to existing traffic of Church Lane/Mayhew Way/Brooks Road as an alternative to Malling Hill and to improve the capacity of the junctions at the A26 /B2192 Earwig Corner, Church Lane/Malling Hill, and the Brooks Road/Phoenix Causeway roundabout; xv) Measures are put in place to improve access from the site to the town centre by non-car modes through the preparation and implementation of a Travel Plan to be approved by the local planning authority in consultation with the local highway 	
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		<p>authority; and</p> <p>xvi) The development will provide a connection to the sewerage system at the nearest point of adequate capacity, as advised by Southern Water.</p>	
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Justification

The site subject to the above policy is a greenfield site situated on the northern side of the town in a 'green finger' between the 1970s part of the Malling Estate to the east and the River Ouse, mainline railway and Landport Estate to the west. The site lies wholly within the South Downs National Park and is currently in agricultural use. There is an existing access bridge over the disused railway cutting (a Site of Nature Conservation Importance SNCI), providing single track access to Old Malling Farm from Old Malling Way. A further double width

		<p>access point onto Monks Way, which is at grade and currently used for agricultural vehicles, is situated at the northern end of the site. Monks Way would form the principal access to the site, with the railway bridge providing secondary access for pedestrians, cyclists and emergency use, as well as access to the former farm buildings. To the south of the site lies the Malling Deanery Conservation Area, including the Grade II* St Michaels Church.</p> <p>Much of the site is Agricultural Land Classification Grade 2, with some Sub-grade 3a, and therefore constitutes best and most versatile agricultural land. There is also ecological interest in the area, including the Offham Marshes SSSI on the opposite side of the River Ouse and the SNCI along the adjacent disused railway cutting on the east of the site. The site also lies within an area of high archaeological potential being in the vicinity of a medieval settlement and the ruins of a college of Benedictine Canons.</p> <p>While current information would suggest that these interests do not override the principle of development on the site, further survey work will be required and appropriate mitigation measures implemented. The loss of best and most versatile land is to be avoided where possible. However in this case the few alternative options for strategic level residential development around Lewes town have been ruled out for other reasons, such as being of even greater great landscape sensitivity within the National Park.</p> <p>Development of the site could adversely impact the Special Qualities of the National Park, for instance on landscape and views, on recreational activities (the Ouse Valley Way), on tranquillity (including dark night skies), on historical features and cultural heritage (including the Conservation Area, Listed Building and archaeological remains), and on nearby wildlife and habitats. Nevertheless a sensitively designed scheme could be accommodated at Old Malling Farm, which takes into account the range of significant constraints and impacts on the SDNP and its Special Qualities and incorporates an appropriate range of mitigation measures.</p>	
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		<p>Landscape mitigation measures should address the following sensitivities (as identified by the SDNPA's landscape consultant¹):</p> <ul style="list-style-type: none"> • Views from the site to local landmark features including chalk hills, church towers and Lewes Castle give this site a strong sense of place. • The rural, tranquil and natural character of the Ouse Valley with no development apparent on its eastern banks, save for historic settlement associated with Old Malling Farm and Lewes Malling Deanery. • The visually sensitive western edge of the site above the Ouse Valley floor where development would intrude into the valley. • The site is seen in the context of the wider Ouse Valley floodplain when viewed from elevated locations to the east and west. • From elevated locations to the west the site visually separates the historic settlement of Old Malling Farm and Lewes Malling Deanery. • From elevated locations to the east the northern field of the site is visually prominent and is seen as part of the wider Ouse Valley corridor. • The Ouse corridor to the north of Lewes was included in the South Downs National Park as providing a high quality setting to Lewes town for reasons of its intrinsic scenic attraction, cultural heritage and nature conservation. <p>Various measures were suggested to address these, including development on parts of the site only and at a lower density, and pulling development back and away from the western, southern and northern parts of the site. Other suggestions include: providing only limited night lighting on the site and the use of low level lighting where required, ensuring the use of dark colours for roofs,</p>	
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¹ Landscape and Visual Assessment: Old Malling Farm, Lewes, Allison Farmer Associates, May 2012

		<p>retaining views out of the site to surrounding landmarks, retaining some areas of floodplain with no access, and ensuring that any improved access to the floodplain does not unduly extend urbanising influences, including that signage and surfaces, gates and fencing are low key.</p> <p>These various measures will be reviewed and considered for inclusion in a Design Brief be undertaken for the site either by the SDNPA or by the applicant and subject to the SDNPA's approval. This will be informed by a detailed site appraisal, which shall include as 3D computer modelling of the site and its context; appropriate Verified Photomontages; and Zone of Theoretical Visibility plots from appropriate locations within the site.</p> <p>Transport evidence shows that significant development of this site should be contingent on highway improvement works at the Earwig corner junction of the A26 with the B2192 on the edge of the town to the east of the site. This is a junction that already experiences congestion, particularly at peak times, and therefore the further strain from new development (including from other development in Lewes town and at Ringmer) will need to be mitigated. Development consistent with this policy, as well as other development in the area will enable this mitigation to occur, possibly through a traffic light system to improve the flow of traffic through the junction.</p> <p>In addition, mitigation measures associated with the impact of development at Old Malling Farm will be required at the critical junction of Church Lane/Malling Hill and at the Brooks Road/Phoenix Causeway roundabout, in agreement with the local highway authority. Traffic calming measures are also required to reduce the amount of existing traffic using the access roads to the site so that they can accommodate the additional traffic movements that will be generated by the development.</p> <p>Contributions to infrastructure, including green infrastructure and equipped play</p>	
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		<p>space, will be sought initially through a Section 106 agreement and would be specified further as part of that agreement. However, depending on the date of permission being granted, some of these contributions would be made through the Community Infrastructure Levy, once introduced.</p> <p>Core Policy 1 seeks to achieve a district-wide target of 40% affordable housing. This district-wide target is supported by robust viability evidence, as well as evidence of a significant need for affordable housing. As evidenced through the District Council's Housing Needs Register, this need is particularly high in Lewes town, which has a particular shortage of affordable housing provision.</p> <p>Due to the high number of affordable houses that will be delivered on this site it will be important to consider the mix of these houses, particularly in terms of type and tenure. With this being the case, the National Park Authority and District Council (as the Housing Authority) may seek/accept a tenure split for the affordable housing that delivers a greater proportion of intermediate housing than the 25% guideline in Core Policy 1.</p>	
MM06	<p>Section 6 (Spatial Strategy)</p> <p>Spatial Policy 5 paragraphs 6.80 – 6.83 p58-59</p>	<p>6.80 Through the evidence collected for the Core Strategy, a case can be made for the delivery of a strategic housing allocation at Ringmer during the early part of the plan period. The identification of such an allocation will help maintain a sufficient supply of deliverable housing sites during this period and up until the point further allocations are made in subsequent plans.</p>	
MM07	<p>Section 6 (Spatial Strategy)</p> <p>Spatial Policy 5, p.55</p>	<p>Amend the first sentence of Spatial Policy 4:</p> <p>Land amounting to 8.5 hectares is allocated for residential development of approximately 175 dwellings (of which 62 net units already have planning permission on this strategic site). Development will be</p>	

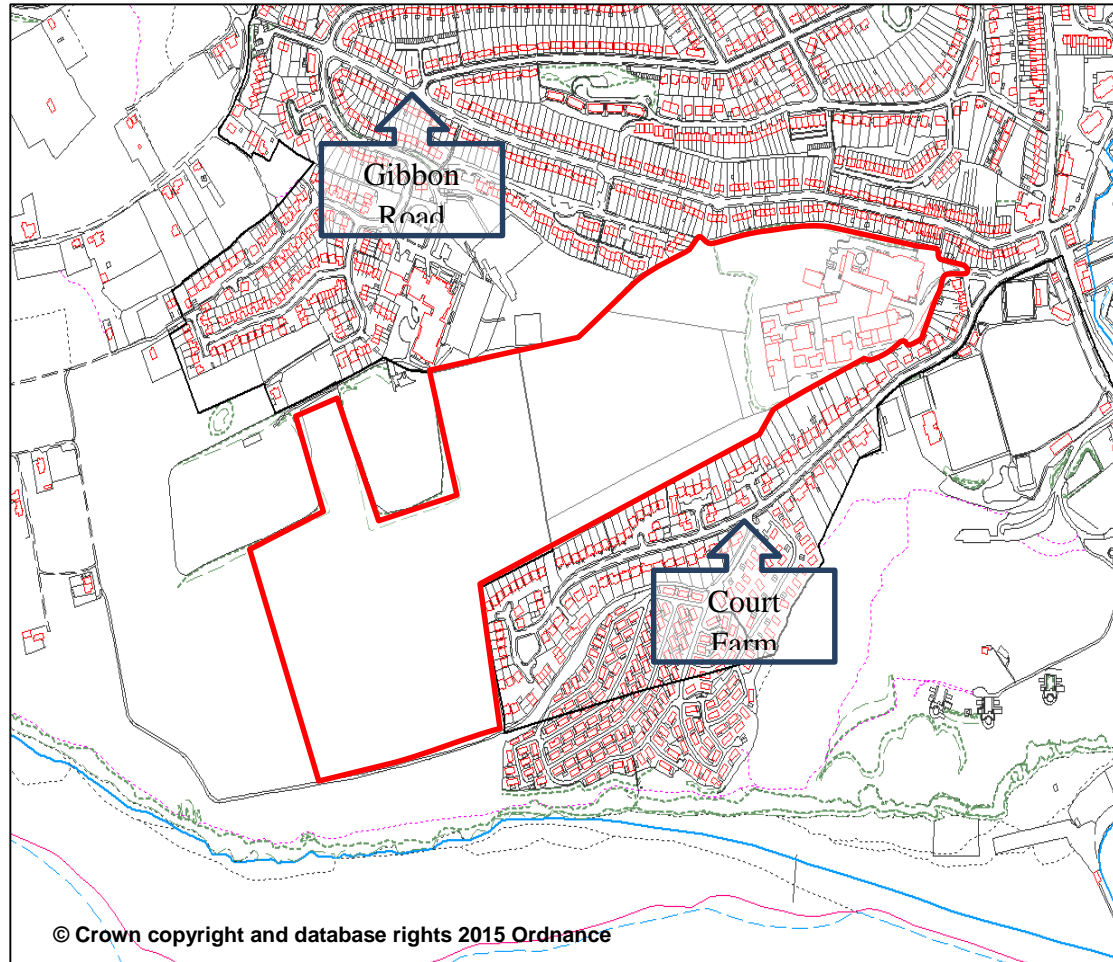
		permitted subject to compliance with the Core Delivery Policies of this plan and the following criteria:	
MM08	Section 6 (Spatial Strategy) Spatial Policy 5, criterion(i), p.55	Replace the words 'Primary and secondary accesses' with 'Access' and add the word '/or' to read: i) Access including provision for pedestrians and cyclists to be provided from Ridge Way and/or Greenhill Way;	
MM09	Section 6 (Spatial Strategy) Spatial Policy 5: New criterion (viii) p.55	Add new criterion (viii) to read as follows: The development will provide a connection to the sewerage and water supply systems at the nearest point of adequate capacity, as advised by Southern Water, and ensure future access to the existing sewerage and water supply infrastructure for maintenance and upsizing purposes.	
MM10	Section 6 (Spatial Strategy) Spatial Policy 6 p59 Additional criterion iii)	Insert additional criterion after existing criterion ii) and renumber subsequent criteria accordingly: iii) The development will wherever possible allow for the retention and enhancement of important existing hedgerows. Mitigation will be required in the event that the removal of a hedgerow, or parts, is needed to facilitate development.	
MM11	Section 6 (Spatial Strategy) Spatial Policy 6 p59	Amend criterion vii) to remove reference to the cycle route as follows: vii) Contributions towards off-site infrastructure improvements arising from and related to the development. This will include off-site highway improvements being made to the Earwig Corner junction as well as in the immediate vicinity of the site, particularly along Bishops Lane and its junction with the B2192; and	
MM12	Section 6 (Spatial Strategy)	Add new criterion (ix) to read as follows:	

	<p>Spatial Policy 6: New criterion (ix) p.59</p>	<p>The development will provide a connection to the sewerage system at the nearest point of adequate capacity, as advised by Southern Water.</p> <p>Delete final sentence.</p>	
<p>MM13</p>	<p>Section 6 (Spatial Strategy)</p> <p>Spatial Policy 7 paragraphs 6.90 – 6.101 p61-65</p>	<p>Delete paragraphs 6.90 to 6.101 and SP6 policy wording. Replace with new text and policy wording relating to a full allocation:</p> <p><u>Newhaven</u></p> <p>6.90 Newhaven is the smallest of the four towns in the district (parish population: 12,232), despite being located in a strategically important position on the south coast at the mouth of the River Ouse. Newhaven is a port town which still has an active industrial and commercial river frontage. This includes a harbour with a cross-channel ferry service to Dieppe.</p> <p>6.91 Regeneration of the district’s coastal towns is a key objective of this plan. Key to this will be regeneration at Newhaven and growth will have a significant role to play in achieving this transformation. In this regard, the District Council supports the Port Authority’s plans for the continued use of the port for freight and passengers, which includes plans for expansion and modernisation. The District Council is also seeking to make better use of the current employment sites in the town and Core Policy 4 will be key to achieving this.</p> <p>6.92 Housing growth is considered pivotal in helping to achieve regeneration at Newhaven. As well as supplying much needed housing within an area of need, additional housing in Newhaven will also bring about significant investment into the town, including improvements to infrastructure and the creation of jobs, and a larger population base to support the existing businesses, including town centre retailers, which</p>	

		<p>operate in the town.</p> <p>6.93 Spatial Policy 2 has identified Newhaven as the town to have the highest level of housing growth during the plan period. The Strategic Housing Land Availability Assessment has identified significant potential for housing growth during the plan period, both through redevelopment opportunities within the existing town and some outward expansion. It will be for the District Council's Site Allocations and Development Management Policies DPD, or a Neighbourhood Plan, to specifically allocate the majority of sites for housing. However, it is already clear that redevelopment opportunities within the existing town alone will not meet the overall housing target. In order for this target to be met, a strategic site that involves the outward expansion of the town will need to come forward.</p> <p>6.94 The allocation of Harbour Heights will be considered by the local planning authority as a single development. In the event that the site comes forward through multiple applications it is important that these are guided by and accord with a masterplan, infrastructure delivery strategy and phasing strategy. This will help ensure a comprehensive approach for the delivery of the allocated site as a whole as well as ensure that any proposals for part of the site help deliver a cohesive development that meets the Core Strategy's policy objectives and do not prejudice the delivery of the remainder of the site or infrastructure provision.</p> <p>Spatial Policy 7 – Land at Harbour Heights, Newhaven</p> <p>Land amounting to 20 hectares is allocated for a mixed-use development including employment <u>units and</u> approximately 400 dwellings. Development will be permitted subject to compliance with the Core Delivery Policies of this plan and the following criteria;</p>	
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		<ul style="list-style-type: none"> i) Progress in accordance with a detailed Masterplan, infrastructure delivery strategy and phasing strategy to be agreed with the local planning authority; ii) Primary and secondary accesses including provision for pedestrians and cyclists to be provided from Court Farm Road and Quarry Road. iii) Development delivers at least 30% affordable housing in accordance with the relevant criteria of Core Policy 1. iv) The development maintains the undeveloped nature of the cliff top coastline, and avoids exposing new development to coastal erosion risk, by ensuring a sufficient undeveloped area from the cliff edge to the most southerly point of development. This area will be utilised for informal open space and will respect the Beachy Head to Selsey Bill Shoreline Management Plan. v) Development respects the amenity of the existing dwellings adjoining the site. vi) Contributions towards off-site infrastructure improvements arising from and related to the development. This will include off site highway improvements being made to the South Road/ South Way junction. vii) Subject to a proven need and viability considerations, any loss of employment units will be compensated for by the provision of modern business units that are appropriate for a predominantly residential area. viii) Robust landscaping, which is appropriate to a coastal location, is provided within and around the site to mitigate the impacts of this edge of town site on the surrounding landscape, having particular regards to views from and into the National Park. viii) The development incorporates and/or makes contribution towards the provision of equipped play space and sports pitches. ix) Development is subject to an appropriate assessment and 	
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		<p>evaluation of the archaeological potential and historic interest of the site.</p> <p>x) Development is subject to an ecological impact assessment and appropriate measures are undertaken to mitigate adverse impacts on biodiversity. Development will also allow for the protection and enhancement of biodiversity, where possible.</p> <p>xi) The development will provide a connection to the sewerage system at the nearest point of adequate capacity, as advised by Southern Water.</p> <p><u>Should any planning application be submitted that only relates to part of the site it must be accompanied by:</u></p> <ul style="list-style-type: none"> • <u>A Masterplan and Infrastructure Delivery Statement that sets out:</u> <ul style="list-style-type: none"> a) <u>Site specific infrastructure requirements and how these relate to the full allocation Infrastructure Delivery Strategy;</u> b) <u>Details of proposed development phasing, proposed triggers for the delivery of associated infrastructure and how these relate to the full allocation Phasing Strategy; and</u> c) <u>Details of how proposed publicly accessible space and facilities would be managed and maintained and related to the wider site and surroundings.</u> • <u>A Financial Appraisal in a format to be agreed in advance with the local planning authority, reporting on financial viability issues and justifying the form and content of the proposals. This will include the amount and type of affordable housing and amount and phasing of employment provision and details of how this relates to the delivery of the wider site.</u> 	
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Justification

6.95 The area subject to the above policy is in the south western part of Newhaven and is bordered to the north by Gibbon Road and to the

		<p>south by Court Farm Road. The area extends from the Meeching Quarry Industrial Estate site in the east to land known as Harbour Heights in the west.</p> <p>6.96 The majority of the area subject to this policy is in agricultural use. The land is considered low grade agricultural land. Meeching Quarry Industrial Estate, covering approximately 3 hectares of the eastern part of the policy area, currently contains a mix of B2, B8 and Sui Generis uses. The Economic and Employment Land Assessment (EELA) scores the site low with regards to market attractiveness due to the poor quality and age of units, a number of which are currently vacant (including the Artex unit that covers a significant proportion of the site). The EELA identifies a need for the provision of smaller, high quality premises within Newhaven, particularly move-on office units, including to accommodate businesses seeking to move-on from the Enterprise Centre. The redevelopment of the Industrial Estate offers a good opportunity to meet this need and help off-set the loss of the existing employment floorspace.</p> <p>6.97 A site specific affordable housing requirement has been included for this strategic site in recognition of known and potential site constraints, including local topography, potential land contamination and infrastructure mitigation. An initial viability assessment indicates that affordable housing delivery at 40% (as sought by Core Policy 1) is unlikely be deliverable. Therefore, the level of affordable housing has been reduced to at least 30%, with the final level of affordable housing to be provided on site being informed by further detailed viability work. The development would be expected to be consistent with all other relevant aspects of CP1.</p> <p>6.98 There are two potential access points, from Court Farm Road (between 128 and 138) and Quarry Road. Opportunities to create linkages</p>	
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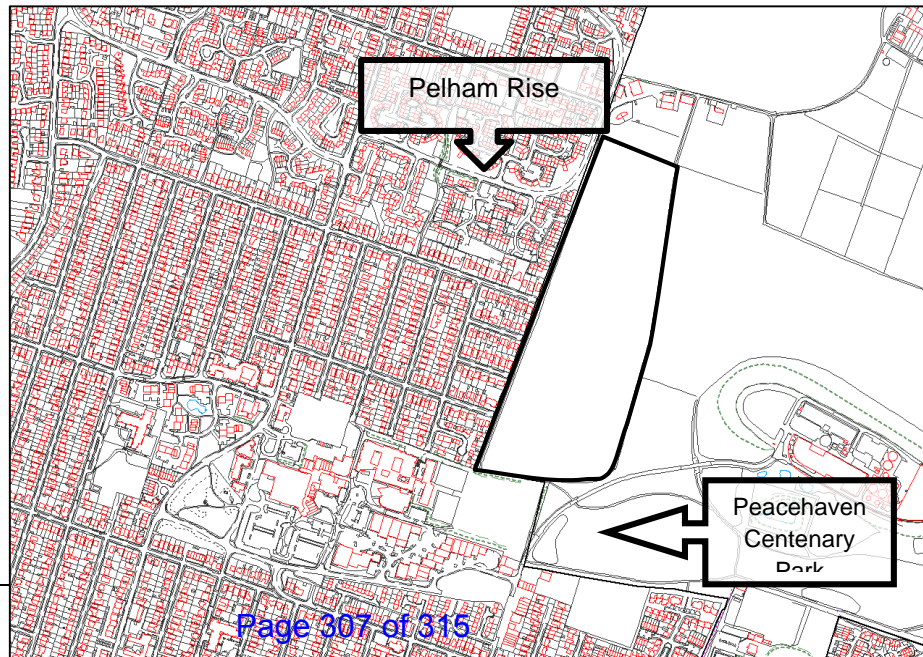
		<p>between the development and surrounding area should be explored, particularly linking the development to the primary and secondary schools to the north.</p> <p>6.100 Previous consideration of development in this part of Newhaven, as well as the findings from the evidence base (particularly the Landscape Capacity Study) identifies that parts of this area are quite prominent in landscape terms, particularly with the site being visible from a number of locations in and around Newhaven. However, existing and planned (the 2003 Local Plan land west of Meeching Quarry allocation) development in this part of the town has provided an urban feel to this area, which would not be exacerbated by development in accordance with this policy. To ensure that this is the case, careful consideration will still need to be given to the development's layout, design and landscaping. This will need to ensure that visual impacts on the landscape, including views of the site from vantage points such as the cliff top and Newhaven Fort/ Castle Hill, are not compromised and that a suitable gap is maintained between Newhaven and Peacehaven (in this regard the development should not be located any further west than the western end of Hill Top Way and should provide a soft landscape interface between the town and countryside).</p> <p>6.101 In considering the impact of development on the landscape, special regard will need to be given to the undeveloped nature of the coastline, which needs to be retained. This should ensure that no development is located within the indicative cliff top erosion zone where no active intervention, to prevent erosion, is planned within the Shoreline Management Plan.</p> <p>6.102 The policy makes reference to highway mitigation measures and improvements to sustainable transport options. The justification for this</p>	
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		<p>is that the transport evidence indicates that an increase in traffic from development in this part of Newhaven will have an adverse impact on southern access junctions of the Newhaven Ring Road (A259) in that they would be at or above their operating capacity. The additional strain from the development of this site will need to be mitigated. These mitigation measures will be in the form of junction improvements at South Road and South Way and by substantially improving sustainable transport options in this part of the town, especially a good quality and high frequency bus service, which will reduce the need to utilise the private car. As such, a sustainable travel plan will be required, which will need to be agreed by the local planning authority, in consultation with the local highway authority, and implemented accordingly.</p> <p>6.103 Newhaven is currently recognised as having a shortfall in equipped children’s play space and sports pitches. Although it is unreasonable to expect this development to make up the entire shortfall, it is proposed that the provision of, or contribution towards, open space and sports and recreation provision should be focussed on providing the facilities that are currently under-supplied in the area.</p> <p>6.104 The site lies in an area of archaeological potential and as a result an appropriate assessment and evaluation of the site’s archaeological and historic interest through desk-based assessment, geophysical survey, geo-archaeological survey and trial trenching will be expected to inform appropriate mitigation by design and recording.</p> <p>6.105 The site is adjacent to the Brighton to Newhaven Cliffs SSSI and there are SNCIs to the east and west. There are also multiple records of protected and notable species from the local area. As a result an ecological impact assessment will be required together with appropriate mitigation informed by the ecological impact assessment.</p>	
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MM14	<p>Section 6 (Spatial Strategy)</p> <p>New policy SP8 and text p.65</p>	<p>Insert new text to read:</p> <p><u>Peacehaven and Telscombe</u></p> <p>Peacehaven and Telscombe (combined parish population: 21,544) are located on the coast between Newhaven and the city of Brighton & Hove. The combined areas are classified as a district centre in the settlement hierarchy and offer a range of shops and services, together with a leisure centre, health facilities, library, and secondary school.</p> <p>Peacehaven and Telscombe offer only limited employment opportunities and there is significant out-commuting to work, particularly to the adjacent city of Brighton & Hove. The proximity of the city is also reflected in a fairly buoyant local housing market, which is supported by significant levels of in-migration from Brighton & Hove.</p> <p>The A259 coast road is the only vehicular route in and out of the urban area and ESCC, as the local transport authority, has concerns about the ability of this road to accommodate further increases in demand. Accordingly, the County Council's transport policies and strategy for district's coastal towns focus on improvements to, and increasing usage of, public transport to meet future demands along the A259 corridor.</p> <p>Peacehaven and Telscombe benefit from an extensive network of green spaces, including the cliff top and Telscombe Tye, which offers important recreational opportunities for residents. The Peacehaven Centenary Park, a 12 hectare site incorporating both formal and informal recreational facilities, was opened in 2015, funded primarily by recent housing development and the adjacent Waste Water Treatment Plant.</p> <p>Opportunities for expansion of the built-up area are limited by the sea to the south and the boundary of the South Downs National Park to the north.</p>	
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		<p>However, a strategic housing development opportunity exists on agricultural land at Lower Hoddern Farm, located north-west of the new Peacehaven Centenary Park, as detailed in the following policy.</p> <p>Spatial Policy 8 - Land at Lower Hoddern Farm, Peacehaven</p> <p>Land amounting to 11 hectares is allocated for residential development of approximately 450 dwellings. Development will be permitted subject to compliance with the Core Delivery Policies of this plan and the following criteria:</p> <ul style="list-style-type: none"> i) The primary vehicular access point shall be taken from Pelham Rise; ii) The provision of safe and convenient pedestrian and cycle access to Southview Road, Firle Road and the Peacehaven Centenary Park; iii) The provision of equipped children’s play spaces throughout the development; iv) The provision of 2 hectares of public amenity space at the south east corner of the site, allowing for the potential expansion of the Peacehaven Centenary Park; v) The provision of a comprehensive landscaping scheme, incorporating a significant new tree belt along the eastern boundary of the site; vi) The identification, delivery and funding of a co-ordinated package of multi-modal transport measures to mitigate the impacts of development on the A259 coast road to the satisfaction of the local planning authority, in consultation with the local highway authority and adjacent highway authority; vii) The development will provide a connection to the sewerage system at the nearest point of adequate capacity, as advised by Southern Water; 	
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- viii) The development is subject to a programme of archaeological works in order to enable any archaeological deposits and features to be recorded;
- ix) Contributions to other off-site infrastructure improvements arising from and related to the development.
- x) The provision of a comprehensive noise and odour assessment in consultation with the utility provider which confirms that acceptable noise and odour standards can be met within the proposed homes and amenity areas.



Justification

This housing allocation comprises a tract of open, relatively flat agricultural land which abuts the existing built-up area of Peacehaven on its western boundary. Peacehaven Community School and Centenary Park are located on the southern boundary, with Peacehaven Waste Water Treatment Works to the south east. A small group of residential properties and industrial units are located to the north, whilst elsewhere open countryside extends eastwards from the boundary of the allocated site towards the National Park.

The site is in single ownership and is currently classified as Grade 2 agricultural land (i.e. the best and most versatile agricultural land). However, the site is within easy walking distance of the Meridian Centre, Peacehaven Leisure Centre, Peacehaven Community School, primary schools, and local employment opportunities. It is therefore considered that the economic and social benefits of housing development in this location outweigh the loss of valuable agricultural land.

The development of the site also provides an opportunity to improve the urban edge of Peacehaven in this location, which is currently highly visible in views from the adjacent countryside of the National Park. This will be achieved through the requirement for a significant tree belt along the eastern edge of the allocation in order to help assimilate the development into the surrounding downland landscape.

Approximately 2 hectares of the southern section of the site was allocated for public open space in the adopted Lewes District Local Plan 2003. This was part of a wider allocation to help address the significant shortfall of outdoor

		<p>playing space in Peacehaven and Telscombe. Notwithstanding the recent completion of the Centenary Park, a shortfall in outdoor playing space still exists in the towns and it is therefore considered appropriate for the housing allocation to include at least 2 hectares of public amenity space to meet the needs of the new residents. Provision should also be made for equipped and informal children's play spaces in accordance with the Councils' adopted standards.</p> <p>Due to local highway capacity constraints, an essential requirement of the development will be the identification and delivery of a co-ordinated package of multi-modal transport measures to mitigate the impacts on the A259 coast road. This will include effective enhancements to the existing bus service levels and infrastructure in the A259 corridor, thereby increasing the share of total person demands by bus for the whole area, not just arising from the new development itself.</p> <p>The development would also be 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. The development should also demonstrate overall sustainable accessibility, including good connections to the adjacent street network in order to encourage walking and cycling.</p> <p>The allocated site is located within an Archaeological Notification Area, defining an area of prehistoric activity and settlement. The developer will therefore be required to record and advance understanding of the significance of any archaeological deposits and features within the site and should make this evidence publicly accessible.</p>	
MM15	Section 7 (Core Delivery Policies)	MM15 is deleted.	

	Core Policy 1, p70		
MM16	Core Policy 2 p73	Amend Criterion 2 to read: 2. Provide flexible, socially inclusive and adaptable accommodation to help meet the diverse needs of the community and the changing needs of occupants over time. This need will include accommodation appropriate for the ageing population and disabled residents.	
MM17	Section 7 (Core Delivery Policies) Core Policy 3, criterion 1, p.76	Amend criterion 1 by inserting the words 'and wastewater facilities' to read: Avoid locating sites in areas at high risk of flooding or significantly contaminated land, or adjacent to existing uses incompatible with residential uses, such as waste tips and wastewater facilities;	
MM18	Core Policy 3 p76	Amend the first paragraph of the policy wording to read: Provision will be made for a net total of 13 additional permanent pitches for Gypsies and Travellers to serve the needs for the period 2014 to 2030. Of these 5 pitches will serve the needs of the area outside the National Park and 8 will serve the needs within the National Park area of the district. The local planning authority will allocate specific, deliverable sites through the Local Plan Part 2 and the SDNPA Local Plan, <u>unless allocated through Neighbourhood Plans</u>. These allocations will be informed by appropriate Site Assessment work and take into account any planning permissions granted <u>for</u> permanent use in the interim.	
MM19	Core Policy 4 p81	Amend and add to criterion 2 to read: Safeguard existing employment sites from other competing uses unless there are demonstrable economic viability or environmental amenity reasons for not doing so. This will include:	

		<ul style="list-style-type: none"> i. A demonstrated lack of tenant/occupier interest. ii. A demonstrated lack of developer interest. iii. Serious adverse environmental impacts from existing operations. iv. Where the site is otherwise unlikely to perform an employment role in the future. v. Where the loss of some space would facilitate further/improved employment floorspace provision. <p><u>Guidance on the interpretation of i. and ii. in the determination of planning applications is set out in paragraph 7.44 of the supporting text.</u></p> <p>Criterion 2 then continues as in the Submission Plan.</p>	
MM20	Core Policy 6 p91	<p>Insert additional text after the first sentence under the <u>Main Town Centres</u> heading within the policy:</p> <p>The loss of retail units that are within these defined areas and frontages will be resisted.</p>	
MM21	Core Policy 6 p91	<p>Insert additional text after the first sentence under the <u>District Centres</u> heading within the policy:</p> <p>The loss of retail units that are within these defined areas and frontages will be resisted.</p>	
MM22	Core Policy 6 p91	<p>Insert the following text under the <u>District Centres</u> heading, after the existing text:</p> <p>In Newhaven town centre a diverse range of retail and other uses such as cafes, restaurants, financial and professional services, employment, arts, cultural and community facilities will be encouraged in order to support the retail function. Such uses will also be permitted in vacant retail units within the Newhaven Primary Shopping Area. Changes of use to residential will be supported in Newhaven town centre, except at street</p>	

		<p>level in the Primary Shopping Area, where other appropriate alternative uses such as retail, cafés, restaurants, financial and professional services, arts, cultural or community facilities cannot be identified.</p> <p>Delete this same text from under the <u>Local Centres</u> heading.</p>	
MM23	Core Policy 6 p92	<p>Reword and expand Criterion 4 to read:</p> <p>4. Support and retain local shops and in locations not identified in the retail hierarchy unless:</p> <p>i) a viability appraisal, including a marketing exercise, demonstrates that continued use as a shop is no longer feasible; or</p> <p>ii) an alternative facility of equivalent or better quality will be provided in an accessible location within the same locality.</p> <p>Where such uses are demonstrated to be unviable alternative community uses will be sought in the first instance. Proposals for new small scale rural retail and community facilities will be encouraged where they provide for local needs.</p>	
MM24	Section 7 (Core Delivery Policies) Core Policy 10 p.102	<p>Amend criterion 2 to read:</p> <p>2. The highest priority will be given to the <u>first purpose</u> of the South Downs National Park and the integrity of European designated sites (SACs and SPAs) in and around Lewes District. <u>Within and in the setting of the South Downs National Park, development will be resisted if it fails to conserve and appropriately enhance its rural, urban and historic landscape qualities, and its natural and scenic beauty, as informed by the South Downs Integrated Landscape Character Assessment.</u></p>	
MM25	Section 7 (Core Delivery Policies)	Amend criterion 3. to read:	

	Core Policy 10 p.102	<p>3. To ensure that the Ashdown Forest (SAC and SPA) is protected from recreational pressure, residential development that results in a net increase of one or more dwellings within 7km of the Ashdown Forest will be required to contribute to:</p> <p>i. The provision of Suitable Alternative Natural Greenspaces (SANGs) at the ratio of 8 hectares per additional 1,000 residents; and</p> <p>ii. The implementation of an Ashdown Forest <u>Strategic Access Management and Monitoring Strategy (SAMMS)</u></p> <p>Until such a time that appropriate mitigation is delivered, development that results in a net increase of one or more dwellings within 7km of Ashdown Forest will be resisted. Applicants may consider mitigation solutions other than SANGs in order to bring forward residential development. Such solutions would need to be agreed with the District Council and Natural England.</p>	
MM26	Section 7 (Core Delivery Policies) Core Policy 10 p.102	<p>Amend criterion 4 to read:</p> <p>4. Ensure that water quality is <u>improved where necessary or maintained when appropriate</u> (including during any construction process) and that watercourses (including groundwater flows) are protected from encroachment and adverse impacts in line with the objectives of the South East River Basin Management Plan. Where appropriate, the local planning authority will seek the enhancement and restoration of modified watercourses.</p>	
MM27	Section 7 (Core Delivery Policies) Core Policy 11, p.105	<p>Amend Criterion (iii) of Core Policy 11 by deleting the words “Incorporates sustainable construction standards and techniques and” to read:</p> <p>iii. Adequately addresses the need to reduce resource and energy consumption;</p>	

MM28	Section 7 (Core Delivery Policies) Core Policy 13, p.111	Amend Core Policy 13 by deleting Criterion 5 and re-numbering Criteria 6 and 7 accordingly.	
MM29	Section 7 (Core Delivery Policies) Core Policy 14 p 115	Amend the first paragraph of the policy to read: In order to reduce locally contributing causes of climate change, including through the implementation of sustainable construction techniques in new developments, the local planning authority will:	
MM30	Section 7 (Core Delivery Policies) Core Policy 14 p 115	Amend criterion 2 to read: 2. Support applications for low carbon and renewable energy installations, subject to the following matters being satisfactorily assessed and addressed: ii. <u>i.</u> Protecting the special qualities and setting of the South Downs National Park, in accordance with national park purposes and the duties of regard by relevant authorities iii. <u>ii.</u> Landscape and visual impact iv. <u>iii.</u> Local amenity impact v. <u>iv.</u> Ecology impact vi. <u>v.</u> Cultural heritage impact, including the need to preserve and enhance heritage assets.	
MM31	Section 7 (Core Delivery Policies) Core Policy 14 p 115	Amend criterion 3 to read: 3. Require planning applications relating to Core Strategy strategic site allocations to be accompanied by an Energy Strategy. The Energy Strategy will seek to incorporate decentralised and renewable or low carbon technologies into the development proposal. Where a strategic	

		site is developed in phases, the Energy Strategy will guide the development of infrastructure for renewable and/or low carbon technologies in a coordinated way.	
MM32	Section 7 (Core Delivery Policies) Core Policy 14 p 115	Amend criterion 4 to read: 4 <u>Require all new dwellings to achieve water consumption of no more than 110 litres per person per day, unless it can be demonstrated that it would not be technically feasible or financially viable. All new non-residential developments over 1,000 square metres (gross floorspace) will be expected to achieve the BREEAM 'Very Good' standard and <u>developers</u> will be expected to provide certification evidence of the levels achieved in the relevant <u>requirements/standards</u> at the planning application stage.</u>	
MM33	Key Diagram	Retitle "Portrait of the District" as "Key Diagram" and annotate accordingly.	
MM34	Appendix 3	Monitoring and Delivery Framework Update in accord with all other Main Modifications.	
MM35	Appendix 4	Replace with new Housing Trajectory as at October 2015.	