

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

LEWES DISTRICT LOCAL PLAN PART 1

Joint Core Strategy – Proposed Submission Document

DRAFT

May 2014

The Joint Core Strategy Proposed Submission Document

Representations are invited on the amendments to this document for an 8 week period between XXX and XXX. If you made representations on the original Proposed Submission document, which was published in January 2013, then there is no need to resubmit them during this representation period, unless you wish to alter or withdraw your representation in light of the amendments made.

Although the document has been jointly prepared by Lewes District Council and the South Downs National Park Authority, comments should be submitted to Lewes District Council as they are managing the consultation exercise. Comments can be sent to the District Council by:

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Planning Policy Team
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Southover Road
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You can also be kept informed on the latest news and developments on the Core Strategy through the District Council's website (www.lewes.gov.uk) and Twitter account (@lewesdc).

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

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 markets. 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 Proposed Submission Document 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 broad 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 the Joint Core Strategy will be supported in due course by the preparation of more detailed and non-strategic policies, including Neighbourhood Plans where town and parish councils choose to produce them. Together all these documents will form the comprehensive Development Plan for the district.

Cllr Tom Jones

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

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1. INTRODUCTION

- 1.1 Lewes District Council, in partnership with the South Downs National Park Authority (NPA), has prepared a plan that will, once adopted, 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 is the version that will be submitted to Government for an independent Examination in Public. This joint Core Strategy will form Part 1 of the new Lewes District Local Plan (see paragraph 1.5 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 will be considered by the Planning Inspector appointed to conduct the Examination in Public. In advance of submitting this Core Strategy to the Secretary of State, the District Council and National Park Authority have taken the decision to make certain amendments to the Proposed Submission document (as published in January 2013), as well as the accompanying Sustainability Appraisal report. Representations are now invited on these amendments. As with the representations made on the original Proposed Submission document, all representations made on the amendments will also be considered by the Planning Inspector.
- 1.2 Ways to submit comments to on this document are detailed inside the front cover. The remaining parts of this introductory section provide some background and context to this plan.

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

- 1.3 At present, planning policies for all of Lewes District are the 'saved' policies of the Local Plan. The Local Plan was adopted in 2003, since when 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 the Local Plan is a single document containing all planning policies, the LDF was presented like a portfolio of documents, each dealing with a different aspect of planning or the administration of planning. The Core Strategy was the pivotal document in the LDF, setting out the over-arching strategy to which all other documents in the LDF should conform. A Core Strategy will tend not to deal with detailed policies, which were instead expected to be covered in other Local Development Documents.
- 1.4 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 seen a move away from the principle of producing a portfolio of planning policy documents in the form of an LDF. Instead, the Government refer to Local Planning Authorities producing a 'Local Plan', which, where possible, consists of a single plan for the area.

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- 1.5 As these most recent changes have been introduced late in the production of the Core Strategy, the Council and NPA have considered it appropriate to proceed with the production of the Core Strategy as a strategic level plan for the whole of the district. This Core Strategy will form 'part 1' of the Local Plan, with a Site Allocations and Development Management Policies DPD providing the non-strategic policies in 'part 2' of the Local Plan. This latter document will be prepared subsequent to the Core Strategy and only apply to the part of Lewes District that lies outside of the South Downs National Park. Within the National Park, a park-wide plan will ultimately provide both Parts 1 and 2 of the Local Plan (see www.southdowns.gov.uk for further details).
- 1.6 On adoption, the Core Strategy will replace a number of the current 'saved' Local Plan (2003) policies. Those policies to be replaced and retained are set out in Appendix 2 of this plan. The policies retained will be reviewed through the Site Allocations and Development Management Policies DPD.
- 1.7 Other planning policy documents to be prepared will be Supplementary Planning Documents, where indicated within this document, Community Infrastructure Charging Schedule, and Neighbourhood Plans prepared under the Localism Act.
- 1.8 Collectively, these policy documents will set out the plan for how the district is expected to change over a period of time and will reflect other relevant strategies and policies in the area. It will make clear where, what, when and how development will take place and in doing so it will establish a clear vision for the district that helps to create sustainable communities where people want to live, work and visit, now and in the future.
- 1.9 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 National Park Authority deal with such matters within their administrative area).
- 1.10 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)¹. Alongside this Core Strategy, these plans form the development plan for the area and District and Borough councils therefore also need to take relevant policies in these plans into account when reaching decisions on planning applications. Planning applications for waste and minerals activity

¹ 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 to the ESCC website:

<http://www.eastsussex.gov.uk/environment/planning/development/mineralsandwaste/default.htm>

are considered by the County Council, or by the South Downs National Park Authority (where applications are made for activity within the Park).

How is the Core Strategy prepared?

- 1.11 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 four 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 Papers²</i>	<i>May 2010</i>
<i>Emerging Strategy (including other options considered)²</i>	<i>Autumn 2011</i>
<i>Proposed Submission Document³</i>	<i>January – March 2013</i>
<i>Proposed Submission Document – Focussed Amendments³</i>	<i>May – June 2014</i>
Formal Submission ⁴	August 2014
Examination	Autumn 2014
Adoption	Early 2015

- 1.12 As can be seen from the above table, a number of the stages in preparing the Core Strategy have already been undertaken. In May 2010, nine Topic Papers were published by the District Council and consulted upon. These papers included proposed objectives for the Core Strategy, a proposed vision for the district and potential policy areas and policy options for consideration. Views were sought on all aspects covered in the Topic Papers. In parallel with the consultation on the Topic Papers, the District Council also held seven drop-in sessions and two discussion forums in various venues across the district. These events were held in order to obtain views on the content of the Topic Papers and to also understand what issues people felt a plan for the district should be addressing and how they felt they could be addressed.
- 1.13 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 (see, ‘Summary of Consultation on the Core Strategy: Issues and Emerging Options Topic Papers’ at <http://www.lewes.gov.uk/corestrategy/index.asp>).

² These stages constitute Regulation 18 of The Town and Country Planning (Local Planning) (England) Regulations 2012

³ Regulations 19 and 20 of the above regulations

⁴ Regulation 22 of the above regulations

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- 1.14 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 on the consultation undertaken, a summary of the representations received, and the local authority response to them has been published (see, 'Emerging Core Strategy Consultation Summary Document' at <http://www.lewes.gov.uk/corestrategy/index.asp>).

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

- 1.15 The Core Strategy covers the whole of Lewes District, including that part of the district within the South Downs National Park. The map in section 2 (see page 13) identifies the extent of the National Park within Lewes District.
- 1.16 On 1st April 2011 the National Park Authority became the sole planning authority for the whole designated area. Hence, from this date Lewes District Council has been formally working alongside the South Downs National Park Authority in progressing this Joint Core Strategy. This means that this document has been approved for publication and consultation by both the District Council and the National Park Authority.
- 1.17 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 mid 2017. Given the relatively close adoption dates of the respective plans, and that the policies within 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 later park-wide Local Plan, although some may change depending on the findings of up to date evidence and monitoring.
- 1.18 A key influence on planning policies for the National Park area should be the South Downs National Park's Partnership Management Plan, which was adopted in December 2013 and will inform the National Park Authority's own Local Plan.

What determines the content of the Core Strategy?

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

National influences

- 1.20 In March 2012 the National Planning Policy Framework (NPPF) was published. It sets out the Government's planning policies for England and 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.

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- 1.21 The NPPF condenses and replaces 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 new national Planning Practice Guidance, covering various topics including housing and economic development needs assessment and Local Plans.

Regional influences

- 1.22 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 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 are as follows:

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

- 1.26 Since the Sustainable Community Strategy was prepared, the District Council has also prepared and adopted a Regeneration Strategy that covers the period between 2012 and 2015. This Strategy outlines how the District Council and its partners will help create the conditions to sustain economic growth over the coming three years. It is based on five priorities⁵ that this Core Strategy will have a key role in seeking to realise.

- 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 should reflect. Amongst others, these strategies include

⁵ The five priorities are; attracting investment; promoting enterprise; inspiring learning; welcoming visitors, and; strengthening partnerships.

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East Sussex County Council's Local Transport Plan⁶, 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 the past couple of years a number of studies have been undertaken on several different subject areas. References to these studies will appear throughout this document, particularly in the reasoned justification for each policy. The full extent of the evidence base studies and their content can be viewed at: <http://www.lewes.gov.uk/planning/backgroundreps.asp>

National Park influences

- 1.29 Since a significant part of the Joint Core Strategy plan area is within the South Downs National Park, the two statutory National Park purposes will need to underpin the strategy and policies that 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:
- 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.⁷
- 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 needs to be subject to the Sustainability Appraisal process. This process incorporates the requirements of the Strategic Environmental Assessment (SEA) Directive. The Sustainability Appraisal process assesses strategy and policy options against a set of objectives that reflect the characteristics and issues within the plan area.
- 1.32 A Sustainability Appraisal Report 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

⁶ The current version of this plan is Local Transport Plan 3, which was adopted in 2011

⁷ In accordance with the Sandford Principle, where irreconcilable conflicts exist between the two purposes, the conservation interest (the first purpose listed) should take priority.

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included within this document are generally options that have performed well in the SA process. However, it also needs to be recognised that consideration has been given to other issues such as findings of the evidence base, stakeholder involvement and delivering 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 significant adverse effect on any of the protected sites as a result of implementing the plan.

1.34 The Duty to Co-operate

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 requirement and are members of the East Sussex Strategic Planning Members Group, the Coastal West Sussex and Greater Brighton Strategic Planning Board and the West Sussex Joint Planning Board. A background paper, Justification for the Housing Strategy, has been prepared that demonstrates 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, in particular 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 preparation. Obtaining such views and opinions is undertaken both through formal consultation methods (such as the consultation on the Issues and Emerging Options Topic Papers) and through informal engagement (one-to-one meetings, workshops, inputting into evidence studies, etc).

The role of Neighbourhood Planning

- 1.36 Through the Localism Act 2011, a new tier in the planning system has been created at a 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 are taking a very positive approach with regards 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. A key part of this is to progress this Core Strategy to adoption, in order to provide the strategic planning context for any neighbourhood plans

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prepared in this area. Therefore, neighbourhood plans, where produced, will be key to the delivery of some of the strategic elements of this plan.

- 1.37 It is accepted that neighbourhood planning will not be undertaken in all areas covered by this plan (and in some cases neighbourhood planning may only seek to focus on certain issues that this plan addresses). Therefore, the Site Allocations and Development Management Policies DPD (also referred to as 'Part 2 of the Local Plan') will also provide the detailed and local policy that will aid in the delivery of strategic elements of this plan. Within the South Downs National Park part 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. A number of appendices appear at the end of the plan, which cover a range of issues including how the plan will be monitored once it has been adopted.

2. A PORTRAIT OF LEWES DISTRICT

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

General Characteristics

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- Lewes District is located within East Sussex, in the South East region 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 97,500 (ONS, Census 2011), 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 is approximately 22,500.
- The city of Brighton & Hove is located on the south-western boundary and exerts a strong influence on the life of the district, providing employment, shopping 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. This includes the A259, which links the coastal communities, and the A26, A272 and A275, which are key routes through the northern part of the district.
- Lewes, Seaford and Newhaven are linked by rail connections to London, Gatwick, and towns along the Sussex coast and beyond.
- The port of Newhaven provides cross channel passenger and freight services to Dieppe, in Haute Normandie, France, and beyond to northern Europe.
- Lewes District is included in both the South East Local Enterprise Partnership (LEP) and the Coast to Capital LEP. Each LEP is a public and private sector partnership, which seeks to improve economic prosperity.

Environmental Characteristics

- The landscape and historic environment of the district is highly valued by both residents and visitors. There is a diverse and attractive countryside, including chalk cliffs and downland, shingle beaches, heathland, river valleys, flood plains, wetlands, and areas of ancient woodland.

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- 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 99 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 43% 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 Lewes town centre, where most of the air pollution is generated by traffic. Another area of concern, in terms of air quality, is the area beside the A259 in the centre of Newhaven, where the levels of nitrogen dioxide are close to the limits of which AQMA designation will be required.
- Large parts of the district benefit from a highly peaceful and tranquil environment, with minimal noise and light pollution, that is much valued by residents and visitors alike.

Social Characteristics

- The district has a significantly higher percentage of residents over 65 years of age (22.8%) compared with the national average (16.4%). By contrast, it has a smaller proportion of residents aged 15-29 years (15.3%) compared with the national average (20%).
- 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

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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 £36,619, which is higher than the mean for East Sussex or Great Britain, but still well below the South East region's mean of £40,226.
- 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.

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- Self-employment is a significant feature of the district, representing 18% of the economically active population, compared with 14% in the South East.
- There are around 30,900 jobs in the district, predominantly in public administration, education and health (36%), retail (16%) and manufacturing (7.5%).
- 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 2009, tourism supported approximately 2,300 full time equivalent jobs in the district.
- Many employment premises in the district are ageing and do not meet modern business requirements. An exception to this is the recently opened Newhaven Enterprise Centre, which has consistently high occupancy rates.
- Employment land is under pressure from higher-value competing land uses, particularly residential and retail.

Lewes Town

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

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- 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, and has a population of 12,225. The South Downs National Park surrounds the town on the landward side.
- 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*).

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- 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 21,657.
- 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 Peacehaven's early origins 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 is being created in Peacehaven, utilising land provided in association with the new Waste Water Treatment Works and funding provided by recent housing developments.

Seaford

- Seaford is the largest settlement in the district with a population of 24,044. It is located between the sea and the South Downs National Park, with the river

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valleys of the Cuckmere and the Ouse lying to the east and west of the town respectively.

- 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 and shaws and areas of ancient woodland, together with extensive areas of protected heathland at Chailey Common.
- The quality of the panoramic views across the Low Weald from the escarpment ridge of the Downs has a strong influence on the landscape character of the South Downs National Park.
- Villages in this part of the district are small (less than 2,000 population), with the exception of Ringmer, which has a wider range of facilities and services, including a secondary school 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.

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- 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 is seeking to address. Developing the spatial portrait has identified some of the issues, as has the early work on the Core Strategy and Sustainability Appraisal process. This included the engagement work that led to the formulation of the Topic Papers and the subsequent consultation on them. These issues and challenges also

reflect the issues and priorities that are detailed in the Sustainable Community Strategy.

- 3.2 It is these strategic issues and challenges that need to be addressed in the planning of the district and, as such, they inform the subsequent vision, objectives and strategy that follows this section.

Accommodating and delivering growth

- There is a requirement to 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 much higher levels of growth are planned than in Lewes District.

Improving access to housing

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

Promoting sustainable economic growth and regeneration

- We need to determine the best way of addressing the pockets of socio-economic deprivation 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.

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- 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.

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- 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.

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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 2030, the period of time that the Core Strategy covers.

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- 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

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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

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the special qualities of the National Park⁸. 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.

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⁸ 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, including through the implementation of the highest feasible standards of sustainable construction techniques in new developments, and is pro-active 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 utilised⁹. 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

⁹ 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 no longer in place, this particular evidence is still considered 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 (www.lewes.gov.uk/planning/backgroundreps.asp) 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)

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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	Barcombe, Bishopstone, Norton, Chailey Green, East Chiltington, Hamsey, Offham, Plumpton, Iford, Streat, Southease, Tarring

	accessibility to higher order settlements.	Neville, Telscombe Village, Wivelsfield, Westmeston
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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. 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 be updated on a regular basis. Updates will reflect any new and amended delivery plans prepared by infrastructure providers.

The amount of development

- 6.12 The focus of development over the coming years is going to be on the housing and employment sectors as this is where the greatest level of need exists. This 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 for some of the locational policies within the Core Strategy, as well as within 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 Following the revocation of the South East Plan, the scale of future housing growth needs 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 Area¹¹ 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). 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 needs 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. These factors, and their implications for housing growth, are examined in the Housing Background Papers 2011 and 2013. A further assessment, which reviews the Duty to Co-operate Housing Study and its implications, is set out in the Core Strategy Background Paper: Justification for the Housing Strategy 2014.
- 6.15 This latter assessment explains how the District Council and the National Park Authority have sought to explore a range of options in order to attempt 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 further housing growth and the capacity of existing and planned infrastructure 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

¹¹ 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>

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Lewes, which lies wholly within the National Park, and Seaford, which is tightly constrained by the National Park boundaries. 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 around the towns of Lewes, Newhaven and Seaford, and the proximity of international and national ecological designations. In terms of infrastructure, the capacity of the road network has been, and continues to be, a critical issue affecting the district. This issue principally impacts upon the growth of Newhaven, Peacehaven and Telscombe but also affects the potential for large-scale housing development in the villages and urban fringe areas to the north or east of Ditchling.
- 6.18 Finally, 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 Council's most recent 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. A detailed justification of the inability of the district to accommodate its full objectively assessed housing need is provided in the background paper entitled 'Justification for the Housing Strategy'. This includes an explanation of the assessments undertaken in a 'no stone unturned' approach to ensuring all possible options for maximising housing delivery in the district have been thoroughly explored.
- 6.19 The outcome from the appraisal of different options has led the District Council and the National Park Authority to conclude that the overall target for net additional housing in the district should be a minimum of 5,600 dwellings between 2010 and 2030 (an average of 280 dwellings per annum). Whilst this figure is below the district's objectively assessed housing needs, 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. Higher housing delivery targets would be incompatible with the wider policies of the National Planning Policy Framework and the Core Strategy vision to preserve the district's unique, distinctive and generally high quality environment and, by damaging one of its economic assets, could also have negative impacts on the local economy.
- 6.20 It is also evident through the findings of the Duty to Co-operate Housing Study 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 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 identifies 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. One of the options likely to be examined is the potential for a new settlement within the Sussex Coast Housing Market Area. The District Council and the National Park Authority did not consider it appropriate to delay the submission of the Core Strategy until the outcome of this work is known. However, if a long-term solution which affects the plan area is agreed, we are committed to a review of the Core Strategy if this is necessary to deliver it.

Employment provision

- 6.17 The provision of planned employment land is 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 2031¹².
- 6.18 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 weak economic outlook on both a local and wider level. As a result, the economic and employment growth forecasts are somewhat lower than envisaged a few years ago.
- 6.19 Despite the relatively low growth forecasts, the need remains to set a positive strategy to aid in the recovery from the recession, give flexibility for stronger economic 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.
- 6.20 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.

¹² 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).

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.

- 6.21 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/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 has concluded that there is not a need, in quantitative terms, to be planning for and allocating sites for significant retail development in the period up until 2030 (although it is recognised that this position will need to be kept under review throughout the plan period). There is however a qualitative need for some additional provision, particularly in Lewes town. Spatial Policy 1 addresses this issue.
- 6.22 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 has 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 5,600 net additional dwellings will be provided in the plan area (this is the equivalent of approximately 280 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

6.23 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 commitment¹³. 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.

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

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

¹³ 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.

¹⁴ 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.

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) ¹⁵	(D) Units considered deliverable having made sufficient progress through the planning process ¹⁶	(E) Unimplemented Local Plan allocations for housing ¹⁷ .	Residual requirement to plan for (A – B, C, D & E)
Housing (within the National Park)	Plan – wide requirement:	77	163	0	0	Plan – wide requirement:
Housing (outside of the National Park)	5,600	551	961	77	227	3,544

6.24 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 (EELA) 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 for the same reason 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.

6.25 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 (this was a possible extension to the Caburn Industrial Estate). Although the site has no

¹⁵ A discount has been applied to small-scale schemes permitted – see the Justification for the Housing Strategy Paper.

¹⁶ These are schemes granted planning permission subject to a section 106 agreement being put in place.

¹⁷ Only unimplemented allocations that are still deemed deliverable or developable through the SHLAA process have been included within this allowance.

obvious on or off-site constraints that would preclude its development, it is 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 emerging National Park Local Plan and/or relevant Neighbourhood Plans.

- 6.26 Although the main argument for the additional employment floorspace in Lewes town is for qualitative reasons, 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

- 6.27 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.
- 6.28 In identifying an over-arching 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 and the National Park Local Plan. In some areas, Neighbourhood Plans may 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.
- 6.29 However, there are certain sites and locations in the district where the delivery of housing will be key 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 appropriate to allocate or identify them in this 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 seen as deliverable in the early part of the plan period. The allocation of these sites will aid the District Council and National Park Authority in maintaining a sufficient supply of deliverable housing sites in the early part of the plan period and at least up until non-strategic housing allocations come forward in subsequent plans. A contingency strategic allocation is also identified for potential delivery. This is in the event of the non-delivery of housing for the early part of the plan period through the Ringmer Neighbourhood Plan. The following spatial policy, as well as paragraphs 6.75 – 6.78 of this document, set out and provide an explanation on this approach.

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- 6.30 The broad location identified is where housing is expected to come forward in the latter part of the plan period and therefore, as this is some way off, it is not considered appropriate at this stage to set a detailed allocation, which would include the identification of definitive site boundaries and other details such as the exact development mix. This is because detailed circumstances may change between now and when the allocation would be expected to be delivered. Instead, these locations are indicated as they are critical to the delivery of housing in the latter part of the plan period and their detailed allocation will be brought forward through subsequent Development Plan Documents, based on the principles outlined in this plan.
- 6.31 Housing delivered by strategic sites and the identification of broad locations will not be the only way by which new housing is secured in the plan area. Smaller site allocations will play an important role in helping to maintain a sufficient supply of new housing, particularly in the more rural locations in the district. 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 5,600 net additional dwellings will be delivered in the district. Part of this total will be met as follows;

- **628 completions in the period between April 2010 and April 2013**
- **The delivery of 1,428 commitments across the plan area.**
- **An allowance for 518 dwellings to be permitted on unidentified small-scale windfall sites during the plan period and subsequently delivered¹⁸.**

The remaining 3,026 net additional dwellings will be distributed as follows;

- **(1) Housing to be delivered on the following strategic site allocations;**
 - **Land at North Street, Lewes – 390 net additional units.**
 - **Land to the north of Bishops Lane, Ringmer – 110 net additional units (contingent on the Ringmer Neighbourhood Plan not being made before the adoption of the Core Strategy or that it does not allocate sufficient sites to deliver 110 net additional units by 2019).**
 - **Land at Greenhill Way, Haywards Heath (within Wivelsfield Parish) – 175 net additional units.**
- **(2) Housing to be delivered at the following broad location;**

¹⁸ See the Core Strategy Background Paper: Justification for the Housing Spatial Strategy 2014

- Land at Harbour Heights, Newhaven – a contribution towards the 830 planned net additional units at Newhaven (see (3) below)
- (3) Planned housing growth at the following settlements;
 - Lewes – a minimum of 260 net additional units
 - Newhaven – a minimum of 830 net additional units
 - Peacehaven & Telscombe – a minimum of 660 net additional units (520 of 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 170 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 220 net additional units (although if the contingency allocation for the land to the north of Bishops Lane is implemented through point (1) of this policy, the figure will be 110 net additional units).
 - Wivelsfield Green – a minimum of 30 net additional units

For the planned growth identified in section (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, although should they not be progressed in an appropriate timeframe, fail at Examination or referendum, or not identify sites to deliver the required number of units then the aforementioned local planning authority documents will plan for this growth.

For settlements not listed in section (3) 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.

6.32 By taking the policy above, it is possible to summarise the planned levels of housing growth for each settlement, factoring in the units already built, the commitments, strategic site allocations, broad locations for development and planned growth to come forward on future allocations. The table on the following page presents this summary.

Table 5 – Planned levels of housing growth, by settlement

Settlement (NP denotes	Completions (April 2010 –	Commitments (as at 1 st April	Housing delivered on	Housing to be delivered	Total
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it is in the National Park)	April 2013)	2013)	strategic sites	through subsequent allocations	
Edge of Haywards Heath (within Wivelsfield Parish)	0	0	175	0	175
Seaford	89	240	0	170	499
Lewes (NP)	66	152	390	260	868
Newhaven	35	783	0	830	1648
Peacehaven & Telscombe	223	137	0	660 ¹⁹	1020
Edge of Burgess Hill (within Wivelsfield Parish)	70	0	0	100	170
Ringmer & Broyle Side ²⁰	4	41	0 (110)	220 (110)	265
Newick	22	5	0	100	127
Barcombe Cross	0	1	0	30	31
Plumpton Green	1	3	0	50	54
Wivelsfield Green	15	3	0	30	48
Cooksbridge	0	7	0	30	37
North Chailey	4	0	0	30	34
South Chailey	2	2	0	10	14
Ditchling (NP)	8	2	0	15	25
All other settlements and areas	89	52	0	0	141
Totals	628	1428	565	2535	5156

The windfall sites allowance of 518 units is not accounted for in the table above.

6.33 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 rating 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.

¹⁹ 520 dwellings of the total 660 dwellings are contingent upon the delivery of as yet unspecified transport mitigation measures required to resolve capacity constraints on the A259

²⁰ The figures in brackets for Ringmer and Broyle Side represent the scenario that the contingency allocation of land to the north of Bishops Lane is implemented.

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- 6.34 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.
- 6.35 Another key factor in setting the strategy for distributing growth has been the potential impact of new development on the highway network and the ability to mitigate this. The Newhaven Transport Study, and other transport modelling work carried out by East Sussex County Council, demonstrate that there is a limit to the amount of development that is possible in Newhaven and Peacehaven/Telscombe before sections of the A259 South Coast Road reach unacceptable levels of congestion. The County Council has identified transport mitigation measures that would deliver a certain level of housing growth in these towns but, over and above this level, an essential element in unlocking further growth lies in the possibility of achieving much greater use of public transport throughout the A259 corridor. It has yet to be demonstrated to the satisfaction of the County Council, as the local highway authority, that the necessary levels of public transport patronage are realistic or achievable, and this has been a factor in determining the planned growth of Peacehaven/Telscombe.
- 6.36 No short-term strategic allocations have been identified in the coastal towns. Along with the issues identified in the previous two paragraphs, another key factor in this has been the existing levels of housing supply in this part of the district. Newhaven, in particular, has a significant level of housing commitments, much of which is considered deliverable in the short-term. With a relatively weak housing market, this existing supply is considered sufficient to meet short-term needs prior to the additional planned growth coming forward through the Site Allocations and Development Management Policies DPD, or Neighbourhood Plans for the towns.
- 6.37 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.

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- 6.38 One such village where housing development is planned is Newick. Newick falls 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 on this) 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.
- 6.39 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 (3) of Spatial Policy 2.
- 6.40
- 6.41 The following sections and policies of this Spatial Strategy relate to the strategic site allocations, as well as the broad locations for growth, and are set out on a settlement by settlement basis.

Lewes town

- 6.42 Lewes is the county town of East Sussex (population: 16,348). 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.

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 Local Plan for further information on Exception Sites.

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- 6.43 Although Lewes is in the National Park, it nevertheless has significant development needs, particularly for additional housing (both open market and affordable housing). The District Council's Housing Register consistently shows 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.
- 6.44 Opportunities 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 are within the existing town, particularly through the redevelopment of sites. However, such redevelopment opportunities are limited, as evidenced by the SHLAA and the Employment and Economic Land Assessment. Most of these opportunities 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 a Lewes Town Neighbourhood Plan (if produced).
- 6.45 Very few sites are suitable for strategic level opportunities for growth and redevelopment within and around Lewes town. The main current opportunity is for the redevelopment of a centrally located site, as detailed within the following policy.

North Street Quarter and adjacent Eastgate area, Lewes

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

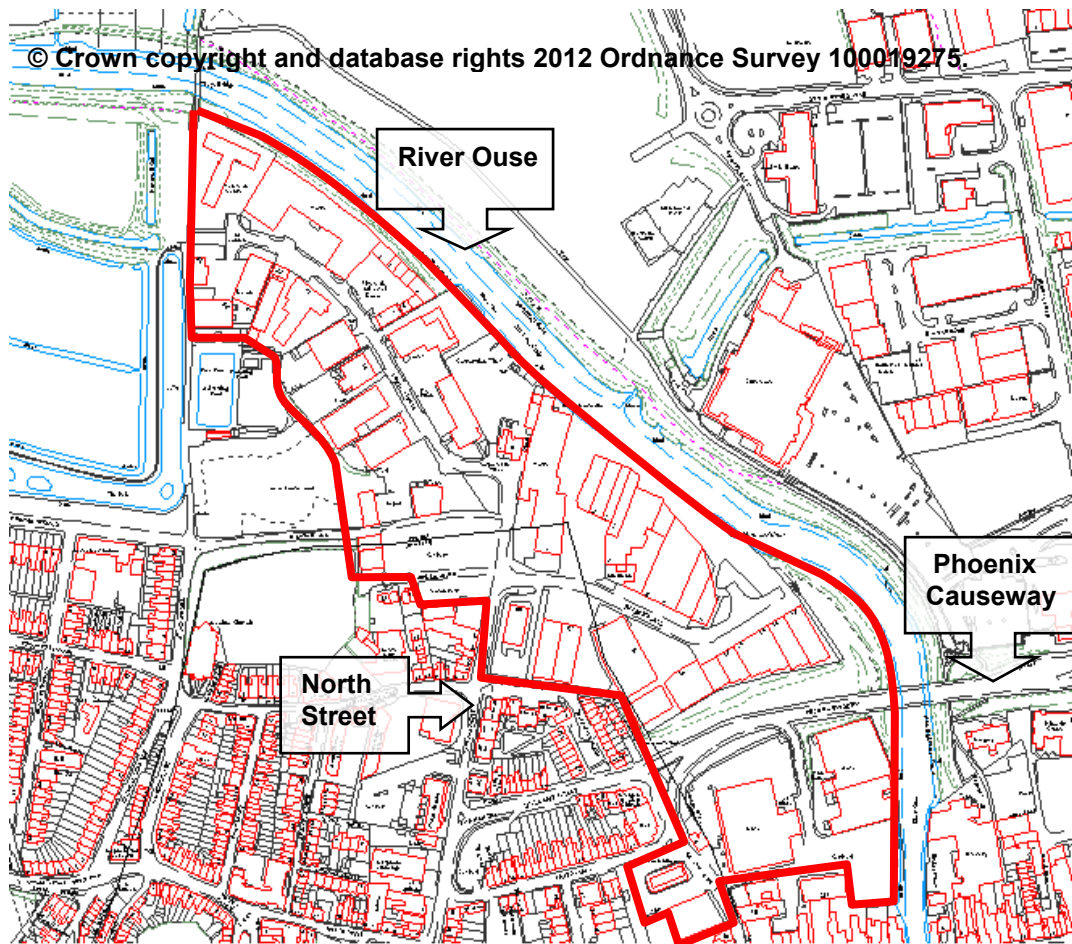
Land amounting to approximately 9 hectares at North Street and the neighbouring part of Eastgate is allocated for a mixed-use development that would create a new neighbourhood for the town of Lewes. A detailed masterplan is to be prepared in advance of a formal planning application that will indicate the exact development mix based on the following uses and broad quantum of development:

- **Approximately 390 residential units, predominantly focused towards the northern part of the site;**
- **Between 4,000 sq metres and 5,000 sq metres of B1a office floorspace;**
- **Retail floorspace that meets a qualitative need in the town, predominantly for comparison goods;**
- **A hotel;**
- **The redevelopment or relocation of the existing food superstore; and**
- **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 A2 Financial and Professional Services, A3 Restaurants and Cafes, A4 Drinking Establishments, A5 Hot Food Takeaways and community floorspace).**
- **D1 Medical and Health Services and D2 Leisure floorspace.**

Development of this site will be delivered in the period between 2016 and 2020 and this will be further expanded upon in the masterplan, which will be developed in consultation with residents, businesses and community groups on site and in the local area.

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, the aforementioned masterplan, and the following criteria:

- i) The development incorporates the early provision of flood defences to an appropriate standard and to the approval of the Environment Agency;
- ii) The development 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) The delivery of enhancements to vehicular access and off-site highway improvements, arising from and related to the development and its phasing;
- iv) The development 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 the adjacent Conservation Area;
- v) The development will be subject to 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 into the scheme, which will extend the town's riverside focus and contribute to the character and quality of the town. Additional pedestrian and cycling routes will be incorporated into the site to aid in linking the site to the rest of the town;
- vii) The redevelopment would result in no net loss of public parking provision;
- viii) The retail element of the development is incorporated into the town centre boundary (as designated by Core Policy 6) as far as feasibly possible, with any additional significant retail provision being directed to the southern part of the North Street Quarter. The exact location and amount of retail provision will be informed by a Retail Impact Assessment, which will be undertaken to inform the masterplanning process;
- ix) Subject to the commercial need, flexibility will be applied to the requirement to deliver B1a office floorspace, so that other B1 uses can be explored;
- x) Alternative uses will only be permitted on the bus station site should the facility be replaced on an operationally satisfactory and accessible site elsewhere; and
- xi) Contributions towards off-site infrastructure improvements arising from, and related to, the development.



Justification

- 6.46 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.
- 6.47 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.
- 6.48 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.

- 6.49 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.
- 6.50 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).
- 6.51 In terms of the proposed uses within the strategic site, the following paragraphs provide a summary of the reasoned justification for them.
- 6.52 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.
- 6.53 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.
- 6.54 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,

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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.

- 6.55 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.
- 6.56 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.
- 6.57 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”. Despite it not being mentioned within the policy, the incorporation of light industry (Use Class B1c) would, in principle, be acceptable within the redevelopment of the site. This will be determined through the masterplanning process, and any subsequent planning application.
- 6.58 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.

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- 6.59 The re-development of this strategic site will 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.
- 6.60 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 masterplanning process.
- 6.61 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.

Haywards Heath – Wivelsfield Parish

- 6.62 The town of Haywards Heath (population: 23,000) 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.
- 6.63 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.
- 6.64 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

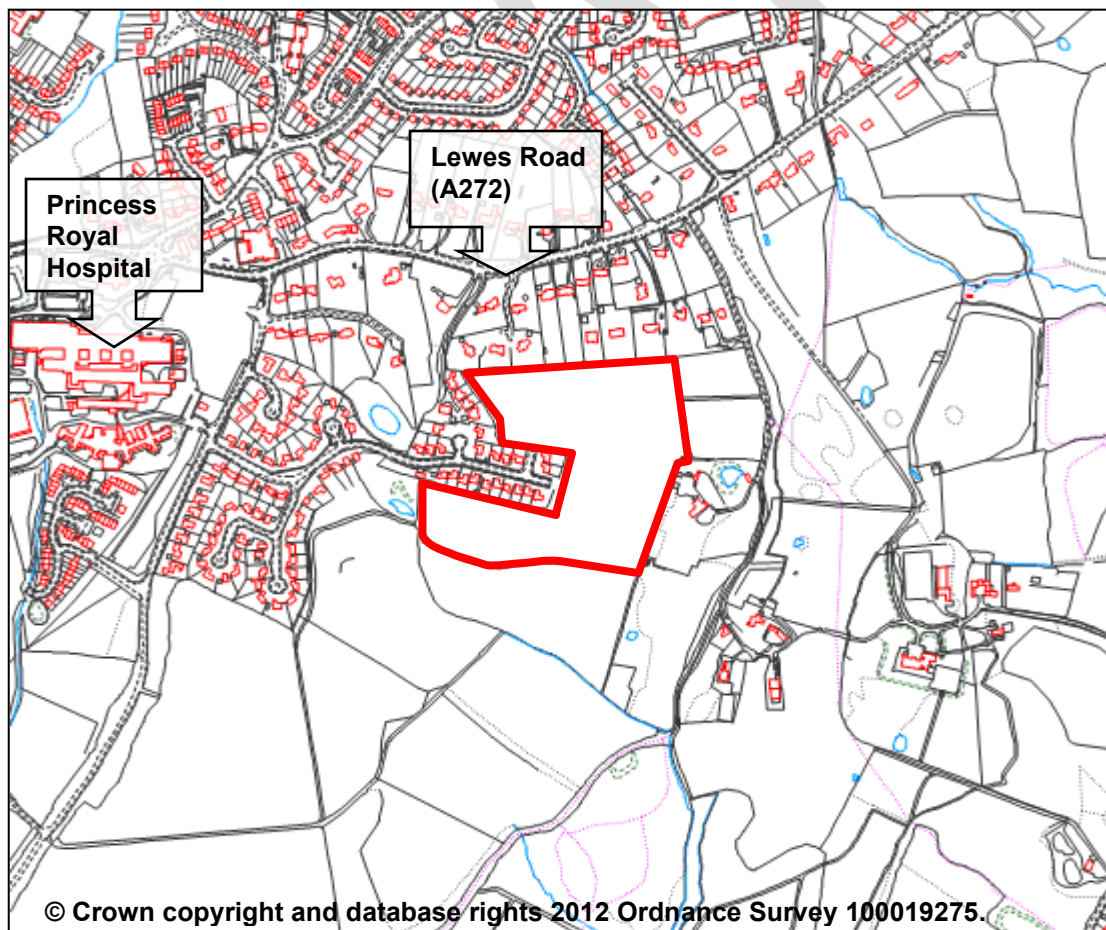
Spatial Policy 4 – Land at Greenhill Way/Ridge Way, Haywards Heath (within Wivelsfield Parish)

Land amounting to 6 hectares is allocated for residential development of approximately 175 dwellings. Development will be permitted subject to

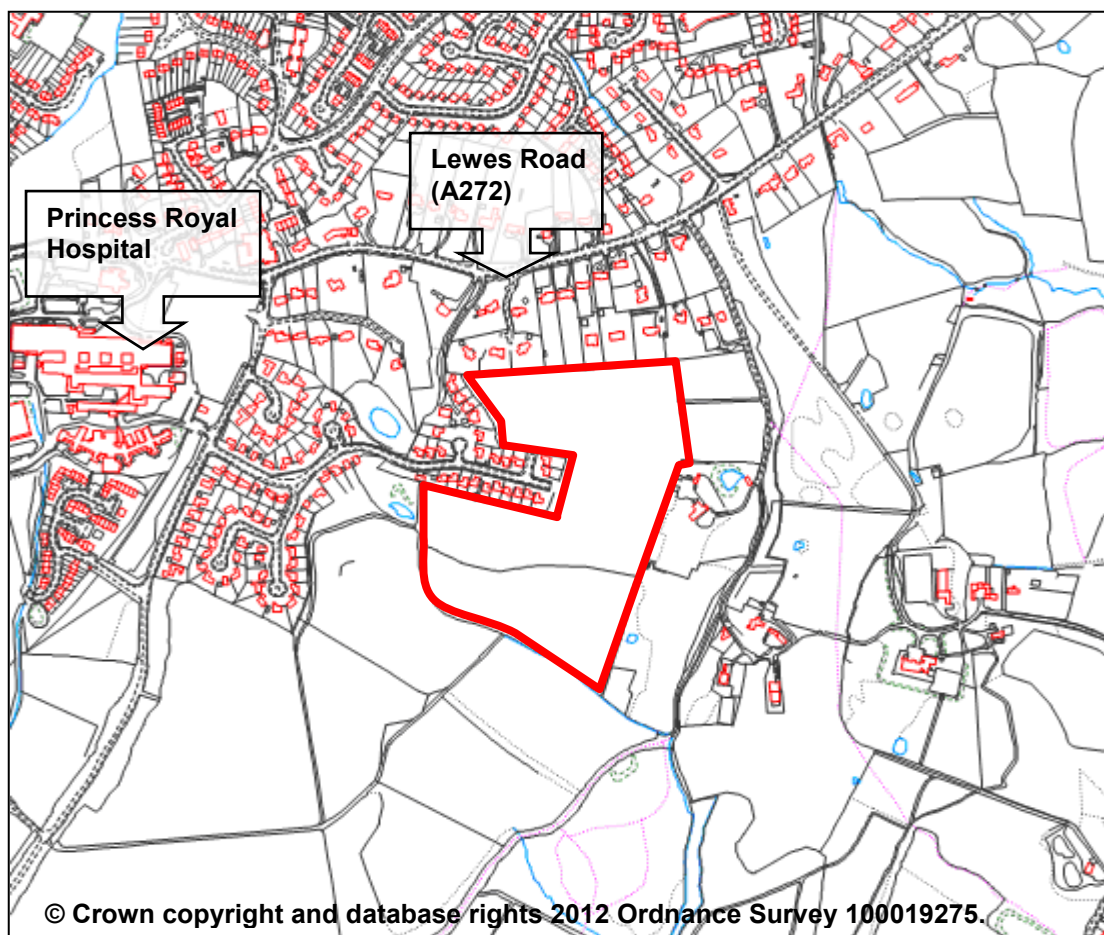
compliance with the Core Delivery Policies of this plan and the following criteria:

- i) Primary and secondary accesses including provision for pedestrians and cyclists to be provided from Ridge Way and Greenhill Way;
- ii) A site specific flood risk assessment is undertaken and an appropriate surface water drainage strategy is agreed by the Environment Agency 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; and
- vii) Ecological and tree surveys and appropriate measures to mitigate adverse impacts on nearby Tree Preservation Orders and Ancient Woodland.

Delete plan below



Insert plan below



Justification

- 6.65 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.
- 6.66 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.
- 6.67 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 6 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. It is

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also understood to be part of a temporary environmental stewardship/ permissive access scheme, which gives public access to paths around the edge of the site, but would not prevent development. There are no formal public rights of way on the land.

- 6.68 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 a 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.
- 6.69 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 (due for completion 2014/2015) 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.
- 6.70 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.
- 6.71 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.
- 6.72 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

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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

- 6.73 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 population, including Broyle Side, is approximately 4,300) 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.
- 6.74 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.
- 6.75 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. However, Ringmer Parish Council is at an advanced stage of producing a Neighbourhood Plan (they were selected as one of the first 17 Neighbourhood Plans to be commenced in the country under the Governments Neighbourhood Planning Vanguard scheme). The Parish Council propose that this plan will include the identification of sites for the delivery of housing.
- 6.76 Given the above scenario, the preference is to let this Neighbourhood Plan decide on the location of all of the 220 net additional housing units assigned to Ringmer and Broyle Side through Spatial Policy 2. This would include the delivery of housing in the early part of the plan period to help maintain a sufficient supply of deliverable sites during this period.
- 6.77 Although the Core Strategy seeks the allocation of the 220 net additional dwellings at Ringmer and Broyle Side through the Neighbourhood Plan, a contingency is required should this plan not be successful in securing the delivery of part of this total in the early part of the plan period (if the neighbourhood plan does not secure housing for the latter part of the plan

period then the contingency is the Site Allocations and Development Management Policies DPD – this applies to all towns and parishes preparing a neighbourhood plan). This is particularly important as no guarantee can be given that the required number of dwellings will be delivered through this Neighbourhood Plan (the risk of a plan not being approved through the referendum process particularly contributes towards such uncertainties). The contingency to the Ringmer Neighbourhood Plan led approach is to identify a strategic allocation at Ringmer that will be implemented should the need arise.

6.78 In the event that the Ringmer Neighbourhood Plan is not made before the adoption of the Core Strategy or that it does not allocate sites that will secure the delivery of 110 net additional dwellings by April 2019, the following policy will apply.

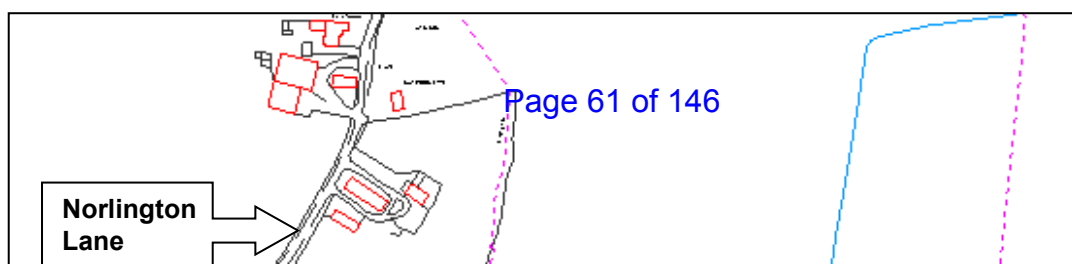
Land north of Bishops Lane, Ringmer

Spatial Policy 5 – 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) **An appropriate surface water drainage strategy is agreed by the Environment Agency and implemented accordingly.**
- iv) **The development incorporates and/or makes a contribution towards the provision of equipped play space and sports pitches.**
- v) **Development is subject to a geophysical survey and trial trench evaluation due to the high archaeological potential in the area.**
- vi) **Development respects the amenity of the existing dwellings adjoining the site.**
- 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. In addition, the development will be expected to make a contribution towards the delivery of the extension to the cycle route between Lewes and Ringmer.**

Any units will be phased for completion once increased capacity has been provided at the Neaves Lane Waste Water Treatment Works.



Justification

- 6.79 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.
- 6.80 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.
- 6.81 The policy requires the housing to be completed only once increased capacity is provided at the Neaves Lane Waste Water Treatment Works, which will serve this development. At present, the treatment works is operating close to its designed capacity with only limited headroom for accommodating additional housing (there is not enough headroom to accommodate the 110 units planned for this strategic site). Southern Water have indicated that the works can be expanded, whilst according with the Environment Agency's

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consenting requirements. Southern Water will seek funding for these works through the periodic review process. The next periodic review is due to take place in 2014 and assuming that funding for the required works is approved, the additional capacity should be provided by 2016. Although construction of the properties will be able to commence in advance of the additional capacity being provided, completion and occupation will only be permitted once this has occurred.

- 6.82 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.
- 6.83 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. Another area of mitigation that the development will be expected to contribute towards will be the completion of the Lewes to Ringmer cycle route. Part of this route is already in place and once it has been completed it will provide a high quality sustainable transport route between the two settlements.
- 6.84 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

- 6.85 Newhaven is the smallest of the four towns in the district (population: 12,225), 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.
- 6.86 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.

- 6.87 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.
- 6.88 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 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 development that involves the outward expansion of the town will need to come forward. The area for where this development will be is at Harbour Heights, which is located to the southwest of the town.
- 6.89 Given that there is already a significant supply of planned housing for Newhaven (in the form of existing commitments), there is not seen a need to bring forward the Harbour Heights area for housing in the early part of the plan period. Hence, this plan identifies the broad area and it will be for the Site Allocations and Development Management Policies DPD, or Newhaven Neighbourhood Plan, to set the detailed allocation for this development. Nevertheless, it is considered important to set some guiding principles for this, which are detailed within the following policy;

Spatial Policy 6 – Land at Harbour Heights, Newhaven

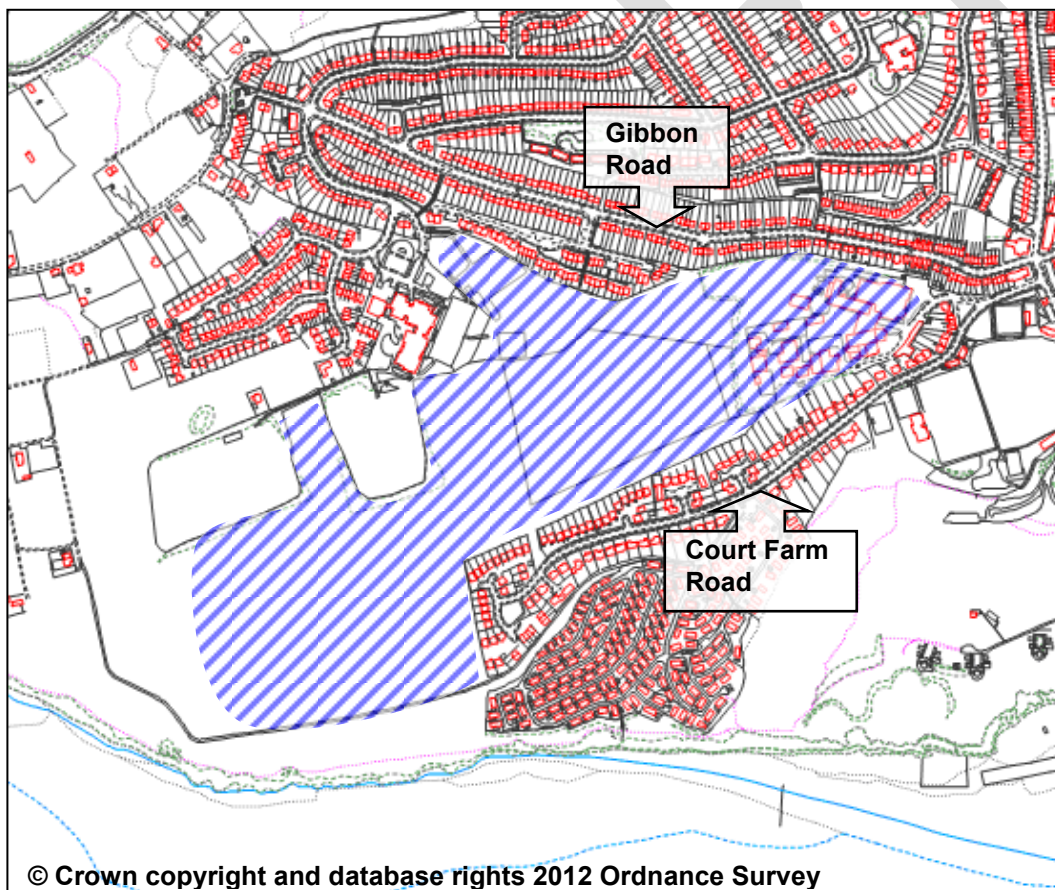
Development of the Harbour Heights area at Newhaven will need to be subject to a detailed allocation within, either the District Council's Site Allocations and Development Management Policies DPD, or a Newhaven Neighbourhood Plan. This allocation will make a contribution towards the overall housing delivery target for Newhaven and it will need to identify the specific development boundary, the mix and quantum of development and be subject to the following criteria;

- i) 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.**

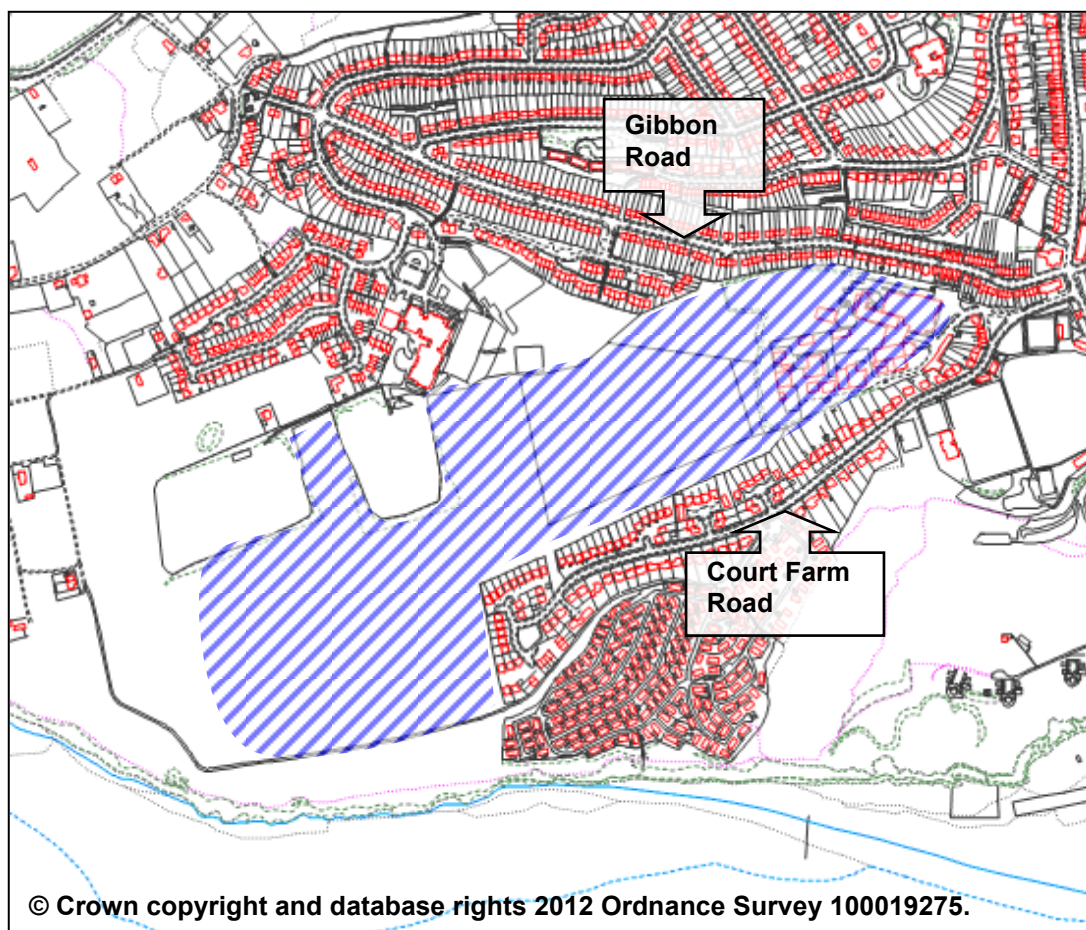
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- ii) The development mitigates against adverse impacts on the highway network, which includes the junction of South Road and South Way, and incorporates measures to improve sustainable travel options from the site to the town centre and beyond.
- iii) Development respects the amenity of the existing dwellings adjoining the site.
- iv) Contributions towards off-site infrastructure improvements arising from and related to the development.
- v) 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.
- vi) 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.

Delete plan below



Insert plan below



Justification

- 6.90 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.
- 6.91 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) recognises that the industrial estate has a low vacancy rate (15%) but scores low with regards to market attractiveness due to the poor quality and age of units. In setting the future allocation for the Harbour Heights area, consideration should be given to the redevelopment of this Industrial Estate so that the opportunity to provide smaller, high-quality premises, particularly move-on office units from the Enterprise Centre, identified as a need in the EELA, can be explored. It would also offer the opportunity to relocate those uses that are not considered compatible with the neighbouring residential uses.
- 6.92 At present a number of access opportunities exist, including from Court Farm Road, through the Industrial Estate and also creating an access onto Southdown Road. The development should enable vehicular, cycle and

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pedestrian access through the site to link Southdown Road and Court Farm Road and the detailed allocation should address this.

- 6.93 Part of this broad location includes a site allocated for residential development in the Local Plan from 2003 (Policy NH8). This specific allocation has been retained, although should it be delivered in advance of a wider development that is consistent with this spatial policy, consideration will need to be given as to how the scheme can integrate with development to the north, east and west.
- 6.94 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 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 developments 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).
- 6.95 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.
- 6.96 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. Appropriate mitigation measures are deemed deliverable and would need to be identified in the detailed allocation. These mitigation measures will be in the form of junction improvements and by substantially improving sustainable transport options in this part of the town, especially a good quality and high frequent bus service, which will reduce the need to utilise the private car.

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

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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

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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 is 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 above 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 equivalent). 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.

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- 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 necessary.
- 7.16 The affordable housing tenure split will generally be expected to be 75% affordable rented and 25% intermediate (shared ownership) 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.
- 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 (shared ownership) 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 in urban areas 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 'Lifetime Homes'; and specialist accommodation such as nursing homes and extra care homes.

- 7.23 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.
- 7.24 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.
- 7.25 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.
- 7.26 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.

- 7.27 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 accommodation appropriate for the ageing population, and 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. Lifetime Homes standards will be encouraged in new residential developments.**
- 3. Achieve residential densities in the region of 47 to 57 dwellings per hectare for the towns and 20 to 30 dwellings per hectare for the villages. Exceptions will be made where individual sites merit lower or higher densities when taking into consideration the site context including the character of the surrounding area, site accessibility, and the size/type of dwellings needed in the locality. Densities to be achieved on allocated sites will be identified in the development principles that accompany the site allocation in the relevant DPD.**
- 4. Where appropriate, 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 in urban areas and to plan for new development in the highly sustainable locations without adversely affecting the character of the area.**

- 7.28 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 Travellers.²²
- 7.29 In 2005 East Sussex Local Authorities and Brighton & Hove City Council commissioned a Gypsy and Traveller Accommodation Assessment (GTAA) to assess the needs of Gypsies and Travellers in the East Sussex and Brighton & Hove county-group. This Assessment was undertaken in response to Circular 01/2006 *Planning for Gypsy and Traveller Caravan Sites* and Circular 04/2007 *Planning for Travelling Showpeople*, which emphasised the importance of assessing accommodation needs²³. The GTAA went through a process of external benchmarking²⁴, the outcomes of which then informed formal local planning authority advice submitted to the South East England Regional Assembly (SEERA) as part of the South East Plan (SEP) Gypsy and Traveller provision (Policy H7) Partial Review²⁵.
- 7.30 In response to Government's announcement in July 2010 to revoke Regional Spatial Strategies, the Review was abandoned. Consequently, East Sussex and Brighton & Hove local planning authorities outlined a joint approach to establish local pitch requirement figures using available robust information.
- 7.31 This joint approach indicated a need for 13 additional permanent pitches in Lewes District between 2006 and 2016. To ensure the Core Strategy considers a level of planned growth for a five year period from adoption, the 3% compound growth, previously applied to the 2011 – 2016 period in the draft South East Plan policy, is extended to 2019. Consequently, an additional 2 permanent pitches are required taking the total required provision

²² For the definition of Gypsies and Travellers, see Appendix 1:Glossary

²³ Section 225 of 2004 Housing Act outlines the requirement of assessing accommodation needs.

²⁴ GTAA Benchmarking and Audit of Advice, Final Summary Report. Universities of Birmingham, Salford and Sheffield Hallam, January 2008.

²⁵ Single issue review required to consider accommodation assessments undertaken during the preparation of the SEP. Paragraph 7.27-7.30, SEP(2009)

to 15 pitches. Permanent planning permission for 4 pitches has since been granted, leaving a residual requirement of 11 permanent pitches to 2019.

7.32 No accommodation needs for Travelling Showpeople have been identified for the period to 2016. Based on current available evidence it is unlikely that a need will arise between 2016 and 2019. In the event that a need is demonstrated in the short term, then any proposal would be assessed against the criteria below.

7.33 The draft South East Plan Policy H7 also outlined the requirement for local planning authorities to make appropriate provision for transit and temporary stopping places. There are currently 2 transit sites in the East Sussex/

Core Policy 3 – Gypsy and Traveller Accommodation

Provision will be made for a net total of 11 additional permanent pitches for Gypsies and Travellers in Lewes District for the period 2011 to 2019*. The local planning authority will allocate specific, deliverable sites through a Site Allocations and Development Management DPD and the SDNPA Local Plan. These plans will be informed by appropriate Site Assessment work and taking into account any planning permissions granted 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;
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.

²⁶ South East England Gypsy and Traveller Regional Transit Study 2009, University of Birmingham.
²⁷ SER draft policy did not allocate transit provision on a planning authority level due to insufficiently robust evidence.
²⁸ Paragraph 4 and 6(c) of DCLG's Planning policy for traveller sites (2012).
²⁹ Gypsy and Traveller Site Assessment (Parker Dann, 2010) and subsequent update (2012)

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

7.36 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 in urban areas and to plan for new development in the highly sustainable locations without adversely affecting the character of the area.**

7.37 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.

7.38 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.

7.39 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.

- 7.40 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.

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).

- 7.41 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.

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- 7.42 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).
- 7.43 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 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 occupants. 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.
- 7.44 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.
- 7.45 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

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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.

- 7.46 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.
- 7.47 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. These 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 developer interest.**
 - ii. Persistently high vacancy rates.**
 - 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.**

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.**

7.48 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

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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.

- 7.49 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.
- 7.50 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.
- 7.51 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.

- 7.52 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.**

- 7.53 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.
- 7.54 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.
- 7.55 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.
- 7.56 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)</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>Newhaven 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>

7.57 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.

- 7.58 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.
- 7.59 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.
- 7.60 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. Consequently the retail function of the area has reduced and is classified as a Local Centre in the retail hierarchy. However, it is envisaged that with the wider regeneration of the town, including a revitalised and more accessible town centre, the position of Newhaven town centre will be upgraded to District Retail Centre in time. 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.
- 7.61 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.

- 7.62 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.
- 7.63 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.
- 7.64 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.
- 7.65 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

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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.

- 7.66 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.
- 7.67 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.
- 7.68 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.
- 7.69 The extents of the town centres, primary shopping areas, primary shopping frontages and secondary shopping frontages are defined on the maps in Appendix 5. These will be included on the amended policies maps prior to formal submission of the Core Strategy.
- 7.70 The retail policy approach will be monitored and will be subject to periodic review, 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. 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. 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.

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.

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.

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 and rural shops and community facilities in locations not identified in the retail hierarchy. Where such uses become redundant or 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

- 7.71 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.**

- 7.72 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

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

- 7.73 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.
- 7.74 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.
- 7.75 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.
- 7.76 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.
- 7.77 The 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.**

7.78 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

7.79 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

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opportunities for greater appreciation and enjoyment of the landscape and cultural heritage of the Downs.

- 7.80 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.
- 7.81 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

7.82 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, including through the implementation of the highest feasible standards of sustainable construction techniques in new developments.**

7.83 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. Declaration of an AQMA is necessary under Part 4 of the Environment Act 1995, when certain statutory air quality thresholds are breached. There are similar concerns in the South Way area of Newhaven, which has not yet been declared an AQMA but where nitrogen dioxide has been recorded at levels approaching the maximum acceptable limits.

7.84 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.

7.85 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 town centre, causing the AQMA to be declared.

7.86 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.

- 7.87 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.
- 7.88 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.**

- 7.89 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 purposes³⁰ as specified in the Environment Act 1995, which will be fundamental as the SDNPA implements its National Park Management Plan and develops its Local Plan.
- 7.90 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.
- 7.91 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

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

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

- 7.92 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”.³¹
- 7.93 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.
- 7.94 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 Inventory³².
- 7.95 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.
- 7.96 A Habitats Regulation Assessment (HRA) of the Core Strategy has been undertaken. The assessment has concluded that the Core Strategy will not

³¹ Landscape Character Assessment (LCA) guidance, Countryside Agency and Scottish Natural Heritage (2002)

³² http://www.lewes.gov.uk/Files/plan_Lewes_ancient_woodland_survey_report.pdf

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

- 7.97 With regards 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.
- 7.98 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 other measures as listed in Core Policy 10. 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.
- 7.99 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.
- 7.100 Watercourses are integral to biodiversity, health and landscape character of the district. A River Basin Management Plan for the South East³³ 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.

³³ <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. Seeking to conserve and enhance 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 the development clearly outweigh the harm caused. In such cases appropriate mitigation and compensation will be required;**
 - iii. Seeking the conservation, enhancement and net gain in 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 conservation and enhancement of the landscape qualities of the South Downs National Park, and the integrity of European designated sites (SACs and SPAs) in and around Lewes District.**
- 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;**
 - ii. The implementation of an Ashdown Forest Management Strategy;**
 - iii. A programme of monitoring and research at Ashdown Forest**

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 maintained or improved (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, including through the implementation of the highest feasible construction techniques in new developments.**

- 7.101 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.
- 7.102 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.
- 7.103 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.

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- 7.104 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.
- 7.105 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 best practice advice contained in *By Design* (DETR, 2000), *Better Places to Live* (DTLR, 2001), *Safer Places – The Planning System and Crime Prevention* (ODPM 2004) *Manual for Streets* (DCLG/DETR 2007) and the *Lewes District Public Realm Framework* (LDC 2013). It is recognised that some of the aforementioned best practice documents have been earmarked for deletion through the Taylor Review of Planning Practice Guidance. Should this occur, then the documents in question will be adopted as 'local guidance and advice' by the District Council and National Park Authority.

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 shall be in accordance with the Park purposes and outside the SDNP that regard is had to the setting of the National Park and its purposes;
- iii. Incorporates sustainable construction standards and techniques and 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

7.106 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.**

7.107 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.

7.108 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).

7.109 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, with some areas more susceptible than others. Many of these areas have been identified in the Preliminary Flood Risk Assessment. This has been prepared by East Sussex County Council, which has an emerging role as the Lead Local Flood Authority. As part of this role, the ESCC will take on the management of surface water flooding and Sustainable Drainage Systems (SuDS).

7.110 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.

- 7.111 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.
- 7.112 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.

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. 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 liaise with 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, 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, including through the implementation of the highest feasible standards of construction techniques in new developments**
- **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**

- 7.113 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.
- 7.114 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.
- 7.115 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.

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- 7.116 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.
- 7.117 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.
- 7.118 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. Expecting new development to contribute to delivering the priorities of the East Sussex Local Transport Plan.**
- 6. 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.**
- 7. 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:

- i. Support the expansion and improvement of public transport services, particularly those providing links between the rural and urban areas;**
- ii. 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**
- iii. 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, including through the implementation of the highest feasible standards of sustainable construction techniques in new developments.**

7.119 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

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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.

- 7.120 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 have been introduced to address this, including, stepped tightening in the Building Regulations, which will result in new residential development reaching 'zero carbon'³⁴ from 2016 and non-domestic buildings being 'zero carbon' from 2019.
- 7.121 In light of the ambitious programme that will secure the delivery of 'zero carbon' buildings over the coming years, it seems that the role of the planning system is to help facilitate this.
- 7.122 A Renewable Energy & Low Carbon Development Study has been prepared as part of the evidence for the Core Strategy. Part of the output from this study is an Energy Opportunities Map, which identifies the renewable and low carbon technologies that are most viable in different parts of the plan area. The map is shown below.
- 7.123 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.

³⁴ A building is zero carbon if it has net zero carbon emissions over the course of a year.



7.124 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 2020³⁵.

³⁵ See Section 4.11 of the Renewable Energy & Low Carbon Development Study for further justification of these targets and what is meant by them.

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- 7.125 Achieving '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 Homes³⁶ covers all of these matters.
- 7.126
- 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 comply with Code Level 4 of the Code for Sustainable Homes in relation to water consumption. 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 the core policy on affordable housing, factored in a number of assumptions, which included all new houses being constructed to meet the full Code Level 4 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 Code for Sustainable Homes only applies 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.
- 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.

³⁶ See: <http://www.breeam.org/page.jsp?id=86> for further information

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 the highest feasible standards 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. Meeting the National Park Purposes where proposals lie within the South Downs National Park boundary
 - iii. Landscape and visual impact
 - iv. Local amenity impact
 - v. Ecology impact

Appendices

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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).

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.

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.

Code for Sustainable Homes – national standard for the sustainable design and construction of new homes.

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.

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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.

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.

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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 LOCAL PLAN POLICIES

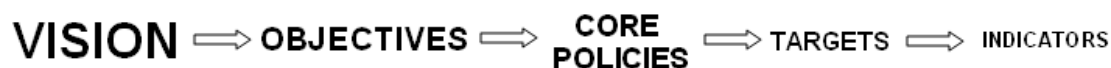
Core Policy	'Saved' 2003 Local Plan policies that the Core Policy replaces.	'Saved' 2003 Local Plan policies to retain.
Spatial Strategy	RES1, RES2, RES3, ,	
CP1 – Affordable Housing	RES9	RES10
CP2 – Housing Type, Mix and Density	ST5, ST6	ST3, ST4
CP3 – Gypsy and Traveller Accommodation	RES21, RES22	
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, ST5, ST6, 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		ST14, ST20, ST21

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Resources		
Lewes Town	LW7, LW12	LW1, LW3, LW4, LW5. LW6, LW8, LW9, LW10, LW11, LW13, LW14
Newhaven	NH10	NH2, NH4, NH6, NH7, NH8, NH12, NH13, NH14, NH15, NH16, NH17, NH18, NH19, NH20, NH21, NH22, NH23, NH24
Peacehaven	PT1, PT2, PT3, PT7, PT8, PT21, PT23	PT5, PT6, PT9, PT10, PT11, PT12, PT13, PT15, PT16, PT17, PT18, PT19, PT20.
Seaford	SF1, SF10	SF5, SF8, SF9, SF11, SF12, SF14, SF15, SF16
Barcombe		BA1
Beddingham/Glynde		BG1
Chailey		CH1, CH2
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 – 6 (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 5,600 net additional dwellings between 2010 and 2030 (280 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 January 2014: 87% of a 5 year housing land supply requirement (+5%)

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	<p>Number of dwellings permitted on unidentified windfall sites per annum.</p> <p>A review of the Spatial Policies 1 and 2 will be triggered in April 2022 if transport mitigation measures to accommodate the additional 440 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>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 currently not available (but is expected by the time the JCS is submitted for examination).</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		
• Objective 2		
Target	Indicators	Current Position
<p>District wide target of 40% Affordable Housing provision (on developments exceeding 10 dwellings)</p>	<p>Gross number of affordable housing completions per annum</p>	<p>2012/13: 38</p>
	<p>Percentage of affordable dwellings completed</p>	<p>2012/13: 45.78%</p>
	<p>Percentage of applications of 10 units or more meeting</p>	<p>2012/13: 50%</p>

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	40% affordable housing target	
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 %	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%
Provide flexible and adaptable accommodation and encourage Lifetime Homes standards	Percentage of affordable dwellings built to Lifetime Homes Standards	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

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To provide a net total of 15 Gypsy & Traveller pitches between 2006 and 2019* to meet the identified need * pitch requirements for the plan period to be updated once the current Gypsy, Traveller and Travelling Showpeople requirements update results are known.	Pitches granted planning permission since 2006 Number of pitches allocated in the Site Allocations and Development Management Policies DPD	As at 2013: 4 Pitches Not monitored yet – to be monitored
To meet the long term need identified in the updated GTAA	Identified need not available yet	Not monitored yet – to be monitored

Core Policy 4 – Encouraging Economic Development and Regeneration		
Core Policy 4 will aim to meet the following Objectives		
<ul style="list-style-type: none"> • 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 viability or environmental reasons for not 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%

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Support opportunities for the up-skilling of the Districts labour supply	Percentage of adults with degree level (or equivalent) qualifications	2011: 37.3%
	Numbers of Adult learners	2008/09: 2,638

Core Policy 5 – The Visitor Economy		
Core Policy 5 will aim to meet the following Objectives		
<ul style="list-style-type: none"> • 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	Retail unit vacancy rate in town centres <ul style="list-style-type: none"> - Lewes town centre - Newhaven town centre 	2012 <ul style="list-style-type: none"> - Lewes Town Centre (TC) – 5.2% - Newhaven TC – 21% (2009)

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uses.	<ul style="list-style-type: none"> - Peacehaven SCR - Peacehaven Meridian Centre - Seaford town centre <p>Net amount of completed retail development (sq m)</p>	<ul style="list-style-type: none"> - Peacehaven SCR – 10 % - Peacehaven Meridian Centre – 6.25% - Seaford TC – 7.2% <p>2012/13: -819.56m²</p>
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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 m²
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	<p>Number and extent of SNCIs and LNRs</p> <p>Condition of internationally and nationally important wildlife and geological sites (SSSIs and SACs)</p>	<p>2011: SNCIs – 115, 1,235 hectares (4.2% of District) 4 LNRs – 354 hectares (1.2% of District)</p> <p>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.</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</p>

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		hectares. 97.12% of SAC land favourable or unfavourable but recovering. 2.88% of SAC land unfavourable but declining.
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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	2013: 1 (Lewes 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		
Core Policy 10 will aim to meet the following Objectives		
<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	Condition and size of internationally and nationally important wildlife and geological sites (SSSIs and SACs)	<p>2013: SACs – 2:</p> <p>Castle Hill – 114.52 hectares (both in Lewes District and Brighton & Hove). 100% of SAC land favourable.</p> <p>Lewes Downs – 161.29 hectares. 97.12% of SAC land favourable or unfavourable but recovering. 2.88% of SAC land unfavourable but</p>

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	<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>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	Cumulative number of Code for Sustainable Homes certificates issued	2012 – 44 (total to date; 2007-2012)
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 Urban Drainage Systems (SUD's) into new development where appropriate	Percentage of appropriate developments incorporating sustainable urban drainage systems	Not monitored yet – to be monitored

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Core Policy 13: Sustainable Travel		
<p>Core Policy 13 will aim to meet the following objectives:</p> <ul style="list-style-type: none"> • 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		
<p>Core Policy 14 will aim to meet the following Objectives</p> <ul style="list-style-type: none"> • 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	2012/13: 10 (plus 1 solar related application withdrawn)
	Carbon Dioxide emissions per capita per sector: Total emissions (kt)	2011: 488

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All new dwellings to achieve Code for Sustainable Homes Level 4 in relation to water consumption	Percentage of new dwellings which meet Code Level 4 in relation to water consumption	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

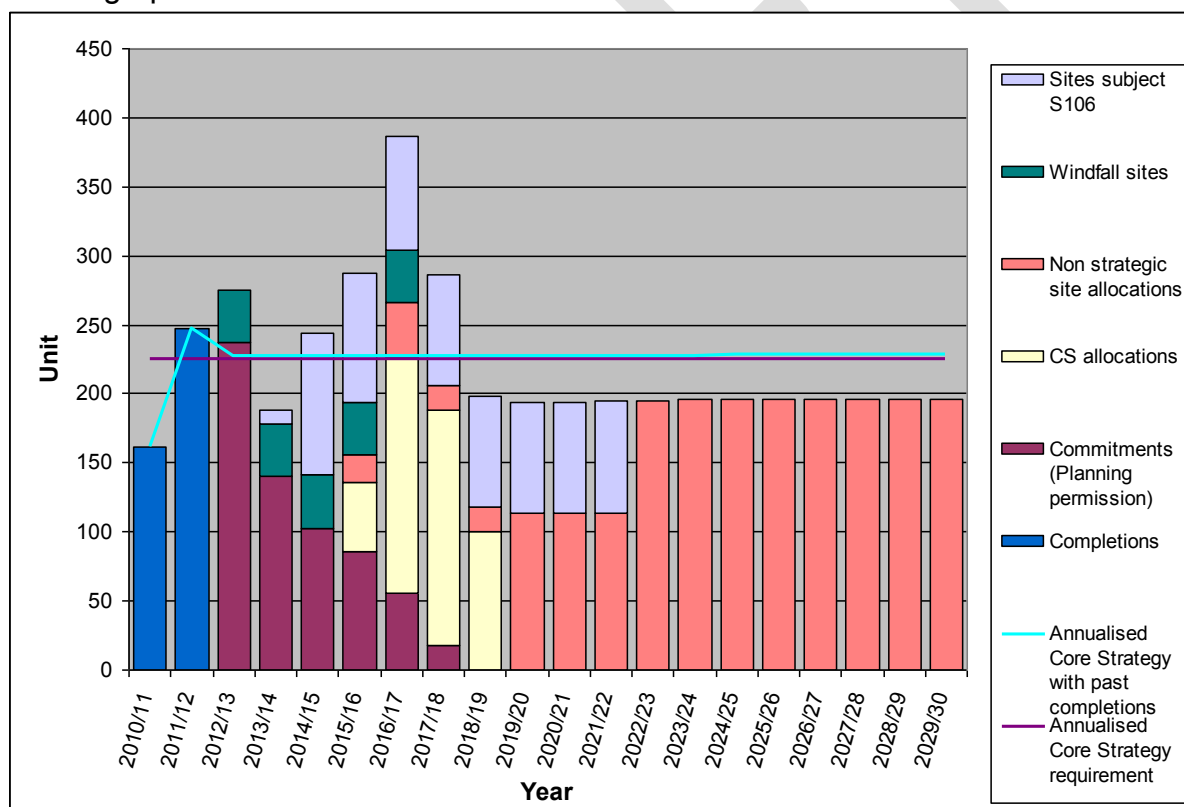
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APPENDIX 4 – HOUSING TRAJECTORY

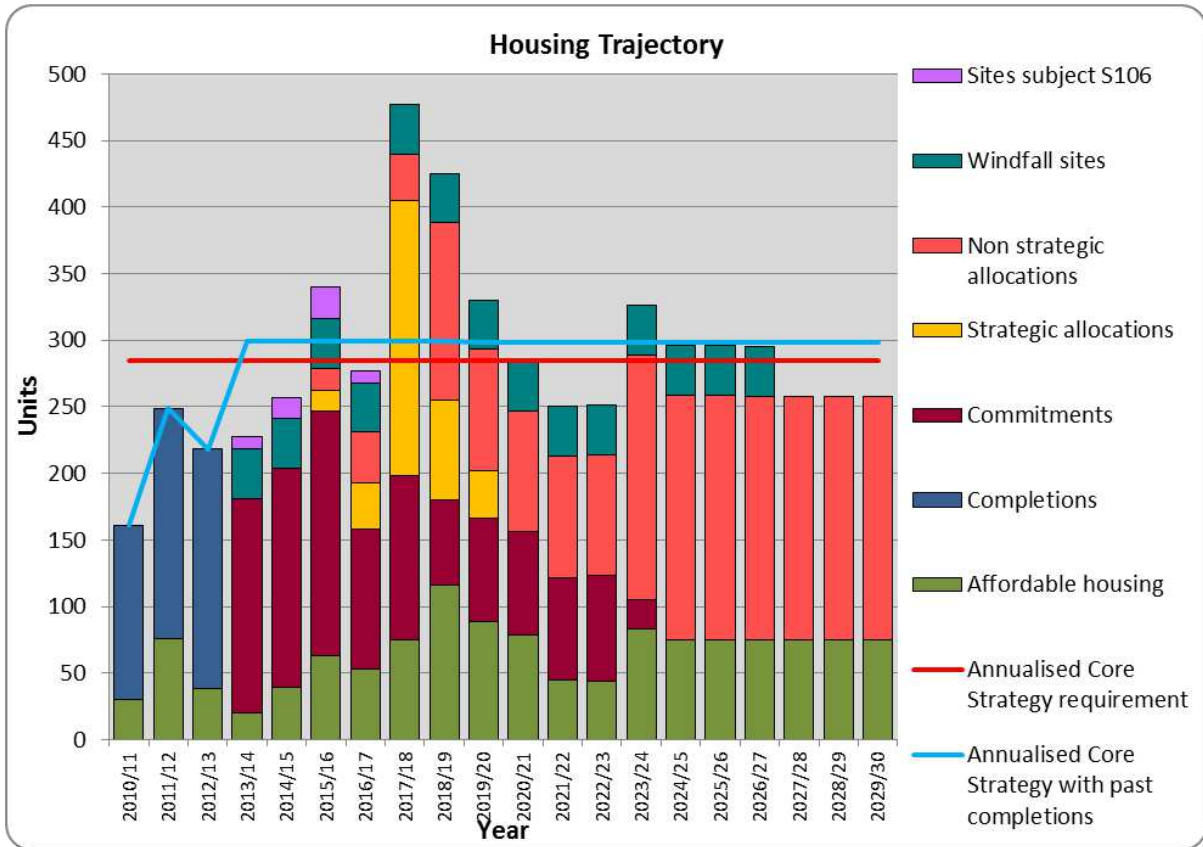
The Housing Trajectory indicates the anticipated delivery of market and affordable housing in the district over the Core Strategy Plan period (2010/11 - 2029/30). The Core Strategy sets a housing target of 5,600 net additional units up to 2029/30.

The trajectory reflects the housing trajectory position as at 1 April 2013 and is informed by the 2013 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.

Delete graph below



Insert graph below



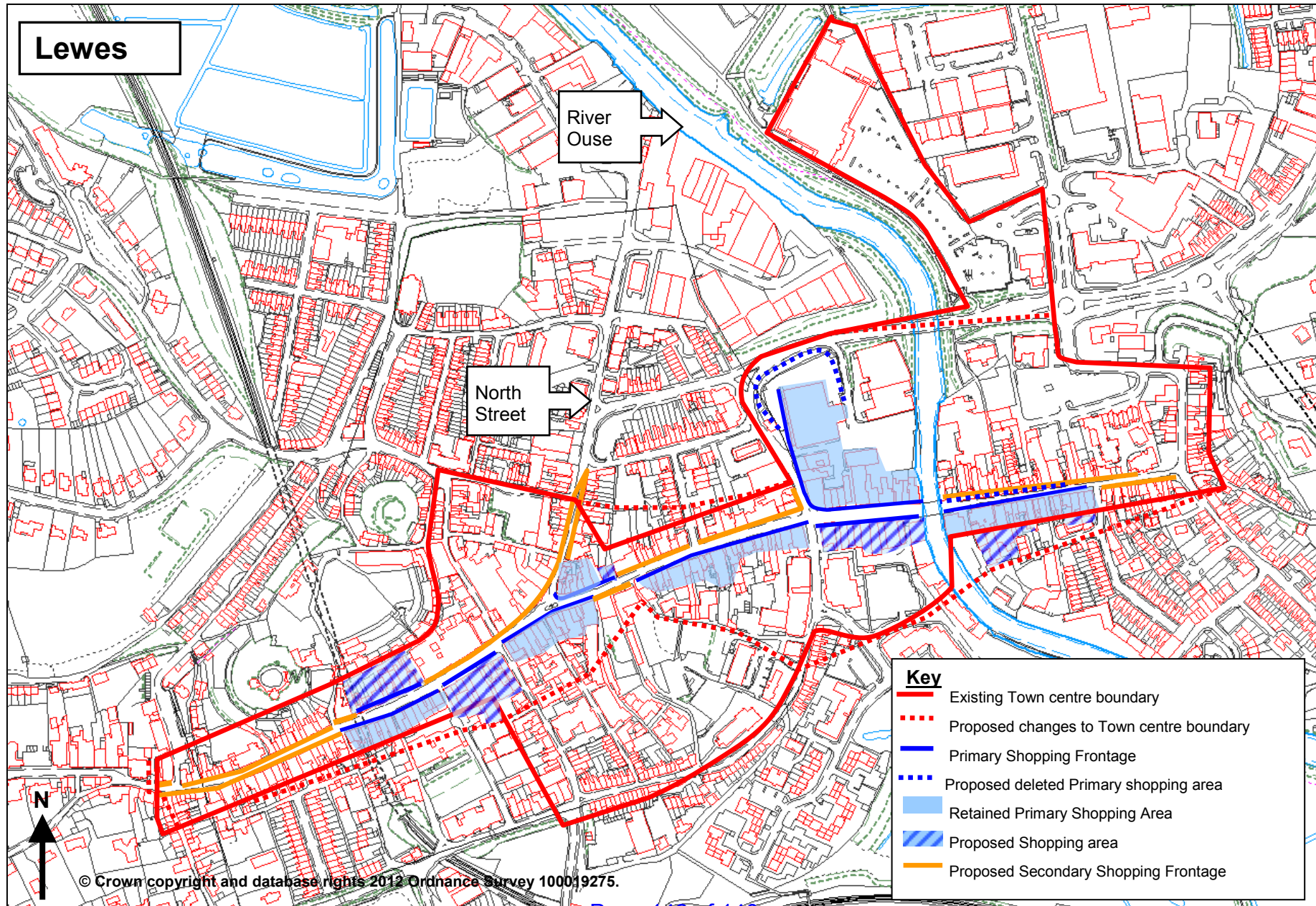
Further details on the individual elements are provided in the Housing Background Paper.

APPENDIX 5 – TOWN CENTRE AND SHOPPING AREA BOUNDARY AMENDMENTS

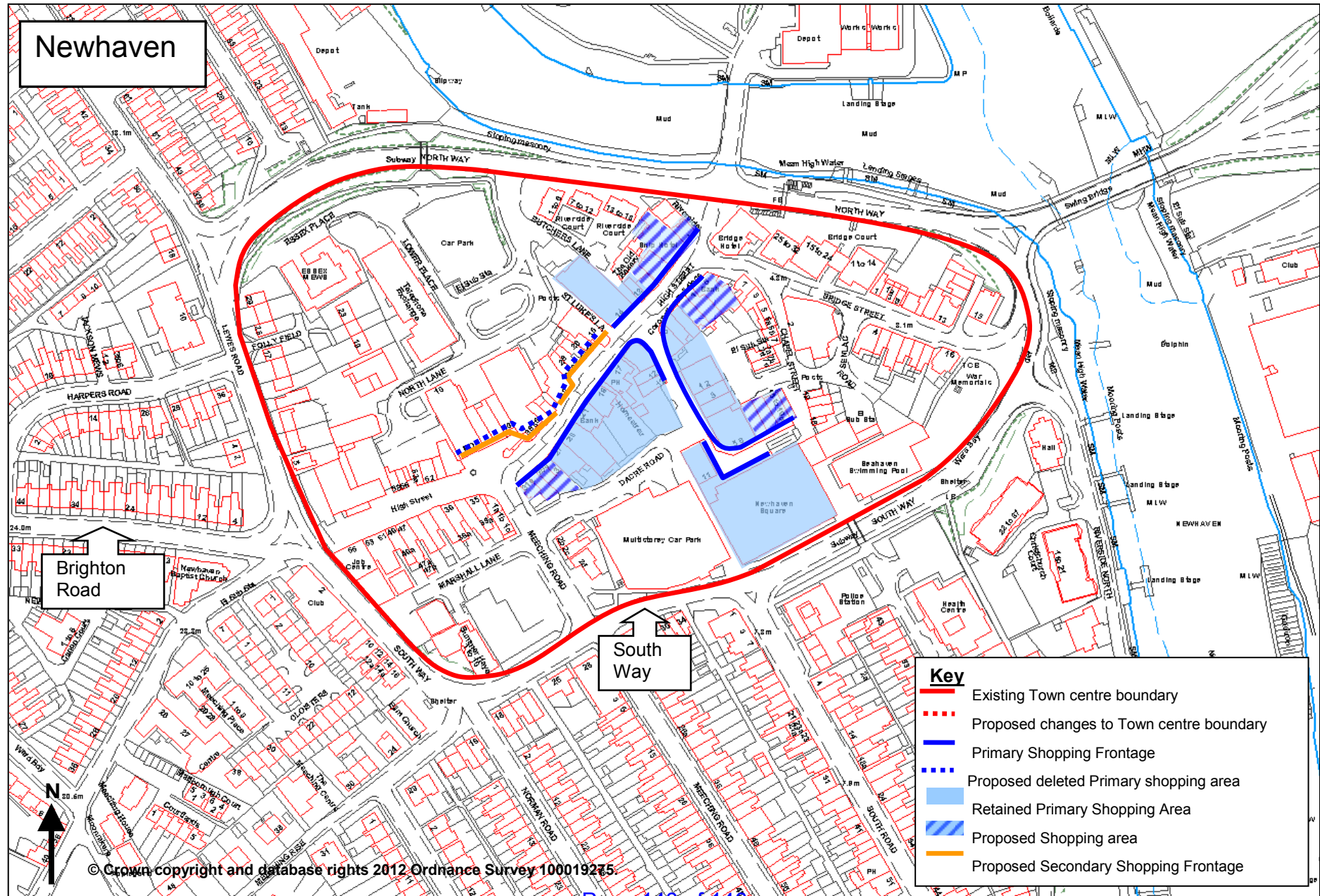
The maps below indicate the proposed additions and deletions to the four towns' Town Centre boundaries and Primary Shopping areas. These boundary amendments were recommendations made by Planning Consultants, GL Hearn, who undertook the Lewes District Shopping and Town Centres Study in 2012 (www.lewes.gov.uk/planning/backgroundreps.asp).

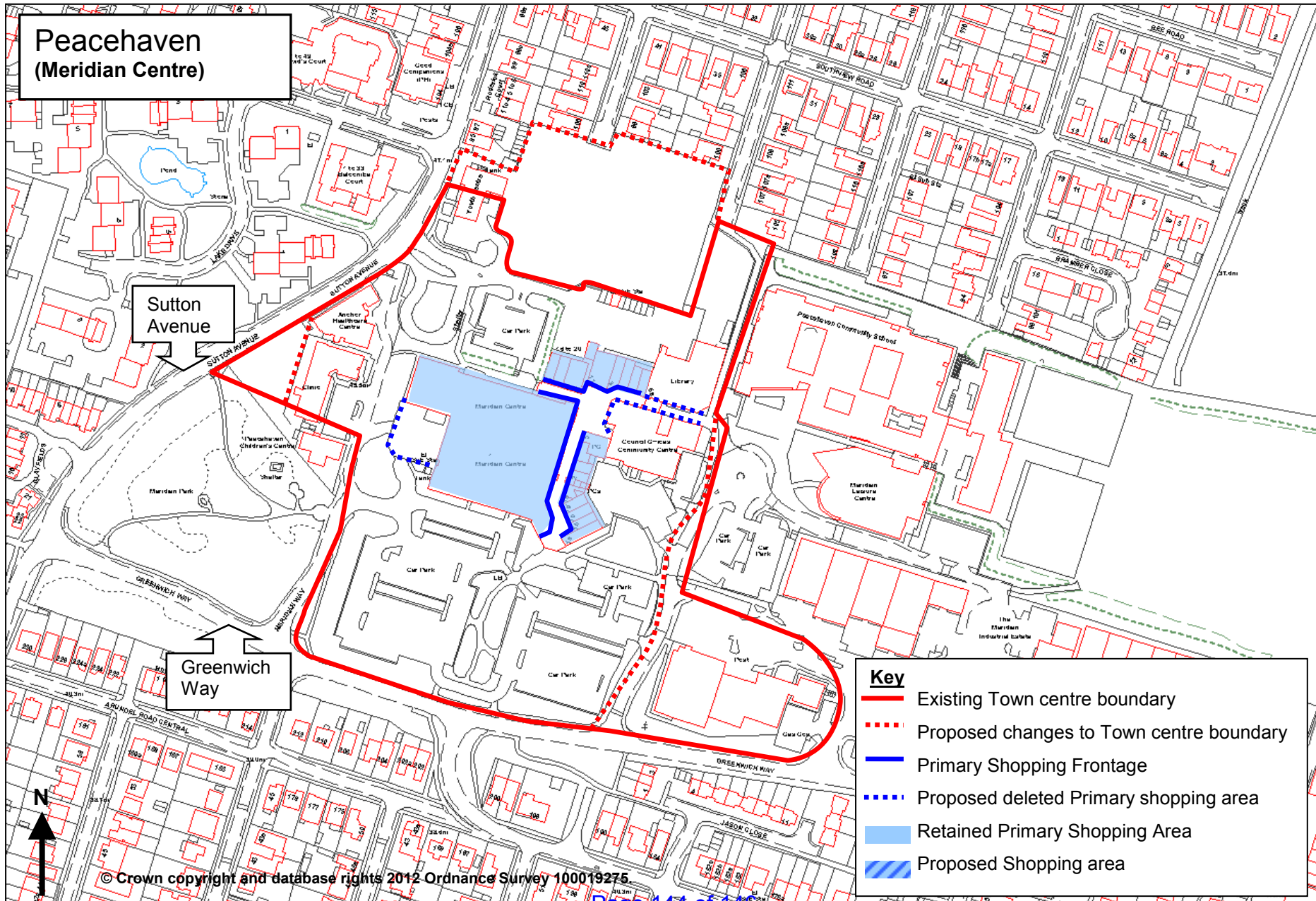
The Study also introduces Primary and Secondary shopping frontages to the identified town centres as required by Government in the National Planning Policy Framework 2012. These are also shown on each of the below maps where appropriate.

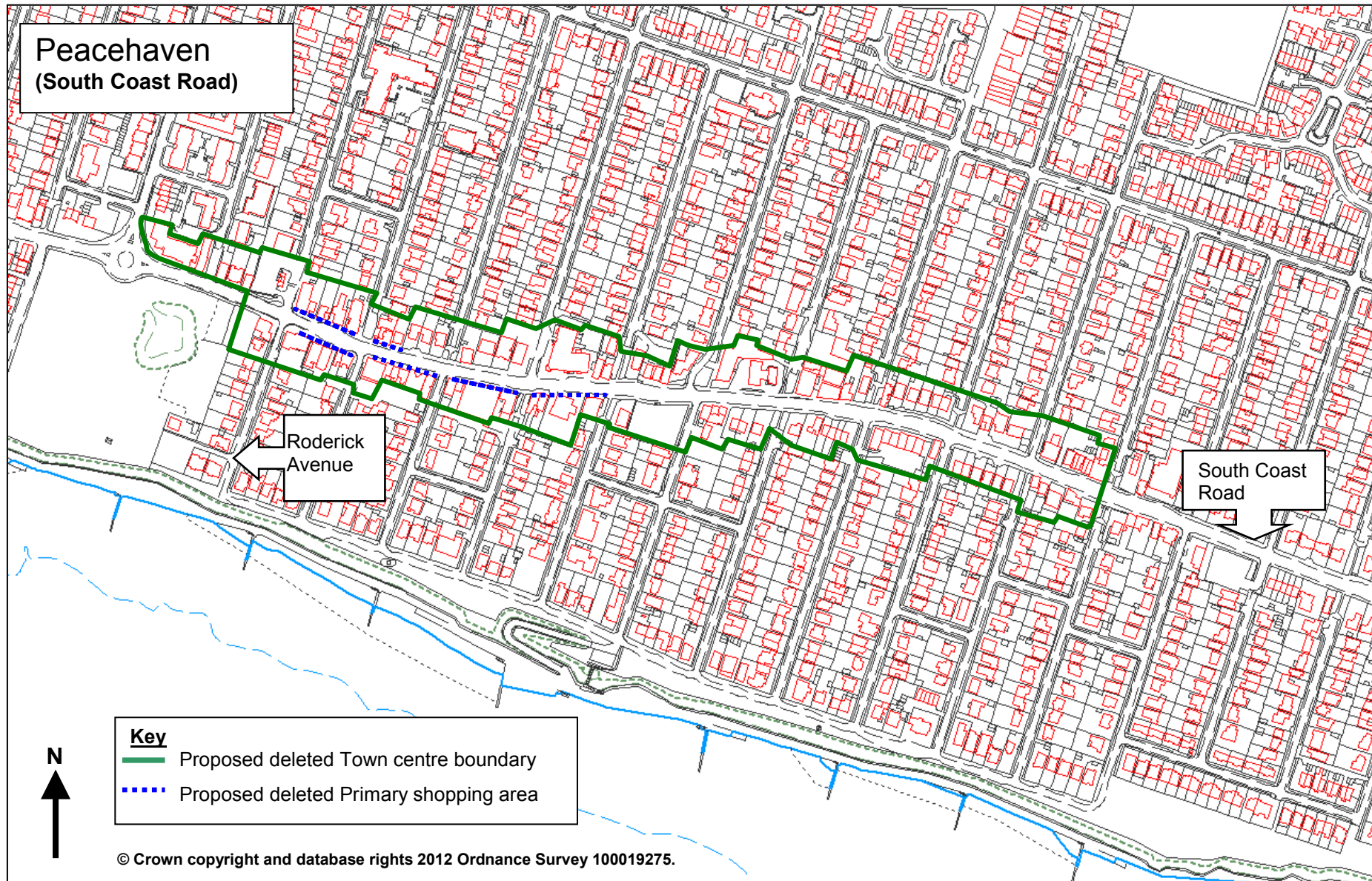
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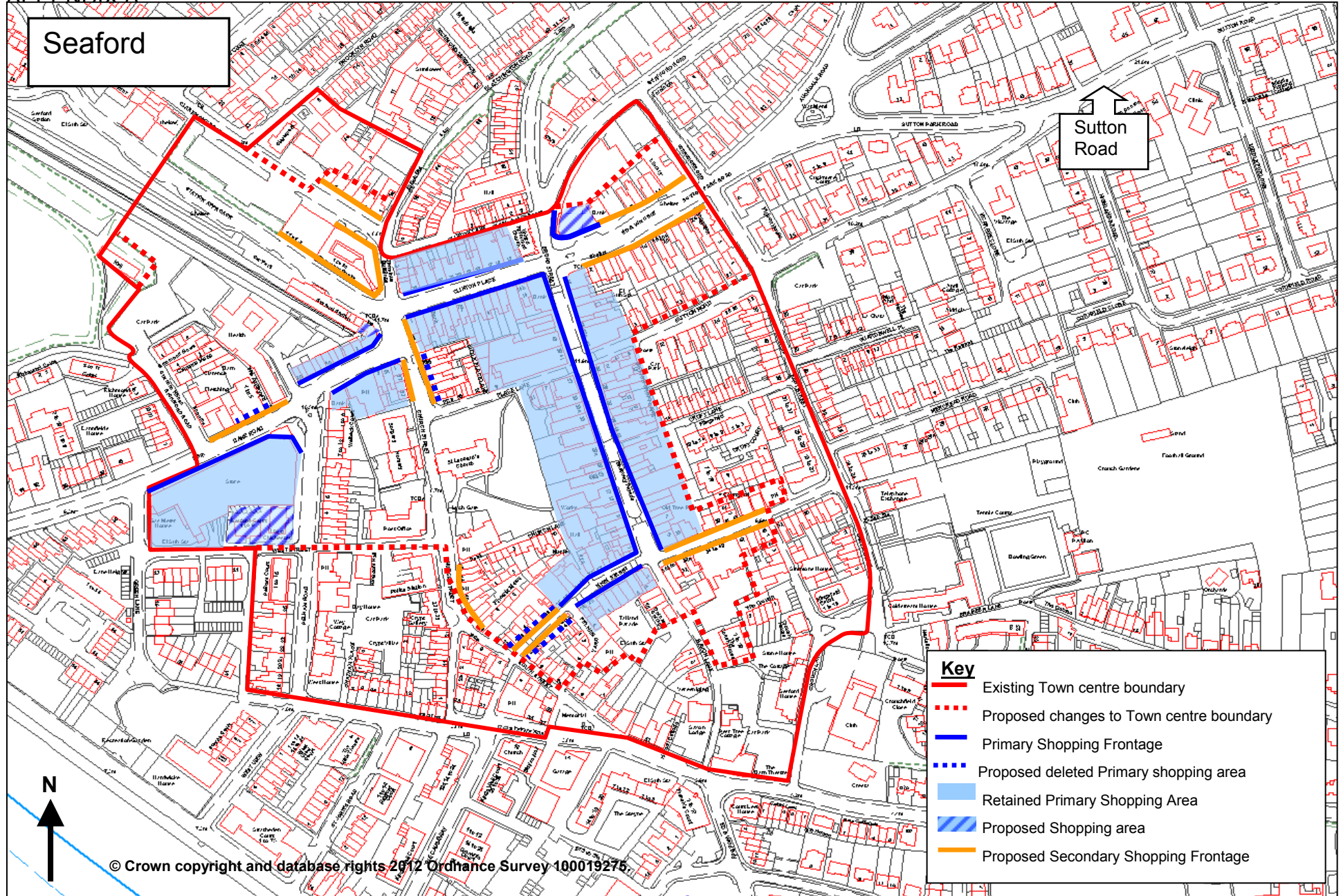
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Seaford



Sutton Road

Key

- Existing Town centre boundary
- ⋯ Proposed changes to Town centre boundary
- Primary Shopping Frontage
- ⋯ Proposed deleted Primary shopping area
- Retained Primary Shopping Area
- ▨ Proposed Shopping area
- Proposed Secondary Shopping Frontage