



**Lewes District Council**

Lewes District Council

# Towards a Local Plan Spatial Strategy and Policies Directions

(Regulation 18 Consultation)

Autumn 2023

## Welcome

All Councils in England are required to plan for future population growth and the demand for homes and jobs. As part of that requirement I'm really pleased to be introducing the 'Towards the Spatial Strategy and Policies Directions' consultation to you. This stage of the Local Plan making process is crucial to setting out how our district will look and how and where new homes are built. Just as important are the policies that planning applications will be assessed against, and we are setting out the direction that we want to take for these policies.

We now want to hear your views and invite you to take part in this consultation.

This Local Plan aims to be the greenest ever and will be the spatial expression of our ambitions set out in the Council's Corporate Plan (2024-2028). Although, much has changed since we adopted the existing Local Plan in 2016 and Part 2 in 2020, it is vital that we have a plan in place for the council to gain control over local planning decisions.

We are setting out some great ideas in the Local Plan consultation document for how any new development that comes forward between now and 2040 could be delivered. For the majority of our residents, the Local Plan will be good news and bring many benefits, especially in providing a framework for the plan area. The plan will give us control over local planning decisions and help grow our area in a way that allows everyone to have the opportunity to live in a home that is affordable for them, and in communities that are strong.

For our administration, it is essential that we ask for comments from residents, community groups, businesses, infrastructure providers, landowners, neighbouring local authorities, statutory bodies, and other stakeholders. I believe that your contributions will really make a difference. The 42,000 comments received from the earlier Issues and Options consultation have helped us get to this point, and you will see how we have sought to include what you have already told us into the policy directions.

Putting a Local Plan together is a huge, complicated task, and finding the right balance between meeting needs and demands for homes and jobs against protection of our natural environment is challenging and some decisions will not be easy to make. We haven't developed policies yet; we want to know what you think and what you would want in those policies. After all we are looking to create an exciting forward-thinking plan.

The themes and ideas that we'd really like your thoughts about are how we can:

- limit the impacts of Climate Change
- maintain the natural environment
- provide homes for everyone
- regenerate the coastal towns
- support the economy in the villages and rural areas
- provide infrastructure and community facilities
- build decent homes that people want to live in
- improve the water quality of our rivers.

I really hope you can see from these themes that the focus is very much upon protecting our environment whilst providing the homes, services, infrastructure and jobs that make living in our area something to be proud of.

The Local Plan will be made available on the 29<sup>th</sup> November 2023 for ten weeks, for you to read, comment and tell us what you think about these early proposals, please contribute to making this area an even better place to live, work and enjoy.



**Councillor Laurence O'Connor**  
Cabinet Member for Planning and Infrastructure  
Lewes District Council

# Contents page

- Welcome..... 2
- Contents page ..... 4
- Executive Summary..... 8
- Getting involved.....12
- A. About this Plan .....13
  - 1. What is the Lewes Local Plan? .....13
  - 2. How does Local Plan fit with other plans and strategies?.....15
  - 3. Our plan-making journey so far .....17
  - 4. What is the timetable and, how is the Local Plan prepared? .....19
  - 5. The purpose of this plan making stage.....20
  - 6. The structure of the new Local Plan .....22
- B. Lewes Local Plan Area in 2040 .....23
  - Vision and Aims .....23
  - Vision for Lewes District’s plan area .....24
  - Proposed Aims for our Local Plan.....25
- C. Key facts about our Plan Area .....28
- D. Consultation questions .....29
- E. Developing a spatial strategy in response to climate change and other challenges .....32
  - What development do we have to plan for? .....32
  - Delivering new housing in a managed way .....38
  - Other Development Needs.....40
- F. The Plan Themes .....42
  - Theme: Development strategy [responding to Climate Change] .....42
    - Strategic Policy SDS1: A spatial development strategy approach .....43
    - Strategic Policy SDS2: Settlement Hierarchy.....56
    - Strategic Policy SDS 3: Settlement boundaries .....59
  - Theme: Climate Change.....61
    - Strategic Policy CC1: Mitigating and Adapting to Climate Change .....62
    - Policy CC2: A design response to a changing climate .....64
    - Policy CC3: Solar PV, Storage and Demand Management .....68
    - Policy CC4: Sustainable Construction .....70

Policy CC5: Renewable Energy Development .....	73
Strategic Policy CC6: Coastal Change .....	75
Theme: Natural Environment.....	78
Strategic Policy NE1: Green and Blue Infrastructure .....	79
Policy NE2: Biodiversity .....	82
Policy NE3: Landscape .....	85
Policy NE4: Clean and Healthy Environment.....	88
Theme: Homes for Everyone.....	92
Strategic Policy H1: Meeting Housing Needs.....	94
Policy H2: Suitable Homes for All .....	98
Strategic Policy H3: Affordable Housing .....	102
Policy H4: Specialist Accommodation for Vulnerable People.....	107
Policy H5: New Residential Development in the Countryside .....	111
Policy H6: Making Best Use of Existing Rural Buildings .....	115
Policy H7: Making Best Use of the Existing Housing Stock .....	118
Policy H8: Accommodation for Gypsies, Travellers and Travelling Showpeople .....	120
Theme: Economy and Regeneration .....	125
Strategic Policy E1: Meeting Economic Needs .....	126
Strategic Policy E2: Newhaven Town .....	129
Policy E3: Newhaven Port.....	133
Policy E4: Local Labour Agreements .....	136
Policy E5: Rural Employment.....	140
Policy E6: Retail and Town Centres.....	142
Policy E7: Visitor Economy .....	145
Policy E8: Equestrian Development.....	147
Theme: Infrastructure and Community Facilities .....	149
Strategic Policy IC1: Infrastructure Provision .....	151
Policy IC2: Water Supply and Wastewater Management.....	153
Policy IC3: Digital Infrastructure and Communications .....	156
Policy IC4: Safeguarding Community Facilities.....	159
Policy IC5: Commercial community uses.....	162
Policy IC6: Outdoor Playing Space .....	165
Policy IC7: Local Food Infrastructure .....	167

Policy IC8: Sustainable transport and movement .....	169
Policy IC9: Parking Standards and Electric Vehicle Charging Points.....	172
Policy IC10: Former Lewes to Uckfield railway line.....	175
Policy IC11: Public Rights of Way .....	177
Theme: Design, Landscape and the Built Environment.....	179
Strategic Policy D1: Development Principles .....	181
Policy D2: Achieving High-Quality Design in Development.....	184
Policy D3: Landscape Character.....	187
Policy D4: Conservation and Enhancement of Heritage Assets.....	189
Policy D5: Public Realm.....	191
Theme: Water.....	193
Strategic Policy W1: Flood risk and flood management.....	194
Policy W2: Protection of water resources and water quality.....	197
Policy W3: Water efficiency in new development.....	200
Delivery and Monitoring.....	203

**Table of Figures**

Figure 1: Consultation Document Order ..... 9

Figure 2: Map of District within the wider South East .....14

Figure 3: Map of the Plan Area .....14

Figure 4: Planning Policy Framework .....15

Figure 5: Our Plan Making Journey .....17

Figure 6: Local Development Scheme Timetable .....19

Figure 7: Key Facts About Our Plan Area .....28

Figure 8: Historic Housing Delivery Rates .....34

Figure 9: Spatial Development Approach .....44

Figure 10: Spatial Option 1 Indicative Locations.....47

Figure 11: Spatial Option 2 Indicative Locations.....48

Figure 12: Spatial Option 3 Indicative Locations.....50

Figure 13: Spatial Option 4 Indicative Locations.....51

Figure 14: Spatial Option 5 Indicative Locations.....53

Figure 15: Spatial Option 6 Indicative Locations.....54

Figure 16: Proposed Settlement Hierarchy.....57

**Tables**

Table 1: Existing sources of supply .....36

Table 2: Supply from new sites identified in the LAA.....37

Table 3: Development Capacity Study Potential Sites.....38

Table 4: Spatial Option 1 Development Yield .....47

Table 5: Spatial Option 2 Development Yield .....49

Table 6: Spatial Option 3 Development Yield .....50

Table 7: Spatial Option 4 Development Yield .....52

Table 8: Spatial Option 5 Development Yield .....53

Table 9: Spatial Option 6 Development Yield .....55

# Executive Summary

## Introduction

Lewes District Council is preparing its new Local Plan with the aim of providing the planning framework for our plan area to 2040.

The new Local Plan will help to make sure that our plan area provides the homes, jobs, community facilities and services to meet the people living, working and visiting in the plan area in a sustainable manner.

Once adopted the new Local Plan will replace the current Local Plan, which consists of:

- [Part 1 Joint Core Strategy 2010-2030](#): Adopted in 2016 and sets out the strategic vision, objectives and spatial strategy for the district (including the areas that are within the South Downs National Park).
- [Part 2: Site Allocations and development management policies](#), which sets out more detailed (non-strategic) planning policies for different types of development.

Until the new Local Plan is adopted (scheduled for 2025), the current Local Plan will continue to be used when making planning decisions.

The ‘Towards a Local Plan spatial strategy and policies directions’ document makes a key stage in the plan making process and provides the basis for consultation with residents, businesses and organisations on how we should develop the plan area for the future. The document outlines the preferred vision, aims and key planning issues affecting the plan area, as well as proposed policy directions for addressing these and potential locations for new development and growth.

We are now seeking views on the preferred policy directions and options for growth. We are also asking for thoughts on whether there are any additional policies or growth options we should be considering.

The consultation runs from Wednesday 29 November 2023 to Thursday 8 February 2024. You can give us your views and thoughts in a number of ways:

- Online via the [consultation platform](#)
- Email: [localplan@lewes-eastbourne.gov.uk](mailto:localplan@lewes-eastbourne.gov.uk)
- In writing: Lewes District Council, C/O Eastbourne Borough Council. Town Hall, Grove Road Eastbourne.



The consultation document is organised in the following order:



Figure 1: Consultation Document Order

## Lewes' Local Plan Area in 2040, including Vision and Aims

We set out some of the key characteristics of our plan area and its population. The Local Plan will need to establish a clear vision to set out what the Plan Area should look like by 2040. As part of this consultation, we have set out the preferred vision and supporting aims, informed by the key issues, consultation feedback and taking account of other relevant plans and strategies.

The document identifies seven aims that reflect and underpin the visions and priorities for the Plan Area. These form the basis for the strategic policy directions within the consultation document.

## Developing a Spatial Strategy in response to climate change and other challenges

We also need to make sure that the Local Plan prepares for sustainable development, however it is unlikely that we will be able to plan to meet housing 'need' in full. It will only be able to deliver between a range of approximately 270 dwellings per annum (which would be lower than the 2016

adopted Local Plan, and 45% of the identified need) and approximately 460 dwellings per annum (which is between the 2018 and 2014 population projections)<sup>1</sup>.

This upper level would be approximately 25% lower than the housing need (602dpa) identified using the government Standard Method algorithm for the plan area. Further work will be required following this consultation and prior to a housing requirement being determined for the draft Local Plan stage.

## The Plan Themes

The new Local Plan will set out strategic policies to underpin and guide development within the Plan Area. The strategic policies under each theme will be designed to deliver the strategic aims and vision over the plan period. As part of the thematic approach of this consultation document, a number of strategic policies and policy directions have been proposed:

- Development Strategy
- Climate Change
- Natural Environment
- Homes for Everyone
- Economy and Regeneration
- Infrastructure and Community Facilities
- Design, Landscape and the Built Environment
- Water

## Options for Growth

The new Local Plan will need to consider a range of options to deliver the development which is needed. The Issues and Options consultation document identified the following growth options:

- Intensification of development within the coastal towns
- Further outward expansion of Newhaven and Peacehaven
- Urban extensions to Burgess Hill and Haywards Heath
- Focussing growth on the most sustainable villages in the Low Weald
- Dispersing growth across all villages in the Low Weald
- A new settlement within the Low Weald

This consultation document takes a high-level approach to assessing the options and their respective contribution to meeting development need.

## Next Steps

We are asking a number of questions in this document on which we want your views. These will help us to shape the next stage of the Local Plan. At the end

---

<sup>1</sup> The figure have been rounded to the nearest 10.

of the consultation period, we will consider all the comments together with evidence collected to inform the next stage. It is anticipated that we will consult on the Draft Local Plan in Spring 2024.

## Getting involved

Lewes District Council is consulting on this stage of its local plan between Wednesday 29<sup>th</sup> November 2023 and 09:00 on Thursday 8<sup>th</sup> February 2024. This is a ten-week consultation period, taking into consideration the Christmas and New Year holiday period.

You can find out how to respond to the consultation online by visiting our [consultation platform](#).

You can also reach the website by scanning the QR code



The consultation document includes a series of consultation questions that we are asking you. Your answers will help us to further develop our policies and strategy.

The best way to submit your response is by using the [online consultation platform](#).

However, if you are having difficulty registering to use the portal, then you may download the questionnaire from our website, or request it by emailing [localplan@lewes-eastbourne.gov.uk](mailto:localplan@lewes-eastbourne.gov.uk)

You can also post your completed questionnaire to:

Lewes District Council,  
C/O Eastbourne Borough Council,  
Town Hall, Grove Road  
Eastbourne

### Data Protection / Confidentiality

Responses to the consultation cannot be treated as confidential so please do not include any personal or identifiable information within your comments. Responses to the consultation will be published on the council's website, together with the name and/or organisation name of the respondent.

## A. About this Plan

### 1. What is the Lewes Local Plan?

There are two local plans covering Lewes District area. The first is the [Lewes District Local Plan 2010-2030](#), which itself is in 2 parts:

- [Part 1 Joint Core Strategy 2010-2030](#): Adopted in 2016 and sets out the strategic vision, objectives and spatial strategy for the district (including the areas that are within the South Downs National Park).
- [Part 2: Site Allocations and development management policies](#), which sets out more detailed (non-strategic) planning policies for different types of development.

The second is the [South Downs Local Plan \(2014-2033\)](#), adopted in 2019 and covering those areas of the District inside the South Downs National Park for which the South Downs National Park Authority is the local planning authority.

The two parts of the [Lewes District Local Plan 2010-2030](#), alongside the adopted Neighbourhood Plans and Supplementary Planning Documents make up the statutory development plan for the area for which Lewes District Council (LDC) is the planning authority.

The new Lewes Local Plan will cover the area of the District which is outside of the South Downs National Park. The areas that the Plan will cover are separated by the South Downs National Park and has distinct characteristics:

- the coastal strip including the towns of Seaford, Newhaven, Peacehaven and Telscombe, which are located to the south of the National Park, and
- the countryside and villages of the Low Weald, to the north of the South Downs National Park within Lewes District's boundary.

Together these two parts of the district are referred to as 'the plan area' throughout this document. LDC will be working with the South Downs National Park Authority and other partners to tackle any cross-boundary issues affecting the wider area, such as where new strategic transport and utilities infrastructure may be needed. Figure 2 shows how the district relates to neighbouring areas in the South East. Figure 3 shows the plan area within Lewes District.

**Figure 2: Map of Lewes District within the wider South East area**



*Figure 2: Map of District within the wider South East*

**Figure 3: Map of the Local Plan Area**



*Figure 3: Map of the Plan Area*

## 2. How does Local Plan fit with other plans and strategies?

### The Planning Framework

The Local Plan is required to be consistent with national policy, including the [National Planning Policy Framework \(NPPF\) \(2023\)](#), planning Circulars and Written Ministerial Statements. The NPPF sets out the government’s planning policies for England and how they should be applied. In addition to including the parameters for the preparation of the local plan, the NPPF is also a material consideration in planning decisions. The [National Planning Policy Guidance \(NPPG\)](#) supports the NPPF, giving greater detail on various matters.

### Lewes Development Plan Documents

The [Lewes District Local Plan 2010-2030](#) is the development plan for the planning area and planning applications must be determined in accordance with it, unless material considerations indicate otherwise. Figure 4 illustrates how the Local Plan and its supporting documents sit within the wider planning framework.

Figure 4: Planning Policy Framework

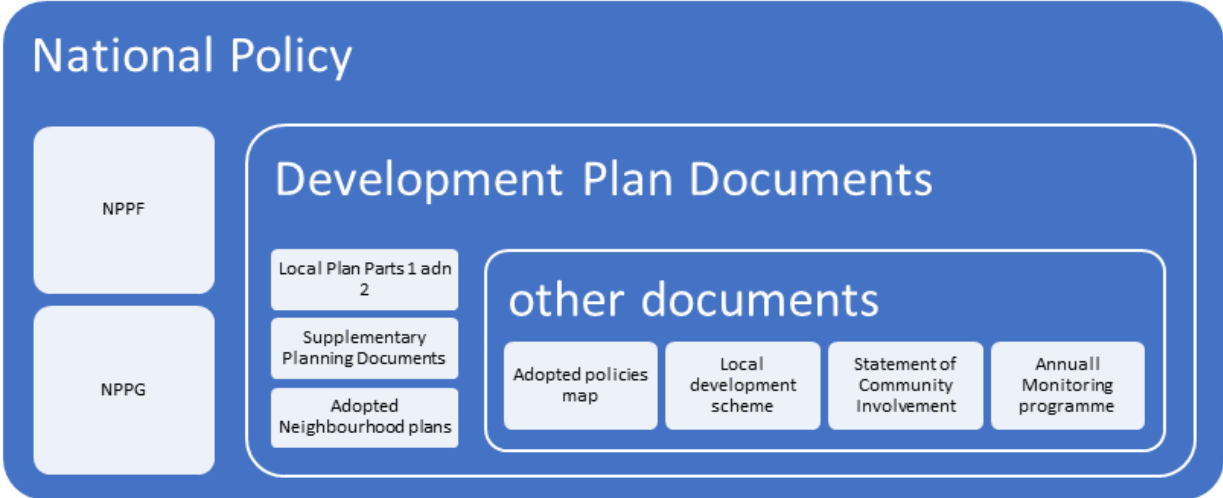


Figure 4: Planning Policy Framework

Since the [Issues and Options consultation](#) (Summer 2021), government has published a revised NPPF, and has proposed further planning reforms. The Local Plan will need to conform to NPPF, NPPG and associated legislation. Once adopted the new Local Plan 2020-2040 will replace the Lewes District Local Plan 2010-2030 [Part 1: Joint Core Strategy](#) and [Part 2: Site Allocations and Development Management Policies](#).



## **Corporate Plan 2024-2028**

LDC's Corporate Plan was approved in 2020 and sets out the high level priorities of the council. We are preparing a new Corporate Plan to cover the period 2024-2028.

The focus for the new Corporate Plan is:

- Responding to the challenges of the cost of living crisis
- Providing leadership to the district in tackling the climate emergency
- Creating sustainable community wealth
- Building homes you can afford to live in
- Delivering high quality, responsive services to local people.

## **Neighbourhood Plans**

Local communities can shape the future development of their areas through preparing neighbourhood plans. Almost every parish within the plan area has an adopted neighbourhood plan; the policies of which were assessed as being in general conformity with the strategic policies in the adopted Local Plan.

The policies within these adopted neighbourhood plans must be used when determining any planning application within the relevant area. Although the new Local Plan will postdate the adopted Neighbourhood Plans, we will fully endorse and, seek to implement all the policies within the Neighbourhood Plans while local communities review their Neighbourhood Plans.

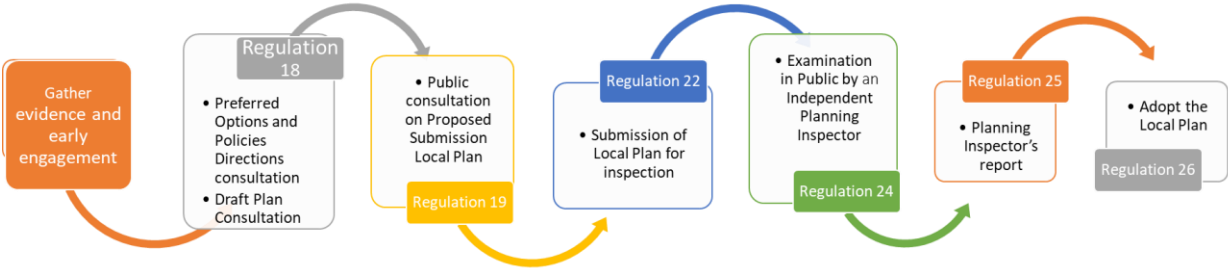


### 3. Our plan-making journey so far

The Lewes Local Plan Part 1 was identified as being more than five-years old by May 2021<sup>2</sup>. Work to review the local plan commenced during 2020. Several stages are involved in the preparation of the plan, as well as having to comply with the required procedures. These stages, prescribed in national policy and legislation, require multiple rounds of consultation before submitting a draft local plan to the Secretary of State for checking that it is ‘sound’ through independent testing at public examination; that it is realistic, deliverable and based on evidence.

Figure 5 sets out the key stages of the plan making process, highlighting where in the process we are at currently.

**Figure 5: Our Plan Making Journey**



*Figure 5: Our Plan Making Journey*

We held a Local Plan Issues and Options public consultation during the summer of 2021. This was the first public stage of preparing the new Local Plan and among other questions we asked about how we could approach planning for additional housing, how we could promote and require measures to address climate change from development, and what improvements could be made to transport. You can still see the [consultation document](#) on the council’s website.

We received over 42,000 comments to the Issues and Options consultation from over 4,000 individuals and organisations. **Thank you for taking part and for giving us your views.** These responses have been analysed and considered by the council when preparing this consultation document. For each of the policies in this document we have set out a section entitled ‘**What you have told us so far**’, which summarises the comments made in response to the themes in the Issues & Options consultation.

<sup>2</sup> Under Regulation 10A of the Town and Country Planning (Local Planning)(England) Regulations (as amended) local planning authorities must review their local plans at least once every 5 years from the adoption date to ensure that policies remain relevant and address the needs of the local community effectively.

In addition to the Issues and Options consultation, we also undertook a 'Call for Sites' exercise. This gave landowners, developers and other stakeholders the opportunity to submit sites to the council for consideration. 66 new sites were submitted through this process, and 186 sites sourced from other supply were assessed as part of the [interim land availability assessment](#) that was published in February 2022.

While the initial 'call for sites' has already taken place, we will continue to receive additional sites while we prepare the plan. As part of this consultation, we are asking for sites to be put forward that are adjacent to and share a boundary with sites that have already been assessed as either potentially deliverable/developable (orange shade on map) or assessed as deliverable/developable (green shade). We are also asking for sites suitable to accommodate Gypsy and Traveller pitches and 'Green sites' to be put forward which could be used to help mitigate against climate change, in particular sites that would either be suitable for Biodiversity Net Gain or Carbon offsetting.

You can complete a 'call for sites' form for a new site that you would like us to consider on the consultation portal.

#### 4. What is the timetable and, how is the Local Plan prepared?

The Local Plan is being prepared within the context of a wider planning framework, which sets out the local plan making parameters, its content and operation. The timetable for the Local Plan review is set out in the council’s Local Development Scheme (December 2022) and is summarised in Figure 6.

**Figure 6: Local Development Scheme Timetable**

Stage	Proposed dates
Preferred Option Consultation (Reg. 18)	Autumn 2023
Draft Plan consultation (Reg. 18)	Spring 2024
Publication (of pre-submission plan) and consultation (Reg. 19)	Winter 2024
Submission to Secretary of State (Reg. 22)	Spring 2025
Examination in Public (Reg. 24)	*Autumn/Winter 2025
Adoption and Publication (Reg. 26)	* Subject to progress of independent Examination

*Figure 6: Local Development Scheme Timetable*

This consultation stage moves our Local Plan forward from the Issues and Options 2021 and, in legal terms, is part of our Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012.<sup>3</sup> We will keep the timetable under review and it may be amended depending on several factors including new or updated evidence, comments received through consultation, and changes to the planning system consulted on by the government. We do not yet know the outcome of the government’s winter 2022/23 consultation on reforms to the planning system.

Further updates of the timetable will be published on our website in our [Local Development Scheme](#).

#### Evidence Base

While public consultations are one of the means by which we collect evidence and information, the Local Plan is supported by a suite of technical evidence studies and supporting documents. It is critical that the council and all stakeholders have a thorough understanding of the issues and needs facing the plan area. The evidence studies have been prepared by the council and other organisations.

Several studies have informed the development of the spatial strategy and policies directions. Key new evidence to support the Local Plan to this stage includes:

- Water Cycle Study Scoping Report
- Landscape Character Assessment

---

<sup>3</sup> England’s primary legislation providing the main basis for the plan led system is the Planning and Compulsory Purchase Act 2004

- Landscape Sensitivity Assessment
- Local Housing Needs Assessment
- Land Availability Assessment
- Development Capacity Study
- East Sussex Gypsy and Traveller Need Accommodation Assessment
- Economic Needs Assessment
- Retail and Leisure Needs
- Strategic Transport Evidence Base
- Settlement Hierarchy Study
- Settlement Services Assessment
- Playing Pitch Needs Assessment
- Sustainability Assessment

The majority of our evidence studies have been completed, but we are still working to refine some of the evidence and will need to commission more evidence to inform the next stage of plan making, the draft local plan. This process will continue in the months ahead and as we move towards examination of the plan by the Secretary of State.

### **Working with our neighbouring Local Authorities and other statutory bodies**

The Localism Act (2011), regulations and the NPPF place a statutory duty on local planning authorities to cooperate with each other, and other bodies such as Natural England and the Environment Agency, when preparing, or reviewing policies that have cross border implications. The government has proposed replacing the ‘Duty to Co-operate’ requirement with an ‘Alignment Policy’ “to secure appropriate engagement between authorities where strategic planning considerations cut across boundaries.” Details are not yet known as to when and what form this new approach will take. In the meantime, we will continue to work positively with our neighbouring authorities and other bodies to share evidence and develop planning solutions across a range of topics.

### **Assessing environmental impacts**

This consultation document is accompanied by a Sustainability Appraisal. Consultation with statutory consultees on the Sustainability Appraisal Scoping Report that was undertaken ahead of the Issues and Options consultation. The report provides a baseline of information on the social, economic and environmental impacts of the plan. Further assessments will be undertaken at subsequent stages of the Local Plan making process.

## **5. The purpose of this plan making stage**

This document is not the draft Local Plan, which we will prepare later in the process, it is our next step in the plan making journey and is our consultation document

following on from the Issues and Options consultation and before we consult on our draft Local Plan in spring 2024. It builds on, and is informed by, the previous consultation alongside the latest evidence studies. It reflects our understanding of the main issues for the new Local Plan and the possible approaches to address these through planning policy. We set out the reasons for taking these approaches as well as any alternatives considered in each of the policies.

This document also sets out our initial approach to what we consider to be an appropriate spatial (growth) strategy to deliver the plan's housing and economic development need. We will continue to refine this following this consultation stage and there will be further opportunities to comment on the new Local Plan through future consultations.

The Local Plan covers many land uses like new homes, businesses, shops, transport, community facilities, green spaces and biodiversity. At this stage we want to know what you think about these and, whether the vision and aims to address these issues as we have set out are the correct ones for our area. Through this consultation we are asking questions to gather your ideas and views before we develop the approaches into detailed planning policies and firm up the spatial strategy.

## 6. The structure of the new Local Plan

We have taken a thematic approach to preparing this Local Plan document. This means that it is arranged under a number of themes but needs to be read a whole, particularly for the purpose of planning and investment decisions. The document includes a **vision and aims** setting out what the Local Plan aims to achieve. In simple terms, this is to ensure sustainable development – social, economic and environmental – when planning for the homes, jobs and infrastructure needed, alongside protecting and enhancing the environment.

The spatial strategy, at the start of the document, sets out how the plan area as a whole and the different towns and villages within it should develop, together with our response to climate change within the plan period. How much development will take place, where this will be located and when it will be delivered will be key to delivering the plan area's vision and aims.

Each of the themes contains strategic policies and non-strategic policies. The strategic policies are those necessary to address the strategic priorities of the whole plan area and provide a starting point for any non-strategic policy. The strategic policies support the delivery of the spatial strategy and establish the principles of development in the plan area.

The non-strategic policies provide the detailed design and technical criteria and standard against which proposed development will be assessed. They support the delivery of strategic policies, spatial strategy and vision. This document contains a number of non-strategic policies but it does not preclude the matters from being addressed elsewhere either through Neighbourhood Plan or subsequent local planning documents, as long as they are in conformity with the strategic policies.

## B. Lewes Local Plan Area in 2040

### Vision and Aims

The Planning Acts require that each local planning authority must identify the strategic priorities for the development and use of land in the authority's area. The Local Plan adopted in 2016 for our district was prepared jointly with the South Downs National Park Authority (SDNPA). Its Vision and Objectives were for the entire Lewes District authority area. However, the SDNPA adopted its own local plan in 2019, and therefore the vision and objectives need to be revised and updated.

Although the Issues and Options consultation in 2021 did not ask for views on the existing vision and objectives, we want to adopt an ambitious and succinct vision for development in the plan area, which reflects our ambitions and priorities for the future and is achievable. In setting a vision, clear aims for development aspects such as housing, infrastructure, environmental protection and economic growth will need to be developed.

'Good' growth is an underlying foundation of our vision. Our understanding of 'good growth' is one which is helping to meet the needs of our residents and businesses and building community wealth, but it should not be at any cost. Any growth has to be socially and economically inclusive and environmentally sustainable – we will expect the highest standards to the benefit of all those who live and work here and for development to be sensitive to the local context.

Also, we need to take into consideration amendments to the NPPF (updated in July 2021 and revised in September 2023) when developing a vision, aims and spatial strategy for the new Local Plan:

- The NPPF includes specific reference to the 17 Global Goals for Sustainable Development agreed by members of the United Nations of which the United Kingdom was a signatory. These address social progress, economic wellbeing and protections for the environment, including specific goals on sustainable communities and cities, reducing inequalities, health and well-being and climate action.
- The presumption in favour of sustainable development was updated in relation to plan-making, to add reference to the need for all plans to promote sustainable patterns of development that seeks to meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate and adapt to climate change [and its effects].
- Chapter 12 of the NPPF was expanded, with a stronger emphasis on design and beauty. A change to Chapter 11 puts forward the use of area based character assessments, design guides and codes and masterplans to help ensure land is used efficiently, while also creating sustainable and beautiful places.

## Vision for Lewes District's plan area

The vision for the plan area, responding to the changes and issues identified, is set out below.

In 2040 Lewes' planning area will be:

**Green** – putting the environment at the heart of everything that is built and regeneration to improve air quality and support the health and wellbeing of our resident communities, businesses and visitors, now and into the future.

New development will minimise carbon emissions, put active travel ahead of reliance on the private car, increase nature and biodiversity and safeguard our heritage and landscapes.

The Local Plan will contribute to mitigating and adapting to the greatest challenge of our lifetime – Climate Change.

**Inclusive** – our plan area has many unique and distinct settlements, places which are both beautiful to live and work in but also places which are challenging because of extremes of wealth and inequality.

We will narrow the inequality which exists and ensure that we provide the truly affordable homes, the employment opportunities and access to services that all our residents, and especially the most vulnerable, need.

We will support the economy of our towns and villages to thrive and perform to their full potential, taking advantage of new digital infrastructure to attract new start-ups and support existing businesses.

We will support our plan area to be a dynamic place, reflecting our communities' strengths with our partnership working at its core.



Great/Beautiful **Places to live & work** – Our plan area will be a place where all generations can not only live, but also thrive.

A place where visitors will experience the opportunities and assets that we take pride in – from the coastal towns offer to the beauty of our rural villages.

Investment from new development will secure wider public realm infrastructure, from trees providing shade and cooling in our towns and village centres to new routes that make cycling and walking natural choices.

Our residents will live in healthy, safe and cohesive communities; in homes which are [sustainably] designed to a higher quality and improve sense of place but also meet their need, especially those looking for smaller homes.

We want to deliver this vision co-operatively in consultation with everyone who has a stake in our area. We want to include our community partners, parishes and town councils, supported by policies in this Local Plan and our powers as a local planning authority. Most of all we want you to love living in our area.

## Proposed Aims for our Local Plan

The following section sets out our aims for this plan:

**A RESPONSE TO CLIMATE CHANGE** – We want to future-proof our communities by supporting action on climate change and aid the transition to net zero through a combination of mitigation and adaptation measures.

Ensuring that, where possible, new development is designed to reduce car use by increasing the use of the most sustainable transport modes – walking and cycling through new cycleways and walkways that link our village and settlements.

Supporting a low carbon circular economy/principle; maximising energy efficiency of new and existing development will help to realise long-term reductions in energy use and carbon emissions as well as support the health and well-being of our communities through improved air quality.

Working in partnership with other agencies, we also want to guard against the risk of flooding and coastal erosion and improve the water quality of our rivers; by ensuring that new development is appropriately located and retains and enhances flood defences through river restoration works.

Accommodating population growth **HOMES FOR ALL**– within our constrained plan area housing will be tailored to respond to population growth and provide access to a wide range and mix of high-quality housing. This will include genuinely affordable homes that meet the varying needs of our population, including the needs of those from all age groups at different stages of life, families and those with a requirement for specialist housing. Ensuring the right size, right type and tenure in the right locations will provide a choice of housing for people, enabling families and individuals to both settle and remain rooted in their local area.

**A THRIVING LOCAL ECONOMY** – We see our town and local centres as being the focus for community activity. Investing to support growth in retail, tourism, business and cultural activities; this will not only increase local job and business opportunities but help to tackle the inequalities that exist in our plan area by providing local people of all ages with jobs that allow them to remain here. Supporting measures to build on the diverse economy of the plan area and build our community's wealth. Allowing the economy to thrive and adapt to changing economic challenges and arising opportunities - from taking advantage of the opportunities offered by Newhaven Enterprise Zone to strengthening our coastal towns' economies and rural centres - through enabling a quality environment and flexible mix of uses. Protecting land for commercial use within [neighbourhoods] and seeking contributions to employment and skills support programmes will help increase the variety and number of jobs available locally.

**OUR NATURAL BIODIVERSITY AND GREEN SPACES** – We want new development to enhance and deliver biodiversity net gains rather than detrimentally impact on our environmental assets including designated national sites, landscape character, water quality and biodiversity. Supporting opportunities to increase and improve the ecological quality of open space and multi-functional green infrastructure, the retention of existing trees and the planting of more trees. Good development links to and upgrades existing green spaces, improves access for new and existing residents as well as delivering green spaces closer to where people live in our towns and villages.

**SUPPORTING COMMUNITY HEALTH AND WELLBEING** – Places we create will encourage and allow people to pursue active and healthy lifestyles irrespective of their age or ability.

Encouraging the principles of healthy lifestyle in the design of the built environment will contribute to improving our residents' health and wellbeing and reduce health inequalities.

Expecting new development to create an environment that encourages and enables people to take advantage of our coast, rivers and South Downs landscape and other leisure assets; using these outdoor opportunities to promote healthier living and reduce inequalities in health and wellbeing.

**PUTTING IN PLACE INFRASTRUCTURE** – Development will be supported by the necessary physical, social and green and blue infrastructure to meet people's current and future needs. We want the infrastructure to be in the right places; built at the right time to serve our communities' needs for education, health, energy, water and transport, as well as the digital infrastructure for the 21<sup>st</sup> century.

Continuing in our role to co-ordinate investment to secure the timely delivery of new infrastructure, including through CIL and planning contributions; we will work with East Sussex County Council and transport providers to increase public transport capacity and accessibility as well as improved facilities for pedestrians and cyclists between our towns and villages.

**CREATING ATTRACTIVE AND DISTINCT PLACES** – We want our residents to take pride in the place(s) they live and work in – whether that is in the coastal towns or the rural villages and settlements.

Working with our stakeholders to create and maintain distinctive local places which respond positively and value, through excellent design of buildings and the public realm, our heritage, identity, cultural [tourist] assets, and the natural environment. Jobs close to homes locally will not only help develop and sustain the unique character of our villages and towns but will ensure their long-term economic prosperity.

## C. Key facts about our Plan Area

The following provides information on key facts about Lewes District

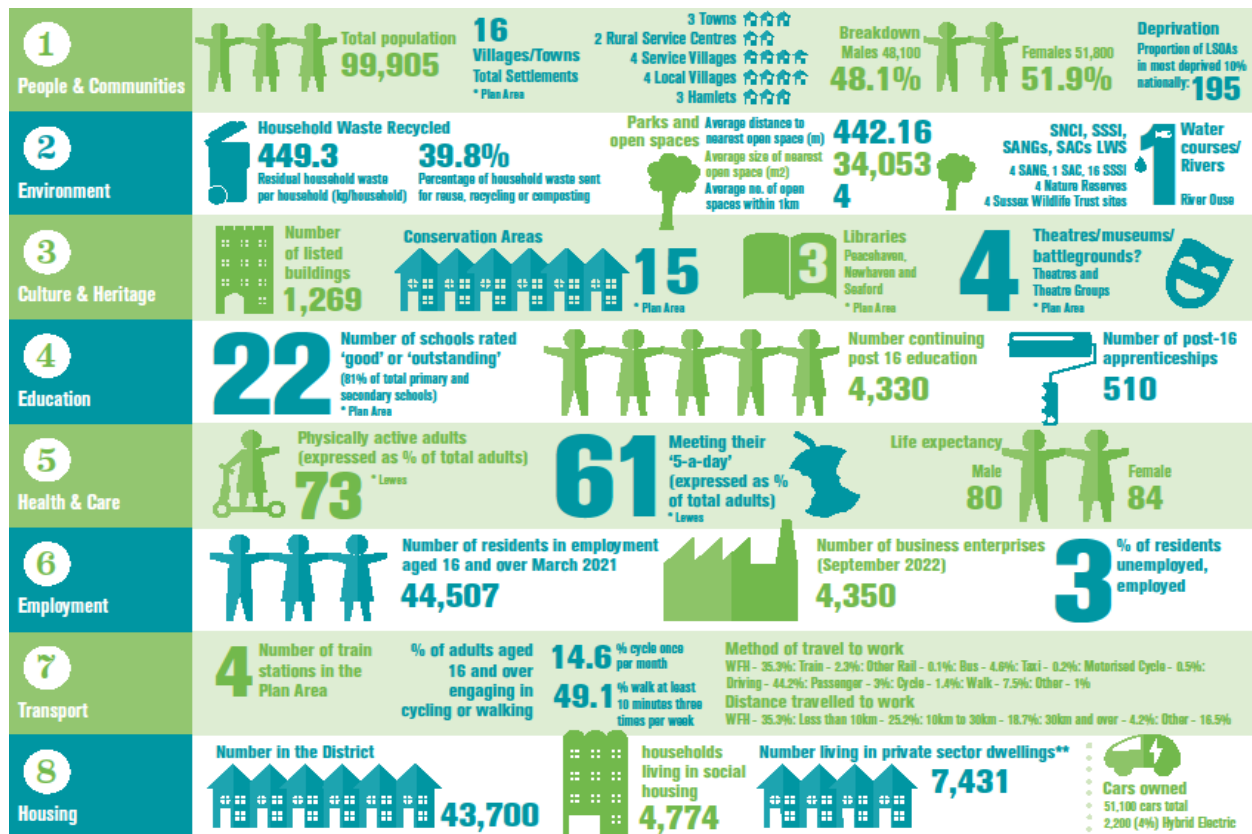


Figure 7: Key Facts about our Plan Area

## D. Consultation questions

This consultation seeks your views on whether we have chosen the right policy directions to respond to each of the plan themes. Under each theme we ask whether we have chosen the right policies and whether there are any other policies you think should be included within that theme. We also ask you why you think extra policies should be included so that we can start to understand how best to address those comments. Some of the themes have specific questions in relation to the policy directions. For clarity, we have set out all of the consultation questions below although they are repeated at the start of each theme in this consultation document.

### Vision and aims

- What are your views on the proposed vision and aims?
- Is there an alternative vision or aims (or parts of) that we should be considering?

### Spatial Strategy

- Do you agree that the proposed range identified to determine the housing requirement is the correct approach? If not, please explain why.
- Do you think there is an alternative settlement hierarchy that we should consider? If so, what is it?

### Climate Theme

- Are there any further policies you would like to see included to respond to Climate Change? Why do you think they should be included?
- Should the new Local Plan require minimisation of and compensation for the loss of carbon sequestration, and if so, how should off site compensation be addressed?

### Natural Environment Theme

- Are there any further policies you would like to see included to protect and enhance our natural environment? Why do you think they should be included?
- Do you think the policy direction for Green and Blue infrastructure is the right one? If not, please identify how it can be changed and why?
- Do you think the policy direction for Biodiversity is the right approach? If not please identify how it can be changed and why?
- Should the Local Plan consider preparing an urban greening policy which requires a minimum level of greening on a development site?

### Homes for Everyone Theme

- Are there any further policies you would like to see included to meet housing needs? Why do you think they should be included?

- Do you agree with the emphasis on securing two-bedroom homes through new development and retaining smaller homes in the housing stock? If not, please explain why.
- Do you agree with the affordable housing policy direction that is being set in the Affordable Housing policy? If not, please identify how it could be changed.
- Do you agree with prioritising rented affordable tenures over affordable home ownership tenures? If not, please explain why you think different tenure proportions should be sought.
- Can you identify specific sites that could accommodate Gypsies and Travellers? If you can identify a site, please submit it to our call for sites using the form on the consultation portal.

### **Economy and Regeneration Theme**

- Are there any further policies you would like to see included to meet economic and regeneration needs? Why do you think they should be included?
- Do you agree with the policy direction for employment and economic development? What other issues should the policy consider?
- Do you agree with our policy direction relating to retail and leisure? If not, what would you change and why?

### **Infrastructure and Community Facilities Theme**

- Are there any further policies you would like to see included to meet the need for infrastructure and community facilities? Why do you think they should be included?
- Should there be a separate policy on resisting the loss of playing pitches?
- Should a design-led policy for parking standards be progressed and included in the next version of the Local Plan?
- How should we seek to manage cycle hire schemes to encourage the modal shift but at the same time avoid their potential for cluttering the street scene?

### **Design, Landscape and Built Environment Theme**

- Are there any further policies you would like to see included to guide Design, Landscape and the Built Environment? Why do you think they should be included?
- Do you agree with the proposed policy directions that are being considered for further development? Are there alternatives that we should be looking at?
- Do you think that having concept masterplans for all residential development sites would assist in bringing forward sites and retain the design quality of the development? If yes, what stage of the plan should these be prepared and agreed?

## Water Theme

- Are there any further policies you would like to see included to respond to water resources and water management? Why do you think they should be included?
- Should the water quality policy specify standards for development for intensive livestock production?
- Should the new local plan continue with the existing policy approach set out in Policy DM18: Recreation and Rivers or go further and consider specific locations for recreational uses, and other, or more specific areas/water bodies.

## E. Developing a spatial strategy in response to climate change and other challenges

### What development do we have to plan for?

Our commitment to tackling climate change, which is the single greatest challenge of our time is set out in our [Climate Change and Sustainability Strategy](#). Development is, and will continue to be, one of the biggest influences on climate change. We want to use the planning system and the new Local Plan as a vehicle to shape our response to it, for example by encouraging carbon resilient design and protecting our valued natural environment. At the same time, we need to seek to meet our development needs through sustainable development in our plan area. All growth, therefore, must maintain or improve the quality of our communities – both new and existing.

The government's [presumption in favour of sustainable development](#)<sup>4</sup> means that our Local Plan must help to facilitate new development that seeks to meet identified needs over the plan period. The council, as the local planning authority, must therefore plan positively through the Local Plan to meet these identified needs. This includes planning for housing, workspaces, space to accommodate town centre uses, office space and industrial uses and other land uses. However, we want to do this in a manner that balances and minimises our environmental impacts and takes account of the different roles and character of our area.

### Housing Need

National policy requires that a Local Plan should plan for a fifteen year period following adoption.<sup>5</sup> We anticipate our new Local Plan being adopted in 2025 in accordance with the [Local Development Scheme](#). The NPPF also requires local planning authorities to meet their full need for both market and affordable housing as far as is consistent with other policies in the Framework.

National Planning Policy requires that to determine the minimum number of homes, Local Plans should be informed by a local housing needs assessment, conducted using the [Standard Method in national planning guidance](#).<sup>6</sup> Our Local Housing Needs

---

<sup>4</sup> See Paragraph 11 of the [National Planning Policy Framework \(NPPF\) 2023](#)

<sup>5</sup> [NPPF 2023, Paragraph 22](#)

<sup>6</sup> The Standard Method is the government's algorithm or calculating housing need, Local Planning authorities are expected to determine their housing needs, using this algorithm unless there are exceptional circumstances.

The government also consulted in December 2022 on making the LHN an advisory starting point for plan-making. However, any housing number put forward is still required to be based on evidence and to be tested by the Planning Inspectorate at Examination. There are examples of Local Plans planning for a lower level of housing than their identified housing need which have been adopted following Examination. A recent example is Worthing, which adopted its local plan earlier this year.



Assessment (LHNA, 2023)<sup>7</sup>, based on the Standard Method using the 2014 household projections as required by Government guidance<sup>8</sup>, generates an average ‘annual housing need’ of 602 dwellings for our plan area. This equates to 12,040 homes for the plan area over the twenty-year plan period from 2020 to 2040.<sup>9</sup> The Economic Needs Assessment does not require us to consider a higher number of homes to plan for because of economic growth projections over that generated by the Standard Method.

## Alternatives to national policy for determining housing need

We know that our plan area is constrained<sup>10</sup> in terms of landscape impact, flood risk and infrastructure especially transport, and as such we have looked at the appropriateness of using an alternative to the government's Standard Methodology for identifying our housing need. We have looked at three potential alternatives to the government's standard methodology. These are:

- Calculating housing need using the 2018 household projections in the Standard Methodology formula.
- Calculating housing need using the available Census 2021 dataset in the Standard Methodology formula.
- Testing the appropriateness of planning at the adopted local plan requirement level 275 dwellings per annum for the plan area.

Through the LHNA we have tested the level of housing need using the 2018 household projections. This results in a housing need of 397dpa (7,940 over plan period) rather than 602dpa in the plan area.<sup>11</sup> We have also, through the LHNA, considered the Census 2021 population or dwelling stock data for calculating housing need. The Census 2021 results in a housing need figure of 574dpa or 11,480 over the plan period.

However, since the full Census 2021 data is scheduled for release only in mid-2024, calculating housing need on the basis of the available Census 2021 data when combined with a lack of clarity from government as to how it will implement changes to the Standard Methodology, carries a higher risk to the Local Plan than using the 2014 projections.<sup>12</sup>

---

<sup>7</sup> AECOM, Local Housing Needs Assessment, 2023; Economic Needs Assessment, 2022

<sup>8</sup> <https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments>

<sup>9</sup> Standard Method is set out in National Planning Policy Guidance. The 2014 household projections were published in autumn 2016. While the Local Plan covers a 20 year period (2020-2040), from the adoption (in 2025) to the end of the Plan period (2040) will be 15 years.

<sup>10</sup> see Landscape Character Assessment, Landscape Sensitivity Study, Strategic Flood Risk Assessment

<sup>11</sup> The 2018 projections are closest to the Census 2021 data as released, hence their relevance in being tested through the LHNA.

<sup>12</sup> We may revisit this once full dataset and changes to Standard Method have been implemented.

The government, in its December 2022 consultation, made clear that for the time being, the methodology set out in National Planning Policy Guidance would continue to use the 2014 based household projections.

Additionally, the current minimum level of identified housing need for the plan period (602 dwellings per annum) is a much higher level of housing to be delivered than we have either historically planned for or been able to deliver. To put this in context following independent examination<sup>13</sup>, our adopted [Local Plan Part 1: Core Strategy](#) set a housing requirement of 345 dwellings for the whole of the district including the South Downs National Park area. This was subsequently revised to 275 dwellings per annum for our plan area (i.e. excluding the area inside the national park)<sup>14</sup>.

The challenge of meeting the Standard Method (602dpa) figure is not to be understated when considering delivery rates against the adopted Local Plan; an average annual delivery rate for 2010 to 2023 was approximately 250 net housing completions. Even the 536 net additional housing completions in 2022/23, which were the highest annual level to date, has been unable to deliver at the Standard Method target. Figure 8 sets out our net delivery rate over the adopted Local Plan period to 2023.

**Figure 8: Historic Housing Delivery Rates**

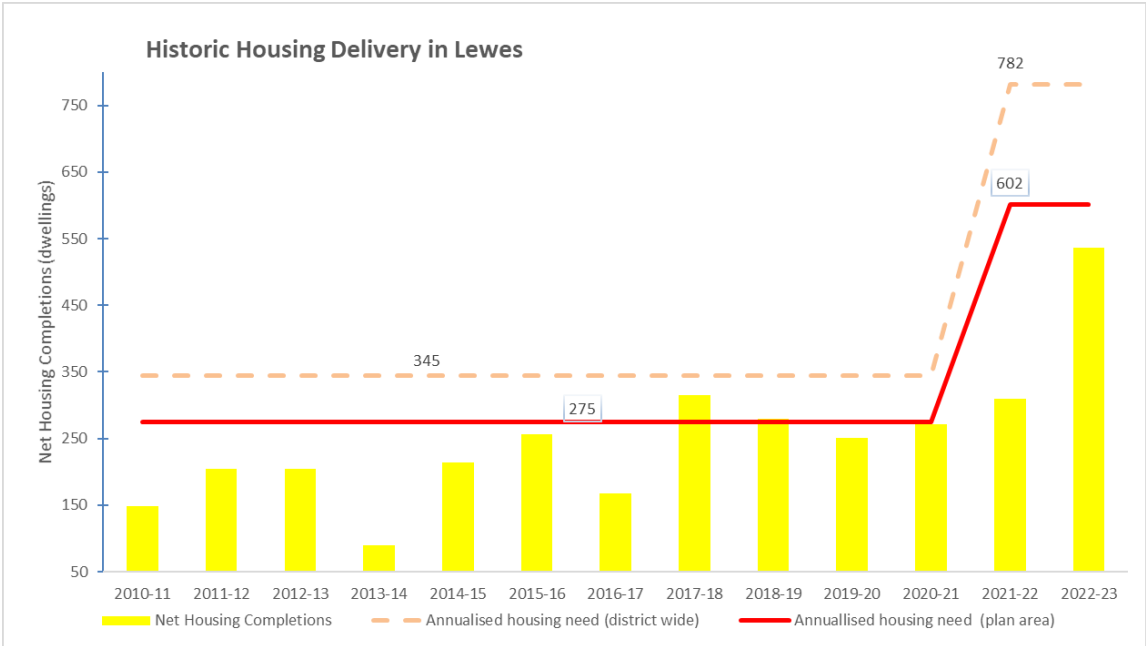


Figure 8: Historic Housing Delivery Rates

The rate of housing delivery within the Plan area is largely controlled by the development industry. The rate at which developers deliver sites is influenced by

<sup>13</sup> The Inspector in his report [Inspectors Final Report \(lewes-eastbourne.gov.uk\)](#) agreed with this level of housing need. See Paragraphs 20 to 31.

<sup>14</sup> Lewes District Council, [Approach to Local Housing Need](#), May 2021

local and national market conditions, potential market saturation, availability of development land, funding and government support, changes to national planning policy, the current state of the economy, supply chain challenges, the availability of workers, interest rates and the costs of borrowing.

While we seek to plan positively to establish whether housing delivery can be increased, in considering our historic delivery rate, the supporting evidence informing the Local Plan, and our limited ability to influence the rate of housing delivery, alongside the significant challenges faced nationally in seeking to increase the rate of housing delivery, it is unlikely that the gap between the level of identified need and delivery rates can be closed. This means some very difficult choices and, potentially a new approach to planning and delivering development will be needed if the full needs are to be met through the new Local Plan.

### **Towards setting a Housing Target**

The scale of change required to increase delivery across our area is very significant. To achieve this, both a sufficient amount and variety of land has to come forward where it is needed to address the specific needs of different groups and for development on land with planning permission to not be unduly delayed.

Our plan will seek to ensure that a continuous supply of land for housing over the plan period is made available by drawing on several sources. These include:

- Completions – the new plan period overlaps with the previous plan period and account therefore needs to be taken of dwellings that have been completed.
- Remaining allocations and commitments – sites which are allocated in the previous local plan and are being taken forward through the new Local Plan, neighbourhood plan allocations and sites where permission has been granted but the development not yet built.
- Windfall sites - Sites that have not been permitted or specifically allocated for development, and unexpectedly become available for development during the Plan period.
- New sites allocations in the new Local Plan – sites which have been assessed through the LAA as being suitable for allocation.

### **Housing Supply at March 2023**

Table 1 shows the land supply position at 31 March 2023. There have been a significant number of completions and commitments through the grant of planning permission since 2020, together with a windfall allowance that can be deducted from the total housing need figure.

**Table 1: Existing sources of housing supply**

-	Supply Source	Net Number of Homes
A	Total Target <sup>15</sup>	12,040
-	<b>Existing Supply:</b>	-
B	Completions (2020-2023)	1,118
C	Allocations Commitments (unimplemented planning permissions) 5YHLS	1,790
D	Remaining Allocations and Commitments <sup>16</sup>	1,503
E	Windfall Allowance	588
<b>F</b>	<b>Total existing supply</b>	<b>4,999</b>
<b>G</b>	<b>Residual Amount = A–F</b>	<b>7,041</b>

Table 1: Existing sources of supply

### Windfall sites<sup>17</sup>

The NPPF states that ‘windfall sites’ should be supported through Local Plan ‘policies and decisions – giving great weight to the benefit of using suitable sites within existing settlements for homes’.<sup>18</sup> Sites which make up the small sites windfall element of the supply typically comprise homes from change of use, residential conversions and/or extensions, non-residential redevelopment (permitted development) and residential redevelopment.

Our assessment of the contribution likely to be made from windfall sites, based on past trends, shows that windfall developments have clearly played a role in the supply of small sites for housing. It shows an average of 42 dwellings being completed on small sites per annum between 2011/12 and 2020/21. However, it is not possible to identify these in advance as they fall below the size or capacity thresholds for inclusion in the Land Availability Assessment and allocation for development. Where such development proposals are put forward, we will look to support them where they are in accordance with the other Local Plan policies. At present, there is no evidence to suggest that these types of sites will not be available over the plan period.

The government’s introduction and proposed further expansion of Permitted Development rights will potentially result in even more opportunities for developers to bring forward this type of ad-hoc residential development. Therefore, there is no reason to revise forecasts downwards. The anticipated contribution from windfall will continue to be reviewed annually.

<sup>15</sup> Housing Need identified in the LHNA 2023,

<sup>16</sup> Supply sites which are likely to come forward from Year 6 of the Plan period but over which there is less certainty.

<sup>17</sup> Sites which are not specifically identified in the development plan but are expected to come forward through the development control process in accordance with policies set out in the Local Plan and through the use of permitted rights.

<sup>18</sup> NPPF 2023, [Paragraph 69](#)

**Future supply**

Taking the above sources of supply into account leaves a residual<sup>19</sup> housing amount that will need to be planned for through new allocations in order to meet the Government’s standard method annual target of 602 new dwellings over the plan period. There also needs to be some flexibility to allow for phasing issues and for an element of non-delivery. We will seek to meet as much of this residual need as possible given the ecological, environmental, national policy and land constraints.

The Land Availability Assessment (LAA) is a key piece of evidence informing the Local Plan options for meeting housing need. It provides the mechanism through which the quantity and suitability of land potentially available for housing development is determined. The LAA identifies a potential capacity of approximately 4,053 dwellings from new sites, out of which only an approximate 413 dwellings are assessed as ‘Deliverable<sup>20</sup> or Developable<sup>21</sup>’ sites at this stage.

For sites that currently fall within the ‘potential’ category, additional evidence to determine their ‘deliverability’ as well as the capacity will be required before they can be considered for allocation. Sites within this potential category, which are assessed as not being deliverable or developable, may result in a further reduction from this supply source that can be considered for /allocation through the draft Local Plan.

Table 2 sets out the supply from the LAA source and the residual need once this is factored into the supply.

**Table 2: Supply from new sites identified in the LAA**

	<b>Supply Source</b>	<b>Approx. Net Number of Homes</b>
	<b>LAA sources:</b>	
H	Deliverable or Developable Sites (LAA)	413
I	Potentially Deliverable or Developable Sites (LAA)	3,745
J	<b>Total LAA sites supply</b>	<b>4,158</b>
K	<b>Residual Need Amount = A–(F+J)</b>	<b>2,883</b>

*Table 2: Supply from new sites identified in the LAA*

<sup>19</sup> Residual housing calculated by deducting the total supply from the housing target  
<sup>20</sup> [The NPPF Glossary](#) says: ‘To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within 5 years...’  
<sup>21</sup> [The NPPF Glossary](#) says: To be considered developable, sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged.

**Capacity for development in existing area**

National planning policy expects a proactive approach to site identification to be taken in the preparation of Local Plans. The Development Capacity Study (DCS) seeks to fulfil this role. It assesses the possible supply of land within the built-up areas of our settlements in addition to what has been assessed in the Land Availability Assessment.

While it identifies sites with development potential, it is the Local Plan that sets out the locations for development, which will be managed and assessed through the development management process.

The DCS is based on the best available knowledge and is a snapshot of capacity and any constraints, based on a desktop exercise, at the time of writing (Sept 2023). Assumptions about the availability, suitability and viability of land to help contribute towards supply have been high-level and will need to be carried out in detail.

A total of twelve additional potential development sites were identified within or adjacent to the top tier settlements of Newhaven, Seaford, Peacehaven & Telscombe, Newick and Ringmer and key transport hubs in the plan area. Cumulatively, these sites have a theoretical capacity of approximately 208 dwellings which may contribute towards the overall housing supply. Table 4 details the contribution from this source towards the housing need.

Information on these sites is likely to change over time and will be further refined as more detailed information for the sites becomes available. The DCS will be updated to reflect any changes to inform future iterations of the Local Plan as needed.

**Table 3: Development Capacity Study identified potential sites**

	<b>Supply Source</b>	<b>Approx. Number of Homes</b>
L	DCS potential sources supply	208
M	<b>Residual Need Amount = A-(F+J+L)</b>	<b>2,675</b>

*Table 3: Development Capacity Study Potential Sites*

Taking all of the supply together means that, at this stage we are only able to identify a lower theoretical housing land supply than the housing need under the standard method from the above supply sources.

**Delivering new housing in a managed way**

New development will inevitably lead to pressures on existing natural resources, infrastructure and services. The Local Plan needs to strike a balance between the need for new homes and the impacts resulting from any new development. Planning

for new development, gives us a greater ability to secure funding from development and design schemes to mitigate impacts.

In order to ensure that the scale and location of proposed growth has been informed by carefully considering the evidence, the negative and positive impacts of this growth and its contribution to social, economic and environmental objectives, it is more appropriate to express the requirement as a range rather than a single figure at this stage of our plan-making. We consider that the range for the housing requirement would fall between approximately 5,412 (271dpa) and approximately 9,365 (468dpa). The lower end of this range is derived by the lower level of supply (i.e. supply from Rows F & H, (Tables 1 and 2). The upper end of this range also includes supply from sites that are currently assessed as potential (i.e. Rows F, J & L in Tables 1, 2 and 3 above).

Taking such an approach will allow us to continue to investigate how we can seek to accommodate our housing need and the potential constraints to development which we need to take account of within our Plan area and set a single definitive figure for the scheduled draft Local Plan consultation in spring 2024.

Therefore, while proactively seeking sustainable locations for growth through our call for sites, which will allow new development to be delivered in a coherent and well managed manner, we are continuing to test issues like:

- Impacts on landscape, environment, air quality, flood risk and water supply, and the cumulative impact of development on landscape character/sensitivity.
- Impacts on services and critical infrastructure, particularly constraints related to highways infrastructure capacity.
- Ability of the market to absorb new housing, especially with regards to market saturation in parts of the plan area.
- The capacity of potential development sites in the existing urban areas.
- Appropriate densities for potential new developments based on the character of the surrounding areas and the types of housing needed.
- The viability of new development in the area, and the implications for the delivery of local housing needs.
- Any further constraints to development in the area such as environmental designations and pollution.

This further Local Plan evidence work will comprehensively assess the ability of the Plan area to accommodate housing needs by maximising the development capacity of the area within the limits of the constraints that exist.

Additionally, through the Issues and Options consultation, you told us that you had concerns about infrastructure including transport, healthcare, education, landscape, flood risk and air **and** water quality. These and other issues may mean that we need



to phase development. This would see the Local Plan allocate a larger number of homes to be built later in the plan period allowing for the infrastructure required to be delivered by the time new homes are occupied.

## Other Development Needs

While the delivery of housing is a key aim of this Local Plan, planning for other land uses such as renewable energy generation, land for biodiversity off-setting, carbon sequestration, community and leisure facilities, and commercial/industrial spaces is also within the scope of this Local Plan and we will plan for these needs as well.

## Gypsy, Traveller and Travelling Showpeople accommodation

Gypsies, Travellers and Travelling Showpeople are recognised as ethnic groups and are protected from discrimination by the Equality Act 2010. We are required to assess and plan for their specific needs for cultural appropriate accommodation.

The need is identified through the East Sussex Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment (May 2022). The need for our area over the plan period is for six pitches to meet the needs of those that meet the ethnic definition of Gypsies and Travellers. We are required to identify land for enough sites for Gypsies and Travellers that meet the definition set out in the national Planning Policy for traveller sites (2015). For Gypsies and Travellers that meet the planning definition, three pitches are required over the plan period.

## Employment

We want our towns and villages to sustain their services and continue to be the great places people live and work in. Hence our approach is to support sustainable economic growth. We want to promote and enhance the economic offer of our area. We want our residents to be able to have the suitable jobs and employment opportunities within our plan area.

The Economic Needs Assessment (ENA) details the demand for employment space in our plan area in order to meet the needs of existing, as well as new, businesses.<sup>22</sup>It identifies 39 employment clusters, ranging from small (under 500sqm) to large (over 2,000sqm) units, as well as their quality. The ENA also concludes that while most of these clusters are performing well, potential opportunities to either intensify and/or redevelop exist in certain cases. The ENA's recommendation is that **no new site allocations are needed for employment** and instead 'well-performing' sites should be protected.

To ensure that a range of employment sites and premises are available, we will seek through this local plan (principally through Policy E1) to safeguard existing

---

<sup>22</sup> Employment space relates to office and industrial use classes



employment sites, mainly located in Newhaven, and encourage their intensification. The delivery of new spaces through mixed use allocations, where they support existing communities, and are supported by consultation respondents, may also help to meet the modest demand that has been identified.

## Retail

We know from anecdotal evidence that what happens in our town centres is changing with the growth of online shopping, 'click and collect' and the behavioural changes engendered as a consequence of the Covid-19 pandemic. We, therefore, commissioned a Retail and Leisure Study<sup>23</sup> for the whole of the district (including the planning area covered by the South Downs National Park). This recommends a tiered retail hierarchy approach should be developed to deliver the forecasted retail uses for the plan period to 2040.

Given their important roles in the lives of our residents, we will need to positively support the growth, management and adaptation of our town and local centres. We need to ensure that alongside new development, the existing stock of premises has a role in accommodating the identified need. Our retail centres will need to service the changing habits and needs of our communities and visitors as well as encourage people to shop locally rather than travelling further afield to Brighton or Eastbourne. The policy direction that we consider will help us meet the level of retail need that the evidence identifies is set out in Policy E6: Retail and Town Centres.

Additionally, in accordance with National Planning Policy, the Local Plan confirms the hierarchy of centres and will direct development appropriately to them. This will ensure that the vitality and viability of our high streets, and town/local centres is maintained over the plan period.

---

<sup>23</sup> AECOM, 2023, Retail and Leisure Study

## F. The Plan Themes

### Theme: Development strategy responding to Climate Change

**Aim:** The development strategy sets out the locations where development may take place to help meet the identified need, as well as the supporting infrastructure

#### Which Policies Are We Proposing?

The following policies are being proposed under this theme:

SDS 1: A spatial development strategy approach

SDS 2: Settlement Hierarchy

SDS 3: Settlement Boundary

#### Consultation Questions for Spatial Strategy

- Do you agree that the proposed range identified to determine the housing requirement is the correct approach? If not, please explain why.
- Do you think there is an alternative settlement hierarchy that we should consider? If so, what is it?

## Strategic Policy SDS1: A Spatial Development Strategy Approach

### Objectives

The overarching spatial strategy will be central to delivering the vision and aims for the Plan area to 2040 and will inform the preparation of neighbourhood plans.

In setting out the long-term planning strategy for directing growth, our development strategy for the area will recognise our environmental constraints, the availability of land for development, the viability of development and the need to balance such matters against supporting the local economy and seeking to meet local housing need, including for affordable housing.

### Preferred Policy Direction

The policy will seek to direct development to locations that are the most sustainable, which is often brownfield land within existing settlements. It will seek to protect and enhance nature, address the impacts of climate change and help deliver many of the Council's wider aspirations.

Depending on where in the range (level of development) the Local Plan seeks to plan for, and drawing on our evidence and consultation feedback, our approach will be a blended strategy meeting the needs of our diverse area, responding to issues in the plan area and reflecting the sources of land supply. At present influences on the emerging spatial strategy include:

- A strong commitment to reducing climate change impacts, locating homes and jobs close to each other and where active and sustainable travel can be maximised.
- Making the best use of brownfield land; especially previously developed land in the built areas.
- Supporting economic growth within the plan area.
- Supporting rural communities to thrive and sustaining local services.
- Increasing the supply of affordable homes.
- Supporting growth in locations which support or maximise the capacity of existing infrastructure and provide opportunities for new infrastructure.
- Achieving a high-quality environment – balancing the protection of our natural landscapes, heritage, and watercourses with meeting our social and development needs.
- National policy requirements and other plans and strategies affecting the area.
- Government's principles of sustainable development.

A potential blended approach to spatial development is illustrated through the diagram in Figure 9.

**Figure 9: Spatial Development Approach**

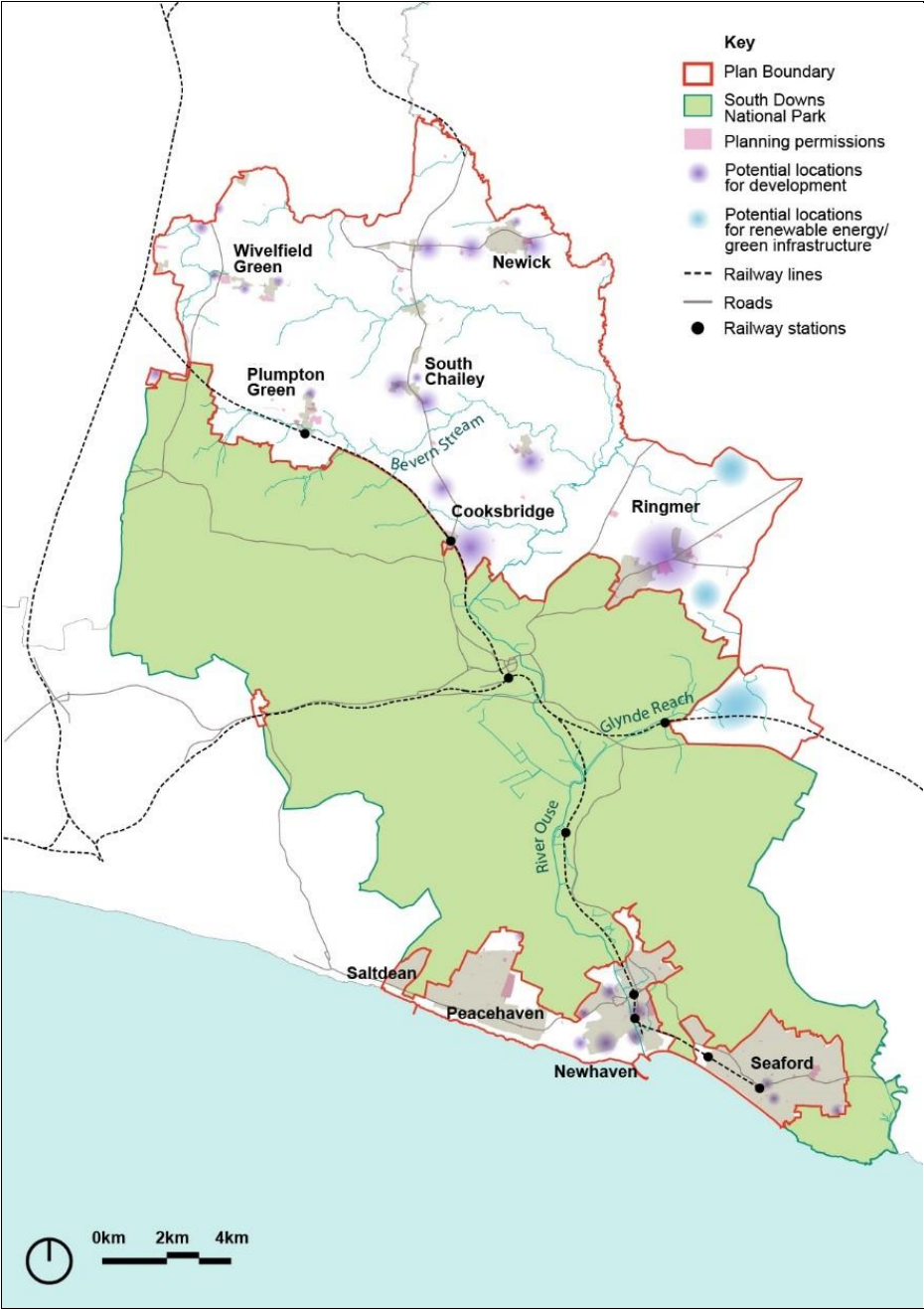


Figure 9: Spatial Development Approach

We are scheduled to consult on our Draft Local Plan in spring 2024. The locations identified in the Draft Local Plan will be our preferred locations for new development to meet our social responsibility for providing housing (including affordable housing, improve access to jobs services and facilities, and achieve a high-quality environment whilst addressing climate change to create resilient and adaptive environments. For this reason, the final spatial strategy will need to ensure that it maximises the contribution from appropriate previously developed land within the existing built-up area, locations which maximise existing infrastructure capacity or

support delivery of new key infrastructure. Greenfield land in the most sustainable locations adjacent to existing built-up areas will also have to be included to meet the assessed development need.

Alongside looking at the best locations for new homes, and safeguarding employment locations, we want to set out locations where our area's habitat networks can be restored and where new green and blue spaces can be created to help improve the health and wellbeing of our communities as well as our natural environment. This may mean that sites are identified for the provision of this infrastructure or that the green/blue infrastructure is delivered as part of a wider development site.

### **Why is this policy needed?**

The many distinctive places in our plan area give it its unique character and identity. Communities in our plan area take pride in their neighbourhoods, and the new Local Plan can help steer the right development to ensure they continue to be places that people are proud of and want to live in.

Climate change has, internationally, been recognised as the single most pressing environmental challenge of our time. It impacts on the council's activities and how we meet the needs of all residents in the plan area. At the heart of our spatial strategy is a commitment to responding to the climate and nature emergencies that we declared and to deliver sustainable placemaking in which people want to live in.

The NPPF<sup>24</sup> indicates that the efficient use of land is a priority and that planning policies should support development that makes efficient use of land. The strategy will also need to have regard to the sustainability of the location and character and amenities of the location's surroundings. Densities that will be achieved in the area will reflect the diversity of our settlements. Higher densities will be sought in locations in higher order settlements as identified in the Settlement Hierarchy Study.

The Issues and Options consultation document included broad options for growth which the council considered could be approaches to accommodating growth in the plan area. Six options for residential growth were included. The six strategic growth options were:

- Option 1: Intensification of development within the coastal towns
- Option 2: Further outward expansion of Newhaven and Peacehaven
- Option 3: Urban extensions to Burgess Hill and Haywards Heath
- Option 4: Focussing growth on the most sustainable villages in the Low Weald
- Option 5: Disperse growth across all villages in the Low Weald.
- Option 6: A new settlement within the Low Weald

---

<sup>24</sup> [NPPF Paragraphs 119 and 120](#)

Through the Issues and Options consultation document the advantages and disadvantages of each option were set out and we asked for views on each of the options. We also said it was likely that on their own each option would potentially not be enough, and it would be a combination of the options that would make up the spatial strategy. While there were varying levels of support for each option. Such a response is not uncommon, particularly when issues concerning the possible locations of new growth are involved.

We have now considered, in further detail, each of these options and a high-level assessment considering national planning policy. The extensive research and technical studies which make up our evidence base is also informing our understanding of the potential contribution of each of the spatial options towards developing a preferred spatial strategy.

The following section provides further information on each of the six options and the potential amount of development that could come forward were the option included in the final spatial strategy. Where options are similar, an element of duplication in the sites/yield is to be expected.

## **Spatial Option 1: Intensification of development within the coastal towns**

Under this option housing development would be located within the coastal towns of the plan area. Using the existing built-up area, re-using brownfield land, and increasing the density of development where possible within the coastal towns in the plan area.<sup>25</sup>

### **What you told us**

Generally, a positive response to this strategic option was received through the Issues and Options consultation. Many of these positive comments were supportive of the approach as it would focus development on the settlements which have the best level of services and facilities.

Comments in particular considered this option as providing a host of opportunities for regenerating the coastal towns and bringing economic prosperity to these areas. This option was also considered to give greater protection of the rural landscape especially within the South Downs National Park, countryside and wildlife, preserving agricultural land and minimising the need to develop on greenfield land.

### **What does this option look like?**

A high-level analysis of the option suggests that it is consistent with the preferred settlement hierarchy which seeks to focus development on the most sustainable

---

<sup>25</sup> Seaford, Newhaven, Peacehaven & Telscombe

settlements. It should therefore continue to be explored further as a preferred option for development. Work to understand the potential of sites, including those identified through the Development Capacity Study will need to be undertaken. This option, on its own is unlikely to meet the range identified for development needs and sites outside of the existing coastal towns would need to be considered.

The map in Figure 10 provides an indicative illustration of development locations under this option including potential sites identified through the Land Availability Assessment. Table 4 provides details on the supply of dwellings and sites that would contribute to this option.

**Figure 10: Spatial Option 1**

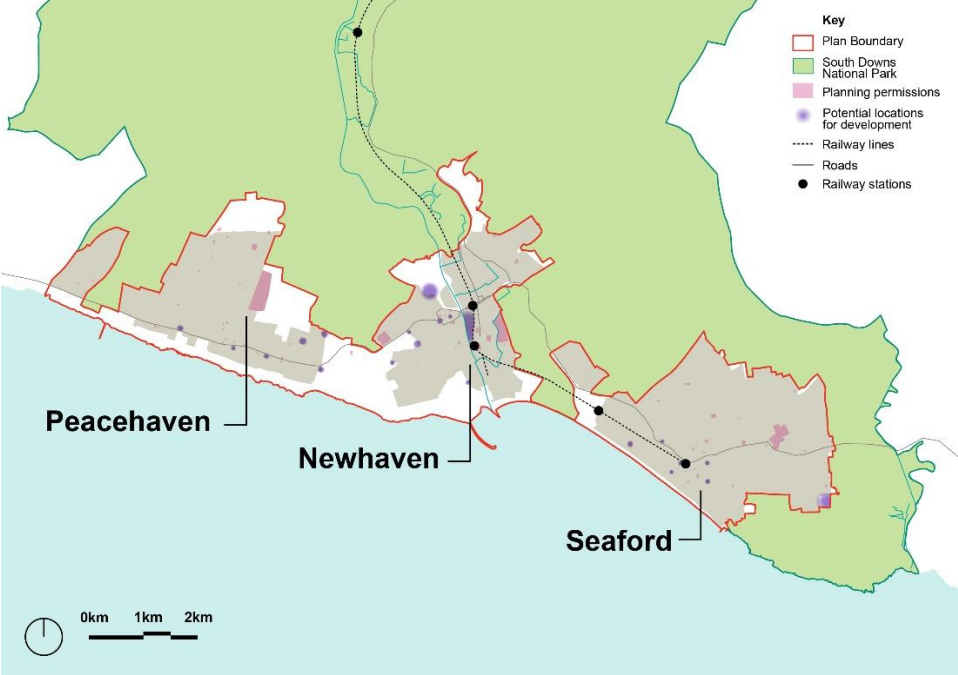


Figure 10: Spatial Option 1 Indicative Locations

**Table 4: Spatial Option 1 - Intensification of development within the coastal towns**

Supply source	Number of sites	Yield (Number of Dwellings)
LAA sites - Deliverable/Developable	4	103
LAA Sites - Potentially deliverable/Developable	13	205
LAA Sites – Not deliverable/Developable	14	0
Commitments (Planning Applications)	80	866
Allocations (LPP1 & LPP2)	18	874
Completions (2020-2023)	85	447
<b>TOTAL SUPPLY IN OPTION</b>	<b>214</b>	<b>2,495</b>

Table 4: Spatial Option 1 Development Yield



## Spatial Option 2: Further outward expansion of Newhaven and Peacehaven

This option looks at development opportunities on greenfield locations coming from a limited area outside the built-up areas of Newhaven and Peacehaven – the area North of Telscombe Road and Valley Road as well as at Peacehaven Heights.

### What you told us.

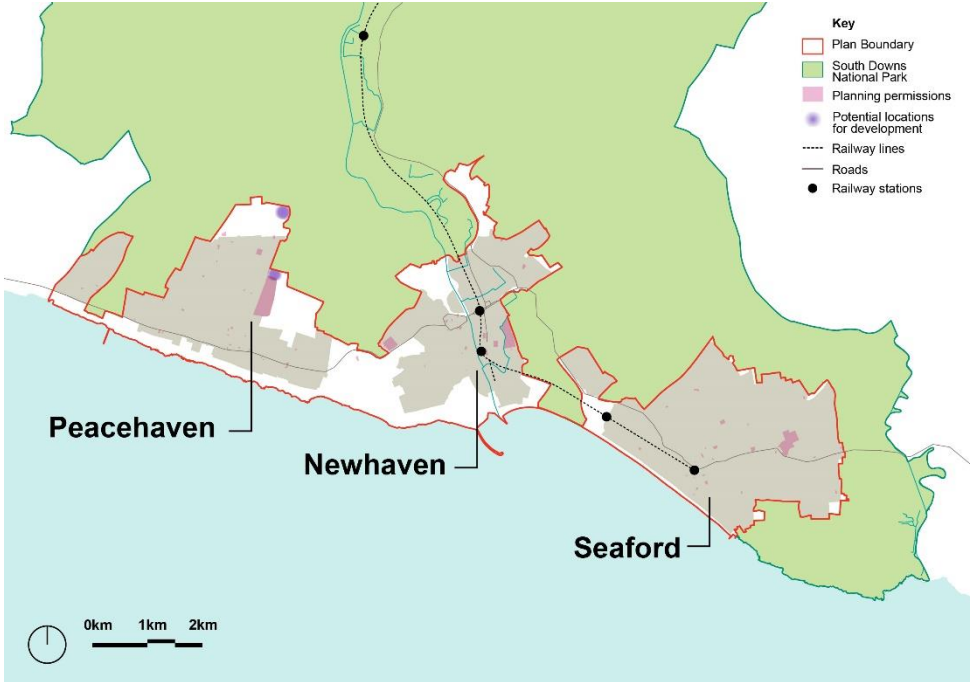
Similarly, to Option 1, this option was considered to provide the most opportunities for regenerating Newhaven and Peacehaven as well as bringing in new investment to those settlements. There was also a view that it could maximise tourism opportunities for Newhaven, taking advantage of the port and its offer.

### What does this option look like?

A high-level analysis of the option suggests that it is consistent with the preferred settlement hierarchy which seeks to focus development on the most sustainable settlements. While it should continue to be explored further as a preferred option for development, its potential contribution towards meeting need, on its own, would be very limited.

The map in Figure 11 provides an indicative illustration of development locations under this option including potential sites identified through the Land Availability Assessment. Table 5 provides details on the supply of dwellings and sites that would contribute to this option.

**Figure 11: Spatial Option 2**



*Figure 11: Spatial Option 2 Indicative Locations*



**Table 5: Spatial Option 2 - Further outward expansion of Newhaven and Peacehaven**

<b>Supply source</b>	<b>Number of sites</b>	<b>Yield (Number of Dwellings)</b>
LAA sites - Deliverable/Developable	1	15
LAA Sites - Potentially deliverable/Developable	0	0
LAA - Not deliverable/Developable	15	0
Commitments (Planning Applications)	4	191
Allocations (LPP1 & LPP2)	1	400
Completions (2020-2023)	3	187
<b>TOTAL SUPPLY IN OPTION</b>	<b>24</b>	<b>793</b>

*Table 5: Spatial Option 2 Development Yield*

### **Spatial Option 3: Urban extensions to Burgess Hill and Haywards Heath**

Both Burgess Hill and Haywards Heath are outside the plan area and are located within Mid-Sussex’s administrative area. Nevertheless, they are closely linked and function as the principal centres for the population in the northern part of the plan area.

#### **What you told us**

Respondents to the Issues and Options consultation thought that this option provides opportunities to better grow the existing towns and to enhance existing infrastructure, rather than the need and cost to deliver new infrastructure. Respondents thought that the option, rather than spreading housing piecemeal in rural areas, would also have brownfield opportunities. Respondents also commented that Option 3 was also reflective of the view that the rural area does not have adequate roads or services to support development,

#### **What does this option look like?**

A high-level analysis of the option suggests that it is consistent with the preferred settlement hierarchy which seeks to focus development on the most sustainable settlements. While it should continue to be explored further as a preferred option for development, its potential contribution towards meeting need, on its own, would be very limited and we would need to work closely with Mid Sussex District Council, under the Duty to Co-operate, to realise this option.

The map in Figure 12 provides an indicative illustration of development locations under this option including potential sites identified through the Land Availability Assessment. Table 6 provides details on the supply of dwellings and sites that would contribute to this option.

**Figure 12: Spatial Option 3**

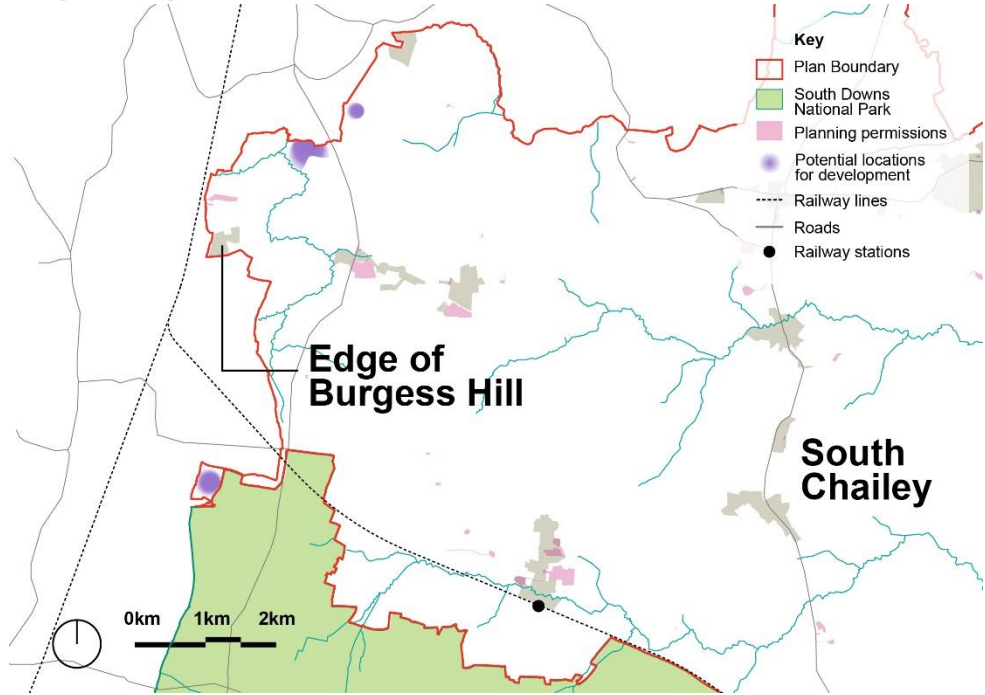


Figure 12: Spatial Option 3 Indicative Locations

**Table 6: Spatial Option 3 - Urban extensions to Burgess Hill and Haywards Heath**

Supply source	Number of sites	Yield (Number of Dwellings)
LAA sites - Deliverable/Developable	0	0
LAA Sites - Potentially deliverable/Developable	4	504
LAA - Not deliverable/Developable	6	0
Commitments (Planning Applications)	2	24
Allocations (LPP1 & LPP2)	0	0
Completions (2020-2023)	1	53
<b>TOTAL SUPPLY IN OPTION</b>	<b>13</b>	<b>581</b>

Table 6: Spatial Option 3 Development Yield

**Spatial Option 4: Focus growth on the most sustainable villages in the Low Weald**

This option would see the locations for development coming from the most sustainable villages within the plan area. These are places which have access to jobs, shops, schools, public transport connections and other services and facilities.

**What you told us**

Respondents to the Issues and Options consultation commented that this was one of the options with the least impact on the environment and was preferred over Option 2. There was a preference to distribute development across the plan area rather than building large developments. However, not all of the comments were supportive of

this option, and comments that this option should only come forward if required enhancements of existing infrastructure are delivered given the limited scope of the villages to absorb development.

**What does this option look like?**

A high-level analysis of the option suggests that it is consistent with the preferred settlement hierarchy which seeks to focus development on the most sustainable settlements. By maintaining the network of larger service centres we can help ensure that everyone in the plan area can have access to a basic range of services and facilities. While it should continue to be explored further as a preferred option for development, its potential contribution towards meeting need, on its own, would not deliver the level of need identified.

The map in Figure 13 provides an indicative illustration of development locations under this option including potential sites identified through the Land Availability Assessment. Table 7 provides details on the supply of dwellings and sites that would contribute to this option.

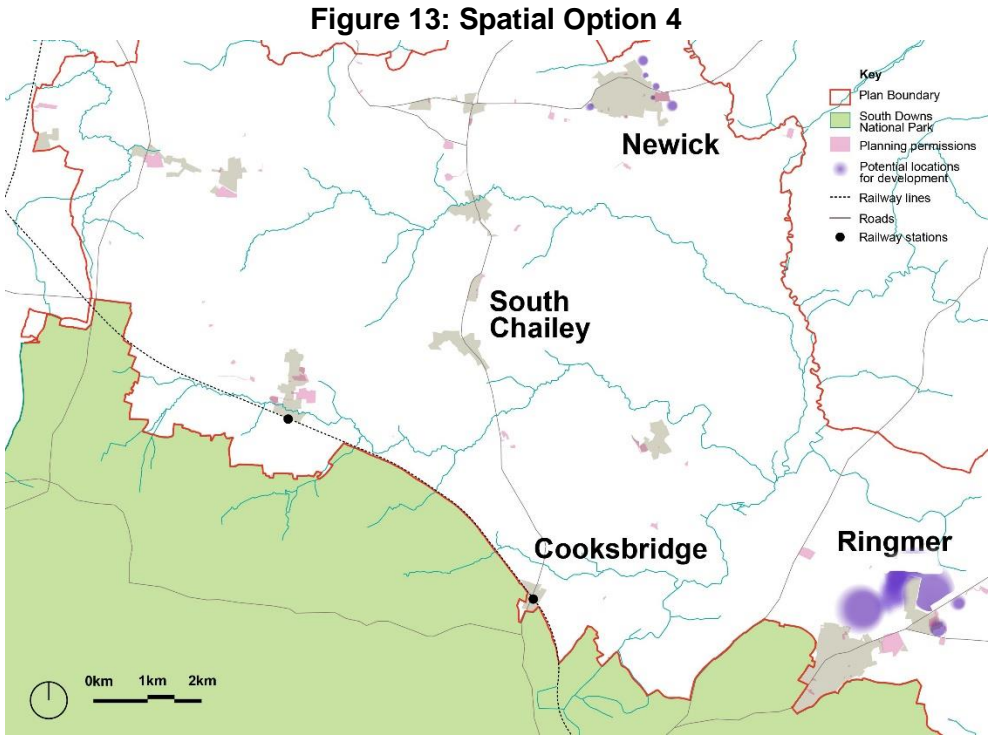


Figure 13: Spatial Option 4 Indicative Locations

**Table 7: Spatial Option 4 - Focussing growth on the most sustainable villages in the Low Weald**

<b>Supply source</b>	<b>Number of sites</b>	<b>Yield (Number of Dwellings)</b>
LAA sites - Deliverable/Developable	1	123
LAA Sites - Potentially deliverable/Developable	14	1,566
LAA - Not deliverable/Developable	18	0
Commitments (Planning Applications)	22	227
Allocations (LPP1 & LPP2)	15	63
Completions (2020-2023)	11	227
<b>TOTAL SUPPLY IN OPTION</b>	<b>81</b>	<b>2,206</b>

*Table 7: Spatial Option 4 Development Yield*

**Spatial Option 5: Disperse growth across all villages in the Low Weald**

This option would see the new housing for the plan area distributed across a wide range of settlements, from our largest to the smallest villages and hamlets. The level of new housing apportioned would relate to the level of service and facilities available within the settlement.

**What you told us**

A range of comments were provided on this option. Responses seemed to suggest that such an option would be less sustainable since many of the smaller settlements have much poorer access to services and facilities. This would lead to increased car usage due to a lack of public transport serving smaller settlements.

A number of comments suggested that a dispersed approach to growth could help to meet housing needs closest to where it arose, particularly in those smaller villages. This could help to support services and facilities within these smaller settlements where they already exist or even encourage new provision.

**What does this option look like?**

A high-level analysis of the option suggests that it is inconsistent with the preferred settlement hierarchy which seeks to focus development on the most sustainable settlements. Under this option growth will be spread across all settlements within the plan area including rural hamlets and therefore it would not contribute positively towards the objective of reducing the need to travel, contribute towards the reduction of CO2 emissions or associated climate change aims and could potentially lead to growth at less sustainable settlements. While it should continue to be explored further as a preferred option for development, its potential contribution towards meeting need, on its own, would not deliver the level of need identified.

The map in Figure 14 provides an indicative illustration of development locations under this option including potential sites identified through the Land Availability Assessment. Table 8 provides details on the supply of dwellings and sites that would contribute to this option.

**Figure 14: Spatial Option 5**

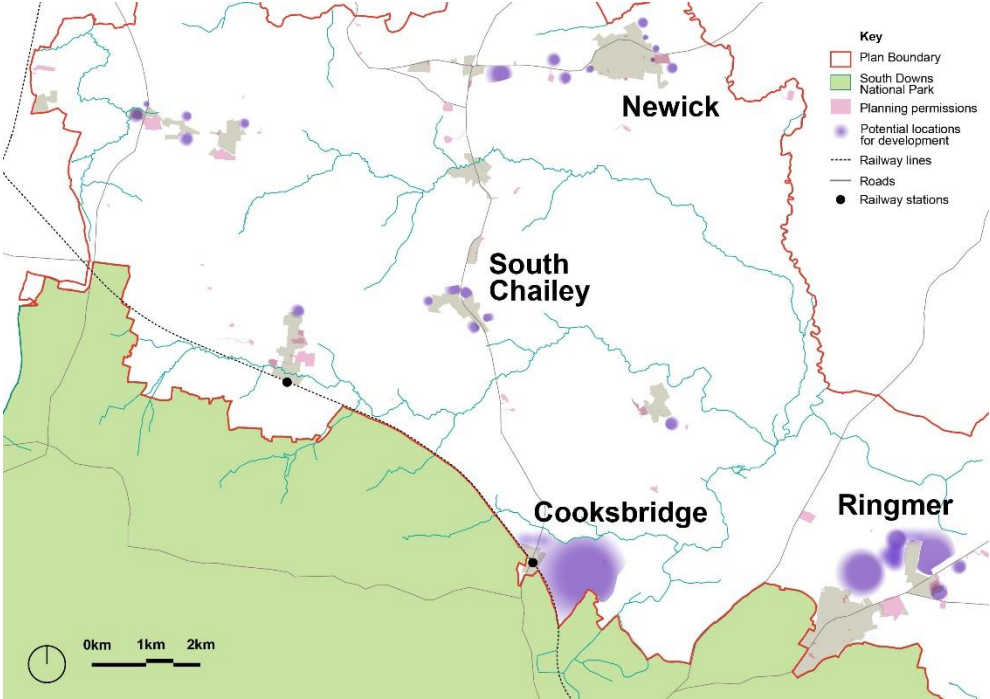


Figure 14: Spatial Option 5 Indicative Locations

**Table 8: Spatial Option 5 - Dispersing growth across all villages in the Low Weald<sup>26</sup>**

Supply source	Number of sites	Yield (Number of Dwellings)
<b>LAA sites - Deliverable/Developable</b>	5	295
LAA Sites - Potentially deliverable/Developable	26	3,036
LAA - Not deliverable/Developable	45	0
Commitments (Planning Applications)	44	575
Allocations (LPP1 & LPP2)	19	114
Completions (2020-2023)	19	341
<b>TOTAL SUPPLY IN OPTION</b>	<b>158</b>	<b>4,361</b>

Table 8: Spatial Option 5 Development Yield

**Spatial Option 6: New settlement within the Low Weald**

This option would see growth focussed on one or more new sustainable settlements in the Plan area. This approach could absorb the majority of new development with a smaller level of growth allocated to key settlements in the plan area.

<sup>26</sup> This include all sites/dwelling shown in Option 4

### What you told us

Respondents to the Issues and Options consultation commented that while there are benefits associated with a new settlement, there are constraints such as infrastructure costs and requirements, the long lead in time and risk of market saturation.

A significant number of objections to this option were made through the consultation citing various reasons.

### What does this option look like?

This option is contrary to the preferred settlement hierarchy which seeks to focus development on the most sustainable settlements. Desk top analysis of a new settlement option highlights the potential impact upon areas and asset of importance, especially impacts on the landscape. While the Land Availability Assessment and 'call for sites' identified that there is land available around Plumpton, this scale of development would have a level of harm that could not be mitigated. No other land has been promoted to the Council for a new settlement and therefore **this is not considered a deliverable option which should be explored further.**

The map in Figure 15 provides an indicative illustration of development locations under this option including potential sites identified through the Land Availability Assessment. Table 9 provides details on the supply of dwellings and sites that would contribute to this option.

Figure 15: Spatial Option 6

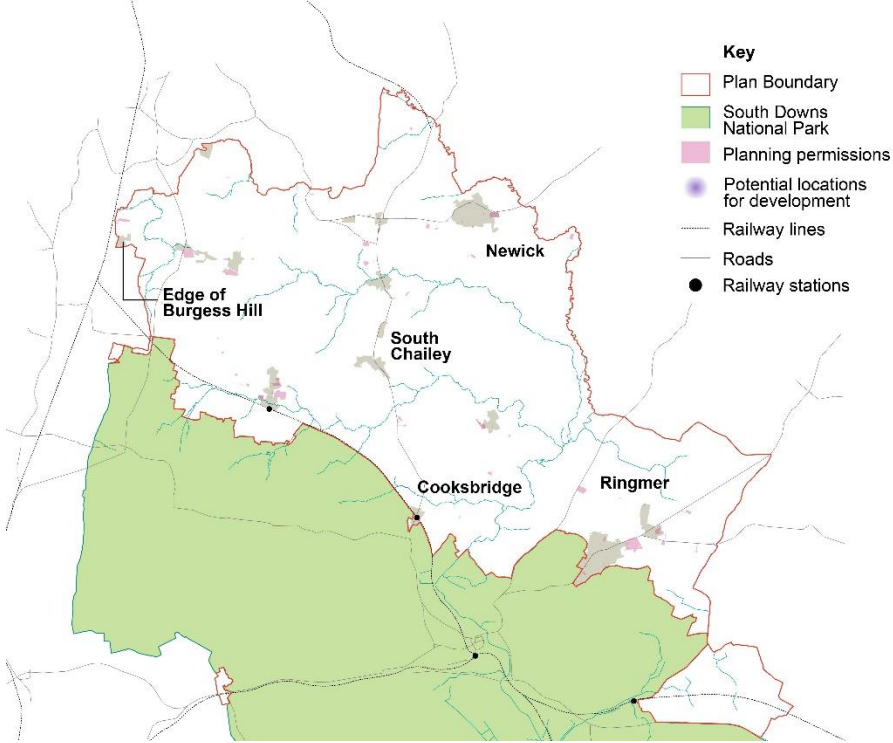


Figure 15: Spatial Option 6 Indicative Locations



**Table 9: Spatial Option 6 - New settlement within the Low Weald**

<b>Supply source</b>	<b>Number of sites</b>	<b>Yield (Number of Dwellings)</b>
LAA sites - Deliverable/Developable	0	0
LAA Sites - Potentially deliverable/Developable	0	0
LAA - Not deliverable/Developable	1	3,000
Commitments (Planning Applications)	0	0
Allocations (LPP1 & LPP2)	0	0
Completions (2020-2023)	0	0
<b>TOTAL SUPPLY IN OPTION</b>	<b>1</b>	<b>0</b>

*Table 9: Spatial Option 6 Development Yield*

### **Alternatives considered and reasons for discounting**

Not including a spatial development strategy is not considered to be an appropriate alternative.

### **Further information**

Land Availability Assessment November 2023

### **Existing Policies in Adopted 2016 & 2020 Plans**

Local Plan Part 1 - Spatial Policy 1: Provision of housing & employment land

Local Plan Part 1 - Spatial Policy 2: Distribution of housing

## Strategic Policy SDS2: Settlement Hierarchy

### Objectives

This policy will group together similar settlements into categories reflecting their particular characteristics, scale and sustainability. The policy seeks to provide the framework for decisions about the appropriate scale and location of new built development within the Plan area.

### Preferred Policy Direction

There are a range of settlements within our plan area. They vary in size, form and character from the coastal towns of Seaford, Newhaven and Peacehaven to the hamlets of Barcombe, Chailey Green and Wivelsfield and more isolated rural communities. There are also several large higher order settlements outside of the plan area boundary, including Lewes Town, Eastbourne and Brighton.

The Settlement Hierarchy Review (2023) identified the following changes to the hierarchy in the adopted Joint Local Plan (2016):

- Removal of Primary and Secondary Regional Centres.
- Removal of settlements that fall within the South Downs National Park within the district boundary.
- South Chailey and South Street settlements have been reclassified as one settlement: South Chailey
- South Chailey reclassified from a Local Village to a Service Village.

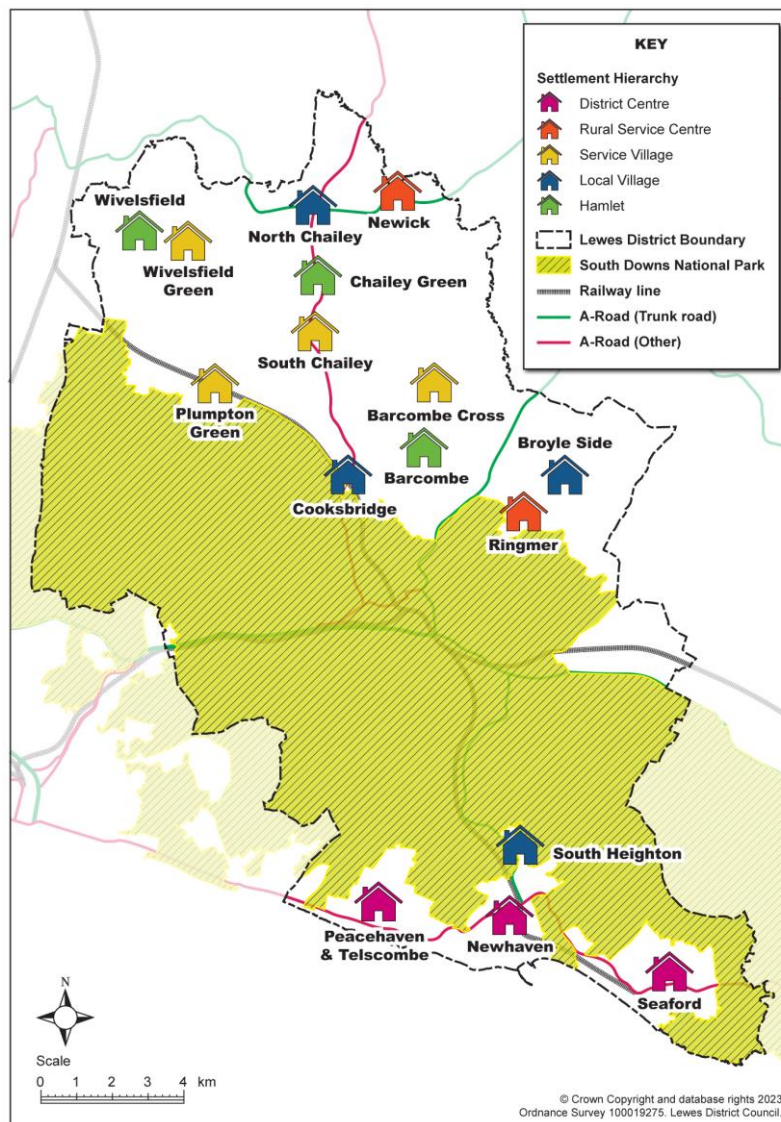
While we propose that development over the plan period should build upon the existing settlement pattern and in those areas where the infrastructure and facilities can support sustainable growth, it does mean following allocations of sites, further changes to the settlement hierarchy are likely to be included in the draft Local Plan.

Settlements outside of settlement hierarchy are able to deliver additional development, but this would be limited to infill or change of use within the settlement where a settlement boundary has been defined, and to rural exception schemes for affordable housing to meet local needs. This type of limited development will help to ensure the long-term sustainability of rural communities. Outside of these settlements, we propose that development is restricted and in accordance with other policies.

Figure 7 details the settlement hierarchy following the changes that are being proposed.



**Figure 7: Proposed Settlement Hierarchy**



*Figure 16: Proposed Settlement Hierarchy*

### Why is this policy needed?

The existing spatial strategy includes towns and settlements for which LDC is not the local planning authority and thus the existing hierarchy of the settlements within the plan area has been reviewed. While national policy does not set out specific advice for how to prepare and produce a settlement hierarchy, it does highlight the important role of a local plan in promoting sustainable locations for development.

This means that the Local Plan must consider the most appropriate locations for development growth. The prime factors to be taken into account are accessibility to jobs, services and amenities, public transport and the range of services that a community can access. National policy promotes the use of development at existing settlements to assist in the delivery of homes to meet community’s needs.

While there is not a standalone policy in Local Plan Part 1, the district's settlements are categorised hierarchically according to their different roles and grouped accordingly. At the top of the existing hierarchy are the larger towns and areas that fulfil the most functions and which are viewed as the most sustainable. The smaller settlements with fewer functions are towards the bottom of the hierarchy.

An assessment of the services and facilities available within the settlements has been carried out. This included dividing the services and facilities into primary and secondary categories. In addition, accessibility by public transport to these amenities and services contributed towards a settlements place within the hierarchy.

Primary and secondary regional centres have been removed as their inclusion in the previous hierarchy was based upon evidence from the South-East Regional Spatial Strategy, which could still be used in Local Plan preparation under the framework that existed when the Core Strategy was produced. This legislation has since been superseded by the NPPF. As settlements that fell within the primary and secondary regional centres categories are outside the plan area, the removal of those categories is justified.

### **What you have told us so far**

We did not ask any specific questions on the settlement hierarchy in the Issues and Options consultation.

### **Alternatives considered and reasons for discounting**

An alternative which sees no limit on the scale of developments for all settlements is not considered to be reasonable as it could lead to unsustainable levels of development taking place in areas that are not served well by services, facilities or public transport.

### **Further information**

- Settlement Hierarchy Review (2023)
- Settlement Services Study (2023)

### **Existing Policies in Adopted 2016 & 2020 Plans**

Local Plan Part 1 - Spatial Policy 2: Distribution of Housing

## Strategic Policy SDS 3: Settlement Boundaries

### Objectives

This policy will re-define the boundaries of settlements for planning purposes following site allocations in the new local plan.

### Preferred Policy Direction

The Local Plan will include settlement boundaries around settlements, identifying areas that are considered to be part of the settlement for planning purposes. The boundaries will be drawn on the Policies Map that will accompany the draft Local Plan for consultation.

We propose that boundaries are defined that include the present extent of the built-up area as well as planned new development. Buildings associated with countryside uses, such as farm or equestrian buildings, would not normally be included within a settlement boundary. Boundaries would not be defined around small clusters of houses or areas of scattered development where such buildings are isolated in open countryside or detached from the main concentration of buildings in a defined settlement.

Where sites with planning permission have reached sufficient certainty regarding their exact boundaries, new settlement boundaries will be drawn. Within settlement boundaries a range of policies within the Local Plan will indicate what sorts of developments may be suitable. This includes residential development, as will be indicated in the settlement hierarchy policy.

Outside settlement boundaries, no development would be permitted except for:

- allocations within Neighbourhood Plans that have been adopted;
- sites for the provision of affordable housing for people with a local connection to the area (see Policy H5: Residential Development in the Countryside);
- development for agriculture, horticulture, forestry, outdoor recreation and other uses that need to be located in the countryside; or
- development supported by other policies in the plan.

### Why is this policy needed?

Settlement boundaries define where policies for the built-up areas of settlements give way to policies for the countryside. This is necessary to ensure that the countryside is protected from gradual encroachment, but in particular they help guard against incremental growth in unsustainable locations. An important element of the development strategy is to focus growth in the more sustainable locations of the area, and settlement boundaries help achieve this purpose.

In the countryside development is generally restricted to uses that need to be located there. The plan will seek to include flexibility for reusing existing buildings, for development which supports the rural economy, and for other uses which need a countryside location.

### **What you have told us so far**

We did not ask any specific questions on settlement boundaries in the Issues and Options consultation.

### **Alternatives considered and reasons for discounting**

Alternatives to the policy considered and discounted included not having a policy setting out the boundaries of settlements within the plan area. This was discounted as it would not provide certainty regarding development proposals, could impact on the settlement character and result in the encroachment into the countryside around defined settlements.

### **Further information**

No specific study has been undertaken however settlement boundaries are informed by the spatial strategy and settlement hierarchy.

### **Existing Policies in Adopted 2016 & 2020 Plans**

Local Plan Part 2 - Policy DM1: Planning Boundary

## Theme: Climate Change

**Aim:** The Local Plan will contribute to mitigating and adapting to the greatest challenge of our lifetime – Climate Change.

Lewes District Council have declared a Climate Emergency, with a headline target of becoming a fully resilient and net zero Council by 2030. Addressing climate change is one of the core planning principles that the NPPF expects to underpin plan making.

Responding to climate change is underpinned by effective spatial planning influencing emissions, protecting the environment and increasing resilience through the location and design of development.

Responding and adapting to climate change also links with other themes and policies, such as the Natural Environment, Water and Sustainable Transport.

### **Which Policies Are We proposing?**

- CC1 - Mitigating and Adapting to Climate Change
- CC2 - A Design Response to a Changing Climate
- CC3 - Solar PV, Storage and Demand Management
- CC4 - Sustainable Construction
- CC5 - Renewable Energy Development
- CC6 - Coastal Change

### **Carbon Sequestration**

In order to address the impact of development on the potential for carbon sequestration the Local Plan could include a further policy to require developers to minimise and compensate for its loss on development sites. The policy could require developers to assess the existing carbon sequestration associated with the site, the sequestration potential post development and the difference could be calculated and potentially used to inform an offset arrangement addressed either through financial payment or commitments to deliver equivalent sequestration improvements elsewhere.

### **Consultation Questions for the Climate Theme**

- Are there any further policies you would like to see included to respond to Climate Change? Why do you think they should be included?
- Should the new Local Plan require minimisation of and compensation for the loss of carbon sequestration, and if so, how should off site compensation be addressed?

## Strategic Policy CC1: Mitigating and Adapting to Climate Change

### Objectives

The impacts of climate change are unavoidable and are set to get worse. New development should consider climate change factors from the outset and ensure that the site, and the people who will eventually be using it, will be prepared as possible.

The Local Plan has been identified as key to delivery of the council's net zero ambitions. The Local Plan has the greatest influence on new development, however it can also have positive impacts on improving the building standard of existing developments by supporting retrofit and improvements to buildings as well as the surrounding environment and infrastructure.

Local Plan policies will support the council's overall aim of becoming fully climate resilient and a net zero district by 2030. Locally led adaption is critical to adequately preparing for climate risks.

### Preferred Policy Direction

Climate Change is a strategic issue which should be considered and addressed where possible in every development.

A strategic policy in the new Local Plan will set out the overall approach to mitigating and adapting to climate change. This policy will ensure that development in the plan area will represent sustainable development, and include the following principles:

- Ensure that new development is as energy efficient and low carbon as possible.
- Encourage the retrofit of existing buildings to reduce carbon emissions.
- Ensure new development is designed to address the risks associated with climate change.
- Support suitable opportunities for low carbon energy generation and storage to serve the district.
- Reducing the reliance on private vehicles and the emissions associated with transport and prioritising walking and cycling measures.
- Improve infrastructure to support sustainable development and help existing residents to reduce emissions.
- Work with the natural environment to help reduce emissions and risks associated with climate adaptation alongside other benefits such as nature restoration and improving biodiversity.

### Why is this policy needed?

Addressing climate change is one of the core land use planning principles which the NPPF expects to underpin plan making. To be found sound, local plans will need to reflect this principle and enable the delivery of sustainable development. There is

also a statutory duty for local plans to include policies designed to tackle climate change and its impacts. The NPPF emphasises that responding to climate change is central to the economic, social and environmental dimensions of sustainable development.

### **What you have told us so far**

The Issues and Options consultation asked for views on how the new Local Plan could mitigate, and adapt to the effects of, climate change. There were 15 questions covering a number of options under the topic of climate change, and out of the total number of representations 32% were received on this issue. This shows that climate change resilience and adaptation matter to respondents and is an important issue for the residents.

### **Alternatives considered and reasons for discounting**

The alternative of no policy and relying on national guidance is not considered as addressing climate change as it is one of the core land use planning principles which the NPPF expects to underpin plan making. To be found sound, local plans will need to reflect this principle and enable the delivery of sustainable development.

### **Further information**

- Climate Change Topic Paper
- Climate Change Study 2023
- Renewable Energy Potential Study 2023
- Biodiversity Study 2023

### **Existing Policies in Adopted 2016 & 2020 Plans**

Local Plan Part 1 - Core Policy 13: Sustainable Travel

Local Plan Part 1 - Core Policy 14: Renewable and Low Carbon Energy



## Policy CC2: A Design Response to a Changing Climate

### Objectives

The Local Plan policy will support renewable energy generation. For the district to become carbon neutral by 2030, energy demands need to be reduced and energy generation needs to be switched to renewable energy sources.

Policies around energy efficiency of new developments should be considered two-fold, not just in relation to carbon emissions from new development but also with respect to the benefits of reduced overall energy consumption. The policy options consider the carbon emission reductions associated with increased efficiency and also have the added benefits of reducing overall energy consumption through the following principals:

- Operational costs – Buildings with lower energy demands and systems to generate, store and manage energy will cost users significantly less to run.
- Future retrofit costs – It will be significantly more challenging and expensive for homeowners to install fabric, energy efficiency and equipment than for it to be installed upon construction.
- Local grid resilience – Reduced energy demands from new development will have a lower impact on the capacity of the local power network thereby allowing capacity for wider decarbonisation (for existing buildings and vehicles) and reducing the extent and cost of upgrade work.
- Building resilience – Homes designed with low demands, generation, storage and demand management systems will be much more resilient to supply issues as well as energy price fluctuations.

The choice of heating and hot water system will have the most significant impact on operational carbon emissions of buildings. The decarbonisation of electricity, with national plans for supply from the national grid to be net zero by 2035, mean that heating from systems that use electricity, which will principally be heat pumps, will not only be lower carbon now but will continue to reduce over the lifespan of the building and become net zero once the grid is fully decarbonised.

In contrast the carbon emissions associated with the combustion of gas will remain unchanged and any buildings that are designed with gas boilers now are likely to retain those for at least the expected lifespan of that product which in most cases will be approximately 15 years. New building regulations will enforce the switch from gas boilers to electric heat pumps or low carbon technologies, however the change to building regulations is still under development and could be altered or delayed. Even if delivered as expected, there may be transitional arrangements and as such there may be a gap between the adoption of the new Local Plan and updated building regulations coming into force. This could mean that gas boilers are still being



installed in new developments, with the costs of replacement then being passed to the homeowner.

## Preferred Policy Direction

The Climate Change Study demonstrates that to meet the districts climate ambitions there is a need to transition away from fossil fuels and towards electrical systems. To support this it is essential to lower overall energy demands on the electrical infrastructure locally and nationally. Fabric and energy efficiency measures are the most cost effective and reliable way to reduce energy demands; as well as reducing CO<sup>2</sup> emissions this will reduce costs for occupants of new buildings.

The new Local Plan policy will require all new developments to follow a clear energy hierarchy when developing an energy strategy which should be documented in an Energy Statement. The Energy Statement will need to set out how the development will:

- Reduce energy demands
- Use energy efficiently
- Generate and store renewable energy
- Monitor energy use.

The policy will be clear that gas boilers or other fossil fuel heating systems should only be used where it proven by the developer that other options are not technically feasible or financially viable. The plan will also set out that strategic allocations should consider the incorporation of heat networks.

Submitted Energy Statements should set out how the development meets the following requirements, details of which will be set out in further policies or additional guidance:

- How developments will reduce energy demands and where practical and viable meet a maximum space heating demand of 30kWh/sqm/yr.
- Require all development to install heating systems that align with carbon neutral policy, and which are designed to maximise efficiency.
- Set requirements for assessing overheating risks and mitigating these through design, avoiding the use of active cooling systems unless essential.

Overheating is recognised as a key risk in the built environment in the future as a result of climate change and the impact of rising temperatures. There is a link between the energy performance of a building and the overheating risks. Increasing the fabric performance can lead to increasing overheating risks however this can be mitigated through design. Strategies for reducing over heating risk need to be incorporated in the early stages of design to be effective. New local plan policy will require applications to be accompanied by a risk assessment showing the

overheating risks which have been identified and the measures taken to address these in the proposal while avoiding the use of active cooling systems wherever possible.

### **Why is this policy needed?**

The Climate Change Study sets out baseline emissions of Carbon (CO<sup>2</sup>) from the district<sup>27</sup>. The study shows that the predominant emissions in the district arise from the buildings and transportation sectors, within which the residential buildings and on-road transport (primarily private vehicles) subsectors are the most important.

While the current building regulations requirements on fabric performance are expected to be improved, further reducing energy consumption will deliver additional benefits such as:

- Reduced energy costs for residents/occupiers;
- Reduced demands of the local electricity network; and,
- Homes designed with low demands, generation, storage and demand management systems will be much more resilient to supply issues.

### **What you have told us so far**

The issues and options consultation was accompanied by a Topic Paper 'Tackling Climate Change' which set out broad ways in which the new Local Plan should seek to address climate change.

The majority of responses to the Issues and Options consultation agreed that the new Local Plan should set lower carbon emissions targets for new homes/buildings than those set through building regulations. Comments showed support for modern construction techniques and features including modular construction, use of ground source heat pumps on both new buildings and retrofitting existing properties.

### **Alternatives considered and reasons for discounting**

Alternatives to the proposed policy are to rely solely on building regulations to decarbonise future development and not set any additional standards beyond this. However, there are two key risks associated with this alternative position, both of which would lead to emissions from new development being significantly higher. The first risk would be that the Future Homes Standard and Future Buildings Standard do not go as far as anticipated or take effect later than expected. The second risk is that electricity grid is not decarbonised, or this process happens at a slower rate than expected.

---

<sup>27</sup> The carbon emission baseline used in the Climate Change and Sustainability Strategy 2021 was the baseline developed by Anthesis using their SCATTER tool, a summary of which is provided in the Climate Change Study.

### **Further information**

- Climate Change Topic Paper
- Climate Change Study 2023
- Renewable Energy Potential Study 2023

### **Existing Policies in Adopted 2016 & 2020 Plans**

Local Plan Part 1 - Core Policy 13: Sustainable Travel

Local Plan Part 1 - Core Policy 14: Renewable and Low Carbon Energy

## **Policy CC3: Solar PV, Storage and Demand Management**

### **Objectives**

In common with other coastal parts of the South East, Lewes District has some of the highest irradiance across the whole of the UK, therefore properties stand to gain the most from solar technologies. Although decarbonisation of the electricity grid will result in the use of Photo Voltaic (PV) having less of an impact on carbon savings over time, the main driver for a policy to require PV will be on reducing energy costs and providing energy security for the building and the local power networks.

While the notional building used in Building Regulations Part L (as updated 2021) includes PV in the reference specification, the indicative specification for the planned Future Homes Standard notional building does not. Therefore, it may be possible to comply with the proposed building regulations through a combination of good fabric and energy efficiency specification and the use of an electric heat pump. As such, given that the developer must factor in the up-front costs of the PV and doesn't realise the longer-term benefits, they might decide not to include PV if there is no need to do so to comply with Building Regulations.

Solar PV will have an impact on the total energy consumption of a development, and therefore the operational costs for occupants. Cumulative use of solar PV will also have a positive impact on local grid resilience.

The costs of installing PV during construction are significantly lower than retrofitting so there is justification for the Local Plan to require installation during construction of development.

### **Preferred Policy Direction**

The Local Plan policy will require all developments to incorporate PV and have a presumption to maximise the amount of PV installed, unless it is shown this is not technically feasible or financially viable.

All developments should consider the potential for thermal and battery storage as well as smart metering and other demand management systems. The use of these systems will provide long term benefit for the building owners in both energy costs and resilience as well as providing wider benefits to the local power networks. Options relevant to the development should be considered in the Energy Statement.

### **Why is this policy needed?**

For Lewes to become carbon neutral by 2030, energy demands need to be reduced and energy generation needs to be switched to renewable energy sources. Any increase in energy consumption or additional use of non-renewable energy sources from new development will make these targets more difficult to achieve. Generating

renewable energy on site helps to meet targets for renewable energy use and can reduce bills for building users.

### **What you have told us so far**

Respondents to the Issues and Option consultation were generally supportive of requiring new developments to incorporate on site renewable energy generation.

### **Alternatives considered and reasons for discounting**

Alternatives to the proposed policy are to rely solely on building regulations to decarbonise future development and not set any additional standards beyond this. However, the indicative specification for the planned Future Homes Standard notional building does not require the installation of PV and therefore it may be possible to comply with the proposed building regulations through a combination of good fabric and energy efficiency specification and the use of an electric heat pump. For Lewes to become carbon neutral by 2030, energy demands need to be reduced and energy generation needs to be switched to renewable energy sources. The costs of installing PV systems during construction are also significantly lower than retrofitting these so there is justification for the Local Plan to require installation during construction of development.

### **Further information**

- Climate Change Topic Paper
- Climate Change Study 2023
- Renewable Energy Potential Study 2023

### **Existing Policies in Adopted 2016 & 2020 Plans**

Local Plan Part 1 - Core Policy 13: Sustainable Travel

Local Plan Part 1 - Core Policy 14: Renewable and Low Carbon Energy

## **Policy CC4: Sustainable Construction**

### **Objectives**

The sustainability of a development cannot just be considered from a point of view of the resulting development. During construction, emissions come from the creation of the materials to be used in construction, from bringing people and materials to the site, and from the use of machinery. This links with Circular Economy principles and the approach to retaining as much material in use as possible, to extract the maximum value, thereby reducing waste.

Building regulations only address regulated operational emissions associated with development, they do not include unregulated emissions or the embodied carbon emissions which make up a large share of the whole lifecycle emissions of a building.

The amount of energy that will need to be consumed on a site should be reduced as much as is practical. Where energy needs to be used, it should be done in the most efficient way possible. The Local Plan policy will support sustainable construction methods and techniques.

Achieving lower carbon emissions from buildings and energy efficiency is only one aspect of building sustainably. The use of appropriate building materials and techniques and minimising waste are additional steps that can improve the sustainability of buildings. Extending the life of a building and recovering and reusing materials at the end of its life can significantly reduce the demand for materials and subsequent waste produced.

To be effective, sustainable construction and design needs to be considered at the outset of the development of scheme.

### **Preferred Policy Direction**

Demolition often leads to large amounts of waste and can impact on the amenity of residents. Reusing, or adapting buildings can reduce waste and can preserve the character of the surrounding area and therefore the local plan will encourage the reuse, repair and refurbishment of existing buildings to new uses where possible.

The policy will set out requirements for development proposals to provide evidence of circular economy principles and demonstrate how waste arising from construction is to be minimised. This will include consideration of the longevity, maintenance, and repair of developments and how they can be adapted to changing needs through the development lifetime. The policy will also set out the priority for use of locally sourced and/or sustainable materials that have smaller carbon footprints.

A policy requiring whole life cycle carbon assessment is being considered for larger developments. In these circumstances the developer would be required to document the whole life carbon assessment and the steps taken to minimise/mitigate these through the design of the development within the Energy Statement. There would be a cost to carrying out such assessments which would need to be assessed by the whole plan viability assessment.

### **Why is this policy needed?**

In the UK, construction is one of the largest consumers of materials and produces more waste than any other sector. In East Sussex and Brighton & Hove, construction and demolition wastes amount to over half the total of all wastes produced<sup>28</sup>, of 1.75million tonnes of solid waste handled each year construction and demolition waste accounts for 51%.

Extending the life of buildings and recovering and reusing materials at the end of their life can significantly reduce the demand for materials and subsequent waste produced. Adopting a circular economy approach in the development sector will play a significant role in promoting resource efficiency and addressing the challenge of the climate emergency.

### **What you have told us so far**

Question 1.2 of the Issues and Options Consultation set out three options for decarbonising a building's life cycle, asking whether the Local Plan should require development proposals to:

1. Provide evidence of circular economy principles and waste reduction – requiring retention of existing buildings unless evidence of need to demolish?
2. Evidence reductions in carbon by prioritising the use of materials and construction techniques that have smaller ecological and carbon footprints?
3. Consider the lifecycle of the building and whether it can be easily adapted to meet changing needs.

In response 96% of respondents selected at least one of the three listed options. while 85% selected all three options. Option 1 received marginally more support than the other two options.

### **Alternatives considered and reasons for discounting**

No policy and relying on the ESCC Waste and Minerals Plan policies or national policy is an alternative option. However, given how much waste is associated with construction it is considered necessary for the local plan to promote resource efficiency.

---

<sup>28</sup> [ESCC Waste and Minerals Plan \(2013\)](https://www.eastsussex.gov.uk/planning/waste-minerals-plans-monitoring-reports) <https://www.eastsussex.gov.uk/planning/waste-minerals-plans-monitoring-reports>

A policy for whole life cycle carbon assessments is being considered for larger developments due to the costs and expertise required, this will need to be tested in the whole plan viability study to ensure that it is a viable policy option when considering all policy requirements.

### **Further information**

- Climate Change Topic Paper
- Climate Change Study 2023
- ESCC Waste and Minerals Plan 2013
- ESCC Supplementary Planning Document on Construction and Demolition Waste (2005)<sup>29</sup>
- LDC Circular Economy Planning Technical Advice Note 2021<sup>30</sup>

### **Existing Policies in Adopted 2016 & 2020 Plans**

Local Plan Part 1 - Core Policy 14: Renewable and Low Carbon Energy

---

<sup>29</sup> <https://www.eastsussex.gov.uk/planning/waste-minerals-plans-monitoring-reports>

<sup>30</sup> [https://www.lewes-eastbourne.gov.uk/media/2408/Circular-Economy-Technical-Advice-Note/pdf/Circular\\_Economy\\_Technical\\_Advice\\_Note.pdf?m=638200215633970000](https://www.lewes-eastbourne.gov.uk/media/2408/Circular-Economy-Technical-Advice-Note/pdf/Circular_Economy_Technical_Advice_Note.pdf?m=638200215633970000)



## **Policy CC5: Renewable Energy Development**

### **Objectives**

For the district to become carbon neutral by 2030, energy demands need to be reduced and energy generation needs to be switched to renewable energy sources.

A transition to a low carbon district will involve a change in the way existing infrastructure is used and may require new infrastructure. The Local Plan can allocate land for new infrastructure through identifying areas suitable for renewable energy generation, or land for supporting energy infrastructure including power transmission, distribution and storage systems.

The Renewable Energy Study carried out an assessment of the potential for Solar Energy generation from ground and roof mounted solar PV and from Wind Turbine Generators (WTGs) and identified areas of land that might be suitable for wind and solar energy generation and advised that these wider areas should be identified on the policy map.

The Local Plan can also support the transition to renewable energy by supporting electricity infrastructure upgrades. The Local Plan can identify specific infrastructure upgrades and include them in the Infrastructure Development Plan after consultation with the electricity infrastructure provider. This will help to ensure renewable energy delivery within the plan period to support the existing and new population.

### **Preferred Policy Direction**

The policy will encourage and support the principle of renewable energy generation in suitable locations providing proposals meet all other policies in the plan and take account of local constraints such as in relation to landscape and visual impacts, amenity impacts etc.

The Local Plan will identify areas on the policies map which are suitable for renewable energy generation and identify strategic sites for renewable energy generation.

In addition to strategic allocations, the policy will support neighbourhood plan identification of renewable energy sites including community renewable energy schemes.

### **Why is this policy needed?**

For Lewes to become carbon neutral by 2030, energy demands need to be reduced and energy generation needs to be switched to renewable energy sources. Any increase in energy consumption or additional use of non-renewable energy sources from new development will make these targets more difficult to achieve. The Local

Plan supporting and encouraging renewable energy generation schemes will help to ensure renewable energy delivery within the plan period to support the existing and new population.

While respondents to the Issues and Options consultation supported neighbourhood plans identifying land for renewable energy generation, given the strategic nature of the scale of renewable energy, it is also important for the Local Plan to consider strategic allocations and allocations to support improved infrastructure that may be required to support the existing and new population of the district.

### **What you have told us so far**

There was overall support from respondents to the Issues and Options consultation for supporting renewable energy generation, although some concerns raised about the impact of wind turbines, primarily on the landscape.

A number of respondents suggest that existing or new buildings are the best places for solar panels rather than large scale farms. There was also support for offshore wind farms in preference to onshore.

Overall there were mixed responses on whether the allocation of land for renewable energy generation should be through the local plan or neighbourhood plans, many respondents supported communities identifying the best location of such developments.

### **Alternatives considered and reasons for discounting**

An alternative option is to not identify sites for renewable energy generation, however not supporting strategic allocations may reduce the ability to deliver enough renewable energy in the district. For the district to become carbon neutral by 2030, energy demands need to be reduced and energy generation needs to be switched to renewable energy sources. A lack of support for renewable energy generation at a strategic level will make these targets more difficult to achieve.

### **Further information**

- Climate Change Topic Paper
- Climate Change Study 2023
- Renewable Energy Potential Study 2023

### **Existing Policies in Adopted 2016 & 2020 Plans**

Local Plan Part 1 - Core Policy 14: Renewable and Low Carbon Energy

## Strategic Policy CC6: Coastal Change

### Objectives

Policy CP12 of Local Plan Part 1 seeks to ensure that 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. The policy however does not currently meet the requirements of the NPPF in terms of defining a 'Coastal Change Management Area' to cover the coastline where rates of shoreline change are significant over the next 100 years, taking into account climate change. NPPF paragraph 171 states that plans should reduce risk from coastal change by avoiding inappropriate development in vulnerable areas and not exacerbating the impacts of physical changes to the coast.

The district has 14.5km of coastline, erosion rates vary from year to year and at different rates along the coast. In the long-term erosion will have impact on the coastline and in some areas the risks are larger for infrastructure, beaches and properties. Coastal protection engineering works can affect species and habitats, or beaches and paths. The impact of these should be considered. The emphasis is now on working with natural processes to adapt to climate change rather than trying to prevent it in all situations.

The Shoreline Management Plan for the area is The Beachy Head to Selsey Bill Shoreline Management Plan (SMP)<sup>31</sup>. The SMP sets out the preferred policies for managing the risks of coastal erosion. In four of the eight policy units in the plan area the policy approach is managed realignment, allowing retreat of the shoreline, or no active intervention - a decision not to invest in providing or maintaining defences. The unit recommendation plans are set out in the Climate Change Topic Paper in further detail.

Planning Practice Guidance sets out that a Coastal Change Management Area should be defined where the shoreline management plan policy is anything other than hold or advance the line at any time during its plan period<sup>32</sup>. Therefore the new Local Plan will consider designation of Coastal Change management areas where the SMP policy is 'no active intervention' in the four policy units Telscombe Cliffs, Newhaven to Peacehaven Heights, Seaford (Tide Mills) and Seaford Head.

### Preferred Policy Direction

Guided by the Shoreline Management Plan and the Brighton Marina to Newhaven Harbour Arm Plan, the Local Plan will identify areas likely to be affected by physical

---

<sup>31</sup> <https://se-coastalgroup.org.uk/shoreline-management-plans/beachy-head-to-selsey-bill/>

<sup>32</sup> PPG Flood Risk and Coastal Change paragraph: 072 Reference ID: 7-072-20220825

changes to the coast in CCMA(s). Local plan policy will be clear what development will or will not be appropriate in a CCMA and under what circumstances.

Further evidence on coastal change and potential erosion is required to precisely define the CCMA(s), an updated Shoreline Management Plan is expected in 2024 however the new Local Plan policy is likely to set out what types of development will be acceptable in CCMA(s) in the short/medium/long term time periods and what applications for development will have to demonstrate to be considered acceptable as set out in the NPPF<sup>33</sup> and NPPG<sup>34</sup>.

### **Why is this policy needed?**

The NPPF<sup>35</sup> requires that strategic policies set out an overall strategy and make sufficient provision for flood risk and coastal change management. The NPPF at Paragraph 171 states that plans should identify as a Coastal Change Management Area any area likely to be affected by physical changes to the coast, and:

- a) be clear as to what development will be appropriate in such areas and in what circumstances; and
- b) make provision for development and infrastructure that needs to be relocated away from Coastal Change Management Areas

The SMP states that from 2055 onwards coastline management practices will cease for the stretch at Peacehaven, and properties will be at risk. The Brighton Marina to Newhaven Western Harbour Arm Plan assesses viability of coastal management options.<sup>36</sup>

A local plan policy including a CCMA is required in areas that are defined in the shoreline management plan as anything other than hold or advance the line to ensure inappropriate development is avoided and physical changes to the coast are not exacerbated.

### **What you have told us so far**

Respondents to the Issues and Options consultation supported the coastline, cliffs and other areas at high-risk of sea level rise not being considered for new development. Some respondents stated that the whole coast will see changes and therefore CCMA(s) should extend along the entire coast. Some respondents supported managed retreat, while others commented on the need for active measures to prevent or constrain further erosion.

---

<sup>33</sup> NPPF Paragraph 172

<sup>34</sup> PPG Flood Risk and Coastal Change paragraph: 074 Reference ID: 7-074-20220825

<sup>35</sup> NPPF 2021, par 20

<sup>36</sup> <https://www.lewes-eastbourne.gov.uk/resources/assets/inline/full/0/258572.pdf>.

## **Alternatives considered and reasons for discounting**

It is outside of the scope of the Local Plan to promote management policies for the coastline, for example whether the shoreline should be protected or allowed to erode naturally, this is the purpose of the Shoreline Management Plan.

An alternative of no policy defining a CCMA would not be a realistic option given the recommendations of the SMP and the requirements of the NPPF.

## **Further information**

- Climate Change Topic Paper
- The Beachy Head to Selsey Bill Shoreline Management Plan<sup>37</sup> 2006
- The Brighton Marina to Newhaven Western Harbour Arm Plan (2016)<sup>38</sup>

## **Existing Policies in Adopted 2016 & 2020 Plans**

Local Plan Part 1 - Core Policy 12: Flood Risk, Coastal Erosion, Sustainable Drainage and Slope Stability

---

<sup>37</sup> <https://www.southdowns.gov.uk/wp-content/uploads/2018/04/TLL-19-Beachy-Head-to-Selsey-Shoreline-Management-Plan-2006.pdf>

<sup>38</sup> [Brighton Marina to Newhaven Coastal Management Implementation Plan Local Community Summary \(lewes-eastbourne.gov.uk\)](#)

## Theme: Natural Environment

**Aim:** We want to put the environment at the heart of all new development to enhance and deliver biodiversity net gains rather than detrimentally impact on our environmental assets including designated national sites, landscape character, biodiversity and water quality.

The District's natural environment is one of its greatest assets and supports a range of habitats, species and other features that contribute to biodiversity or geodiversity value. Vital parts of the ecosystem are the soils, the rivers and the wider water environment. In addition to protecting and restoring nature, for nature, the natural environment contributes to enhancing the quality of life for residents, workers and visitors and helps to promote healthy living and social inclusion.

Our natural capital assets have a key role in tackling the two huge environmental crises we now face: climate change, and the devastating loss of biodiversity.

### **Which policies are we proposing:**

NE1: Green and Blue Infrastructure

NE2: Biodiversity

NE3: Landscape

NE4: Clean and Healthy Environment

### **Tree Planting and Greening Requirements**

The Local Plan could set a requirement for greening such as a percentage area for canopy cover from trees. This would require further evidence in relation to the need and opportunity for green infrastructure to ensure it is achievable.

### **Consultation Questions for the Natural Environment Theme**

- Are there any further policies you would like to see included to protect and enhance our natural environment? Why do you think they should be included?
- Do you think the policy direction for Green and Blue infrastructure is the right one? If not, please identify how it can be changed and why?
- Do you think the policy direction for Biodiversity is the right approach? If not please identify how it can be changed and why?
- Should the Local Plan consider preparing an urban greening policy which requires a minimum level of greening on a development site?

## **Strategic Policy NE1: Green and Blue Infrastructure**

### **Objectives**

Green and Blue Infrastructure (GBI) is a network of multi-functional green and blue space and other natural features. With the GBI network the aim is to develop multifunctionality, linking the built-up area with the natural environment, delivering benefits for nature, the environment, climate, health and wellbeing, even economic prosperity.

A Green and Blue Infrastructure network can include street trees, green roofs/walls, parks, private gardens, allotments, sustainable drainage systems, through to wildlife areas, woodlands, wetlands and natural flood management functioning at local and landscape scale. Linear GBI includes roadside verges, green bridges, field margins, rights of way, access routes, and canals and rivers.

Green infrastructure Improvements can be delivered as part of new development via the planning system, upgrading of existing GBI, and retrofitting of new GBI in areas where provision is poor.

### **Preferred Policy Direction**

The Local Plan will identify the existing GBI network and areas where there is potential for the enhancement or restoration of existing GBI and opportunities for the provision of new green space.

.A Green Infrastructure Study is currently being undertaken to inform the policy. However the policy direction is likely to include protection of the GBI network, and enhancement to be encouraged where appropriate, the policy would not support development that would undermine the functional integrity of the GBI network. The policy will also require all development proposals to include GBI appropriate to the type, scale and location of the development.

To support the migration of species between different habitats, the Local Plan policy will promote the reconnection of habitats across the plan area, through compulsory habitat connectivity in new developments. For example, if a site overlaps two identified habitats, or the same habitats that are fragmented, local plan policy can set out mandatory requirements for the design of the site to include a green or blue corridor to connect these habitats. This should then be incorporated into the onsite green infrastructure plan.

### **Why is this policy needed?**

Green infrastructure is considered a strategic priority in the NPPF at Paragraph 20 and its importance is emphasised. It is one of the strategic policies that development plans must include.

Networks of green and blue spaces and other natural features can bring big benefits for nature and climate, health and prosperity.

The GBI network will be part of the Local Nature Recovery Network, a network of wildlife-rich places where habitats are connected to improve the landscape's resilience.

The Council's Corporate Plan expresses the ambition to have the greenest local plan and put sustainability at the heart of the local planning processes. In 2019, Lewes District Council committed to reduce council greenhouse gas emissions to net zero and to become fully climate resilient by 2030 and further committed, in February 2021, to address the ecological crisis. Meaningful biodiverse and nature-based solutions are at the heart of these ambitions.

### **What you have told us so far**

In response to the Issues and Options Consultation comments on questions centred around GBI demonstrated support for requirements for tree planting in new development, allocating land for tree planting or woodland expansion and for the identification of green and blue infrastructure assets to improve biodiversity, carbon capture and storage of water.

Many respondents mentioned the importance of involvement of local groups, local farmers, neighbourhood plans, other stated that green corridors should be part of a national network. Respondents supported substantial improvements to corridors and green and blue assets and there were many suggestions about assuring the quality of the contribution to the network.

### **Alternatives considered and reasons for discounting**

No policy is not an alternative as national planning policy considers green infrastructure is a strategic priority that development plans must include. Further evidence is required to inform the policy direction and the Green Infrastructure Study is currently being prepared.

Alternative policy directions include considering setting a standard for green infrastructure in new developments with a preference for multifunctionality, and whether a policy should allow for off-site contributions to GBI instead of on site provision in certain circumstances.

### **Further information**

- Environment Topic Paper
- Lewes Biodiversity Study 2023
- Lewes Strategic Flood Risk Assessment 2023



- Lewes Climate Change Study 2023

## **Existing Policies in Adopted 2016 & 2020 Plans**

Local Plan Part 1 - Core Policy 8: Green Infrastructure

## **Policy NE2: Biodiversity**

### **Objectives**

The policy will address the protection of international, national, and locally designated sites, areas of ancient woodland, and Local Wildlife sites, and habitats and species of principal importance for biodiversity, with the level of protection being appropriate to its international, national or local significance.

This policy will control the biodiversity impacts from development, including the approach to Biodiversity Net Gain (BNG).

### **Preferred Policy Direction**

All development should ensure the protection, conservation, and enhancement of biodiversity. If harm cannot be avoided, then such harm should be adequately mitigated. Where it cannot be adequately mitigated then as a last resort such harm must be compensated for. Where it cannot be compensated for, then planning permission should be refused. This process is known as the mitigation hierarchy. The level of protection will be linked to the international, national or local significance. Exceptions will only be made where the public benefits significantly outweigh any adverse impacts. Development resulting in the loss or deterioration of irreplaceable habitats will be refused.

On top of mitigation and/or compensation of all impact, the policy will require development to achieve up to 20% and a minimum of 10% biodiversity net gain. This BNG should be delivered on-site, but when this is shown to be unachievable off-site measures can be agreed. The off-site BNG must be consistent with the strategic aims of the Local Nature Recovery Network and/or Green and Blue Infrastructure Network, and preferably be delivered near the development.

The policy will also provide guidance on how development in the north-western part of the plan area should consider the specific qualities of the Ashdown Forest and contribute to mitigation measures where necessary.

### **Why is this policy needed?**

National policy requires development to achieve a net gain for biodiversity, as well as to protect and enhance sites of biodiversity and geodiversity importance, with the level of protection being appropriate to its international, national or local significance.<sup>39</sup>

---

<sup>39</sup> National Planning Policy Framework, paragraphs 174 and 175

The Environment Act makes a 10% biodiversity net gain mandatory. This net gain is considered after all impact is mitigated and or compensated, to ensure habitats for wildlife are left in a better state than they were before the development.

In the LDC Corporate plan the Council expresses the ambition to have the greenest local plan and put sustainability at the heart of the local planning process. In 2019, Lewes District Council committed to reduce council greenhouse gas emissions to net zero and to become fully climate resilient by 2030. The council further committed in February 2021, to address the ecological crisis, including a target of all major developments achieving at least a 20% biodiversity net gain by 2025 in the Climate Change and Sustainability Strategy 2021<sup>40</sup>. Meaningful biodiverse and nature-based solutions are at the heart of these ambitions.

### **What you have told us so far**

Respondents to the issue and options consultation were in general supportive of a 20% biodiversity net gain in all major developments with some arguing that it should be more than 20%.

The majority of the respondents were in favour of off-site BNG provision, with comments that it should not be far away from the development, that there should be strict parameters, and it should improve habitat connectivity. Many respondents stated that there should be no development on greenfield sites and consider this the best way to protect wildlife.

### **Alternatives considered and reasons for discounting**

No policy and rely on national legislation setting out a 10% mandatory biodiversity net gain - This alternative is not the preferred approach, as it would not result in as much benefit for biodiversity.

Require biodiversity net gain higher than 20% - This would require additional evidence, and it is not clear that there would be a justification for such a high requirement. This is not the preferred approach as it would be likely in most instances to require significant off-site measures, and could impact on site viability.

A final option is to rely on national policy for protection of sites of biodiversity importance - This alternative is not the preferred approach as we consider that additional clarity is required to set out how the principles set out in national policy should be applied at a local level.

### **Further information**

- Environment Topic Paper

---

<sup>40</sup> Climate Change and Sustainability Strategy 2021

- Lewes Biodiversity Study 2023

## **Existing Policies in Adopted 2016 & 2020 Plans**

Local Plan Part 1 - Core Policy 10: Natural Environment and Landscape Character

## Policy NE3: Landscape

### Objectives

The District contains high quality and diverse landscapes. The spatial strategy seeks to manage growth in the most sustainable locations to ensure that the most valued and sensitive land is protected. Maintaining green gaps between settlements has been long standing in the plan area, where settlement boundaries have been used to make a clear distinction between town and village locations and the countryside. The purpose of the settlement boundaries has been to positively focus growth on the sustainable settlements while protecting the character and beauty of the countryside. The settlement boundaries were considered taking into account, among other things, important gaps between individual towns and villages and important environmental considerations such as the need to conserve designated areas of national landscape, ecological, geological, or historic importance.

New development will have an impact on the landscape; the new Local Plan will steer developments where harm can be minimised and policies will set out how development should conserve and enhance the natural beauty and high quality character of the District. The policy must ensure that development in the district does not adversely affect the setting of the South Downs National Park (SDNP).

### Preferred Policy Direction

The policy will maintain and where possible enhance the natural, locally distinctive landscape qualities and characteristics of the District. Development proposals should have regard to the Landscape Character Assessment 2023 and the Landscape Sensitivity Study 2023 and where a countryside location is proposed a Landscape Visual Impact Assessment will be required to identify the effects of a proposed development. The landscape policy will set out how the setting of the South Downs National Park should be respected, including the key views, and the dark night sky quality.

The landscape design policy will require developments to reflect the local character and distinctiveness and integrate development into its surroundings. This policy will also set out requirements in relation to tree planting which link with requirements for climate adaptation, carbon capture and cooling.

Trees providing vital benefits such as temperature regulation, reducing runoff rate and water storage, local plan policy will protect existing trees and, where possible require additional trees to be planted within a development area. Street trees provide valuable greening, improving climate resilience offering shelter and shade, cooling and contributions to natural drainage. Priority will be given to native species, including fruit-bearing trees. Local Plan policy will also encourage native hedge mixes in replacement of fences proving living barriers with ecological value.

## Why is this policy needed?

National planning policy is clear that plans should recognise the intrinsic character and beauty of the countryside. The NPPF sets out at Paragraph 174 that “*planning policies and decisions should contribute to and enhance the natural and local environment*”. Paragraph 176 states that great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks which have the highest status of protection in relation to these issues. Further Planning Practice Guidance sets out where landscapes have a particular local value, it is important for policies to identify their special characteristics and be supported by proportionate evidence<sup>41</sup>.

The Landscape Character Assessment<sup>42</sup> and the Landscape Sensitivity Study form the evidence base to support the landscape policy and other character policies within the new Local Plan.

## What you have told us so far

Respondents to the Issues and Options consultation expressed great concern on the impact of development on the landscape of the District, stating that development should be in harmony with the local landscape and nature and that the countryside should be protected and the views from the SDNP must be maintained and not be eroded by un-sympathetic development. There was strong opposition in the responses to the consultation to building on green field sites. Many respondents answered that development needs to be in sympathy with the landscape of the District. There was also support for in relation to the protection of the countryside and natural spaces around villages that prevent coalescence.

## Alternatives considered and reasons for discounting

A landscape policy with a restriction of development in the countryside, outside of defined planning boundaries, is discounted because of national policy guidelines and the benefits or need for some uses of a countryside location which could outweigh the harm caused.

## Further information

- Environment Topic Paper
- Landscape Character Assessment 2023
- Landscape Sensitivity Study 2023

## Existing Policies in Adopted 2016 & 2020 Plans

Local Plan Part 1 - Core Policy 10: Natural Environment and Landscape Character  
Local Plan Part 2 - Policy DM27: Landscape Design

---

<sup>41</sup> Planning Practice Guidance Natural Environment 036 Reference ID: 8-036-20190721

<sup>42</sup> Link evidence base



## Policy NE4: Clean and Healthy Environment

### Objectives

This policy will set out how development should contribute positively to the quality of the environment and how development should minimise polluting impacts on existing and future residents to create a clean and healthy environment for all.

The policy addresses pollution such as air, soil, noise, and light (the dark night sky), and includes specific requirements where appropriate for each where relevant. Pollution in the watercourse is considered in the Water Theme.

### Preferred Policy Direction

The policy will require all development proposals to:

- avoid significant adverse impacts on health and the quality of life for residents and quality of the environment from pollutants such as air, soil, noise, and light (the dark night sky) or other pollutants now or in the future;
- mitigate any adverse impact on the health and quality of life for residents and quality of the environment from pollutants;
- and where possible contribute to the improvement of mentioned quality aspects to help improve health, quality of life and the environment.<sup>43</sup>

Development (residential and commercial) that may potentially contribute to, or adversely affect soil quality, air quality, or contribute to noise or light pollution will only be permitted where it can be demonstrated that the development will not have an adverse impact on the use of other land, the health and quality of life of residents, or on the environment.

#### *Specific for noise pollution*

The policy will set out that development that would expose noise sensitive uses to unacceptable noise levels will not be permitted. Further the policy would set out that noise sensitive development would only be permitted where it can be demonstrated that users of the development would not be exposed to unacceptable noise disturbance from existing or future uses. In turn, noise generating development will only be permitted where it can be demonstrated that nearby noise sensitive uses, including existing or planned uses, will not be exposed to noise impacts that would adversely affect the amenity of existing or future users/occupiers.

Applications for residential development in locations where noise from road, rail, or other noise generating uses is expected must be accompanied by a Noise Impact Assessment.

#### *Specific for light pollution:*

---

<sup>43</sup> Contribution requirement is mentioned in paragraphs 174-e NPPF



Artificial light has valuable benefits, in terms of feelings of safety and allowing longer hours of recreation and sport in some instances. However artificial light can be a source of annoyance for people, and it can have negative impacts on wildlife, and our enjoyment of the countryside. The policy will prevent development from contributing to unnecessary sources of artificial light especially in areas of darker skies or where it would negatively impact on the South Downs designated Dark Sky Reserve.

The policy will require minimum light levels in the entire plan area, with special attention of developments within the setting of the South Downs National Park. In the entire plan area light levels should be the minimum required for working or safety purposes, and glare and spillage should be minimised. The policy will specify how much luminosity is acceptable. Outdoor lighting should be powered by on-site renewable sources where possible. Developments within the setting of the South Downs National Park will be required to minimise adverse impacts on the South Downs International Dark Sky Reserve.

*Specific for soil contamination and unstable soils:*

The policy will set out how development should deal with contaminated soils and will have specific requirements to avoid contamination of any watercourse, or aquifer. Development proposals on a site that is known or suspected to be affected by contamination will only be permitted where the council is satisfied that all works, including investigation of the nature of any contamination, can be undertaken without escape of contaminants that could cause unacceptable risk to health or to the environment. Remediation and mitigation of despoiled, degraded, derelict, contaminated and unstable land, where appropriate<sup>44</sup> must be ensured prior to the commencement of development. Development will not be permitted unless effective measures are taken to avoid contamination of any water course, water body or aquifer, and to avoid threatening the structural integrity of any building or structure built on or adjoining the site.

*Specific for air pollution*

The local plan will set out requirements for sustainable travel. Developments that support or encourage travel by walking, cycling and public transport, reducing the need to travel by private car will be supported, see also sustainable travel policy. The environment policy will set out specific requirements for development that could impact current or potential AQMAs and will address reduction of pollutants in the construction phase.

Development proposals which could impact on a current or potential AQMA must have regard to any relevant Air Quality Action Plans (AQAP) and seek improvements in air quality through implementation of measures in the AQAP; and provide

---

<sup>44</sup> NPPF 174-f The rest is more or less policy DM21 LPP2 LDC, but as next part is condensed.

mitigation measures where the development and/or associated traffic would adversely affect any declared AQMA.

All applications for development will be required to 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. The policy will set out requirements for applications in terms of submission of construction details if known to avoid conditions.

### **Why is this policy needed?**

Pollution negatively impacts on the quality of the environment and health and wellbeing of residents. The National Planning Policy Framework paragraph 174 states that planning policies should contribute to and enhance the natural and local environment by preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. The NPPF also states that development should, wherever possible, help to improve local environmental conditions such as air and water quality, and remediate and mitigate despoiled, degraded, derelict, contaminated and unstable land, where appropriate.<sup>45</sup>

The Environment Act 2021 sets legally binding targets to protect the environment, clean up air and rivers and boost nature.

The Council's corporate plan puts sustainability at the heart of local planning. The goals include providing a well-managed and protected local environment including waterways and coastal areas and cleaner air across the District.

In general air quality in the district is good, however there are concerns with regard to nitrogen dioxide emissions in certain areas. Poor air quality has been linked to respiratory health problems and improving air quality is a Council Priority. There is an AQMA in Newhaven Town Centre as a result of nitrogen dioxide emissions from transport. Declaration of an AQMA is necessary under Part 4 of the Environment Act 1005, when certain statutory air quality thresholds are breached. Addressing these problematic areas will be key to ensuring that further pockets of poor air quality do not become prevalent.

The planning system has a role in seeking to ensure that new noise sensitive development such as housing, is not located close to existing sources of noise that would lead to nuisance and to ensure that potentially noise creating uses such as some industrial processing or recreational activities are not located where they would likely create a nuisance.

---

<sup>45</sup> National Planning Policy Framework Paragraph 174, criteria e).

A policy around noise sensitive development is required to protect the amenity of residents, and to ensure noise generating businesses can operate effectively in appropriate areas.

The entire SDNP is an International Dark Sky Reserve, Lewes District have a responsibility though its plan making and decision taking to ensure that development within the plan area does not affect the setting of the SDNP including the Dark Night Sky Reserve. This includes from development including external lighting and light spill from internal lighting in order to minimise the overall impact of light.

### **What you have told us so far**

The Issues and Options consultation document set out how existing policies tackle Air Quality. There were no specific questions on air quality but respondents commented on the importance of the local plan addressing air quality. Improving air quality is also related to the policies on Modal Shift, for which, in general, there was much support. Some respondents link the need for modal shift measures with healthier environmental conditions.

There were also no specific questions on issues of noise, light, or land contamination, but the problem of littering, air pollution, noise pollution was mentioned several times by respondents. Some respondents mentioned noise from construction and/or construction traffic specifically, while others refer to noise impacts of completed development, and impacts of allowing noise sensitive development adjacent to existing employment spaces with noise generating activities.

Many respondents stated how much they appreciate a healthy, tranquil, green environment, or mentioned the importance of the dark night sky reserve. Many respondents commented on how much they appreciate the natural environment and how important they consider its protection.

### **Alternatives considered and reasons for discounting**

No policy is not considered an alternative as the quality of the environment is a key planning issue which needs to be addressed in the Local Plan.

### **Further information**

- Environment Topic Paper

### **Existing Policies in Adopted 2016 & 2020 Plans**

Local Plan Part 1 - Core Policy 9: Air Quality

Local Plan Part 2 - Policy DM20: Pollution Management

Local Plan Part 2 - Policy DM21: Land Contamination

## Theme: Homes for Everyone

### **Aim: Plan for enough housing to meet our needs**

The strategy for the plan sets out how many homes are needed and the locations in which they will be built. The Homes for Everyone theme will guide how new homes will be delivered. The plan will need to ensure that there are enough homes in the district that are affordable to people living and working in the district, that meet the needs of people at different life stages and provide for enough specialist homes so that people with different needs are able to access a home suitable for their needs.

In the Homes for Everyone theme, the plan will set out the policies that will help to determine whether planning applications that include residential development meet the needs of the district. The policies propose to ensure that new homes include sufficient indoor and outdoor space and that new housing developments respond to the needs of the different sized households and different household income levels that are expected from existing and future residents over the plan period in accordance with Healthy Homes principles<sup>46</sup>. This includes those who would like to build their own homes. The policies will also guide conversions of existing buildings to residential use and the subdivision and expansion of existing homes. Sites suitable to meet the needs of Gypsies and Travellers will be identified alongside a criteria-based policy to guide planning applications for Gypsy and Traveller sites.

### **Which Policies Are We Proposing?**

H1: Meeting Housing Needs

H2: Suitable Homes for All

H3: Affordable Housing

H4: Specialist Accommodation for Vulnerable People

H5: New Residential Development in the Countryside

H6: Making Best Use of Existing Rural Buildings

H7: Making Best Use of the Existing Housing Stock

H8: Accommodation for Gypsies, Travellers and Travelling Showpeople

### **Consultation Questions for the Homes for Everyone Theme**

- Are there any further policies you would like to see included to meet housing needs? Why do you think they should be included?
- Do you agree with the emphasis on securing two-bedroom homes through new development and retaining smaller homes in the housing stock? If not, please explain why.
- Do you agree with the affordable housing policy direction that is being set in the Affordable Housing policy? If not, please identify how it could be changed.

---

<sup>46</sup> [Healthy Homes Principles - Town and Country Planning Association \(tcpa.org.uk\)](https://www.tcpa.org.uk/healthy-homes-principles)

- Do you agree with prioritising rented affordable tenures over affordable home ownership tenures? If not, please explain why you think different tenure proportions should be sought.
- Can you identify specific sites that could accommodate Gypsies and Travellers? If you can identify a site, please submit it to our call for sites using the form on the consultation portal.

## Strategic Policy H1: Meeting Housing Needs

### Objectives

This strategic policy will set out the overall approach to meeting the housing requirements of the District guiding the features that builders of residential development will need to incorporate in order to make their schemes work for existing communities and future residents.

### Preferred Policy Direction

This strategic policy will set out the number of homes that are expected to be delivered on different types of site. It will set out the proportion of homes that are expected on sites that already have planning permission, sites allocated to be developed by the plan and development that we expect to come forward from sites that have not been allocated (windfall development). In accordance with national policy this will include meeting at least 10% of the housing requirement on small sites. The policy will set a challenging target of achieving 40% affordable housing contributions and will highlight the council's own housebuilding and acquisition programme as set out in the Corporate Plan as a source of supply.

The policy will require that on sites which will provide 100 or more dwellings, plots to accommodate 5% of the total number of dwellings proposed on site will be made available as self build or custom build plots subject to consideration of the nature of the development proposed and the viability of the development. Where a partial number of self build plots is required by the policy, this will be rounded to the next highest whole number. Sites consisting of specialist accommodation for particular groups in their entirety and those consisting solely of flatted development, will not be expected to contribute self build plots. Serviced plots will be expected to be marketed to self builders including those on the Self Build Register. Those plots not sold after 6 months of continuous marketing will revert to the developer to be built out.

The approach to delivering homes in the Plan will embody Healthy Homes Principals<sup>47</sup> through the policies set out in each theme. The detailed policies for infrastructure requirements and design of residential developments will be set out in the Design and Community Facilities and Infrastructure themes, but this strategic policy will set the high level expectation that residential development will be designed to a high quality that integrates private and communal outdoor space, provides a suitable level of children's play space, mitigates for the expected impacts of climate change and integrates active and low carbon travel infrastructure.

The policy will set out density expectations for residential development in order to make best use of the land available for development in accordance with the national

---

<sup>47</sup> [Healthy Homes Principles - Town and Country Planning Association \(tcpa.org.uk\)](https://www.tcpa.org.uk/healthy-homes-principles)

policy requirement that developments make optimal use of the potential of each site. This will be established with reference to the settlement hierarchy. Sites in district centres and other locations that are well served by public transport should achieve a minimum density of 50 dwellings per hectare, sites at Rural Service Centres and Service Villages should achieve a minimum of 30 dwellings per hectare. Outside of these areas residential development should aim to achieve a minimum of density of 20 dwellings per hectare. All densities will be based on the net developable area of the site following the RICS approach<sup>4</sup> to establishing the extent of the developable area.

### **Why is this policy needed?**

National planning policy requires that strategic policies should set out the minimum number of homes that need to be built over the Plan period. The size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. This includes those in need of affordable housing and those wishing to build their own homes.

Under the Self Build and Custom Housebuilding Act 2015 (as amended by the Housing and Planning Act 2016) (the Act), local authorities are required to keep a register of those seeking to acquire serviced plots in the area for their own self-build and custom house building. They are also subject to duties to have regard to this register and to give enough suitable development permissions to meet the identified demand.

National planning policy requires that, where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities and ensure that developments make optimal use of the potential of each site. In these circumstances plans should include policies to optimise the use of land and set out minimum density standards that reflect the accessibility and potential of different areas.

The LHNA suggests that there is a substantial need for affordable homes to buy in the district alongside the need for affordable homes to rent. The headline need is for 290 affordable homes per year for the plan area, which consists of a need for 125 homes additional rented affordable homes per year and 165 for affordable home ownership.

The Settlement Hierarchy Review helps to determine the settlement hierarchy for the plan based on the findings of the Settlement Services Study. The study identifies the locations in the district which have good accessibility where it may be appropriate to maximise opportunities with higher density development or locate development where easy access to services is needed. The study recommends that Newick and



Ringmer are defined as Rural Service Centres; Barcombe Cross, Plumpton Green, Wivelsfield Green and South Chailey as Service Villages.

The Land Availability Assessment looks at the density of residential completions and residential permissions within different locations within the district and summarises the findings. This assessment is summarised the appendices to the Land Availability Assessment.

Since April 2016 the council has kept a Self-Build Register which identifies individuals and groups who are looking for a plot to self or custom build their own homes. Part 1 of the register includes all individuals and groups of individuals with a local connection to the District. Part 2 contains all people who have requested to be listed on the register. Based on analysis of CIL receipts and the number of people on Part 1 of the register there is a need for a further 26 plots to be identified by 2025. There is demand for an additional six plots for people on Part 2 of the register.

The Viability Assessment will consider all the requirements set out in the policies in the plan and advise whether different types of sites can realistically be developed under those requirements. The assessment will help to identify the level at which the affordable housing contribution can be set so that other development requirements, such as infrastructure contributions and climate change mitigations, are able to be secured.

### **What you have told us so far**

Respondents to the Issues and Options Consultation gave strong support to maximising the amount of affordable housing secured through development, albeit tempered with regard to the need to secure appropriate contributions to support education, health and public transport infrastructure and climate change mitigation actions. Respondents also supported the delivery of affordable housing where it was needed with both on site delivery and contributions towards an affordable housing fund supported.

Industry respondents noted that affordable housing requirements should reflect the evidence base and suggested that viability assessment needs to factor in the higher end of the scale of developer profits in order to ensure that sites continue to come forward for development and to reduce the need for renegotiation where the viability of schemes may be marginal.

Some support was expressed for achieving higher densities by “building up” within the coastal towns but there was also recognition of the quality of the landscapes surrounding existing settlements; some respondents suggested that extensions to villages should be built at densities reflecting the existing fabric of the settlement rather than maximising the potential of the land available.



## **Alternatives considered and reasons for discounting**

### **Policy option not to set an affordable housing target and instead rely on an affordable housing requirement.**

Not including a target is not the preferred option as the inclusion of a target gives officers greater scope to negotiate for more affordable housing than may be achieved through the affordable housing policy requirement alone.

### **Policy option to detail sustainable design, construction and infrastructure and community facilities requirements in the housing policies.**

This is not the preferred approach as clarity and legibility of the plan will be improved by setting out design, construction, infrastructure and community facility requirements in the appropriate sections of the plan.

### **Policy options to support self-builders**

No sites have been submitted to the council's land availability assessment from landowners willing to accommodate a self-build development. Concentrating the requirement on larger sites supports the need to diversify the housing land supply by supporting small and medium builders who are more likely to develop smaller sites. Larger sites are more likely to be built in phases so that the developer will more easily be able to plan the build out of unsold serviced plots.

### **Policy option to set minimum density levels for the coastal towns and Low Weald.**

This is not the preferred approach because the minimum densities would need to be set at a much lower level to comply with the national policy requirements for maximising densities in accordance with accessibility.

## **Further Information**

- Topic Paper – Improving Access to Housing
- Local Housing Needs Assessment 2023
- Settlement Hierarchy Review 2023
- LDC Self Build Register

## **Existing Policies in Adopted 2016 & 2020 Plans**

Local Plan Part 1 - Spatial Policy 2: Distribution of Housing

Local Plan Part 1 - Core Policy 1: Affordable Housing

Local Plan Part 1 - Core Policy 2: Housing Type, Mix and Density

Local Plan Part 2 - Policy DM1: Planning Boundary

## **Policy H2: Suitable Homes for All**

### **Objectives**

This policy will set out the approach to achieving a dwelling stock that reflects anticipated demographic changes over the plan period. It will set the required internal space standards for new homes, the proportion of accessible and adaptable dwellings to be provided and the most appropriate bedroom size mix for residential developments.

### **Preferred Policy Direction**

The policy will require that the market element of residential schemes on sites of 0.5ha or more or delivering 10 or more dwellings will include more two bedroom homes than other sizes of dwelling. The requirement will be subject to the overall viability of the scheme and will require that a home size mix that does not prioritise two-bedroom homes reflects the needs of the surrounding community.

Gross internal floor areas for all new homes will be required to meet or exceed the nationally described residential space standard or successor standards. Exceptions will be permitted where the homes are provided to meet the needs of specific groups such as students, and evidence is provided to demonstrate that meeting the space standards would result in homes that would be unsuitable for the intended occupants.

New homes created through conversions and changes of use from non-residential land uses should seek to meet or exceed the nationally described residential space standards or successor standards.

All new homes will be required to meet the Building Regulations M4(2) 'accessible and adaptable' dwellings standard as a minimum. Exceptions will be permitted only where it can be demonstrated that site specific circumstances and other requirements for the development, would make the proposed development impractical, unachievable or unviable.

### **Why is this policy needed?**

National planning policy requires that the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. Planning policies should ensure that developments, "create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users, and...do not undermine quality of life". The use of the nationally described residential space standard and the optional technical standards for accessible and adaptable housing as a means of meeting these requirements is supported.

A government consultation on Raising Accessibility Standards in New Homes concluded in July 2022 that Building Regulations will need to be changed to require that all new homes meet the M4(2) accessible and adaptable dwellings standard. Exceptions will be set out in the regulations to specify where M4(1) standards will be acceptable, with the onus on developers to justify why M4(2) standards are not appropriate for a particular site or individual dwellings. The focus is on physical characteristics of the site, rather than viability constraints.

The policy will draw primarily on the LHNA but will also have reference to the Viability Assessment.

Section 5 of the LHNA anticipates that there is a need for the proportion of two-bedroom homes in the district to increase over the plan period. The anticipated need is expected to be more pronounced in the Low Weald where the dwelling stock is dominated by larger dwellings. An increase in one-bedroom homes is also needed.

Sections 9 of the LHNA reports that the proportion of older people in Lewes District is higher than is demonstrated in the sub-regional, regional and national populations as measured by the 2021 census. Older people aged 75+ are more likely to need some level of care than younger age groups. The LHNA models the proportion of older people that are expected to require care in 2040 and the need for specialist accommodation for older people. The study anticipates that specialist accommodation will meet the needs of some older people with care needs but that most will be accommodated in mainstream housing that is likely to need to be adapted to meet their needs as they age.

### **What you have told us so far**

Respondents to the Issues and Options consultation supported the achievement of a mix of dwelling sizes on both a site by site basis and across the District in both rural areas and the coastal towns. Respondents noted that one and two bedroom properties in a mix of tenures and building types were needed for people who want to downsize from larger properties and also younger people who could not afford to purchase larger properties.

Respondents generally supported the setting of minimum space standards in the Local Plan. There was support for adopting the Nationally Described Space Standard, for ensuring that homes were built to the Building Regulations M4(2) standard and that an appropriate proportion of homes were built to accommodate those with mobility impairments with respondents specifying various proportions as appropriate.

Some respondents noted that flexibility was required within the policy to allow for exceptional circumstances on a site-by-site basis, such as smaller homes for student housing and circumstances where level access was not achievable.

### **Alternatives considered and reasons for discounting**

#### **Policy option to require a specific mix of dwelling sizes in all schemes**

This is not the preferred approach as there is a pressing need for more two bedroom homes across the District and particularly in the Low Weald. A more formulaic approach that sets out an idealised dwelling mix for schemes is more likely to need amendment for individual schemes at the application stage which is likely to contribute to delays in the determination process.

#### **Policy option to set out tenure requirements alongside home size requirements.**

This is not the preferred approach as the requirements for the affordable element of the scheme may be different to the market element dependent on the households registered on the waiting list at the time the application is determined. It is considered that the requirements for the mix of homes needed to meet affordable housing needs are best set out in the affordable housing policy.

#### **Policy option to require smaller homes without regard to overall scheme viability**

This is not the preferred approach as where a scheme may not be viable to develop, more larger homes may need to be included in the housing mix to ensure that other contributions, for example towards affordable housing, are secured. The option to mandate the priority for more smaller homes without reference to viability has therefore been discounted.

#### **Policy option to not require a minimum space standard**

This is not the preferred approach because there was strong support from respondents to the Issues and Options consultation to adopt minimum space standards.

#### **Policy option to set out a local standard that exceeds those set out in the Nationally Described Space Standard**

This is not the preferred approach because it is not consistent with national policy. At present the NPPF at Paragraph 130 Footnote 49 requires that local authorities make use of the Nationally Described Space Standards to specify the size of homes where this is justified. However, “Healthy Homes” principals were introduced into the Levelling Up and Regeneration Bill as it passed through the House of Lords during September 2023. The Healthy Home principals include that, ‘all new homes should have, as a minimum, the liveable space required to meet the needs of people over their whole lifetime, including adequate internal and external storage space’. Subject

to the progress of the LURB through the House of Commons, a review of the national space standards would be implied.

**Policy option to set a target or a proportion of new homes to be built to M4(2) standard (percentage of a site or district target)**

This is not the preferred approach because in order to make a difference to the proportion of the dwelling stock that is adaptable over the plan period, it is necessary for all homes to be built to adaptable standards as represented by M4(2) of the building regulations. This is needed to meet the needs of a rapidly ageing population and is in harmony with Healthy Homes principals.

**Policy option to set a requirement for the proportion of new homes to be built to M4(3) standard.**

This is not the preferred approach because setting a requirement for M4(3) wheelchair accessible homes where there may not be occupant for them is costly in viability terms. Those with poor mobility are more likely to be in need of affordable housing so requirements for M4(3) accessible dwellings are included in the affordable housing policy.

**Policy Option to rely on Building Regulation updates to ensure new homes meet M4(2) standards**

This is not the preferred approach as it is currently unclear whether the Building Regulation update will come into force prior to adoption of the plan. Officers will continue to monitor the progress of changes in the Building Regulations throughout the process of producing the local plan and reflect changes to the preferred M4(2) policy requirement as appropriate in accordance with Healthy Homes principals.

**Further Information**

- Topic Paper – Improving Access to Housing
- Local Housing Needs Assessment 2023

**Existing Policies in Adopted 2016 & 2020 Plans**

Local Plan Part 1 - Core Policy 2: Housing Type, Mix and Density

Local Plan Part 1 - Core Policy 5: Built and Historic Environment and High Quality

Local Plan Part 2 - Policy DM25.9: Design

## **Strategic Policy H3: Affordable Housing**

### **Objectives**

This policy will set out the approach to meeting the affordable housing requirements of the district setting out the circumstances under which affordable housing contributions will be required and how the type and tenure of affordable housing will be determined.

### **Preferred Policy Direction**

The policy will require that sites providing 10 to 99 homes make a minimum contribution of 25% of the total homes to be provided as affordable housing on site. Further contributions commensurate with the 40% affordable housing target may be made on site or as commuted sum payments.

The policy will require that sites providing 100 or more homes make a minimum contribution of 30% of the total homes to be provided as affordable housing on site. Further contributions commensurate with the 40% affordable housing target may be made on site or as commuted sum payments.

Where a viability assessment at application stage supports the provision of less than the 40% overall target for affordable housing contributions, the policy will require that the viability of the scheme is subject to review over the course of the build out of the development. Any additional affordable housing provision identified as a result of the viability review will be acceptable as commuted sum payments.

A tenure and house size mix for affordable housing reflecting the most up to date local housing needs evidence and national policy requirements will be expected on sites delivering a mix of market and affordable homes for sale. The delivery of homes for social and affordable rent will be prioritised over the delivery of homes for affordable ownership. The delivery of homes for social rent will be prioritised over the delivery of homes for affordable rent. A tenure mix of 75% rented to 25% affordable ownership products will be set out in the policy. At present, it is anticipated that the tenure mix set out in the policy will be for 60% social rent, 15% affordable rent, 25% affordable ownership products.

Discounted affordable home ownership products should be offered with sufficient discount that they are affordable to households with median incomes as determined by the most up to date housing needs evidence. The implications of this will be set out in the supporting text to the policy. At present, it will require First Homes to be offered at 50% discount. Shared home ownership products will need to be offered with a range of initial share purchases from 10%. Where Rent to Buy homes are offered, these will form part of the affordable rent contribution.

Affordable homes should be integrated with and indistinguishable from market homes and constructed of hard wearing, durable materials. Small clusters of affordable homes throughout the site will be supported. A mix of smaller and larger homes should be offered. Housing waiting lists will be used to determine specific requirements for the affordable element of the scheme to be delivered on site, including bedroom sizes. These may include clusters of two bedroom flats or houses to meet the needs of vulnerable people, care home accommodation, delivery of M4(3)(a) wheelchair adaptable accommodation or M4(3)(b) wheelchair accessible accommodation.

All major residential development will be expected to contribute to meeting affordable housing needs. Where a development consists of Build to Rent homes, the affordable housing contribution will consist of homes offered at Affordable Private Rent with a minimum discount of 20% on market rents inclusive of service charges, secured through agreement with the council. Where a development consists of C2 residential accommodation, the affordable tenure mix will consist of predominantly accommodation for social rent, but the precise tenure mix will be negotiated with the council with regard to evidence from housing waiting lists.

### **Why is this policy needed?**

NPPF Paragraph 62 requires that the size, type and tenure of housing needed for different groups of the community should be assessed and reflected in planning policies including those who require affordable housing. Planning practice guidance clarifies that this includes affordable homes to rent and to buy and states that a minimum of 25% of all affordable housing units secured through developer contributions should be for “First Homes”. National planning policy requires that affordable housing policies should specify the type of housing required and expect provision to be made on site unless off-site provision or an appropriate financial contribution in lieu can be justified and will contribute to the objective of creating mixed and balanced communities.

National planning policy stipulates that affordable housing contributions should not be sought from minor residential development other than in designated rural areas and that requirements may be reduced to support the re-use of brownfield land. Where major residential developments provide affordable housing at least 10% of the total homes need to be made available for affordable home ownership unless this would significantly prejudice the ability to meet the identified affordable housing needs of specific groups. Exceptions to the requirement for affordable home ownership contributions are made for Build to Rent homes, specialist accommodation for groups of people with specific homes, self-build developments and developments consisting exclusively of affordable housing or rural exception sites.



The LHNA found that there is a substantial need for affordable homes to buy in the district alongside the need for affordable homes to rent. The headline need is for 290 affordable homes per year for the plan area, which consists of a need for 125 homes additional rented affordable homes per year and 165 for affordable home ownership.

Analysis of the ability of households to afford different home ownership products confirms that households with median incomes would only be able to access lower quartile First Homes with a 50% discount on market prices or a 10% share of lower quartile shared ownership homes. For First Homes, these households would also need to have saved for a deposit.

Waiting list data analysis in the LHNA suggests that the bedroom size mix for affordable rented tenures should reflect an overall need for 47% one bedroom properties, 26% two bedroom properties, 20% three bedroom properties and 7% four+ bedroom properties. These reflect the minimum size property for which a household is eligible. While this property size distribution reflects trends in the waiting list, it is also noted within the LHNA that there is significant pressure on three bedroom properties, for which there are many more applicants than properties available.

## **What you have told us so far**

There was strong support for securing high levels of affordable housing albeit there was no overall clear steer from the consultation regarding how best the affordable housing should be secured or delivered.

Some respondents stated that all development should consist solely of affordable housing in recognition of the capacity of the district to accommodate new homes while others supported different levels of affordable housing. Differential targets recognising the different sub-markets in the district were supported by some respondents. There was also strong support for the delivery of affordable housing being prioritised alongside essential infrastructure. Industry respondents highlighted the need for viability assessments that recognised the cost of all policies of the plan and built in contingency to accommodate sites with marginal viability. This included a comment that viability assessments need to factor in the higher end of the scale of developer profits in order to ensure that sites continue to come forward for development and to reduce the need for renegotiation later.

Respondents supported affordable housing that reflected the needs of current residents, this included the inclusion of local connection criteria and pricing for affordable homes that are affordable to those with incomes reflective of the community. Smaller starter homes were also supported, particularly in the Low



Weald. Council house building programmes were supported as an alternative to market delivered affordable housing development.

Opinions on the tenure of affordable housing were divided, with respondents suggesting a number of different approaches to proportions of rented and low cost home ownership tenures. The government requirement for inclusion of the First Homes tenure also divided respondents, with some suggesting that rented tenures should be priorities once the First Home requirement had been satisfied, and some suggesting that rented tenures should form a lower proportion so that shared ownership homes could be included in the housing mix. Industry respondents noted that tenure assumptions would have an impact on viability and would need to be reflected in those assessments; the cost and risk to the developer of providing First Homes mean that a market return is expected rather than the lower return anticipated for other forms of affordable housing where Registered Providers share the risk.

## **Alternatives considered and reasons for discounting**

### **Policy Option to Set Higher or Lower Affordable Housing Targets**

Setting a lower affordable housing target is not the preferred approach because affordable housing need exceeds 48% of the housing need as established under the Standard Method. It is anticipated that developments comprising 10 or more homes will generally be viable with a 40% affordable housing contribution; but this will be tested through the whole plan viability assessment. Setting a target higher than 40% will be reviewed based on the viability assessment but may not be supported in view of plan wide requirements for achieving other goals.

### **Setting Lower On Site Affordable Housing Requirements**

Setting a lower on site affordable housing requirement is not the preferred approach as this is unlikely to support the achievement of mixed and balanced communities where development occurs.

### **Alternative proportions of rented and affordable ownership homes**

The LHNA identifies that there is a need for 125 affordable homes for rent per annum and a further potential need for 165 homes for affordable home ownership per annum. This includes newly arising households falling into need and those currently on housing waiting lists. Translated directly to a policy requirement would imply 43% rented and 57% owned tenures. This is not the preferred approach because the potential need to increase access to affordable home ownership products does not outweigh the Council Plan priority to provide homes for those who are not able to access a decent home at all. The preferred approach is supported by the consultation responses and the corporate priority to secure high levels of affordable homes for rent.

## **Further Information**

- Topic Paper – Improving Access to Housing
- Local Housing Needs Assessment 2023

## **Existing Policies in Adopted 2016 & 2020 Plans**

Local Plan Part 1 - Core Policy 1: Affordable Housing

Local Plan Part 2 - Policy DM2: Rural Exception Sites

## **Policy H4: Specialist Accommodation for Vulnerable People**

### **Objectives**

This policy will set out the approach to meeting the need for specialist accommodation for those vulnerable people with specific needs that are not met by standard homes. These include older people in need of care, disabled people, people with learning disabilities, those in need of support with their mental health, single homeless people with support needs, and young people leaving care.

### **Preferred Policy Direction**

Specialist housing will be supported where a need for the type of specialist housing proposed is demonstrated by the most recent district housing needs assessment or other care needs assessments published by health or government bodies, and where the development would not lead to concentrations of such provision in a community.

All development proposals for independent and supported living schemes and new build development for care home accommodation should be located within settlement boundaries and should include communal facilities for residents and accommodation for any essential resident staff on the site.

Development proposals for independent and supported living schemes and care home accommodation will be supported where they are located in district centres.

Development proposals for independent and supported living schemes and care home accommodation will be supported in Rural Service Centres and Service Villages where applicants contribute to the provision of demand led public transport services to support residents' independence.

Provision of care home accommodation and conversion of existing buildings to care home accommodation in Local Villages and Hamlets will be supported where applicants contribute to the provision of demand led public transport services to support residents' need to access community and health services.

Development proposals for specialist accommodation for older people will be required to meet M4(2) adaptable standards as a minimum and include a proportion of the homes as wheelchair accessible in accordance with both M4(3)(a) and M4(3)(b) standards set out in Building Regulations. Affordable housing contributions from such development will be required in accordance with the Affordable Housing Policy.

Conversion of existing buildings to specialist accommodation will be supported. Where the accommodation is for older people, requirements for wheelchair access

will need to be accommodated. The loss of specialist accommodation will be resisted unless the applicant can demonstrate that there is no longer a need for that type of specialist housing and the building cannot be converted, remodelled or redeveloped to meet the need for other types of specialist housing.

Evidence based proposals for the provision of residential annexes to accommodate an elderly or disabled dependent will be supported. The accommodation should meet the functional need of the occupant(s), be proportionate in scale and remain ancillary to the main dwelling. Conditions restricting the occupancy and subsequent sale of such accommodation will be applied to the grant of permission.

### **Why is this policy needed?**

NPPF Paragraph 61 requires that strategic policies should be informed by a local housing need assessment. NPPF Paragraph 62 requires that the size, type and tenure of housing needed for different groups of the community should be assessed and reflected in planning policies including older people and people with disabilities.

Planning Practice Guidance for Housing for Older and Disabled People<sup>5</sup> advises that clear policies should be set to address the housing needs of groups with particular needs. The policies can set out how the authority will consider proposals for the different types of housing that these groups are likely to require and may provide an indicative figure for the number of specialist homes will be needed over the plan period.

### **What are the headlines from the evidence gathered?**

The LHNA investigates the need for specialist accommodation for older persons in Section 9. The LHNA found that there is likely to be an additional 7,779 older people aged 75 plus in the district population in 2040. These are expected to form approximately 5,484 households. This gives rise to a need for a further 1,877 specialist homes in the plan area. There is likely to be some cross over in the extra care figure between the need for independent C3 provision and communal C2 bed-spaces.

The LHNA compares the current supply of specialist homes with the idealised provision rates from the Housing Learning and Improvement Network (LIN) Shop tool. Current provision of specialist homes is estimated to be 152 units per 1000 age 75 plus persons across the whole district. The Housing Lin recommends provision at a rate of 250 specialist homes per 1000 age 75 plus persons. The LHNA goes on to examine the need for C2 bed-spaces and recommends that approximately 451 additional care home beds (23 per annum) will be required over the plan period for older persons.

Section 10 of the LHNA examines the needs for specialist housing for vulnerable people identified in the district. These include older people, people with learning disabilities, people with physical disabilities, people with mental health support needs, single homeless people with support needs and young people leaving care. The study notes that the prevalence of vulnerable people in the district is somewhat below or commensurate with national averages. The pressing need for accommodation for younger vulnerable people is for independent move on accommodation and for two-bedroom accommodation where support can be provided by a resident care provider.

## **What you have told us so far**

Respondents to the Issues and Options consultation supported the provision of homes suitable for older people. The provision of generally smaller homes in the development mix and of small schemes of purpose built older persons accommodation was supported. There was some support for the inclusion of bungalows in the housing mix policies and strong support for increasing the accessibility requirements of new housing from public respondents. Industry respondents noted that Building Regulation M4(1) standards already exceed the accessibility of the general housing stock, while the imposition of requirements for M4(2) adaptable and M4(3) accessible homes could impact negatively on viability and needs to be appropriately evidenced in accordance with the PPG. The need for independent living schemes to be located in places with good access to community facilities, shops and public transport was noted by respondents.

## **Alternatives considered and reasons for discounting**

### **Set a requirement for provision of specialist homes on larger sites**

This is not the preferred approach because Policy H2 sets a requirement for all new development to meet M4(2) standards to ensure that there is a supply of easily adaptable homes across the plan area. However, the LHNA notes that older people are more likely to need to use a wheelchair either some or all of the time. Where schemes are developed specifically for older people, it is likely that a proportion of the intended occupants will need to use a wheelchair at some point in time. For this reason, the preferred approach is that a proportion of the dwellings provided in such development should be fully wheelchair accessible in accordance with Building Regulations M(3)(b).

### **Support Provision of Specialist Homes in All Settlements**

This is not the preferred approach because the spatial strategy seeks to accommodate development in locations where residents will be able to easily access the good and services they require. Specialist schemes for independent living, whether these are intended for older people or people with different support needs are more likely to be occupied by those without access to a private vehicle. In addition, those with poor mobility may find walking longer distances or making

repeated changes when using public transport problematic. Concentrating provision in settlements at the top of the settlement hierarchy will support the continued independence of residents.

### **Allocate sites for the provision of care homes**

This is not the preferred approach as none of the sites promoted to the plan have been submitted for allocation for specialist accommodation. Should a site be promoted to the council for the provision of a care home then this would need to be assessed against the spatial strategy to ensure allocation was appropriate. In the absence of such sites, a criteria based policy is set out to ensure that applications for care homes are directed to the most appropriate locations.

### **Further Information**

- Topic Paper – Improving Access to Housing
- Local Housing Needs Assessment 2023

### **Existing Policies in Adopted 2016 & 2020 Plans**

Local Plan Part 1 - CP2: Housing Type Mix and Density

Local Plan Part 2 - DM4: Residential Conversions in the Countryside

Local Plan Part 2 - DM29: Garages and other buildings ancillary to existing dwellings

## Policy H5: New Residential Development in the Countryside

### Objectives

This policy will set out the circumstances where new residential development outside of defined settlement boundaries will be acceptable including where homes are needed to support rural businesses.

### Preferred Policy Direction

The policy will support the delivery of residential development on sites closely related to existing settlements outside of defined settlement boundaries for the delivery of affordable housing. These may take the form of:

- Rural exceptions sites, where the development is for 100% affordable housing to be retained in perpetuity to meet local needs;
- First Home exception sites where the homes are sold at a 50% discount on market values and offered to those with a local connection first and;
- Single plots for self-builders, where the applicant will be expected to have a local connection to the parish, have a maximum household income of £80k per annum and the home built will be subject to a maximum floorspace of 90m<sup>2</sup> on plots of a maximum of 0.05 ha.

Where the delivery of an affordable housing scheme on an exception site will not be achievable without grant funding, a small element of market housing may be supported as enabling development, subject to viability evidence.

Sporadic residential development in the countryside will generally be resisted. The approach to rural workers dwellings will be carried forward from the adopted LPP2 Policy DM3. In order to support existing viable rural businesses of at least three years trading, new permanent homes will be supported where the business requires one or more workers to be readily available at most times and there is no other suitable or available accommodation within the site or buildings that could be converted to residential use. Where a business is unable to demonstrate ongoing viability over a three year period, a temporary dwelling may be permitted. Occupancy conditions related to the business will be applied to any homes permitted by the policy.

### Why is this policy needed?

#### What is required by legislation from the Local Plan

Paragraph 72 of the NPPF requires that the development of exception sites offering one or more types of affordable housing, including those suitable for first time buyers should be supported where they are adjacent to and proportionate in size to existing settlements. NPPF Paragraph 78 requires that policies are responsive to local circumstance in rural areas and support residential developments that reflect local needs. Furthermore, it is required that opportunities to bring forward rural exception sites are supported including consideration of whether a market element would help to facilitate the development.

The NPPF at Paragraph 80 requires that planning policies should generally avoid the development of new isolated homes in the countryside. Exceptional circumstances for countryside development include the needs for rural workers, securing the future of heritage assets and the re-use of existing buildings. The NPPF Paragraph 80e also supports isolated residential development that is of an exceptional design quality.

Under the Self Build and Custom Housebuilding Act 2015 (as amended by the Housing and Planning Act 2016) (the Act), local authorities are required to keep a register of those seeking to acquire serviced plots in the area for their own self-build and custom house building. They are then required to have granted permission for an equivalent number of plots of land suitable for self and custom housebuilding as there are entries for a prescribed period within three years.

### **What are the headlines from the evidence gathered?**

The LHNA suggests that there is a substantial need for affordable homes to buy in the district. The need for affordable home ownership equates to approximately 165 homes per annum. Analysis of those registered with the Help to Buy agent suggests that the majority comprise smaller households with household incomes that are sufficient to access home ownership with a 50% discount on lower quartile properties achieved either as a 50% First Homes discount or 25% share via Shared Ownership. The study also notes that there are far fewer people registered with the Help to Buy agent in the district than is common in other local authorities and suggests that this may reflect a perceived lack of supply.

The Settlement Services Review helps to determine the settlement hierarchy for the Plan as set out in the spatial strategy policy. The study identifies all the recognised settlements in the District, including hamlets.

The Self Build Register Part 1 identifies that there is a need for the council to grant permission for sufficient land for a further 26 self and custom build plots by 30<sup>th</sup> October 2025 for people with a local connection to the district. There is existing demand for an six additional plots for people on Part 2 of the register who do not have a local connection. Registration is open to anyone who wishes to self-build. New registrations to Part 1 of the register are approximately 15 households per annum which suggests that there is an ongoing need for plots for people with local connections to the district. Analysis of registrants suggests that plots are sought primarily in the rural north of the District.

The 2023 Economic Needs Assessment recommends at R5, Paragraph 9.3.17 that flexibility in the rural economy should be supported to respond to opportunities to use land and buildings previously in agricultural use for industrial or office



employment. The ENA notes that Lewes has a relatively large agricultural sector, which is forecast to decline slightly in size over the new Local Plan period which could bring opportunities for diversification of use of land and buildings currently in agricultural use. The rural economy in Lewes district could provide significant economic opportunities for local people.

## **What you have told us so far**

Respondents to the Issues and Options consultation were generally in support of achieving high levels of affordable housing in the district with some respondents supporting only the delivery of affordable housing over the plan period. Industry respondents noted that an evidence based approach to affordable housing was needed, with due regard to scheme viability.

Rural exception sites were supported as a means of addressing very high levels of affordable housing need in rural areas but there was less support for including First Homes exception sites within the policy. This was in part due to the likelihood of government guidance changes and in part due First Homes only delivering discounted market housing that may not be affordable to residents, rather than the rented and shared ownership tenures that residents need.

## **Alternatives considered and reasons for discounting**

### **Policy Option to Omit First Homes Exception Sites from the Policy**

This is not the preferred option because it would allow First Home Exception Sites to come forward with a discount of 30%. The LHNA concludes that, for First Homes to be affordable to those in need of affordable home ownership products in the district, a discount of 50% on market prices would be needed. The First Homes Guidance states that local authorities are only able to stipulate a discount of greater than 30% on market prices through the plan making process. In order to ensure that any First Homes Exception Sites that may come forward meet the needs of the district, the preferred approach is to include the required discount within the policy.

### **Widen Exception Policy for Rural Workers to all Live/Work Businesses**

This is not the preferred option because there is not necessarily an operational need for all rural businesses to have residential accommodation on site and national policy requires that the development of isolated homes in the countryside should be avoided.

### **Define Exceptional Design Criteria for Isolated Rural Homes**

This is not the preferred approach. By not including a specific policy in the plan the onus will be on applicants to prove the high architectural merit of their design in accordance with NPPF Paragraph 80e rather than the plan setting out what would be looked for in order to make an exception to the spatial strategy.

### **Rely on Market Delivery of Self Build Plots**

This is not the preferred approach because some people who desire to build their own homes will not be able to afford the cost of market delivered serviced plots. The inclusion of the policy opens a route to rural affordable home ownership to self-builders that has been successful in other areas of the country where the affordability and availability of homes in rural areas is poor.

### **Further Information**

- Topic Paper – Improving Access to Housing
- Local Housing Needs Assessment 2023
- Settlement Services and Facilities Study 2023
- Self-Build Register

### **Existing Policies in Adopted 2016 & 2020 Plans**

Local Plan Part 1 - Core Policy 1: Affordable Housing guides rural exception schemes in accordance with saved policy RES10 of the 2003 Local Plan.

Local Plan Part 2 - Policy DM1: Planning Boundary

Local Plan Part 2 - Rural Exception Sites

Local Plan Part 2 - Accommodation for Agricultural and Other Rural Workers

## Policy H6: Making Best Use of Existing Rural Buildings

### Objectives

This policy will set out the approach to the conversion of existing rural buildings for residential purposes and residential redevelopment that will be acceptable in the countryside, outside of defined settlement boundaries.

### Preferred Policy Direction

New residential development will be generally restricted in the countryside, outside of defined settlement boundaries. There will be some circumstances under which the conversion of existing buildings to a residential use will be acceptable and it is proposed that these are broadly carried forward from the Lewes Local Plan Part 2 2020.

Replacement dwellings in the countryside will only be permitted where a replacement dwelling is not substantively larger than the one it replaces and adheres to the design principles set out in the plan. The replacement of caravans, mobile or park homes with permanent dwellings will not generally be permitted.

There are some circumstances where existing rural buildings used for agriculture purposes may be converted to residential use under permitted development Class Q. The policy will guide those conversions which need planning consent.

- For residential conversions in the countryside, the change of use and adaptation of redundant or disused buildings to residential use will be supported where:
- the buildings are unsuitable for employment use, or it is demonstrated through marketing of the property that there is no demand for their development for employment use,
- the proposed development could be achieved without prejudice to any viable agricultural operations;
- the buildings are structurally sound and are of permanent construction, demonstrated through the submission of a structural survey;
- the applicant can demonstrate that access to a district centre, rural service centre or service village is achievable by walking or using public transport (locations within 800m of a bus stop).
- the creation of a residential curtilage can be achieved that enhances the rural setting and responds sensitively to the rural character of the surrounding landscape, particularly through appropriate boundary treatment. The removal of existing structures and features that detract from the rural character and identity of the locality will be supported.

## **Why is this policy needed?**

Paragraph 80 of the NPPF requires that planning policies avoid the development of isolated homes in the countryside unless the development would re-use redundant or disused buildings and enhance its immediate setting or the development would involve the subdivision of an existing residential building. Paragraph 84 of the NPPF requires that planning policies should enable the sustainable growth and expansion of all types of business in rural areas through conversion of existing buildings.

The 2023 Economic Needs Assessment recommends at Paragraph 9.3.17 that flexibility in the rural economy should be supported to respond to opportunities to use land and buildings previously in agricultural use for industrial or office employment.

The 2023 Landscape Character Assessment identifies five different landscape types in the area of the district to the north of the South Downs National Park. The dominant landscape character type identified is that of Western Low Weald which exhibits a highly rural and tranquil character due to the land use and the enclosure from mature vegetation, with localised references to villages via church towers. Other landscape character types are more localised in extent and include Eastern Low Weald to the east, Scarp Footslope bordering the national park, Ouse Catchment bordering the River Ouse, and an area of Heathland to the northwest.

The Landscape Sensitivity Assessment will consider the impacts of development on the Landscape Character.

## **What you have told us so far**

There was general support for policy approaches that make best use of brownfield and redevelopment opportunities by respondents to the Issues and Options consultation. There was some support for supporting farm diversification through use of redundant rural buildings for economic use including for tourist accommodation but also for using redundant rural buildings for residential development. There was general support for policy approaches that maintain the character of the countryside landscape allied to some limited support for the protection of open countryside with design control that ensure that a rural, open feeling is maintained and environmentally and locally sensitive designs are used.

## **Alternatives considered and reasons for discounting**

### **Option to not include a policy**

This approach is not considered a reasonable alternative as proposals for conversion of rural buildings would revert to Paragraph 80 of the NPPF. This could lead to derelict buildings being bought back into use for residential purposes and would not necessarily reflect the ENA recommendations that the conversion of existing agricultural buildings to industrial or office use should be prioritised over residential conversion.

### **Option to Set Out Landscape Considerations in the Policy**

This is not the preferred policy because the approach taken in the plan is that detailed design considerations, including those for reflecting landscape character, are more appropriately contained within the suite of design policies.

### **Option not to include a public transport restriction**

This is not the preferred policy approach because the development of homes in isolated rural locations would be contrary to the spatial strategy and is likely to make access to goods and services difficult for the future occupants of the property.

### **Further Information**

- Topic Paper – Improving Access to Housing

### **Existing Policies in Adopted 2016 & 2020 Plans**

Local Plan Part 2 - Policy DM4: Residential Conversions in the Countryside

Local Plan Part 2 - Policy DM5: Replacement Dwellings in the Countryside

Local Plan Part 2 - Policy DM27: Landscape Design

## **Policy H7: Making Best Use of the Existing Housing Stock**

### **Objectives**

This policy will set out the circumstances where it will be acceptable for existing residential plots or buildings to be developed to increase the number of homes on the site. It will guide the subdivision and extension of existing homes.

### **Preferred Policy Direction**

The policy will continue the approach of the adopted Lewes Local Plan by supporting the subdivision of existing residential plots within settlement boundaries that increase the number of homes on site. The policy will support the provision of replacement homes where this will increase the number of homes on the site. Subdivision of larger homes into smaller homes for single households and multiple household shared homes will also be supported. The net loss of existing homes through development will be resisted unless the loss would result in substantial improvements to the quality of residential accommodation provided.

The policy will set out a restriction on substantially increasing the size of smaller homes to ensure that the stock of smaller homes is not eroded. This will limit the increase to 30% of the existing floorspace. The size of smaller homes will be defined as those of 90m<sup>2</sup> or less at the time of application. The cumulative floorspace added to the property by previous extensions will also be considered by the decision maker. Evidence based proposals for the provision of residential extensions to accommodate an elderly or disabled dependent will be supported in accordance with Policy H4.

Intensification of residential development will be subject to the suite of design policies that reference a range of factors including potential harm to local character, occupier and neighbour amenity, trees, heritage and biodiversity.

### **Why is this policy needed?**

The NPPF at Paragraph 62, requires that the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies.

NPPF Paragraph 119 requires planning policies to promote an effective use of land in meeting the need for homes in a way that makes as much use as possible of previously developed land, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Paragraph 120(c) states that planning policies should give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs.

Section 5 of the LHNA has found that there will be a need for the proportion of two-bedroom homes in the district to increase over the plan period. The anticipated need is expected to be more pronounced in the Low Weald where the dwelling stock is dominated by larger dwellings. The LHNA also anticipates that an increase in one-bedroom homes is needed.

Section 7 of LHNA notes that households with lower quartile incomes are only able to afford the market rent of a single lower quartile room and that the supply of these lower priced properties is very limited.

### **What you have told us so far**

Respondents to the Issues and Options Consultation were generally in support of policy approaches that prioritise or make best use of brownfield land. This included some support for the provision of low rise apartment blocks and smaller properties that may suit older persons looking to downsize. There was some limited support for increasing the supply of shared housing to allow young people access to independent living, with recognition that the creation of smaller, cheaper one and two bedroom properties would also help younger people to access suitable homes. Respondents also commented on the need for study space to accommodate home workers. There was some very limited support for allowing substantial extensions to smaller properties as a way of allowing those with limited budgets to access larger homes.

### **Alternatives considered and reasons for discounting**

#### **Option to take a design led approach to subdivision and intensification**

This is not the preferred approach because intensification of existing residential sites provides scope for providing more housing in the most sustainable locations within existing built up areas. The very limited supply of brownfield land in the plan area means that there is a need to make the best use of all opportunities to increase the supply of homes. The inclusion of a housing policy that sets a clear indication that the subdivision and intensification of existing residential plots is supported, means that schemes for this type of development can be enhanced with regard to the design policies set out in the plan, making both application and decision making processes more straight forward.

#### **Option to limit the development of Homes in Multiple Occupation (HMO)**

This is not the preferred approach because there are no significant concentrations of licenced HMO accommodation within the plan area and very few licenced HMO overall within the district.

#### **Options for the threshold size of home for which substantial increases will be limited and appropriate level of increase.**

Policy H7 seeks to support the supply of two bedroom homes by retaining existing two bedroom homes as such. Permitted development means that there is substantial scope for home owners to increase the size of their homes without recourse to the development management system. This includes the creation of single storey rear and side extensions and modest loft conversions. However, there is limited scope for additional upstairs bedrooms to be created via two storey extensions without requiring planning consent. The preferred policy approach would mean that householder applications to substantially increase the size of smaller homes could be refused planning permission. The intention is that smaller homes would be retained in the housing stock, an approach that has been successfully adopted within the South Downs National Park. The preferred policy approach sets the threshold for the application of the policy at 90m<sup>2</sup>. This would mean that homes of up to 90m<sup>2</sup> would only be able to increase the floorspace of the dwelling by a limited proportion where planning permission is required. Setting the threshold at 90m<sup>2</sup> is considered to be the most appropriate value as it is most likely to impact on two bedroom homes within the plan area. A lower threshold is less likely to capture smaller bungalows which would mean that substantial extensions to them could make them less suitable for smaller, elderly households. A higher threshold is more likely to capture three bedroom homes, which the LHNA advises will still be needed within the housing stock.

The limit of a 30% increase to smaller homes has been set with reference to the Nationally Described Space Standards. The choice of a 30% increase would therefore permit a modest two storey extension with a footprint sufficient to accommodate a generous single bedroom on the first floor for dwellings of 60m<sup>2</sup> to 90m<sup>2</sup> and would accommodate a modest double bedroom on the first floor of dwellings of 80m<sup>2</sup> to 90m<sup>2</sup>. This approach supports the need for three bedroom homes in the housing stock.

### **Further Information**

- Topic Paper – Improving Access to Housing

### **Existing Policies in Adopted 2016 & 2020 Plans**

Local Plan Part 1 - Core Policy 11: Built and Historic Environment and High Quality Design

Local Plan Part 2 - Policy DM8: Residential Sub-Divisions and Shared Housing

Local Plan Part 2 - Policy DM25: Design

Local Plan Part 2 - Policy DM28: Residential Extensions

Local Plan Part 2 - Policy DM30: Back land Development

### **Policy H8: Accommodation for Gypsies, Travellers and Travelling Showpeople**



## Objectives

This policy will allocate sites for Gypsies and Traveller accommodation and set out the criteria against which permission for new sites will be determined.

## Preferred Policy Direction

The policy will seek to allocate land for five pitches for ethnic Gypsies and Travellers.

The submission of sites to accommodate the need for pitches or for transit accommodation is invited through the consultation. Should no suitable sites be identified through the call for sites process, the policy will require that sites providing 100 or more homes contribute to the provision of accommodation for Gypsies and Travellers.

The policy will set out criteria against which planning applications for Gypsy, Traveller and Travelling Show Person Accommodation will be determined. The criteria are drawn from the existing adopted policy but have been modified to reflect the other proposed policies. The following criteria are expected to be satisfied by applications:

- The capacity of the site or extensions to existing sites, can be demonstrated to meet a need for further Gypsy, Traveller or Travelling Showperson accommodation, and is of a sufficient size to accommodate the needs of the intended occupants.
- The site is not subject to absolute barriers to development such as flooding, poor drainage, poor ground stability or proximity to other hazardous land uses where residential development would not be considered appropriate.
- The site has safe and satisfactory vehicular and pedestrian access to the surrounding principal highway network and is large enough to enable vehicle movements, parking and servicing to take place.
- The site can be provided with safe drinking water, sewage treatment, waste disposal facilities and electricity.
- The proposal will be sensitively designed to give privacy to the occupants, minimise impacts on the amenity of neighbouring properties and visual impacts on the surrounding landscape.

Proposals that would lead to a loss of accommodation for Gypsies and Travellers will be resisted unless it can be demonstrated that suitable alternative accommodation is to be provided or that a need for such accommodation no longer exists in the plan area.

## Why is this policy needed?

**What is required by legislation from the Local Plan?**

## **Humans Rights Act 1998 and the Equalities Act 2010**

The Human Rights Act 1998 and Equalities Act 2010 protect Gypsies and Travellers' cultural and ethnic way of life, including living in a caravan. This relates to all those who are ethnically recognised as Gypsies and Travellers and includes Romany Gypsies and Irish Travellers.

## **Planning Policy for Traveller Sites (PPTS), August 2015**

Gypsies and Travellers are defined by the PPTS as:

“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, but excluding members of an organised group of travelling showpeople or circus people travelling together as such.”

In determining whether persons are “gypsies and travellers” for the purposes of the PPTS, consideration should be given to the following issues among other relevant matters:

- a) whether they previously led a nomadic habit of life
- b) the reasons for ceasing their nomadic habit of life
- c) whether there is an intention of living a nomadic habit of life in the future, and if so, how soon and in what circumstances.

While the PPTS excludes those who have ceased to travel permanently as being Gypsies and Travellers for planning purposes, it does not state how the planning definition should be interpreted in relation to other factors, such as whether families travel for economic or work purposes.

Travelling Show People are defined by the PPTS as:

“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, but excludes Gypsies and Travellers.”

The PPTS emphasises the need for local authorities to use evidence to plan positively and manage development and requires local authorities to identify the accommodation needs of Gypsies, Travellers and Travelling Showpeople who accord with the planning definition.

The East Sussex Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment (GTAA) (May 2022) recommends that the East Sussex authorities plan to meet the PPTS figure for the required number of pitches and plots and view the “ethnic” need as an indication of the level of need that is likely to be required to meet the needs of all of the Gypsies and Travellers in the area.

The accommodation needs were assessed using both secondary data and primary consultation with Gypsies and travellers, those that work with Gypsies and Travellers and site owners and managers. The accommodation assessment found 3 permanent pitches were occupied in the plan area and that a further 3 pitches were required for Gypsies and Travellers that meet the ethnic definition, are currently housed in the traditional bricks and mortar housing stock but have an aversion to living in such accommodation due to their ethnic origin.

The study then applies an annual growth rate to the identified population of 3.25% per annum, which it considers appropriate and likely to continue during the period 2026 to 2040. This results in a need for a further 3 pitches for those that meet the PTTS definition. No further pitches are expected to be needed for those that meet the ethnic definition, but not the PTTS definition.

In total 6 pitches are required during the period 2021 to 2040. A total of 3 pitches are required for those that meet the PTTS definition. This requirement needs to be met over the period from 2026 to 2040. A further 3 pitches are needed for those that meet the ethnic definition. These will be needed during the period from 2021 to 2026 for families that are currently housed in the traditional bricks and mortar housing stock but have an aversion to living in such accommodation due to their ethnic origin. This need may be met through the allocation of sites in the plan or through the application of a criteria based policy.

### **Applications for Permanent Gypsy and Traveller Accommodation**

The East Sussex GTAA was published in May 2022 based on evidence gathered over the preceding year. Since publication of the study, one pitch for permanent accommodation for a Gypsy or Traveller family has been granted in the plan area.

### **What you have told us so far**

One respondent noted that there were no questions regarding Gypsy and Traveller accommodation in the consultation materials. One respondent noted that the site allocated by policy GT01: Land South of the Plough had previously been found unsuitable for general development.

### **Alternatives considered and reasons for discounting**

#### **Seek to allocate sites for those that meet the PTTS definition only.**

The council has a duty to assess the need for sites for accommodation for Gypsies and Travellers in accordance with the PTTS definition. However there still exist members of the travelling community who are currently unsuitable accommodated that meet the ethnic definition of Gypsies and Travellers as set out in the Equalities Act. NPPF Paragraph 60 requires that “the needs of groups with specific housing requirements are addressed”. At present, no sites suitable to accommodate Gypsies

and Travellers have been submitted for consideration by the plan. One pitch has been granted permission over the plan period. A further call for sites may bring forward a site that is capable of accommodating the five further pitches which are expected to be needed to accommodate all those who meet the ethnic definition.

The preferred approach is to accommodate all those who meet the ethnic definition through the allocation of suitable sites. Should this not be possible to achieve, a requirement for strategic sites to make land available within the development to meet the needs of those Gypsies and Travellers who meet the PTTS definition will be sought; the criteria based policy will be used to support the accommodation needs of those who meet the ethnic definition.

### **Rely on provision through a criteria based policy**

This is not the preferred approach as the council need to make sufficient land available to meet the needs of those Gypsies and Travellers that meet the PTTS definition. This requires that sufficient land for two pitches for Gypsies and Travellers is identified. The GTAA does not identify a need for plots for Travelling Show People and as such a criteria based policy is considered sufficient.

### **Further Information**

- Topic Paper – Improving Access to Housing
- The East Sussex Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment 2022

### **Existing Policies in Adopted 2016 & 2020 Plans**

Local Plan Part 1 - Core Policy 3: Gypsy and Traveller Accommodation

Local Plan Part 2 - Policy GT01: Land south of the Plough

## Theme: Economy and Regeneration

**Aim: To promote a prosperous local economy and building community wealth through regeneration of the coastal towns and support for the rural economy**

The new Local Plan has an important role to play helping to stimulate and maintain a prosperous and balanced local economy that keeps the wealth generated within the district. It will need to provide policies that ensure sufficient quality and quantity of sites and premises for businesses and other uses to provide local employment for local communities, which will help to reduce unsustainable commuting in and out of the district. It should also encourage 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, which will help to address the pockets of socio-economic deprivation, particularly along the coast.

The Economy and Regeneration theme will support and encourage local economic development by identifying key locations for improving the quality of employment floorspace (with a particular emphasis on office and industrial uses), protecting well-functioning existing employment sites from other competing uses, encouraging the growth of the rural economy and tourism, and supporting the expansion and modernisation of Newhaven port. It also seeks to maintain and enhance the vitality of town and district centres.

### Which Policies Are We Proposing?

- E1: Meeting Economic Needs
- E2: Newhaven Town
- E3: Newhaven Port
- E4: Local Labour Agreements
- E5: Rural Employment
- E6: Retail and Town Centres
- E7: Visitor Economy
- E8: Equestrian Development

### Consultation Questions for the Economy and Regeneration Theme

- Are there any further policies you would like to see included to meet economic and regeneration needs? Why do you think they should they be included?
- Do you agree with the policy direction for employment and economic development? What other issues should the policy consider?
- Do you agree with our policy direction relating to retail and leisure? If not, what would you change and why?

## Strategic Policy E1: Meeting Economic Needs

### Objectives

The Local Plan is required to identify the amount of new employment space that will be required over the plan period, and how and where this will be delivered. The Lewes District Economic Needs Assessment anticipates that there will only be a modest requirement for new additional employment floorspace to 2040, and therefore the Local Plan should concentrate on protecting and improving the quality of employment sites that already exist, with any new floorspace being provided through the intensification and redevelopment of sites within existing employment locations.

### Preferred Policy Direction

The policy will set out the requirement for approximately 4,900sqm of new office space provision over the plan period. This will be delivered through the intensification and densification of existing employment locations, particularly the mixed-use industrial estates where offices are present.

While there is a limited anticipated requirement for additional industrial floorspace over the plan period, it will be important to ensure that existing industrial floorspace in locations that are performing well is appropriately safeguarded. Therefore, the Local Plan will seek to protect employment land from loss to other uses, which include specific protection for existing, well-performing sites in the district. Where loss is proposed, it will need to be justified by evidencing that it is no longer required (by being effectively marketed, with the plan setting out what this would entail).

The following well-performing office sites in our plan area will be protected from development that would result in the loss of office floorspace or land:

- East Quay, Newhaven
- Quarry Road Industrial Estate, Newhaven
- Railway Quay, Newhaven
- Railway Road Industrial Estate, Newhaven
- Meridian and Enterprise Estates, Peacehaven
- Caburn Enterprise Centre, Ringmer
- Land adjacent to The Esplanade, South Coast Road, Peacehaven

The following well-performing industrial sites will be protected from development that would result in the loss of industrial floorspace or land:

- Denton Island, Newhaven
- Avis Way, Newhaven
- Bevan Funnell, Newhaven
- Eastside, Newhaven
- East Quay, Newhaven
- Quarry Road Industrial Estate, Newhaven

- North Quay, Newhaven
- Railway Quay, Newhaven
- Railway Road Industrial Estate, Newhaven
- Robinson Road Industrial Estate, Newhaven
- Old Cement Works, Newhaven
- Meridian and Enterprise Estates, Peacehaven
- Cradle Hill Industrial Estate, Seaford
- Caburn Enterprise Centre, Ringmer
- Blatchington Road Industrial Estate, Seaford
- Land adjacent to The Esplanade, South Coast Road, Peacehaven

### **Why is this policy needed?**

The NPPF requires that local plans promote a pattern of development that seeks to meet the development needs of their area and set out an overall strategy that makes sufficient provision for employment, retail, leisure and other commercial development. Planning policies should set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, while being flexible enough to accommodate needs not anticipated in the plan.

The Lewes District Economic Needs Assessment identifies that there will be a net additional need for up to 9,818sqm of office floorspace over the plan period, of which a portion will fall within the South Downs National Park. Lewes town is the key office location within the district accommodating 65% of the existing office provision in the district.

Subject to further duty to co-operate discussions with the South Downs National Park Authority, it has been assumed that up to 50% of the future office need will be located within the plan area. Therefore, the Local Plan should plan for the provision of an additional 4,900sqm of office floorspace over the plan period.

The Economic Needs Assessment identifies that a number of the existing employment clusters are low density and present opportunities for intensification and redevelopment to provide additional office development to meet the need for 4,900sqm of office space arising over the plan period.

Although the Economic Needs Assessment projections indicate a limited decline in industrial floorspace need over the plan period, this decline is more likely to be stronger within the SDNP part of the district, particularly considering the higher demand, low vacancy rates and higher values in locations such as Newhaven. Therefore, to ensure that there is sufficient industrial floorspace by the end of the plan period it is appropriate to ensure that existing employment locations that are performing well are safeguarded from loss.



In recent years, permitted development rights have been expanded which allows greater flexibility in changing from one use to another without the council needing to grant planning permission. As a result, employment sites within the district are under pressure for redevelopment from residential and other uses. The uncontrolled loss of employment land should be avoided, as it can jeopardise the local economy and the needs of existing and new businesses.

While the majority of the listed areas fall within the coastal towns, the Caburn Enterprise Centre in Ringmer has been included in this list as it comprises the largest employment area outside the coastal towns. It is important for Ringmer and the rural networks it services to protect the employment offer in this area. In addition, two sites in Ringmer within the Land Availability Assessment have been considered suitable for development. These sites would comprise strategic level development if allocated and become part of the growth strategy for the district. A separate strategic policy for Ringmer may be required to ensure infrastructure and employment opportunities are suitably planned for.

### **What you have told us so far**

Section 5 of the Issues and Options Consultation contained questions relating to the economy and regeneration. In addition, the topic of economy and regeneration was addressed by respondents in other areas of the consultation.

Respondents supported optimising existing employment sites, whether that be promoting the use of vacant sites or intensifying existing provision in the first instance. In addition, there was support for the rural economy and ensuring rural jobs are protected.

### **Alternatives considered and reasons for discounting**

No policy, allow employment land to be changed to other uses without restriction – This is not the preferred approach, as it is considered there is an evidenced need to protect employment sites.

### **Further Information**

- Topic Paper – Economy and Regeneration
- Lewes District Economic Needs Assessment (2023)

### **Existing Policies in Adopted 2016 & 2020 Plans**

Local Plan Part 1 – Spatial Policy 1: Provision of housing and employment land  
Local Plan Part 1 – Core Policy 4: Encouraging Economic Development and Regeneration



## **Strategic Policy E2: Newhaven Town**

### **Objectives**

This policy will support the regeneration of Newhaven as a key strategic asset for the local economy. It will support the wide range of investment that is being made in the town, including through the Future High Street Fund, the Levelling Up Fund and the Town Deal. This will include enhancing the provision of high-quality employment space and encouraging opportunities to revitalise the town centre to make Newhaven an attractive location for business and support a sustainable economy.

### **Preferred Policy Direction**

The policy will support the intensification and densification of existing sites within the Newhaven Enterprise Zone that provides opportunities for provision of employment floorspace and supports economic growth within the area. The policy would particularly support the redevelopment of existing sites to provide employment space that replaces ageing and poorly maintained buildings with high quality floorspace that meets modern standards, including transition to net zero.

The policy will support employment development that provides a mix of employment floorspace including the provision of small and medium sized, flexible floorspace, start-up business space to support the town's key employment sectors and help build community wealth.

The policy will resist the loss of existing employment space within the Newhaven Enterprise Zone to residential use, which will work alongside new and updated Article 4 Directions covering the area that removed relevant permitted development rights.

The policy will also reflect the Newhaven Neighbourhood Plan ambition for the regeneration of Eastside to promote a range of new employment opportunities, alongside a variety of housing types and tenures, education and leisure uses set within a high-quality environment.

The policy will require new development to demonstrate that it would not have a significant adverse impact on the operation of local highway network or on the air quality within the Newhaven Air Quality Management Area.

### **Why is this policy needed?**

The NPPF is clear that planning policies should help create the conditions in which businesses can invest, expand and adapt, and should set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration.

Newhaven is identified as a priority employment growth location in a number of strategic economic plans and strategies. Significant ambition for growth associated with the Newhaven Enterprise Zone is set out in a number of Lewes District Council reports, including the Newhaven Enterprise Zone Strategic Framework (2018), Newhaven EZ Implementation & Investment Plan (2017), and more recently Newhaven Unleashed Newhaven Enterprise Business Plan 2023-2026.

The Lewes District Economic Needs Assessment identifies that Newhaven is a key location for the provision of employment space, with almost half (46%) of the industrial floorspace in Lewes District located within Newhaven. Office space in Newhaven is generally found within mixed-use industrial estates, and within the town centre.

The Economic Needs Assessment identifies 12 employment clusters within Newhaven, including sites across Newhaven Enterprise Zone, local plan allocated employment sites, and several industrial sites outside of the Enterprise Zone, comprising 110.1 hectare of land.

Although there is projected to be a slight decline in industrial floorspace across the district, the Newhaven Enterprise Zone drives higher demand in the town and has a strong existing industrial market as evidenced by market signals showing very low rates of vacancy across existing space. There could also be greater demand in Newhaven over and above that projected as a result of potential overspill effect from Brighton. Therefore, provision of new employment space within Newhaven should be supported through the densification and redevelopment of sites within existing industrial locations within the town, which will further enhance rental values and quality of accommodation and attract new business to the town.

Newhaven Enterprise Zone Employment Property Market Report 2022 identified a number of sites and locations with potential for commercial property development or refurbishment, and the Local Plan should support opportunities for employment development of these sites. The Economic Needs Assessment also notes that in Newhaven there is a concentration of employment sites built out to low densities with large areas of landscaping, which could be well suited to accommodate future growth through intensification and densification.

Continual changes to permitted development rights over recent years mean that previous Article 4 Directions that remove permitted development rights to protect employment space from being lost to residential use within the Enterprise Zone may no longer be effective. The effectiveness of the Article 4 Directions will need to be reviewed and where necessary updated, and alongside this the policy will need to seek to resist loss of employment space and set out strict criteria when alternative uses might be appropriate.

There are a number of large-scale grant funded projects that will deliver real change for Newhaven, and it is important that any future opportunities to secure grant funding are supported by the Local Plan. The projects currently being delivered in Newhaven have secured funding from the Town Deal, Future High Streets Fund and the Levelling Up Fund.

An Air Quality Management Area (AQMA) is in operation in Newhaven town centre, where most of the air pollution is generated by traffic. Development proposals in Newhaven will be required to demonstrate that they do not have an adverse impact on air quality, or an adverse impact on southern access junctions of the Newhaven Ring Road (A259) in that they would be at or above their operating capacity.

### **What you have told us so far**

Many respondents to the Issues and Options consultation emphasised the good work that has been ongoing in transforming Newhaven and that development that supports this should continue. There was support for greater emphasis on employment development in Newhaven and promotion of the importance of the Newhaven Enterprise Zone in the regeneration of the town.

There were also a mix of views on whether the focus of the provision of new employment space should be within towns or countryside, although many respondents were keen that new space be focused on locations that have existing provision and brownfield site opportunities, and where there is good access via public transport.

Respondents suggested that the focus of protecting employment space should be in towns and established employment locations such as Newhaven, and there should be particular restrictions applied to converting commercial space to residential, while also encouraging a mix of different uses within town centres. Some respondents suggested that Covid-19 has changed demand for employment space, and there is no longer the need for continuing levels of provision.

### **Alternatives considered and reasons for discounting**

#### ***No policy for Newhaven***

Not providing a policy for economic development in Newhaven is not the preferred option as it would not support priorities for the regeneration of the town and would be inconsistent with the council's approach to supporting the Newhaven Enterprise Zone and the funding that has been given to Newhaven.

### **Further Information**

- Topic Paper – Economy and Regeneration
- Lewes District Economic Needs Assessment (2023)
- Newhaven Unleashed: Newhaven Enterprise Zone Business Plan 2023 – 2026

## **Existing Policies in Adopted 2016 & 2020 Plans**

Local Plan Part 1 – Spatial Policy 1: Provision of housing and employment land

Local Plan Part 1 – Core Policy 4: Encouraging Economic Development and Regeneration

Local Plan Part 2 – Policy E1: Land at East Quay, Newhaven Port

## **Existing Policies Newhaven Neighbourhood Plan**

Policy TC1 – Regeneration of the Town Centre

Policy E1 – Land around Avis Way

Policy E2 – Denton Island

Policy ES1 – The Regeneration of Eastside

## Policy E3: Newhaven Port

### Objectives

This policy will support the expansion, diversification and intensification of Newhaven Port for freight and passengers, including the use of existing vacant land identified in [Local Plan Part 2](#) and maximising the use of the railhead at South Quay, and the delivery of appropriate HGV parking and driver welfare facilities. The policy will continue to allocate land as per [the allocation in Local Plan Part 2 at East Quay](#) for employment uses that support the operations at the port, subject to appropriate environment assessment and measures to mitigate potential adverse impacts from development.

### Preferred Policy Direction

The policy will support proposals that diversify employment uses on the site, maximise the use of existing operations and land already in use through revised internal layout and modernisation, including the number of available berths for cargo and roll-on and roll-off (passenger cars and goods vehicles) movements.

The policy will also support proposals that maximise the use of the railhead and extend the rail sidings at the South Quay to support greater quantities of freight by rail and overall increased modal shift in the freight sector and support the delivery of HGV parking and welfare facilities that are complementary to the operations at the port.

The policy will continue to protect the land at East Quay as allocated in [Policy E1 of the Local Plan Part 2 \(2020\)](#) to support the expansion of the port, subject to appropriate measures to mitigate against potential adverse impacts of the development including:

- loss or damage to the nature conservation interest of the site, which would need to be mitigated to achieve a net gain in biodiversity.
- adverse impact on the setting of the South Downs National Park.
- impacts on the setting of the Newhaven Fort Scheduled Monument and the Tide Mills Archaeological Notification Area.

### Why is this policy needed?

Newhaven Port is well-located to serve the needs of both the local area, as well as the wider south-east of England. The presence of road and rail access is of great advantage to the port area, allowing the port to attract the wide variety of businesses located there. The ferry service between Dieppe and Newhaven is an attractive option for freight users, as well as passengers. The ferry link also helps to facilitate economic activity and industry both in East Sussex as well as in northern France and is a key strategic corridor in part due to being the most direct sailing connecting London, Newhaven, Dieppe and Paris. These factors, along with land availability and

a lack of surrounding housing or other developments that would further limit the uses port land can be put to, offer Newhaven advantages over other ports located within the region.

Newhaven Port is a key strategic asset both for the district and the wider region, and the continued growth of Newhaven is recognised as important in strategic economic plans and strategies. 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. A freight assessment of Newhaven Port was undertaken in November 2022 which included an analysis of past, present and future activity at Newhaven Port with respect to freight and logistics operations. The results of the forecasting exercise with regard to throughput of cargo by sea between 2015 and 2043 show that only moderate growth is possible based on the existing infrastructure at Newhaven Port.

However, the study outlines future opportunities for Newhaven Port, which relate to recent developments including the construction of the McKinley Way access route and additional roads which provide the primary routes to the Port and railhead which may facilitate modal shift of freight. These opportunities are summarised as follows:

- Opening of the port access road: the McKinley Way access route is described as creating direct access to employment and businesses locally, creating direct access to allocated development land potentially opening up 80,000sqm of business space, potentially facilitating creation of new jobs, relieving traffic on neighbouring residential areas, and enabling easier movement between the Ferry Terminal and Border Control Post.
- Opening of new railhead: the new railhead currently used by Brett Aggregates facilitates modal shift to rail (in light of 76% reduction in carbon emissions per tonne of freight compared to road).
- Key markets and growth: intermodal freight to and from ports and construction were the largest rail freight sectors in 2016/2017 and are anticipated to remain so to 2043/44. Bulk cargoes (pertaining especially to construction sector) are identified as the most economically viable commodities to be transported using rail at the port.
- Potential new markets for freight: consideration may be given, in the context of anticipated growth, to new sectors not currently related to rail activity at Newhaven Port including delivery of consumer goods, express parcel deliveries, and utilisation of passenger stations. Although stakeholders consider higher volumes of existing commodities to represent the greatest potential for growth.

## **What you have told us so far**

No comments were received in response to the Issues and Options consultation regarding the expansion, intensification and safeguarding of the Port. A haulier

stakeholder engagement task was undertaken to inform the Newhaven Port Freight Study to gauge opinions of hauliers who utilise the Newhaven-Dieppe route with regard to potential future developments. Overall, the study identified:

- Firms were looking to retain or increase their use of the route, hauliers use other routes, particularly to return to continental Europe.
- Reduced travel times and mileage from Spain and Portugal are benefits.
- Lorry parking in the vicinity of Newhaven is a key issue although this does not altogether prevent respondents from using the port.
- Hauliers would like to see early morning crossings to the UK throughout the year.

It is clear from the stakeholder engagement in particular that the growth of Newhaven Port is restricted by the lack of available land for expansion. This is reinforced by the high occupancy rate of port land, and the fact that businesses located at the port are making use of all land available to them to conduct their activities. It is therefore especially important that land that was identified in Local Plan Part 2 for employment uses associated with Newhaven Port and is both safeguarded and developed to allow the port to develop and grow.

## **Alternatives considered and reasons for discounting**

### ***No policy for Newhaven Port***

Not providing a policy for Newhaven Port is not the preferred option as it would not provide a framework for the expansion, diversification and intensification of Newhaven Port for freight and passengers, which is a key part of the local economy.

## **Further Information**

- Topic Paper – Economy and Regeneration
- Lewes District Economic Needs Assessment (2023)
- Newhaven Port Freight Assessment (AECOM, November 2022)
- East Sussex, South Downs and Brighton & Hove Waste and Minerals Local Plan

## **Existing Policies in Adopted 2016 & 2020 Plans**

Local Plan Part 1 – Spatial Policy 1: Provision of housing and employment land

Local Plan Part 1 – Core Policy 4: Encouraging Economic Development and Regeneration

Local Plan Part 2 – Policy E1: Land at East Quay, Newhaven Port



## **Policy E4: Local Labour Agreements**

### **Objectives**

This policy will set out how development can help to build community wealth by increasing local employment and training opportunities to redirect wealth back into the local economy. This will be done through ensuring that local labour agreements are secured from new residential and commercial development.

### **Preferred Policy Direction**

The policy will seek to support development that can demonstrate its contribution to building community wealth and fair work by offering employment and training opportunities to local people and small and medium enterprises within the district.

The policy will set out how local labour agreements will help to secure local employment at all stages of development with a focus on the operational phase and creation opportunity for local small and medium enterprises (SMEs). Local labour agreements will also assist in education, training and skills initiatives for local people and SMEs.

The policy will seek a local labour agreement require residential developments of 50 homes or more, and commercial developments that provide 1,000sqm additional floorspace or would create 25 or more new full-time equivalent jobs to ensure that local employment and training measures are provided as part of development proposals, with the objective of improving employment, training and skills to support the local economy.

For residential development the requirement will apply to the construction phase. For commercial developments the requirement will apply to both construction and operational stages. Local labour agreements will be secured through Section 106 agreement.

Planning applications for development that meets the above threshold would be expected to commit to working with the council to complete an Operational Employment and Training Plan detailing deliverables and confirming a financial contribution where appropriate. Financial contributions will be used to fund the monitoring of operational employment and training plans, assist towards the co-ordination of employment, training and educational initiatives, as well as recruitment campaigns and pre-employment training for local residents to prepare candidates for vacancies generated by the development. Monies may also be used to support a Local Employment and Training Grants Programme.



## Why is this policy needed?

Creating sustainable community wealth is a focus for the council, in order to provide a people-centred approach to local economic development that redirects wealth back into the local economy, which benefits residents and local companies. Requiring local labour agreements from new development is a direct way that the local plan can help build community wealth.

The use of local labour within the construction and operational stages of development can have significant benefits for local communities by providing opportunities for small and medium-sized businesses and creating employment for local people. It also provides opportunities for the improvement of the skills and educational attainment levels of the district's labour supply; all of which helps to keep wealth generated within the local community.

The Economic Needs Assessment notes that Lewes district's unemployment rate of 4.8% is higher than both the regional (3.9%) and national (4.6%) averages, and that job density for Lewes district, which is the number of jobs in an area per resident population aged 16 to 64, is estimated at 0.77 compared to 0.86 for the South East and 0.85 for England as a whole. Approximately 60% of the workforce based in Lewes district are Lewes district residents, but there are more Lewes residents commuting out of the district to work than commuting in to work from elsewhere. The policy will help to improving access to local job opportunities for local people through the provision of local labour agreements.

Newhaven in particular is identified as an area that has higher unemployment rates than the district and is lower skilled than the surrounding region, with a lower percentage of the population with high level qualifications and over a quarter of the population having no qualifications at all. Within Newhaven, local labour agreements provided through new development as part of the Newhaven Enterprise Zone could have a significant impact.

The policy direction could be impacted by viability considerations. The Viability Assessment will consider all the requirements set out in the policies in the plan and advise whether different types of sites can realistically be developed under those requirements. The assessment will help to identify the extent to which local labour agreements can be secured so that other development requirements, such as infrastructure contributions and climate change mitigations, are able to be secured.

It is essential that sufficient local employment is available for local residents, and highly desirable that more and better quality local employment options should be available to existing residents to reduce out-commuting.

## What you have told us so far

The Issues and Options consultation asked whether there should be a blanket approach to requiring local labour agreements across the plan area, or whether it should focus on specific locations. Views were broadly split between specific area focus and local labour agreement requirements applied across the whole of the plan area, although comments supporting a specific area suggested focus on seaside towns where the levels of unemployment are likely to be highest, and particularly coastal towns. However, some respondents suggested it would be best applied to large scale allocations only.

Respondents to other parts of the Issues and Options Consultation gave support for the creation of apprenticeships and vocational training opportunities, particularly for young people. Respondents also told us that more local employment opportunities should be created in order to create a sustainable local economy reduce travel to work distances, particularly commuting by car to work locations outside of the district.

## Alternatives considered and reasons for discounting

### ***No requirement for local labour agreements***

This is not the preferred approach as the council has a strong commitment to building community wealth, and securing local labour agreements through new development is a key part of delivering this.

### ***Lower threshold for local labour agreements***

Lowering the threshold for size of development to meet local labour commitments could have an adverse impact on the delivery of small sites and discourage small and medium sized enterprises who are more likely to employ local people anyway.

### ***Option for policy to apply to Newhaven only***

Newhaven has the most significant potential to be positively impacted by this policy due to the expected levels of commercial development through regeneration and the Newhaven Enterprise Zone, in an area where employment rates and skill levels are challenged. However, restricting the policy to just Newhaven may compromise the council's community wealth building agenda across the whole district.

### ***Apply policy to specific allocations sites only***

This is not the preferred approach as this could exclude areas where the regeneration or redevelopment of significant commercial and employment could take place, such as within Newhaven Enterprise Zone.

## Further Information

- Topic Paper – Economy and Regeneration
- Sustainability in Development Technical Advice Note
- Circular Economy Technical Advice Note

- Newhaven Local Employment & Training Technical Guidance Note

### **Existing Policies in Adopted 2016 & 2020 Plans**

None

## Policy E5: Rural Employment

### Objectives

This policy will set out the approach to rural employment sites and diversification of farms.

### Preferred Policy Direction

The proposed policy direction will support proposals which enable farming operations to continue. Examples may include, but are not limited to, development that supports the local food system or diversification schemes, particularly where they are engaged in sustainable land management or renewable / low carbon energy, where they are appropriate in scale to their location and, where possible, reuse existing buildings.

Expansion proposals relating to other businesses not related to agricultural enterprise that are currently located in a rural, undefined industrial estate or employment cluster, will be expected to demonstrate that it would not be feasible to re-locate to one of the identified industrial clusters in rural areas in the first instance. These clusters are:

- Land adjacent to Clayhill Service Station, Uckfield Road, Ringmer
- Mid Sussex Business Park, Ditchling Common
- Sheffield Park
- Land at Balcombe Pit, Glynde
- Broyle Place Farm, Ringmer
- Frick Farm

### Why is this policy needed?

It is important that the plan supports rural employment sites and rural enterprises for them to continue to thrive as part of a sustainable rural living network. This may involve re-use or expansion of a site to meet a particular identified need or to enable the site to support the needs of the existing business.

Policies are usually restrictive to new development in the countryside, but supporting certain uses is necessary to support the rural economy. Farms and small rural industrial estates provide an important employment opportunity for people in rural areas and often provide services to local people, including supporting the local food system in specific relation to farms. They need to be able to respond to a changing climate and funding schemes (regionally and nationally) that support their longevity. However, it is also important that diversification or expansion proposals are well founded in terms of the contribution to the rural economy and contribution to the countryside setting.

## What you have told us so far

Section 5 of the Issues and Options consultation contained questions centred on the economy and regeneration. Within that section, questions were posed directly regarding the rural economy. In addition, comments were received throughout the consultation to other questions referencing the rural economy.

The responses supported a policy approach that supports agricultural businesses and rural employment opportunities, in addition to protecting rural jobs. Furthermore, there was general support for local and market gardening and farming to produce local food and reduce food miles.

## Alternatives considered and reasons for discounting

### ***No policy***

This approach is not considered a reasonable alternative as it would lead to uncertainty as to how development proposals outside of the planning boundary in countryside locations would be considered and would not provide sufficient support to the re-use of buildings in supporting the rural economy.

### ***Increased flexibility for residential uses of rural buildings***

This is not the preferred approach. Allowing greater flexibility for residential uses of rural buildings would reduce the opportunities to support the rural economy where a rural business is already established and encourage residential development outside the planning boundary in the countryside where there is greater reliance on the private car to access everyday services.

## Further Information

- Topic Paper – Economy and Regeneration
- Lewes District Economic Needs Assessment (2023)

## Existing Policies in Adopted 2016 & 2020 Plans

Local Plan Part 1 – Core Policy 4: Economic Development & Regeneration

Local Plan Part 2 – Policy DM9: Farm Diversification

Local Plan Part 2 – Policy DM10: Employment Development in the Countryside

Local Plan Part 2 – Policy DM11: Existing Employment Sites in the Countryside

## Policy E6: Retail and Town Centres

### Objectives

This policy will cover proposals relating to retail, leisure (arts, culture and entertainment) and other town centre proposals in Lewes District, including the district, local and neighbourhood centres.

### Preferred Policy Direction

The preferred policy direction for the Lewes Local Plan is to establish a hierarchy of town centres and primary shopping areas:

- Town Centres – Seaford
- District Centres – Peacehaven (Meridian Centre) and Newhaven
- Local Centres – Peacehaven (South Coast Road/ Telscombe Cliffs), Ringmer and Newick

The Local Plan should also set out a series of policies to support the vitality of retail and town centre uses across the district:

- Revitalise high streets through retention of uses typically found within high streets, such as retail, leisure and entertainment uses. This includes encouraging development of small-scale, flexible units, to attract independent shops, leisure activities and small businesses to improve the appeal of the high street as well as allowing local communities to meet their day-to-day needs with village shops and services.
- Continue to resist the loss of town centre uses (retail, leisure, entertainment) in primary shopping areas where it would undermine existing centres' vitality or ability to serve local communities and require proposals to support the character, safety, and accessibility of existing centres and village high streets.
- Proposals for new and existing shops and related high street services should be guided towards the hierarchy of town centres and primary shopping areas in the first instance, followed by edge of centre locations. If neither of these are locations are available, then out of centre locations will be considered with a preference for those with the best accessibility to the centre.
- Ensure that large-scale developments provide a range of new shops and local services, proportionate in size for people to meet their day-to-day needs.

In addition, the council will require that both existing and proposed retail and leisure spaces are well-connected to public transport and active travel networks.

### Why is this policy needed?

Town and village centres play an important role in local communities, it is therefore important to take a positive approach to their growth, management and adaptation. The council also needs to acknowledge that retail is changing, and the centres will need to adapt. Since the adoption of LPP1, there have been significant changes to

permitted development rights, most notably the change regarding Class E use, which has reduced the control over changes between certain uses. In addition, there have been other challenges to the retail environment in the form of the COVID-19 pandemic. Local amenities not only help create local employment opportunities and provide opportunities for social interaction among residents, but they also reduce the need for local people to have to travel to access these services.

The Retail and Leisure Study 2023 recommends that a tiered retail hierarchy should be defined to reinforce and enhance the identified role of each centre, in accordance with Paragraph 86a of the NPPF. The proposed hierarchy of centres will guide proposals relating to new and existing shops and high-street related services towards centres and will help promote long term vitality of these shopping areas.

The development of small-scale, flexible units should attract independent shops and small businesses as well as encourage more leisure activities. These units will help allow the high street to adapt to the changing retail market and the way people use these centres. It is also important that rural settlements provide a range of village shops and services to allow local communities to meet their day-to-day needs. It is important that large-scale developments provide a range of new shops and local services as these facilities can help create a sense of local community and improve social cohesion and community resilience in the early stages.

## **What you have told us so far**

Section 5 of the Issues and Options Consultation contained questions related to the economy and regeneration. In addition, the topic of economy and regeneration was addressed by respondents in other areas of the consultation.

Key feedback received included support for ensuring town centres can thrive. There was support for optimising existing sites (previously developed land), whether that be through promoting the use of vacant sites or intensifying existing provision in the first instance. There was also support for ensuring flexible workspaces are provided and appropriately sized facilities to allow small and medium sized enterprises to thrive and to ensure that both new and existing workspaces are well connected and accessible via public transport and active travel modes.

## **Alternatives considered and reasons for discounting**

### ***No policy***

This is not considered a reasonable alternative as the council considers this policy is needed as the considerations for the different centres, along with the shops and services they provide are essential to supporting their long-term vitality.

## **Further Information**

- Topic Paper – Economy and Regeneration

- Lewes District Retail and Leisure Study (2023)

## **Existing Policies in Adopted 2016 & 2020 Plans**

Local Plan Part 1 – Core Policy 6: Retail and Town Centres



## **Policy E7: Visitor Economy**

### **Objectives**

This policy will state where visitor accommodation and other tourism development will be supported and how the loss or gain of new accommodation and tourism development will be managed.

### **Preferred Policy Direction**

The Local Plan will seek to encourage opportunities for the sustainable development of the visitor economy as a whole and encourage sustainable tourism proposals. Proposals, including those for tourist accommodation, will be supported where they are of a scale, type and appearance appropriate to the locality, relevant tourism economy and provide local employment. This policy will seek to protect tourism venues that represent anchors to the tourism economy.

### **Why is this policy needed?**

Within the district, there are broadly two definitive types of tourism, coastal tourism and rural tourism that are typical of their environment: coastal towns and rural areas. There are some crossovers in terms of typical attractions that are enjoyed in each environment, such as, but not limited to, arts & culture, viewfinding and heritage assets which comprise significant attractions. Focussing on each tourism area specifically, coastal tourism typically centres around the sea, beach and cliff top environments which encourage visitors engaging in watersport activities or recreational activities around those key features. Rural tourism typically centres around open countryside environments and rights of way which encourage visitors engaging in walking/ hiking/ biking, equine usage and visiting diversified farms. Tourism data demonstrates that the tourism economy continues to be a significant contributor to the overall economy of the district and therefore should be appropriately planned for and considered.

With reference to the two types of tourism within the district, coastal tourism has strong links to the Retail and Town Centres policy in terms of visitors requiring services and facilities that are often found within town centres. In relation to rural tourism, there are strong links to the Rural Employment policy in terms of the typical tourism offer surrounding diversified farms. As such, development proposals that relate to these two policies should take account of the impact those proposals may have on the tourism economy.

In terms of visitor accommodation, Airbnb and holiday apartments remain popular options for both rural and coastal tourism. Specifically for coastal tourism, hotels and beach huts are popular forms of accommodation. Specifically for rural tourism, camping is a popular form of visitor accommodation.

## What you have told us so far

Section 5 of the Issues and Options consultation contained questions centred on the economy and regeneration. Within that section, there were questions posed specifically relating to tourism.

The responses supported a policy approach that looked to preserve and enhance the intrinsic character of the district relevant to the visitor economy; including protecting green spaces, improving links to the SDNP and Low Weald AONB, enhancing the seaside offer, encouraging more tourist accommodation, supporting town and village centres. Furthermore, responses supported a more focussed approach to sustainable tourism, through improving active travel and public transport accessibility to areas involved in the visitor offer.

## Alternatives considered and reasons for discounting

### **No Policy**

This approach is not considered a reasonable alternative as the tourism economy continues to be a significant contributor the overall economy of the district and intersects with other key policies and therefore should be planned for and considered accordingly.

### **Policy controlling certain forms of visitor accommodation**

This is not the preferred approach. It is acknowledged that Airbnb and holiday homes have caused issues in other areas of the country, however at present there is no data to suggest these forms of accommodation are creating issues relating to the tourism economy in Lewes District, and as such a policy to control these forms of accommodation is not felt necessary at this stage, however this will continue to be monitored through the plan period. In relation to hotels, beach huts and camping, again there is no data to suggest there is either an oversupply or a lack of provision of these accommodation types within the district, however, this will continue to be monitored through the plan period.

## Further Information

- Topic Paper – Economy and Regeneration

## Existing Policies in Adopted 2016 & 2020 Plans

Local Plan Part 1 – Core Policy 5: The Visitor Economy

Local Plan Part 2 – Policy DM12: Caravan and Camping Sites

Local Plan Part 2 – Policy DM13: Existing Visitor Accommodation

## Policy E8: Equestrian Development

### Objectives

This policy will set out where equestrian development will be supported and how proposals for equestrian development should be managed.

### Preferred Policy Direction

The countryside, both within and adjacent to the Plan area, provides an attractive environment for horse riders and there is a good network of bridleways. Policies are usually restrictive to new development in the countryside, but supporting certain uses is necessary to support the rural economy. Equestrian development and the facilities that support equine use, comprise an important employment opportunity for people in rural areas. However, it is also important that equestrian development schemes are well founded in terms of their siting within a countryside setting.

Equestrian development and associated uses are considered part of the rural economy and therefore this policy acts as an extension to the 'Rural Employment' policy. However, equestrian facilities and development have intrinsic characteristics that need to be accounted for and clearly set out, such as:

- consider the cumulative impact of equestrian developments on landscape character, features and biodiversity;
- ensure any associated floodlighting, earthworks, new access routes or other ancillary structures, including storage facilities, manure bays, hardstanding, fencing and jumps, do not have an unacceptable adverse impact on the surrounding countryside, biodiversity or local residential amenities;
- ensure adequate provision is made for the safety and comfort of horses in terms of the size of accommodation and land for grazing and exercising;
- ensure commercial riding schools, livery stables and other commercial facilities should have satisfactory access to the public bridleway network without the use of unsuitable roads.

### Why is this policy needed?

The riding and keeping of horses are popular leisure pursuits in Lewes District and equestrian development and businesses contribute to the rural economy. These businesses that provide services to equine development include but are not limited to, livery yards, vets, farriers, saddlers, feed merchants and forage providers. The British Horse Society note that the keeping of a horse is estimated at £5548 pa per horse. Further, using this figure and information from DEFRA, they estimate that equine development and services contribute £5million pa to the economies of Lewes and Eastbourne. This figure comprises a significant contribution to the rural economy and should be planned for to support the sustainable growth and expansion of rural businesses in line with Paragraph 84 of the NPPF.

In terms of modal shift, provision for active travel intrinsically lends itself to the inclusion of equestrians, particularly in rural areas. While horse riding is not predominantly used for active travel, the British Horse Society note that equestrians often use horses in place of cars for short local journeys, which contributes to encouraging modal shift. In line with this theme, ensuring equestrian development is suitably planned for will contribute to promoting healthy communities and recreation particularly in rural areas.

## **What you have told us so far**

Section 5 of the Issues and Options consultation contained questions centred on the economy and regeneration. Within that section, questions were focussed on the rural economy as a whole but did not include specific questions around equestrian development.

The responses supported a policy approach that supports agricultural businesses and rural employment opportunities as a whole. In addition, a detailed response was received from the British Horse Society, citing the social, economic and environmental benefits of equine development to Lewes District.

## **Alternatives considered and reasons for discounting**

### ***No Policy***

This is not the preferred option as equestrian development comprises a specific form of development that if not properly planned for, can lead to negative impacts on the countryside, environment and neighbouring amenity. Developing and including an effective policy is therefore crucial to controlling these potential impacts.

## **Further Information**

- Topic Paper – Economy and Regeneration

## **Existing Policies in Adopted 2016 & 2020 Plans**

Local Plan Part 2 – Policy DM6: Equestrian Development

## Theme: Infrastructure and Community Facilities

**Aim: To ensure that that new or improved infrastructure is provided in the most effective way to keep pace with development growth in the plan area, and existing valued community facilities and services are retained.**

The timely provision of infrastructure requirements associated with the growth of new homes and jobs is critical to ensuring that the plan area is a place where people want to be – whether to live, work, study or visit. The new Local Plan will seek to protect existing community facilities and services and to ensure that new facilities are located where they are accessible, particularly for less mobile residents. It will also ensure that development is permitted only where either there is sufficient capacity in the existing local infrastructure to meet the demands arising from that development, or any necessary new or improved facilities will be provided at the time they are needed.

The Infrastructure and Community Facilities theme will require the provision of appropriate infrastructure to accommodate the needs of new development without adverse impacts on the environment. Policies in this theme will also protect community infrastructure that is important to the sustainability of local communities. It also sets out expectations for outdoor sports and food growing in new developments and identifies expectations around sustainable travel.

### Which Policies Are We Proposing?

- IC1: Infrastructure Provision
- IC2: Water Supply and Wastewater Management
- IC3: Digital Infrastructure and Communications
- IC4: Safeguarding Community Facilities
- IC5: Commercial community uses
- IC6: Outdoor Playing Space
- IC7: Local Food Infrastructure
- IC8: Sustainable transport and movement
- IC9: Parking Standards [and EVCP]
- IC10: Former Lewes to Uckfield Railway Line
- IC11: Public Rights of Way

### Consultation Questions for the Infrastructure and Community Facilities Theme

- Are there any further policies you would like to see included to meet the need for infrastructure and community facilities? Why do you think they should they be included?
- Should there be a separate policy on resisting the loss of playing pitches?

- Should a design-led policy for parking standards be progressed and included in the next version of the local plan?
- How should we seek to manage cycle hire schemes to encourage the modal shift but at the same time avoid their potential for cluttering the street scene?

## **Strategic Policy IC1: Infrastructure Provision**

### **Objectives**

The policy will set out how necessary infrastructure to support development should be delivered. New development creates additional demand for infrastructure and services, and it is reasonable for developers to address these needs in order that development is sustainable.

### **Preferred Policy Direction**

The policy will identify that land should only be permitted for development where it can be demonstrated, in liaison with service providers and statutory consultees, that 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 infrastructure or community facilities, the developer will be required to work with the relevant infrastructure providers to ensure that these improvements are provided at the time they are needed.

The policy will support the development of new infrastructure, including community facilities, in appropriate locations where there is a local need for the infrastructure, and they are in close proximity and accessible to the people they will serve.

### **Why is this policy needed?**

The NPPF identifies that all plans should align growth and infrastructure, and strategic policies should make sufficient provision for infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and community facilities (such as health, education and cultural infrastructure).

The NPPF also requires that plans should set out the contributions expected from development, including for infrastructure, although such policies should not undermine the deliverability of the plan.

We are preparing an Infrastructure Delivery Plan, which will identify the infrastructure that is needed to deliver the local plan strategy, when it is needed, and how much it would cost. We already require development to pay a Community Infrastructure Levy, which is used to help funding infrastructure improvements across the district, although development may still be required to make on-site provision or direct infrastructure improvements as part of development proposals where necessary.

The timing of infrastructure relative to the development is very important to the community, as people are concerned about pressure on existing communities. While

desirable, it is not always practicable to deliver all the planned infrastructure upfront before development starts, but a phased approach is needed so that it becomes available as the development progresses.

Further work will be required in terms of viability assessment to ensure that the level of infrastructure provision needed to support development, together with other planning policy requirements, does not undermine the deliverability of the Local Plan.

### **What you have told us so far**

Respondents to the Issues & Options consultation expressed a strong view that infrastructure should be taking into account in the local plan, and that improvements are necessary to accommodate new and additional development. This would include prioritising development in locations where there is sufficient existing infrastructure capacity.

There were a number of comments identifying areas where infrastructure provision was considered to be lacking. Respondents also commented that it is important that infrastructure is accessible to local communities to reduce reliance on the private car.

### **Alternatives considered and reasons for discounting**

#### ***No policy***

No policy is not the preferred option as this would not provide sufficient clarity regarding the requirement of developers to mitigate the impacts of their developments, what infrastructure was needed and when, and how it would be secured.

### **Further Information**

- Topic Paper – Infrastructure and Community Facilities
- Infrastructure Delivery Plan

### **Existing Policies in Adopted 2016 & 2020 Plans**

Local Plan Part 1 – Core Policy 7: Infrastructure



## Policy IC2: Water Supply and Wastewater Management

### Objectives

The policy will ensure that there is sufficient infrastructure to deal with demand for water supply and wastewater management arising from new development.

### Preferred Policy Direction

The policy will require that proposals for new development demonstrates that there are adequate water supply and wastewater treatment facilities in place to serve the whole development, or that improvements are being made to water supply and wastewater infrastructure that will be in place prior to the development being completed and occupied. The developer will be required to work with the appropriate service providers to ensure that upgrades are provided where necessary.

The policy will also support infrastructure proposals designed to increase water supply and wastewater treatment capacity subject to there being no significant adverse environmental impacts. These will be identified through the Detailed Water Cycle Study and the Infrastructure Delivery Plan.

### Why is this policy needed?

The NPPF requires that strategic policies should make sufficient provision for infrastructure, including water supply and wastewater. It states that plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for water supply, and policies should support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts.

Planning Practice Guidance states that planning policies can be used to ensure that new development and mains water and wastewater infrastructure provision is aligned and to ensure new development is phased and not occupied until the necessary works relating to water and wastewater have been carried out.

It suggests that plan-making may need to consider:

- the sufficiency and capacity of wastewater infrastructure
- the circumstances where wastewater from new development would not be expected to drain to a public sewer
- the capacity of the environment to receive effluent from development in different parts of a strategic policy-making authority's area without preventing relevant statutory objectives being met

The Water Cycle Study Scoping Report (2023) identifies that there are 14 wastewater treatment works, and that further investment will be needed in the future to increase the capacity of the wastewater treatment works to accommodate new homes and

businesses. It also identifies that climate change is expected to have an impact on wastewater treatment works especially Peacehaven Brighton and Newhaven East where there is already a very significant risk from rainfall related flooding.

Further evidence will be provided within a Detailed Water Cycle Study which will be prepared to inform the local plan. The Detailed Water Cycle Study will assess network capacity for strategic growth locations (wastewater and water supply) in liaison with Southern Water and South East Water and consider the impact on combined sewer overflow events, and also identify the likely infrastructure required to accommodate the proposed growth or identify opportunities within the water cycle to increase capacity for proposed growth without new infrastructure.

The Detailed Water Cycle Study will be required to help meet PPG recommendations that plan-making consider:

- identifying suitable sites for new or enhanced waste water and water supply infrastructure. When identifying sites it is important to recognise that water and wastewater infrastructure can have specific locational needs (and often consists of engineering works rather than new buildings). This means exceptionally otherwise protected areas may have to be considered, where this is consistent with their designation.
- existing and proposed development in the vicinity of a location under consideration for water and wastewater infrastructure. In two-tier areas there will need to be close working between the district and county councils.
- whether new development is appropriate near to sites used (or proposed) for water and wastewater infrastructure (for example, odour may be a concern).
- phasing new development so that water and wastewater infrastructure will be in place when and where needed. The impact on designated sites of importance for biodiversity should be considered to ensure the required infrastructure is in place before any environmental effects occur.

### **What you have told us so far**

Respondents to the Issues & Options consultation told us how important it is that we protect rivers and waterways, particularly from sewage and farm run-off, and support better measures to stop sewage discharges into rivers.

There is some concern about the capacity of sewage treatment systems, and that the strain on infrastructure is leading to river and sea pollution. There was also some concern about a water shortage and that water company promises about reducing leakage are unlikely to address future demand.

There was a suggestion that sewage infrastructure is a major issue in the Low Weald and should be prioritised, and in areas where housing development is to take place, there needs to be a corresponding improvement in water supply and wastewater

infrastructure. It was also suggested that access to water and wastewater facilities should be considered in Health Impact Assessment.

## **Alternatives considered and reasons for discounting**

### ***No policy***

No policy is not the preferred option as it is considered that water supply and wastewater infrastructure is an important issue that can affect the area, and we should set out this position in terms of ensuring that new development does not progress without the adequate infrastructure in place.

## **Further Information**

- Topic Paper – Infrastructure and Community Facilities
- Lewes Water Cycle Study Scoping Report (2023)
- Infrastructure Delivery Plan

## **Existing Policies in Adopted 2016 & 2020 Plans**

Local Plan Part 1 – Core Policy 7: Infrastructure

## Policy IC3: Digital Infrastructure and Communications

### Objectives

Good communications and the supporting infrastructure is central to the economy and a key component of modern day life. However, poorly designed and sited infrastructure can not only impact detrimentally on the character and appearance of heritage assets, it can also have an unacceptable level of harm on the wider area.

This policy will set the contributions from development that will be required for telecommunication and smart infrastructure in order to futureproof our economy. It will enable our communities to access services and goods through innovative 'smart technologies' as well as being connected as part of the global community.

### Preferred Policy Direction

The policy will seek to provide a clear assessment criteria and guidance to applicants about the considerations that will be expected to be considered for digital communications and infrastructure equipment.

The council will seek to work with stakeholders to secure the provision of digital infrastructure and require development proposals to take appropriate measures to enable full-fibre, or equivalent, connectivity to all end users within new development – unless for technical or viability reasons it can be demonstrated that this is not achievable. This will be sought alongside an expectation to meet the demand for mobile connectivity generated by the development.

The policy will also seek development proposals to demonstrate that the development will be 'connection-ready' on first occupation.<sup>48</sup> Where digital connectivity is already in place, then no further action will be required although mitigation measures will be expected where adverse impact from new development are identified.

Where there are spaces within our towns and villages that experience considerable levels of use by members of the public, then the policy will seek to encourage these spaces and premises to provide regular publicly accessible Wi-Fi.

Where existing equipment cannot be used, and planning permission is needed for new telecommunications equipment, such as masts and base stations, then applications will be expected to demonstrate its necessity and sympathetic design in line with national and Local Plan policies.

---

<sup>48</sup> 'Site Connectivity Statement' will be expected to be submitted as part of the application process.

## Why is this policy needed?

Infrastructure provision, as identified in national policy, is vital to all three of the overarching sustainable development objectives: economic, social and environmental. Digital infrastructure is considered essential strategic infrastructure and necessary to support more inclusive and sustainable communities, especially those living within the more isolated areas within our plan area. .

Communication infrastructure, including digital infrastructure is playing increasingly important roles in the functioning of our communities and is considered essential to sustainable economic development. The government agreed with mobile network providers to take 4G coverage to 95% of the UK landmass by 2025. In evidence to the DCMS Select Committee, it also set out its position on 5G.

Over the plan period the use and demand of digital communication is forecast to grow, and in doing so its impacts on the transport network, helping to reduce demand and/or traffic volume, especially at peak hours are expected to be significant. Digital infrastructure also has implications for physical connectivity and the transport network. While new technologies are changing the way people are working, smart technologies are supporting efficiencies within the logistics sector are in likely to have the greatest impact on Newhaven Port Freight and the wider Enterprise Zone. Homeworking is becoming an increasing feature in rural areas, which has been further accelerated as an business and industry adapts to the post Covid-19 environment.

The expansion of broadband and digital infrastructure are important to support sustainable forms of employment and will encourage the development of enterprises in the plan area. Nevertheless, access to digital networks and highspeed broadband remains inconsistent across the plan area and it is vitally important that coverage, especially of [full fibre] broadband, or equivalent, is enhanced. Digital infrastructure has the potential to provide future technologies with a platform on environmental monitoring and management, health and energy efficiency.

## What you have told us so far

Respondents to the Issues and Options consultation supported the provision of new telecommunications infrastructure from new development and that this should be for both residential and non-residential. Respondents supported this being provided on an open-access basis.

## Alternatives considered and reasons for discounting

### **No Policy**

This is not considered appropriate as it will not support delivery of digital inclusivity.

### ***Continuation of current DM Policy 32: Telecommunications Infrastructure***

This focuses on the erection of telecommunications infrastructure rather than the actual connectivity of the development.

### **Further Information**

- Topic Paper – Infrastructure and Community Facilities
- [Broadband and the road to 5G - Committees - UK Parliament](#)
- Infrastructure Delivery Plan

### **Existing Policies in Adopted 2016 & 2020 Plans**

Local Plan Part 2 - Policy DM32: Telecommunications Infrastructure

## **Policy IC4: Safeguarding Community Facilities**

### **Objectives**

The policy will seek to resist the loss of important community infrastructure that is essential to supporting strong, sustainable and inclusive communities. Community infrastructure could include community centres, village halls, youth centres, places of worship, libraries, health and education facilities, and sport and recreation facilities. It is important change and growth, is supported by a network of high-quality, accessible and effective social infrastructure, and the unnecessary loss of these facilities should be resisted.

### **Preferred Policy Direction**

The policy will set out the strong presumption that land or buildings currently used or last used for community facilities, including sport and recreational facilities, are safeguarded against loss to other uses.

The policy will be clear that the loss of a community facility would be considered acceptable only in exceptional circumstances and will set out the criteria that would need to be satisfied to justify this.

The criteria that would justify an exceptional circumstance would include:

- Where an assessment can demonstrate that the existing community use is surplus to requirements and opportunities for alternative community uses have been explored, and therefore is no realistic prospect of a continued community use.
- Where there is replacement or re-provision of community facilities of an equivalent or improved quality that is in an accessible location and that continues to meet the needs of the local community that the existing facility serves
- Where it can be demonstrated that there is some other overriding public benefit that would result from the loss of the community facility.

The involvement of the local community will be sought in identifying the importance of local community facilities by including them (where appropriate) on the statutory list of assets of community value and developing appropriate solutions for their retention and enhancement.

### **Why is this policy needed?**

NPPF indicates that Local Plans should set out a strategy for a range of uses, including provision of community facilities. The NPPF is clear that planning policies should plan positively for the provision of community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) to enhance the sustainability of communities and residential

environments and should guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs.

In relation to open space, sports and recreation building and land, including playing pitches, the NPPF states that these should not be built on unless an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.

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.

The Settlement Services Study (2023) identifies a number of types of community facility as being key services that are important for day-to-day living. This includes doctors' surgery, chemist, primary school, convenience store, post office, and community hall as key services (being accessed most regularly), and secondary school, library, public house (or restaurant), place of worship, dentist, nursery, cash point / bank, and petrol station as other important services. The Settlement Services Study concludes that the towns within the plan area have all key services available, and the majority of the village settlements of the district have reasonable levels of services and facilities and connectivity. However, more remote rural villages and hamlets have less available services and less connectivity with main towns. Therefore it is considered important that the community facilities that are available are safeguarded from loss.

The Open Space Strategy (2020) recommends that the existing amount of open space should be protected, and that both quantitative and qualitative considerations should be taken into account in determining proposals that involve loss of open space.

The council maintains a statutory list of Assets of Community Value (ACV) that have been nominated by the local community and where the criteria for inclusion has been met. This helps to identify community facilities that should be safeguarded, but does not identify all relevant community facilities – there may be other across the District that do not have ACV designation. Therefore, while ACV designation is a material planning consideration, all community facilities would need to be considered on a case-by-case basis, whether or not they have an ACV designation.



## What you have told us so far

Respondents to the Issues and Options consultation made many broad comments about community facilities, although few that were specific to the issue of safeguarding existing facilities.

The comments supported better provision and accessibility to services and amenities, including community spaces, to enhance towns and villages. They also opined that community facilities should be incorporated within the 20-minute neighbourhood concept to improve accessibility, and residents should not have to drive to access them.

A number of respondents did suggest greater protection for green spaces including playing pitches, and that there should be better support sport and recreational opportunities including local sports clubs.

## Alternatives considered and reasons for discounting

### No policy

No policy is not the preferred option as this would restrict the ability to ensure that important community facilities are protected when new development is proposed

### To have a separate policy on resisting the loss of playing pitches

Playing pitches are considered to be a type of community use and therefore would be covered by a policy that safeguards all community facilities. However, there may be additional factors that may need to be considered in relation to playing pitches, and therefore having a separate policy on resisting the loss of playing pitches could be an appropriate option.

## Further Information

- Topic Paper – Infrastructure and Community Facilities
- Lewes Open Space Strategy (2020)
- Lewes District Playing Pitch Assessment (2020)
- Lewes Local Plan Settlement Services Study (2023)
- Infrastructure Delivery Plan
- Lewes District Council [Asset of Community Value List](#)

## Existing Policies in Adopted 2016 & 2020 Plans

Local Plan Part 1 – Core Policy 7: Infrastructure

## Policy IC5: Commercial Community Uses

### Objectives

There are some commercial uses that are also key community facilities, such as small local shops and public houses, which play a key role in the sustainability of communities. However, the commercial elements of these uses mean that they may need to be treated slightly differently in policy terms than other community facilities.

The council will seek to guard against any unnecessary loss of commercial community uses, and will require proposals for their redevelopment or demolition to provide convincing evidence that there is no reasonable prospect for the building to continue its operation, or for alternative community use.

### Preferred Policy Direction

The policy will resist the loss of commercial community uses including local shops and public houses unless it can be demonstrated that:

- Opportunities to use for premises for alternative community uses (commercial or non-commercial) have been fully explored, including the use by a social enterprise or charitable group
- The commercial community use is no longer economically viable
- There has been no market interest in the building as a commercial community use or interest from local communities for the space to be used for alternative community uses over an appropriate period

In addition, the policy would set out that proposals for development that would compromise the operation or viability of the community use will be resisted.

### Why is this policy needed?

The NPPF indicates that planning policies should plan positively for the provision of community facilities, and some of the community facilities identified, such as local shops, and public houses, would be considered to be commercial community uses. The NPPF confirms that local plans should guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs.

The Use Classes Order identifies a class of uses that are important for the operation of local communities. This includes Class F2(a) use of small local shops that mostly sell essential goods where there is no other such facility within 1,000meters. The policy would be aimed at protecting such uses.

The commercial element means that they should be treated differently in policy terms of other community facilities. In order to justify the loss of a commercial community use, there should be an additional element of marketing the existing use for an appropriate period of time to demonstrate that there is no demand for the commercial

community use to continue. This is different to other community facilities where there is less likely to be a market for an alternative owner/operator.

It is also important to ensure that new development does not compromise the operation or viability of the commercial community use. For example, development within the curtilage of a public house may impact its operation, so such proposals will need to be carefully considered to ensure that it does not adversely impact the community use.

Lewes District Retail and Leisure Study (2023) identifies that local shops outside of the retail hierarchy in the District's rural areas are likely to provide an important local function and reduce the need to travel, and therefore the Local Plan Part 1 (Joint Core Strategy) policy to retain these shops should be retained and aligned with the definition of local community shop as set out in the Use Classes Order, and broadening the policy response to include other uses such as public houses, given the important local role such uses can play in supporting rural communities.

Settlement Services Study (2023) identifies a number of types of community facility as being key services that are important for day-to-day living. This includes commercial uses that are important for the sustainability of local communities such as convenience stores, post offices and public houses.

### **What you have told us so far**

Respondents to the Issues & Options consultation felt that there should be protection for village shops and convenience shops outside of town centres to ensure that all communities have access to shop, pub and community space without the need to drive. Communities should be helped to run them as co-operatives if they are seen to be under threat.

Respondents also commented that local shops and public houses are key features in promoting 20-minute neighbourhoods. It was also suggested that small village shops are more likely to source products locally, therefore reducing food miles and supporting the rural economy.

## **Alternatives considered and reasons for discounting**

### **No policy**

No policy is not the preferred option as this would restrict the ability to ensure that important commercial community uses are protected when new development is proposed

### **To include commercial community uses within the safeguarding community facilities policy**

It is considered that there are additional considerations that would need to be taken into account in a policy on commercial community uses that might not be relevant for other community facilities. For example, it would be expected that a commercial community use would be appropriately marketed before any loss is proposed, whereas for other community facilities that do not have the commercial aspect this may not be applicable. Therefore combining commercial community uses with other community facilities is not the preferred option.

### **Further Information**

- Topic Paper – Infrastructure and Community Facilities
- Lewes Settlement Services Study (2023)
- Lewes District Retail & Leisure Study (2023)

## **Existing Policies in Adopted 2016 & 2020 Plans**

Local Plan Part 1 – Core Policy 7: Infrastructure

## Policy IC6: Outdoor Playing Space

### Objectives

This policy will set out how new development should provide new and enhanced outdoor playing space, including children's play space and playing pitches, to meet the needs it generates.

### Preferred Policy Direction

Outdoor play space provision will be required to be provided by new development, appropriate to the scale and location of new development. Provision should be on-site in the first instance, however, if it is not practicable to locate the space on site, then financial contributions will be sought to improve existing, or provide new, facilities off-site.

The policy will seek to achieve provision of outdoor playing space to ensure that the following minimum quantity standards are met across the plan area:

- 0.25 ha per 1,000 population for equipped and designated children's play space
- 1.6 ha per 1,000 population for outdoor sports including playing pitches, tennis courts and bowling greens

In addition, it is the preferred option to set accessibility standards for the open space typologies.

The following minimum accessibility standards are proposed:

- 400m (5 minute walk) for equipped and designated children's play space
- 1,200m (15 minute walk) for outdoor sports

### Why is this policy needed?

The NPPF confirms that access to a network of high-quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities.

Planning Practice Guidance emphasizes that open space, which includes outdoor playing space, should be taken into account in planning for new development. In line with Government guidance, it is considered essential that adequate provision for outdoor playing space is made in association with new housing developments in order to meet the recreational needs of new residents and to avoid exacerbating existing deficiencies.

The NPPF states that planning policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision.

We commissioned an Open Space Strategy and Playing Pitch Assessment for the entirety of Lewes District, which published in 2020. This study provided recommendations for open space typologies which are reflected in the proposed policy direction above. In addition, accessibility standards have been included within the proposed policy direction as improving accessibility of facilities and amenities is a key mission of the new Local Plan, to reduce travel time, encourage walking and cycling where possible and help support the response to climate change.

## **What you have told us so far**

In response to the question in the Issues and Options consultation about whether there should be specific benchmark standards for the provision of other open spaces in addition to outdoor playing space, there were a mix of views. Some respondents suggested that there was no need for additional standards as each community will have different needs that are best addressed through neighbourhood plans, and specific standards for provision could create unforeseen consequences and result in delays and unnecessary negotiations at the planning application stage. Others supported standards for other types of space, including woodland, dog exercise areas and school playing fields. However, there was strong support for standards for playing pitches and children's play areas.

## **Alternatives considered and reasons for discounting**

### **No policy**

Not having a policy for the provision of outdoor playing space in new development is not the preferred option as it could lead to lower provision than required, which would result in deficiencies in open space across the area.

### **Alternative standards of provision**

The Open Space Strategy proposes quantity standards for open spaces based on evidence through assessment and taking into account national benchmark standards. Setting alternative standards through the policy is not the preferred option as there is no evidence to justify higher or lower standards of provision.

## **Further Information**

- Topic Paper – Infrastructure and Community Facilities
- Lewes District Open Space Strategy (2020)
- Lewes District Playing Pitch Strategy Needs Assessment (2020)

## **Existing Policies in Adopted 2016 & 2020 Plans**

Local Plan Part 2 – Policy DM15: Provision of Outdoor Playing Space

Local Plan Part 2 – Policy DM16: Children's Play Space in New Housing Development

## **Policy IC7: Local Food Infrastructure**

### **Objectives**

The policy will encourage the provision of community and horticultural food growing opportunities through new development and land use decisions in order to help encourage healthy lifestyles, enhance biodiversity and reduce food miles, which can all have positive impacts on carbon emissions. Provision of food growing in any new developments will need to be considered and integrated with other uses for outside space, for example provision of sport and play facilities and access to open space.

### **Preferred Policy Direction**

The policy will support the use of land and buildings as new allotments, orchards and for local food growing spaces and production, and other infrastructure that supports the local food system.

The provision of new community food growing space may form part of the open space provision that is required to be provided on larger residential developments. The use of existing amenity open space for food growing will be supported where it can be demonstrated that land is surplus to requirements.

The policy will expect developers to engage with district and parish councils who manage allotments to identify need for areas for food growing, taking into account any waiting lists that there may be for allotment space. New space should be provided as extensions or improvements to existing community food growing spaces, rather than creating new ones.

The policy will support the inclusion of productive trees and plants in landscaping schemes where appropriate. This could include community orchards, although these may need to be avoided where the space is close to main thoroughfares.

Outside of sites specifically allocated for development through the local plan, the policy will seek to avoid the loss of best and most versatile (BMV) agricultural land. Where developments are proposed on sites that include BMV agricultural land, opportunities for community food growing, agricultural or horticulture should be incorporated into proposals in the areas with the highest grades.

### **Why is this policy needed?**

The NPPF states that planning policies and decisions should aim to achieve healthy, inclusive and safe places which enable and support healthy lifestyles, especially where this would address identified local health and well-being needs.

Planning Practice Guidance states that local planning authorities can have a role by supporting opportunities for communities to access a wide range of healthier food production and consumption choices. It also confirms that where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality.

Using the planning system to promote food growth, and the creation of a sustainable food network, is growing in popularity. Local Plan policies can require new developments to include space for growing food and encourage the use of productive trees or other edible planting. Food producing plants can replace ornamental plants in landscape schemes without excessive cost to the developer, thereby ensuring that any outdoor amenity space required within development can be food-friendly.

The Open Space Strategy identifies that there is a current provision of 17.33 hectares of 'allotments, community gardens and city farms' across the district. It proposes that the proposed standard for provision of 'allotments, community gardens and city farms' should be 0.2 hectares per 1,000 people. This means that using the proposed standards, there is a projected deficiency in provision of 0.04 hectares per 1,000 people to 2030.

## **What you have told us so far**

The Issues & Options consultation asked a specific question about whether the local plan should introduce a policy supporting food growing. Respondents were generally supportive of such a policy, particularly if this is through the provision of allotments as a clearly demarcated area for such activities. Some comments supported comprehensive tree planting schemes to encourage food growing. Respondents were also cautious of allowing housing development on productive farming land.

## **Alternatives considered and reasons for discounting**

### **No policy**

No policy is not the preferred option because it would not encourage the provision of community food growing through new development, which can help encourage healthy lifestyles, enhance biodiversity and reduce food miles, and therefore reduce carbon emissions.

## **Further Information**

- Climate Change Topic Paper
- Lewes District Open Space Strategy (2020)

## **Existing Policies in Adopted 2016 & 2020 Plans**

Local Plan Part 1 – Core Policy 8: Green Infrastructure



## **Policy IC8: Sustainable Transport and Movement**

### **Objectives**

The integration of land use and transport, including a public transport, are essential to delivering communities that are sustainable, healthy and inclusive. This strategic policy will set out how the transport impact of development should be managed, and how new development should be connected to the transport network.

### **Preferred Policy Direction**

This policy will seek to give local effect to national policy and as such the preferred policy direction is to retain elements of the existing policy that are generally in conformity with national policy. The policy will then be amended to reflect the key transport schemes and priorities for the district once the evidence base is up to date.

The policy will seek to improve accessibility and widen transport choices through requiring, as far as possible, all new developments to be served by an attractive choice of transport modes, including public transport, cycle routes, bridleways, and footpaths. The policy not only seeks to encourage a modal shift away from the use of the private car, but in doing so promotes healthier lifestyles.

Continuing to work with partners to improve accessibility by enhancing sustainable transport opportunities, and encouraging development that reduces the need to travel behavioural change will be a key component of this policy. Future development within the district will be focussed on the most accessible and sustainable locations to reduce the need to travel.

Travel Statements demonstrating how many trips will be generated by the development, their impact and how they will be accommodated and addressed as well as maximising sustainable travel will be required from major development proposals.

To assist in meeting the objective of net zero, the policy will seek developments to be designed around the principles of 'walkable or cyclable neighbourhoods'; giving priority to people over vehicular traffic – to make journeys by walking and cycling more direct and convenient over the car.

The policy will also seek contributions to improvements to public and community transport. These are being identified and developed through the ongoing work on the Local Transport Plan 4 and other transport related evidence.

The council will only support developments that will, or are likely to, have an unacceptable level of impact on the transport network in exceptional circumstances

and will not support developments that are wholly dependent on use of the private car or promote unsustainable travel behaviour.

### **Why is this policy needed?**

Sustainable Transport is a key component of sustainable development. Both national and local planning policy promote the idea of sustainable development. Locating jobs and employment closest to new and existing residential development, as well as to services and facilities will mean that people can meet their day to day needs locally, reduce the need to travel by private car, and support Active Travel.

The current Local Plan Core Policy 13 relates to sustainable transport. This sets out the initiatives for sustainable transport improvements which will be supported by the council within the district and what improvements will be required, in particular to the road network.

Development Management policies DM35, DM36 and DM37 also relate to sustainable travel and seek to secure its delivery. DM35 sets out the approach to footpaths, cycle and bridleways; DM36 to station Parking and DM37 in relation to the Uckfield to Lewes former railway line.

Transport related emissions are one of the largest contributing source to climate change, as well as having an impact on the quality of the environment. An Air Quality Management Quality is in place in covering Newhaven, and the policy will need to continue to seek to shift travel choices away from the private car.

A wider range of evidence is being gathered to support the emerging Local Plan. We have begun work understanding the capacity of the transport network. Additionally, East Sussex County Council (as the local transport authority) is developing the Local Transport Plan 4 (LTP4) and this policy will seek to influence the aims of LTP4 and eventually address the specific challenges relating to the plan area. This policy will also look to complement schemes that are proposed by Transport for the South East in its emerging Strategic Investment Plan.

This policy will seek to ensure that development does not lead to unacceptable transport impact.

### **What you have told us so far**

Respondents to the Issues & Options consultation addressed the accessibility to services and facilities and encouraging sustainable modes of transport / active travel opportunities. This included improving the provision of accessible routes and connectivity – including clear signage, particularly to rural settlements, providing safer routes and options for alternative modes of travel to private transport.

Respondents expressed a desire for the re-ordering of the transport hierarchy, with more importance placed on car-free developments and of active travel and public transport having priority over private car use. In particular, the improvement of cycle infrastructure including expansion of the network, enhanced connectivity, bicycle parking facilities, including electric bicycle provision, and a safer network were consistently raised comments.

Respondents who suggested improvements of accessibility to rural settlements and the countryside, identified the provision of safer bridleways and a more connected rural public transport offer as important issues to be addressed in the plan.

## **Alternatives considered and reasons for discounting**

### **No Policy**

This is not considered a reasonable option as it would mean relying on national policy or the Local Transport Plan. Neither of these would provide sufficient information on the local context and fall short of fully addressing considerations through the planning application process.

### **Further Information**

- Topic Paper – Infrastructure and Community Facilities
- Strategic Transport Evidence Base
- East Sussex County Council - [East Sussex Local Transport Plan 3 \(2011-2026\)](#)
- Transport for the South East - [A Strategic Investment Plan for the South East \(2023\)](#)

### **Existing Policies in Adopted 2016 & 2020 Plans**

Local Plan Part 1 – Core Policy 13: Sustainable Transport

Local Plan Part 2 – Policy DM35: Footpath, Cycle and Bridleway Network

Local Plan Part 2 – Policy DM36: Station Parking

Local Plan Part 2 – Policy DM37: Former Lewes to Uckfield railway line

## **Policy IC9: Parking Standards and Electric Vehicle Charging Points**

### **Objectives**

This policy will set out the requirements for managing vehicle and cycle parking, including ensuring that the transition to electric vehicles is supercharged through the provision of electric charging infrastructure. New development will be expected to help facilitate 'a greener local plan' by facilitating movement by walking and cycling.

### **Preferred Policy Direction**

Parking standards are set in accordance with national policy and reflect the needs of our communities. East Sussex County Council is the responsible transport planning authority and as such has prepared the parking standards for both residential and non-residential development. These are the standards that are implemented within the plan area. It will be necessary to update the existing parking standards to provide flexibility for development to respond to the mix of land uses, location and accessibility to other modes of transport.

Although, cycling and walking will be the preferred method of travel with regards to reducing congestion and emissions, it is recognised that vehicle transport will still be necessary, and electric vehicles will play an important role in the transition away from combustion engines. However, the shift to electric vehicles will rely on a significant increase in the availability of charging infrastructure and will put additional pressure on electrical power networks. Public facilities in convenient locations will provide access to charging for residents without off street parking and for visitors to the district.

The recent changes to building regulations now ensure that new developments have EV charging points installed however, local plan policy could require a greater provision of charging points, and require a proportion of these to be rapid charging (50kW+) in suitable locations on a range of different developments to support new public charging facilities to serve existing communities. In particular, to ensure on-site charging facilities are provided in non-residential development, the policy will seek these to be designed into the public realm and for residential development seek with each new dwelling at least 1 charge point.

Cycle hire schemes are increasingly becoming popular, convenient and economical option for individuals to make their entire or partial journey, especially when located in or close to centres or travel hubs. The council, while supporting the expansion and provision of cycle hire schemes will seek to properly manage them, so that 'docking stations' or cycles do not become a street hazard, unsightly or impact negatively on the public realm, safety and local amenity.

## Why is this policy needed?

Managing parking spaces as well as the demand is an important factor in influencing the choice of mode people make. Although, evolutionary technology and the adoption of autonomous vehicle are likely to drive the change in options including the potentially transformative effects on road conditions, for the local plan period parking will need to continue to be managed given the local congestion, and poor air quality above government objective levels experienced in parts of the district.<sup>49</sup>

Through the NPPF local authorities are able to set local parking standards where there is clear and compelling justification and a need to manage the local road network; or for optimising density in town centres and locations that are well served by public transport.

Paragraph 107 of the NPPF requires that parking standards take into account local factors and circumstances, including;

- a) the accessibility of the development;
- b) the type, mix and use of development;
- c) the availability of and opportunities for public transport;
- d) local car ownership levels; and
- e) the need to ensure an adequate provision of spaces for charging plug-in and other ultra-low emission vehicles.

National Planning Policy Guidance sets out further guidance which suggests that the provision of parking should be appropriate to the needs of the development and not reduced to a level considered unreasonable. Policies in the plan need to address a wide range of locations, from hamlets with limited or no bus services to the coastal towns of Newhaven, Peacehaven and Seaford where the car may be the least convenient way to make a local journey.

The current East Sussex County Council parking standards set the optimal level of parking. There is a tendency that these become the default level rather than respond to site specific circumstances. A site by site design-led approach may be a better approach and provide the flexibility to respond to the local circumstance of each site, as well as adapt to the changing patterns of vehicle ownership over the plan period.

Additionally, the council's climate change evidence identifies road transport as the biggest generator of carbon emission. A large proportion of plan area's population drives to work in places outside of the plan area. While the location of new development near to bus and rail service may help to reduce car generated emissions in order to meet the objective of net zero, the council will need to seek more ambitious requirements for both on-street and off-street charging point to support electric vehicle ownership.

---

<sup>49</sup> Newhaven and Lewes town are covered by Air Quality Management Orders, although Lewes Town falls outside the plan area.

Cycling and walking are zero-emission modes of travel and will have a key role in helping to meet the net-zero targets. Charging infrastructure for cycles may encourage take up of electric cycles for some journeys considered too far to cycle.

### **What you have told us so far**

Respondents supported reducing private car use as well as the speed of vehicles. Respondents supported seeking less car-dependent development through improving public and active transport options. In addition, ensuring better EVCP would encourage the modal shift as well as helping to reduce carbon emissions.

Respondents to the consultation supported prioritising development in existing areas and around transport hubs. This would improve accessibility to active travel pathways.

### **Alternatives considered and reasons for discounting**

#### **No Policy**

National policy requires consideration of parking, and while ESCC has produced guidance for optimal parking levels in residential and non-residential development these, this was produced more than six years ago and has gaps in relation to technological advancements.

#### **No set requirements for electric vehicle charging points (EVCP)**

This is not considered a reasonable alternative given the need for development to address changing vehicle types, climate change and transition to cleaner energy.

### **Further Information**

- Topic Paper – Infrastructure and Community Facilities
- East Sussex County Council – [Parking standards for non-residential development](#)
- East Sussex County Council - [Parking standards for new residential development](#)

### **Existing Policies in Adopted 2016 & 2020 Plans**

None

## **Policy IC10: Former Lewes to Uckfield Railway Line**

### **Objectives**

The policy will seek to protect the route of the former Lewes to Uckfield railway line from development that could impact the potential re-opening of the line in the future.

### **Preferred Policy Direction**

The policy will restrict any development along the former Lewes to Uckfield railway line that would significantly prejudice the reinstatement of the former rail line in the future. Meanwhile uses that would not prejudice the future reinstatement of the rail line may be considered acceptable.

### **Why is this policy needed?**

The Lewes to Uckfield railway line closed in 1969. The re-opening of the Lewes to Uckfield line would provide an additional public transport link that would not only ease pressure on the existing network and provide an additional rail route between Brighton and London, but also make more sustainable travel options available to more people across the region.

The London and South Coast Rail Corridor Study, published by the Department for Transport in 2017, concluded that a transport case could be made for such a scheme subject to additional economic growth. The Transport for the South East Strategic Investment Plan (2023) identifies an aspiration to reinstate the railway between Lewes and Uckfield to increase resilience of rail connectivity between the South Coast and London.

East Sussex County Council and Lewes District Council support the reinstatement of the line in order to provide additional rail capacity in the county, in line with the objectives of the Local Transport Plan 2011-2026 and the East Sussex Rail Strategy.

In 2018, Lewes District Council declared a climate change emergency with a headline target of achieving net-zero carbon emissions and being climate-resilient by 2030. Road transport is a significant contributor to carbon emissions in the District<sup>50</sup>, and taking opportunities to provide sustainable transport options such as the re-opening of the Lewes to Uckfield line, will play a key part of reducing carbon emissions by reducing car journeys and lessening traffic congestion around Lewes and Brighton.

Lewes District Council also sees important benefits of the re-opening of the line for the District and also the wider area. There will be quicker and more convenient access between the Weald and employment centres at Lewes, Newhaven and

---

<sup>50</sup> Lewes Climate Change & Sustainability Strategy Framework 2020

Brighton, which will support economic recovery and growth; and the provision of sustainable transport opportunities will provide greater options and facilitate the sustainable delivery of new homes. It would also provide an additional Sussex Coast to London route to relieve the Brighton Main Line in the event of any disruption.

### **What you have told us so far**

Respondents to the Issues & Options consultation suggested that transport issues were underrepresented within the consultation, and that more importance should have been given to rail improvements and new rail connections (Lewes-Uckfield) given the urgency in addressing climate change, but also to help tourism to the area.

### **Alternatives considered and reasons for discounting**

#### **No policy to protect route of former railway line**

No policy is not the preferred option as it could lead to development taking place on the route of the former railway line that would make its reinstatement impossible to achieve.

### **Further Information**

- Topic Paper – Infrastructure and Community Facilities
- East Sussex County Council - [East Sussex Local Transport Plan 3 \(2011-2026\)](#)
- Transport for the South East - [A Strategic Investment Plan for the South East \(2023\)](#)

### **Existing Policies in Adopted 2016 & 2020 Plans**

Local Plan Part 2 - Policy DM37: Former Lewes to Uckfield railway line



## **Policy IC11: Public Rights of Way**

### **Objectives**

Public Rights of Way (PROW) are routes that any member of the public may use a right, rather than a privilege granted by the land owner. The PROW network can provide traffic-free alternatives to on-road routes, which can encourage people to travel by cycle or foot. East Sussex County Council are legally responsible for managing these paths to ensure that they give safe and easy access for the public, but it is considered important that the local plan ensures that new development does not adversely affect PROWs and enhances them wherever possible.

### **Preferred Policy Direction**

The policy will ensure that Public Rights of Way are protected and not adversely affected by development. Where this is not possible, the policy will require that good quality, safe and convenient alternative provision is made or suitable replacement Public Rights of Way are secured.

In addition, the policy will require that development adjacent to the settlement boundaries should improve and enhance access into the countryside, through the Rights of Way network and/or open space and creation of new Rights of Way.

### **Why is this policy needed?**

The NPPF states that access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and wellbeing of communities, and can deliver wider benefits for nature and support efforts to address climate change. The NPPF is also clear that planning policies should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails.

Planning Practice Guidance specifically notes that public rights of way form an important component of sustainable transport links and should be protected or enhanced.

DEFRA's The Rights of Way Circular (1/09) confirms that proposals for the development of land affecting public rights of way give rise to two matters of particular concern: the need for adequate consideration of the rights of way before the decision on the planning application is taken and the need, once planning permission has been granted, for the right of way to be kept open and unobstructed until the statutory procedures authorising closure or diversion have been completed. The Green Infrastructure Study will give further consideration and evidence on the Public Rights of Way network and linkages to open space and countryside.

## **What you have told us so far**

Respondents to the Issues & Options consultation supported the retention and proper management of PROW as they can make a big difference to local communities. They can also enable better accessibility to amenities and services, as well as access to countryside with well-marked and maintained paths, which is good for residents' mental health. However, it is important to ensure that new footpaths do not adversely affect habitats.

Creation of new public footpaths within large developments that go from border to border and can link with other footpaths.

Respondents also noted that footpaths and bridleways are safe joined up routes for cycling and enhance wider access and tourist experience across the district. New development should help facilitate the creation of new public footpaths that links well to the network.

## **Alternatives considered and reasons for discounting**

### **No policy**

There are other mechanisms to help keep public rights of way open and unobstructed, however it is considered that it is important that there is a clear policy for not only protecting public rights of way, but also for securing improvements and enhancements for the wider network. Therefore no policy is not the preferred option.

## **Further Information**

- Topic Paper – Infrastructure and Community Facilities
- East Sussex County Council – [East Sussex On-line rights of way map](#)

## **Existing Policies in Adopted 2016 & 2020 Plans**

Local Plan Part 2 - Policy DM35: Footpath, Cycle and Bridleway Network

## Theme: Design, Landscape and the Built Environment

**Aim: To enhance the high quality and character of the district's towns, villages and rural environment, while ensuring that all forms of development respond positively to climate change and create inclusive, healthy places.**

The district's historic and built environment is highly valued and enjoyed by residents and visitors alike throughout the countryside, towns and villages. The built environment and spaces around it 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. It is therefore imperative that the new Local Plan protects and enhances the built environment of the district's towns, villages and countryside for future generations to enjoy. Encouraging good quality design, respecting the historic environment, and enhancing local character and distinctiveness whenever the opportunity arises is therefore a key mission for the Local Plan.

The district benefits from listed buildings and conservation areas, scheduled ancient monuments, and sites of archaeological importance. These assets contribute to the district's cultural identity within Sussex, unique sense of place and subsequently require protection and to be treated with due sensitivity and care.

Development is never too small to be considered in design terms. Cumulative effects of extensions and alterations have a significant impact on people's perceptions of a place in a day-to-day scenario. In addition, improving the existing fabric of the built environment is key to ensuring that development at every scale responds appropriately to its context, protecting what is of value while enhancing the environmental qualities of the district for future generations. The new Local Plan will encourage the creation of accessible, healthy, safe and sustainable development, which makes the best use of its siting, layout, orientation and design to achieve the highest practicable degree of resource and energy efficiency.

The proposed approach is to set out in a series of design policies, which will be built upon by two design guides as Supplementary Planning Documents, or their replacements, that also provide more detail to other policies within the new Local Plan. One of the guides will detail high level strategic considerations, and one will set out householder application design considerations. The strategic level guide will set out expectations around best-practice in site layout, including details such as but not limited to, expected densities and clear ways of access. The Householder Application Design Guide will set out best practice guidance and expectations of additions to existing development. The vision is that Neighbourhood Plan design guides, codes

and design sections within Neighbourhood Plan's will provide the locally specific, site-by-site detail that communities expect development proposals to adhere to.

### **Which Policies Are We Proposing?**

D1: Development Principles

D2: Achieving High-Quality Development

D3: Landscape Character

D4: Conservation and Enhancement of Heritage Assets

D5: Public Realm

### **Which Policies Are We Proposing to carry forward?**

Local Plan Part 2 – Policy DM26: Refuse and Recycling

Local Plan Part 2 – Policy DM31: Advertisements

Local Plan Part 2 – Policy DM32: Telecommunications Infrastructure

## **Consultation Questions for the Design, Landscape and Built Environment Theme**

- Have we chosen the right policies to respond to meeting the needs for Design, Landscape and the Built Environment?
- Are there any further policies you would like to see included? Why should they be included?

## Strategic Policy D1: Development Principles

### Objectives

The purpose of this policy is to set out overarching principles for achieving high quality design and to ensure a consistency of approach, while providing scope for innovative and imaginative design. It will further provide clarification on the expectation of the use of design guides and codes provided at the National, Local and Neighbourhood level.

### Preferred Policy Direction

This policy will require that development at every scale responds appropriately to its context, protecting what is of value while enhancing the qualities of the district. Lewes district benefits from a variety of built and natural spaces from historic coastal towns and rural villages, to biodiverse countryside and open clifftop and seaside locations. In addition, the district benefits from communities that have invested in neighbourhood planning, particularly on the topic of design, within their designated neighbourhood plan areas. Development proposals will be supported that:

Respond to the climate emergency by:

- Being designed to be long lasting and low impact in construction and maintenance.

Improve connectivity within the district by:

- Being well-connected to and integrated with nearby existing or planned social and environmental nodes and transport infrastructure.

Enhance the character of the district by:

- Contributing to local distinctiveness and sense of place through relationships with the built and natural environment;
- Providing high-quality routes that connect people and wildlife to the wider landscape by optimising Green Infrastructure opportunities;
- Avoiding harmful impact to and from surrounding uses and amenities.

Respond to the district's communities by:

- Responding positively to Neighbourhood plan design guidance, codes and identified character areas within Neighbourhood Plans;
- Creating accessible public spaces within the public realm that are high-quality, safe environments and have a clear de-lineation from private areas.

### Why is this policy needed?

Design has been a point of focus at the national level, with the NPPF being updated to have a tighter focus on design, alongside the National Design Guide and National Model Design Code released in 2022. The updated NPPF puts a strong emphasis on LPAs developing their own design guides, stating that their geographic coverage, level of detail and degree of prescription should be tailored to the circumstances and

scale of change in each place, and should allow a suitable degree of variety. It also states that these design guides and codes should be consistent with the principles set out in the National Design Guide and National Model Design Code.

In addition, neighbourhood planning has been popular within the plan area, with the district benefitting from 8 made (adopted) Neighbourhood Plans, 1 at Regulation 16 stage and another in the early phases of development. Design has been a particularly prominent addition within the neighbourhood plans whether that be both through designated sections of the plan and separate design guides and codes. The sections that focus on design within the Neighbourhood Plans, provide detailed character assessments and set out expectations for development proposals in terms of building fabric design and expected layout.

### **What you have told us so far**

Respondents to the Issues and Options consultation addressed the topic of design both with regards to the design questions and the design influences on a number of other policy areas.

Key feedback received included:

- General support for design codes and guides, with support for codes and guides that cover the whole plan area, specific parts of the plan area and for individual sites.
- Ensuring neighbourhood plans are used.
- Consideration of accessibility and connectivity of development
- That design is an important theme of the plan.
- Ensuring development is specific to place and is resilient to climate change.
- Support for modal shift and encouraging active travel through development.
- Enhance the sense of community in places.

### **Alternatives considered and reasons for discounting**

No policy - Not considered a reasonable alternative due to requirement for plans to set out a clear design vision and provide clarity about design expectations.

Rely solely on Neighbourhood Plan design guides and codes – Not considered a reasonable alternative due to the requirement for plans to develop a stand-alone design guide for the LPA area.

### **Further Information**

Topic Paper – Design, Landscape and the Built Environment

### **Existing Policies in Adopted 2016 & 2020 Plans**

Local Plan Part 1 – Core Policy 2: Housing Type, Mix and Density

Local Plan Part 1 – Core Policy 11: Built and Historic Environment & Design

Local Plan Part 2 – Policy DM25: Design

## Policy D2: Achieving High-Quality Design in Development

### Objectives

This policy will set out requirements for the design quality to be achieved by new developments, and alterations and extensions to all existing development.

### Preferred Policy Direction

This policy will require development proposals to demonstrate how they meet the following expectations:

Designed with communities in mind:

- Ensure buildings are orientated to provide surveillance and create active edges with public spaces by locating entrances and windows of habitable rooms, as well as appropriate uses, next to the street.
- Provide high quality outdoor amenity space appropriate to the needs of its occupiers or users.

Achieve accessible development by:

- Ensuring entrances and exits are safe, convenient and accessible for all users during the day and night, with lighting and security features successfully integrated into the design.

Respond positively to climate-change by, including but not limited to:

- Creating robust and adaptable buildings that can be adapted and reused to extend their lifespan.
- Reducing the carbon impact during demolition and construction of development, adhering to circular economy principles.

Enhance the local character of the district by:

- Providing a comprehensive design approach that contributes to local distinctiveness and sense of place through successful integration of adjoining buildings, routes and topography, including historic settlement pattern.
- Using materials that are of high quality, that will age well and be easy to maintain, and if an extension or alteration, reflect, or successfully contrast with, the existing building form, through the use of materials and architectural detailing.
- Using design to minimise adverse impact on the amenity of existing and future occupiers or users of nearby building and spaces, in terms of overlooking, dominance or overshadowing, traffic generation and pollution.

### Why is this policy needed?

The NPPF sets out that a robust policy framework is required to achieve high-quality design, which is supported through PPG, the National Design Guide and National



Model Design Code. High quality design is fundamental to the creation of high-quality places. It contributes to community cohesion and inclusion, influences safety and security and encourages economic investment. The design of the built environment is intrinsic in promoting modal shift which in turn positively influences health and well-being, as well as addressing the causes and effects of our changing climate. It is important that high-quality design in place-making puts people first so that places are welcoming, feel safe and are enjoyable and easy to use for all.

Materials to be used in development should be suitable for their purpose and setting, accounting for the durability of materials and how they weather. This is particularly important in the plan area as there are a number of exposed locations in the district where particularly durable materials are required to ensure developments remain secure and efficient for their lifespan. Necessary environmental services, plant, recycling and refuse storage, bicycle and car parking must be considered early in the design process to ensure they are successfully integrated into the development and not an afterthought. Such features must be secure and located conveniently but unobtrusively to allow for seamless transitions through development.

### **What you have told us so far**

Respondents to the Issues and Options consultation addressed the topic of design both with regards to the design questions and the design influences on a number of other policy areas.

Responses were received that covered measures needed to achieve high quality development. Comments included that:

- Development should be carbon neutral and encourage low carbon lifestyles.
- The use of renewable materials in construction should be maximised, and that a balance should be found between established building patterns and innovative technologies.
- Pollution sources from development should be mitigated through considerate design technologies.
- Shared spaces where children can play safely and residents can use freely and safely should be fundamental in development,

### **Alternatives considered and reasons for discounting**

No policy – Not considered a reasonable alternative due to the need to respond to local design issues.

### **Further Information**

Topic Paper – Design, Landscape and the Built Environment

### **Existing Policies in Adopted 2016 & 2020 Plans**

Local Plan Part 1 – Core Policy 2: Housing Type, Mix and Density

Local Plan Part 1 – Core Policy 11: Built and Historic Environment and Design  
Local Plan Part 2 – Policy DM25: Design

## Policy D3: Landscape Character

### Objectives

This policy will set out how development should address landscape character within the plan area.

### Preferred Policy Direction

The preferred policy direction will be to require developments to:

- Retain or enhance local landscape character, respecting the key characteristics of each character area.
- Fully consider cumulative effects of development and incremental changes on landscape character areas.
- Retain and enhance existing landscape features including but not limited to, trees and hedgerows, within new developments.
- Protect and enhance the setting of green corridors that extend into settlements from character areas and strengthen or create other Green and Blue Infrastructure opportunities and corridors and improve visual amenity.
- Protect and enhance the setting of the villages in the plan area.
- Respect the clear de-lineation and separation of villages from one and other.

### Why is this policy needed?

Lewes District benefits from a variety of landscapes including river valleys, forests, chalk cliffs and downlands. In addition, the South Downs National Park which bisects the plan area has a primary designation relating to landscape character. As such, the local plan needs to properly account for the variety of landscapes that are present and ensure the differing areas are properly considered in decision making, by ensuring development responds positively to the local landscape character.

The Lewes Landscape Character Assessment (2023) covers themes of the social, cultural, perceptual, aesthetic, and natural environment that can be used as a tool to help understand what the landscape is like today, the influence of the past, and how the landscape may change in the future. Further, the assessment provides a framework to help protect, manage, enhance, mitigate, and restore landscapes in the future and retain their distinctiveness, while guiding future development. The assessment identified 7 distinct Landscape Character Types, within which there are 15 Landscape Character Areas. Five of these landscape types are in the area to the north of the SDNP. The dominant landscape character type identified is that of Western Low Weald which exhibits a highly rural and tranquil character due to the land use and the enclosure from mature vegetation, with localised references to villages via church towers. Other landscape character types are more localised in extent and include Eastern Low Weald to the east, Scarp Footslope bordering the SDNP, Ouse Catchment bordering the River Ouse, and an area of Heathland to the northwest. Detailed information is provided within each, and includes key

characteristics, forces for change and guidance on landscape management and integrating development into the landscape.

### **What you have told us so far**

Respondents to the Issues and Options consultation supported a policy approach to landscape that:

- protects designated landscape areas.
- protects open countryside spaces.
- encourages better connected green corridors and infrastructure.
- encourages a landscape-led approach to development, respecting existing features such as trees and hedgerows.

### **Alternatives considered and reasons for discounting**

No policy – not considered a reasonable alternative as policy guidance is needed to guide how landscape issues are addressed in decision making.

### **Further Information**

- Topic Paper – Design, Landscape and the Built Environment
- Lewes Landscape Character Assessment (2023)

### **Existing Policies in Adopted 2016 & 2020 Plans**

Local Plan Part 1 – Core Policy 11: Built and Historic Environment and Design

Local Plan Part 2 – Policy DM27: Landscape Design

## Policy D4: Conservation and Enhancement of Heritage Assets

### Objectives

This policy will control development that involves or affects conservation areas, historic buildings and structures and their historic places within the plan area.

### Preferred Policy Direction

Proposals affecting heritage assets will be considered in accordance with the guidance set out in the National Planning Policy Framework. This policy will require that proposals provide sufficient information to demonstrate the impact of the proposed development upon the asset and further require them to demonstrate how the proposal preserves or enhances the significance of the heritage asset.

This policy will further set out how the environmental performance of heritage assets should be balanced against the need to protect and enhance the character and value of that asset. For example, this policy will:

- Support proposals which seek to undo the damage caused by previous interventions, including the inclusion of newer technologies to allow for more climate conscious solutions (e.g. removal of cement render and replacement with breathable options)
- Require retrofit works to be carried out in accordance with the latest Historic England guidance for energy improvement to heritage assets and give consideration to measures that will reduce carbon emissions and assist with adaptation to our changing climate (for example external shading or property level flood protection)

### Why is this policy needed?

There is a wealth of national guidance on heritage assets contained within the NPPF and Planning Practice Guidance, together with the relevant legislation applying to individual heritage designations, and there is a well-established structure in terms of heritage policies, meaning that locally specific planning policies are more limited than in other planning policy areas. However, in order to sympathetically manage heritage assets as part of the development process, there must be a clear understanding of the significance of the asset and the contribution of its setting.

Upgrading the fabric of traditional buildings in general, needs to be part of the push to improve energy efficiency across the country. The Committee on Climate Change have concluded that at least 90% of existing buildings in the UK should have energy efficient retrofits for the UK to meet its zero carbon targets. This analysis does however recognise that some buildings simply cannot be adapted to eliminate all emissions, however, there are things that can be done provided that the correct approach is taken. This policy is therefore needed to support owners of heritage

assets to undertake sensitive works to address the performance of their buildings, in line with best practice guidance for heritage assets.

### **What you have told us so far**

Respondents to the Issues and Options consultation highlighted the need to improve the existing built fabric of the building stock in the district. In addition, respondents highlighted a desire to consider more areas for designation as Conservation Areas, highlighting the desire for respecting the local character of the district.

### **Alternatives considered and reasons for discounting**

No policy, rely on national guidance – Not considered a reasonable alternative due to the requirements to set out a strategy regarding heritage, and the need to respond to local issues, in this case, the scale of heritage assets that are present within the district, and the need to respond to the challenge of climate change.

### **Further Information**

Topic Paper – Design, Landscape and the Built Environment

### **Existing Policies in Adopted 2016 & 2020 Plans**

Local Plan Part 1 – Core Policy 11: Built and Historic Environment and Design

Local Plan Part 2 – Policy DM33: Heritage Assets

Local Plan Part 2 – Policy DM34: Areas of Established Character

## Policy D5: Public Realm

### Objectives

This policy will set out expectations for the quality of public realm in development proposals.

### Preferred Policy Direction

The preferred direction of the policy is that developers will be required to demonstrate how development proposals meet the following expectations:

- Development should use gateways, focal points and landmarks to assist people in wayfinding.
- Street furniture and infrastructure should be of the highest quality, using materials that are easily maintained, have a clear purpose, maintain uncluttered spaces and should contribute to the easy movement of people through the space.
- Opportunities for greening (optimising existing GI such as trees, hedges and open spaces in the first instance) such as through planting of trees and other soft landscaping wherever possible, should be maximised.
- Treatment of the public realm should be informed by the heritage values of the place, where appropriate.
- Development should incorporate local social infrastructure such as public toilets, drinking water fountains and seating, where appropriate.
- Create streets that respond to their levels of use while not allowing vehicular traffic to dominate, including vehicular parking, which if on street, should be inset to expanded footways to not compromise pedestrian access.

### Why is this policy needed?

The quality of the public realm has a significant influence on residents' quality of life because it impacts people's sense of place, security and belonging, as well as having an influence on a range of health and social factors. In addition, creating and protecting high quality streets and other open spaces, both public and private, is a key part of adapting to climate change pressures, supporting biodiversity, and promoting active and healthy lifestyles. The public realm is comprised of the spaces between, around and within buildings, streets, squares, parks and open spaces, with all components playing a key role in supporting public life and fostering social interaction.

The effects of traffic can have a significant impact on the quality of the public realm in terms of air quality, noise and amenity of a space. The negative effects of traffic should be minimised to ensure people's enjoyment of public realm is maximised. In addition, the lighting of the public realm, be that natural or artificial, requires careful consideration to ensure places and spaces are appropriately lit, and there is an appropriate balance between issues of safety and security, and reducing light pollution.

## **What you have told us so far**

Respondents to the Issues and Options consultation highlighted that we should encourage accessible places, reducing the reliance on private cars, that support movement by walking and cycling, and that improve air quality, communal spaces, active play areas and green spaces. In addition, respondents sought improvements to the community feel of spaces, making them feel welcoming and safe. Respondents also highlighted street shading and tree lined streets as an important element of places.

## **Alternatives considered and reasons for discounting**

No policy and relying on national guidance - Not considered a reasonable alternative due to the need to respond to local issues.

## **Further Information**

Topic Paper – Design, Landscape and the Built Environment

## **Existing Policies in Adopted 2016 & 2020 Plans**

None



## Theme: Water

**Aim: Working in partnership with other agencies, to guard against the risk of flooding and improving the water quality of our rivers; by ensuring that new development is appropriately located and retains and enhances flood defences through river restoration works.**

### **Which policies are we proposing?**

W1: Flood risk and flood management

W2: Protection of water resources and water quality

W3: Water efficiency in new development

Further consideration needs to be given to the use of rivers and or other water bodies for recreation. Existing Local Plan Part 2 – Policy DM18: Recreation and Rivers is permissive of development proposals for recreation uses of the river Ouse, its margins and wetlands where it can be demonstrated that there would be no adverse impacts, either directly or indirectly on their quiet and natural character, wildlife or geological features or on the natural functioning of the river and associated wetlands.

### **Consultation Questions for the Water Theme**

- Are there any further policies you would like to see included to respond to water resources and water management? Why do you think they should they be included?
- Should the water quality policy specify standards for development for intensive livestock production?
- Should the new local plan continue with the existing policy approach set out in Policy DM18: Recreation and Rivers or go further and consider specific locations for recreational uses, and other, or more specific areas/water bodies.

## **Strategic Policy W1: Flood Risk and Flood Management**

### **Objectives**

Flooding can arise from a range of sources and as a result of climate change flood events are likely to become more frequent and more severe. Sources of flooding include rivers and the sea, direct rainfall on the ground surface, rising groundwater, overwhelmed sewers and drainage systems, reservoirs, and other artificial sources. East Sussex County Council is the Lead Local Flood Authority, responsible for managing local flood risk. Within the plan area, this includes managing surface water, groundwater and ordinary watercourses. The Environment Agency has responsibility for strategic reduction of flood risk from main rivers.

The National Planning Policy Framework sets out strict tests to protect people and property from flooding which all local planning authorities are expected to follow. Where these tests are not met, new development should not be allowed.

It is not always possible to avoid locating development in areas at risk of flooding. The Local Plan will steer new development away from areas with highest flood risk, flood risk policy will look at how development should address flood risk. Policies will provide guidance on the range of measures that could be considered on site in order to manage and mitigate flood risk.

It is important that new development is safe and resilient to flooding and does not increase flooding elsewhere. Therefore, opportunities to reduce flood risk through natural flood management and the use of Sustainable Drainage Systems (SuDs) will be required.

Natural flood management involves techniques that aim to work with natural hydrological and landscape features, and characteristics to manage the sources and pathways of flood waters. Techniques include the restoration, enhancement and alteration of natural features and characteristics, but exclude traditional flood defence engineering that works against or disrupts these natural processes.

### **Preferred policy direction**

In line with national policy development should be directed away from areas with the highest flood risk from any source. Opportunities should be taken to reduce flooding through sustainable drainage systems and natural flood management to deliver multi-functional benefits for people and wildlife.

Developments in areas of potential flood risk will need to demonstrate, through site specific flood risk assessments, that the proposed development is safe and resilient or adaptive to flooding. Flood risk must not be increased elsewhere as a result of development.

The policy will detail the requirements set out in the NPPF<sup>51</sup> for Flood Risk Assessments, the sequential test and exception test, cumulative effects, and flood resistance and resiliency.

Suitable surface water management measures should be incorporated into new development in order to reduce and manage surface water. This should ideally be achieved by incorporating SuDS which are typically softer engineering solutions inspired by natural processes such as ponds and swales which manage water as close to its source as possible. The policy will signpost to the guidance of ESCC on SuDs. SuDs techniques can be used to reduce the rate and volume and improve the water quality of surface water discharges from sites and they should follow a hierarchy of drainage options as reasonably practicable considering the location;

- Into the ground (infiltration),
- To a surface water body,
- To a surface water sewer, highway drain, or another drainage system, and,
- To a combined sewer.

However, connection to a public sewer system should not be at detriment to existing users.

Redevelopment in areas at risk of flooding has the potential to affect flood routing and increase flood risk elsewhere. Site layouts should preserve as much as possible the natural flow of water and not increase flood risk elsewhere. Opportunities shall be sought within the site design to make space for water. Where possible the drainage system should be multifunctional and be incorporated into the Green and Blue Infrastructure Network and opportunities should be taken for nature based solutions.

### **Why is the policy needed?**

Flood risk is a significant concern within the plan area which is predicted to increase as a result of climate change causing more extreme weather events. The Local Plan should reduce the district's vulnerability to climate change and particularly flooding to residential properties. This policy is needed to supplement national policy with local considerations.

### **What you have told us so far**

There were no specific questions in the Issues and Options consultation on flooding and/or water management. However, when asked to express other concerns many people mentioned flooding, and specifically the impact of heavy rainfall.

---

<sup>51</sup> NPPF 2023 paragraphs 159-169

## **Alternatives considered and reasons for discounting**

No policy and rely on national guidance: This is not considered an alternative because a policy on avoiding flood risk should be integral part of the Local Plan and all detail on how to deal with integral and sustainable water management must be linked to local circumstances.

## **Further information**

- Water Topic Paper
- Lewes District Strategic Flood Risk Assessment 2023
- Lewes Climate Change Study 2023
- Lewes Scoping Water Cycle Study 2023

## **Existing Policies in Adopted 2016 & 2020 Plans**

Local Plan Part 1 - Core Policy 12 Flood Risk, Coastal Erosion, Sustainable Drainage and Slope Stability

## Policy W2: Protection of Water Resources and Water Quality

### Objectives

The quality of the water environment in terms of groundwater, surface water and the sea, is of major importance for the ecosystem and biodiversity. It helps to provide good quality drinking water, is an amenity for recreation for sports, and impacts on wildlife and the environment.

The policy will require all development proposals to avoid adverse impacts, mitigate any adverse impact, and where possible contribute to the improvement of the quality of the water environment.

### Preferred policy direction

The policy will extend current Local Plan Part 2 Policy DM22 (Water Resources and Water Quality<sup>52</sup>) with further criteria on water quality and specifically on the effect of the handling of sewage.

Further evidence is still required from the Detailed Water Cycle Study however to ensure good water quality in the District, the Local Plan will steer development away from areas within the Plan Area with an unacceptable risk to the quality and quantity of surface and ground water.

Specifically, this could mean that:

- All major developments must demonstrate, where necessary, how the development will contribute to the protection and enhancement of waterbodies, including natural treatment and pollution control of surface water run off during and following construction.
- Linking with policy IC2, all major developments must demonstrate that where it will materially increase foul and/or surface water discharges, adequate capacity exists or can be provided as part of the development. Where adequate capacity does not exist, the developer will be required to work with the appropriate service providers to ensure that upgrades are provided where necessary. Cumulative impact due to other developments must be considered.
- All major developments must clarify which treatment works will be managing the sewage and how sewerage will be treated prior to discharge. Southern Water should then be requested to provide information to assess the impact on the

---

<sup>52</sup> **Policy DM22: Water Resources and Water Quality**

Development will be only permitted where it can be demonstrated that it would not result in:

(1) unacceptable risk to the quality and quantity of surface and groundwater (including reservoirs); or  
(2) changes to groundwater and surface water levels that would have unacceptable adverse impacts on:  
(a) adjoining land;  
(b) the quality of groundwater resources or potential groundwater resources;  
(c) the potential yield of groundwater resources, river flows or natural habitats.

Work beneath the water table will not be permitted unless there is a comprehensive groundwater management scheme agreed for the construction, operation, restoration and on-going management of the proposal.

number or duration of sewage discharges into local rivers or seas, considering cumulative impacts of other planned developments.

### **Why is the policy needed?**

Core Policy 10 Bullet 4 seeks to ensure that water quality is improved where necessary or maintained when appropriate (including during any construction process) and that watercourses (including groundwater flows) are protected from encroachment and adverse impacts in line with the objectives of the South East River Basin Management Plan<sup>53</sup>. Where appropriate, the local planning authority will seek the enhancement and restoration of modified watercourses.

Water quality is of great concern of the council. On 3 March 2023 a council motion was passed to ask Southern Water for responses on sewage discharges and on 23 May 2023 a motion<sup>54</sup> was passed to protect our local rivers and sea by taking into account the cumulative impact of sewage discharge.

Apart from the policy on natural flood management which will reduce peak discharges of surface water to the sewage system this policy addresses the impact of discharges of foul water of the WwTW.

### **What you have told us so far**

The Issues and Options consultation did not contain specific questions on flooding or water quality. However, when asked to express other concerns many respondents mentioned flooding, and specifically the impact of heavy rainfall, adequate sewer infrastructure and concerns of sewerage discharge into rivers and the sea.

### **Alternatives considered and reasons for discounting**

No policy is not an option given the importance of the issue of water quality and local issues around the capacity of existing wastewater treatment works, and sewerage discharge.

### **Further information**

- Water Topic Paper
- Lewes District Strategic Flood Risk Assessment 2023
- Lewes Climate Change Study 2023
- Lewes Scoping Water Cycle Study 2023

---

<sup>53</sup> River Basin Management Plan Part 1

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/718337/South\\_East\\_RBD\\_Part\\_1\\_river\\_basin\\_management\\_plan.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/718337/South_East_RBD_Part_1_river_basin_management_plan.pdf)

<sup>54</sup> <https://democracy.lewes-eastbourne.gov.uk/documents/s26282/Full%20Council%20Motion%20-%20Protecting%20our%20rivers%20and%20sea%20motion%20appendix%201.pdf>

## **Existing Policies in Adopted 2016 & 2020 Plans**

Local Plan Part 1 - Core Policy 12: Flood Risk, Coastal Erosion, Sustainable Drainage and Slope Stability

Local Plan Part 2 - Policy DM22: Water Resources and Water Quality

## Policy W3: Water Efficiency in New Development

### Objectives

The plan area is within an area of serious water stress and the policy will set out how development should address this by requiring and recommending water efficiency and reuse measures in new development.

### Preferred policy direction

Current building regulations require that the average water usage of a new homes is no more than 125 litres per person per day. Currently, the Lewes District Local Plan<sup>55</sup> Core Policy 14 requires all new dwellings to achieve water consumption of no more than 110 litres per person per day. The council's Climate Change and Sustainability Strategy sets a target of 100 litres per person per day in new builds by 2030 and also for new builds to be water neutral by 2030.

Reducing water consumption to the greatest extent will be critical in the South-East region. Therefore, the new local plan policy will go beyond the existing policy, new development will be required to:

- Minimise water consumption, a target water efficiency rate of 90litres per head per day (l/h/d) will be encouraged unless it is proven to be not technically or financially feasible.
- All developments will be required to be supported by a water calculator which demonstrates consumption of a maximum of 110l/h/d.
- Non-residential development will be required to achieve BREEAM 'very good' or 'excellent' standard for water efficiency unless demonstrated impracticable.
- In major developments grey water harvesting (and dual plumbing) should be incorporated for WC flushing and washing machine connection unless proven to not be technically or financially feasible.
- In all developments rainwater harvesting and/or surface water harvesting must be incorporated.

Another aspect of water availability the local plan can contribute to is leakage reduction. All new properties are required to be fitted with water meters, therefore there is no need for the local plan to mandate such, water meters assist with leakage detection. However, the local plan could ensure that new developments do not add to leakage problems in the supply network, requiring developers to supply information on how the development will contribute to the reduction of, or minimisation of leakage in the water network including how new pipes and networks are resilient to future problems and leaks.

---

<sup>55</sup> Lewes District Local Plan (2016). Available online at: [https://www.lewes-eastbourne.gov.uk/\\_resources/assets/inline/full/0/257159.pdf](https://www.lewes-eastbourne.gov.uk/_resources/assets/inline/full/0/257159.pdf) (accessed December 2022)



## Why is the policy needed?

The South East is classified as an area with serious water stress<sup>56</sup>, which means that the current and future household demand for water is likely to be a high proportion of the available effective rainfall.

Due to climate change, with warmer and dryer summers to be expected, the water availability may decrease, while the demand will grow. In the State of the Environment report on water resources<sup>57</sup> the Environment Agency warns that the current levels of abstraction are unsustainable in more than a quarter of groundwater bodies and up to one-fifth of surface waters, reducing water levels and damaging wildlife.

The Water Cycle Study (2022)<sup>58</sup> identifies that abstraction and poor nutrient management are pressures on the Brighton Chalk Block waterbody, classified as WFD 'Poor' status; and in terms of availability, there is restricted water available.

## What you have told us so far

There were no specific questions in the Issues and Options consultation on the issue of water availability. However, when asked to express other concerns, 'future water shortage' was highlighted by respondents. Respondents were concerned that future demand cannot be met for the increased housing development and that abstraction of drinking water impacts on the South Downs aquifers.

## Alternatives considered and reasons for discounting

An alternative of no policy and relying on Building Regulations requirements is not considered a reasonable alternative as existing local plan policy goes beyond building regulations and this would not reflect the pressure on water resources in the area. There is also no Building Regulations standard for water efficiency in non-residential developments therefore a local plan policy needs to set local requirements to respond to the pressure on water resources in the area.

An alternative of requiring a lower water consumption requirement of 100 l/h/d or 90 l/h/d is not considered because:

- The water providers (South East Water and Southern Water) in their (draft) WRMP (2025-2075) consider an average reduction to 110 l/p/d.

---

<sup>56</sup> Environment Agency, 2013

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/244333/water-stressed-classification-2013.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/244333/water-stressed-classification-2013.pdf)

<sup>57</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/709924/State\\_of\\_the\\_environment\\_water\\_resources\\_report.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/709924/State_of_the_environment_water_resources_report.pdf)

<sup>58</sup> Lewes Water Cycle Study

- A lower consumption than set out by the Building Regulation<sup>59</sup> (=125 or 110 l/h/d<sup>60</sup>) would increase costs significantly which could impact on site viability. This option may be pursued following further viability evidence.

### **Further information**

- Water Topic Paper
- Lewes Climate Change Study 2023
- Lewes Scoping Water Cycle Study 2023

### **Existing Policies in Adopted 2016 & 2020 Plans**

Local Plan Part 2 – Policy DM2: Water Resources and Water Quality

---

<sup>59</sup>[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/504207/BR\\_PDF\\_AD\\_G\\_2015\\_with\\_2016\\_amendments.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/504207/BR_PDF_AD_G_2015_with_2016_amendments.pdf) (BR Part G Water efficiency)

<sup>60</sup> The requirement is either a) 125 Litres per person per day or b) in a case to which paragraph 3 applies, the optional requirement of 110 litres per person per day

## Delivery and Monitoring

The purpose of monitoring the plan is to assess whether the Local Plan policies are achieving their aims and the intended policy outcomes, are still relevant or are having unintended consequences and require a review.

We will work positively and proactively with local communities, parish councils, businesses, key stakeholders, landowners, developers and the wider public to ensure that the Local Plan is successfully delivered. Working effectively across the council and with partners will be essential to support new development through securing the co-ordinated and timely delivery of social and physical infrastructure improvements, including green infrastructure. This will ensure that growth that is being planned for and delivered will be ‘good growth.’

We are preparing an Infrastructure Development Plan (IDP) as a companion document to the Local Plan and this will be finalised for Examination. The IDP will set out details on the infrastructure required to support growth and new development in the plan area. We will need to review the IDP regularly over the plan period, for instance to take account of infrastructure that is delivered and planned.

Table 10 begins to set out the framework for performance indicators for the Local Plan including target where they apply. We will continue to develop this during the plan making process to identify the performance indicators, and will report the final set of performance indicators in our Authority Monitoring Report.<sup>61</sup>

Theme:	Climate Change		
Related Policies:	CC1 – CC6		
<b>Key Policy Outcome</b>	<b>Delivery Indicators</b>	<b>Target</b>	<b>Where presented</b>
	CC1		
	CC2		

Table 10: Sample of Emerging Monitoring Framework Performance Indicators

<sup>61</sup> We produce an Authority Monitoring Report annually. This contains an assessment of the progress of the local plan policies.