

Towards a Lewes Local Plan: Spatial Strategy and Policy Directions

Please respond to the consultation by completing the questions below. Return by email to or by post to:
Lewes District Council, c/o Eastbourne Town Hall, Grove Road, Eastbourne, BN21 4UG.

Your Details

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Name:

Organisation (if relevant):

Agent providing comments on behalf of (if relevant):

Postal Address:

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What type of stakeholder are you / who are you representing: (place 'x' in against box)

	Member of the public (Resident of Lewes District)		Residents Association
	Member of the public (Resident elsewhere)		National group / organisation
	Local business / employer		Planning Consultant
X	Neighbouring District / Parish Council		Landowner / Developer
	Local group / organisation		Infrastructure / service provider
	Other – please describe:		

Vision and aims

What are your views on the proposed vision and aims?

Rural character and landscape in Low Weald villages and settlements need to be protected and enhanced as well as encouraging growth and vitality of coastal towns. New development should be concentrated on the most sustainable towns where there is better opportunity for growth including investment in infrastructure and employment. Sustainable towns also offer Brownfield development opportunities which can be developed and intensified. In addition, housing density in urban areas is much higher than for rural areas, therefore requiring fewer rural sites to achieve an agreed target across a plan area.

Proposed development in and around rural settlements should reflect the scale and character of each location and the capacity of key infrastructure and services to support existing committed and planned development let alone those proposed. Encroachment into surrounding areas and greenfield sites should only be allowed for small development sites which are sympathetic to and can integrate with existing housing to the mutual benefit of both.

Local Plans should continue to give substantial weight to the policies and aims of adopted Neighbourhood Plans (NPs) and to respect their views in the assessment of sites which fail to comply with such policies. This would include supporting sustainable patterns of development that meet the needs of the areas and alignment of growth with infrastructure. The Local Plan should respect the constraints identified within the NPs e.g retention of settlement gaps and buffers consistently across all settlements as emphasised within the respective NPs as well as supporting localism in the determination of realistic housing targets to align with needs and priorities which may be different across specific settlements and settlement types. This would then be consistent with NPPF para 9 to “take local circumstances into account, to reflect the character, needs and opportunities of each area.”

NPs should be in fact be given more weight as a statutory consultee and should be an integral part of the development of the Local Plan and any other related policies which impact on the amenity and health and wellbeing of local residents and businesses. Where possible at all times Town and Parish Councils should be consulted at an early stage in the process to provide expert input to inform the outcomes and proposals.

It is noted most of the sites put forward in the LAA are by local land-owners/developers rather than, as per the methodology statement, based on an overall assessment of where housing could sustainably deliver new housing in the right places. Furthermore aligned with the provision of adequate infrastructure, facilities and social support services with due regard to the harmful impact on protected areas, heritage assets, biodiversity and the health and wellbeing of residents.

The proposed large rural developments will be highly car-dependent with limited local employment opportunities requiring out-commuting to other towns and areas, mainly outside of the plan area and with no plans to increase any such new local employment identified. Emphasis should be given to leisure to promote health and wellbeing with particular emphasis on the SDNP and coastal areas alongside the High Weald AONB although the importance of the beauty, enjoyment and high value of unspoiled open countryside in the Low Weald is not considered in further detail. This is reinforced in the NPPF which recognises the intrinsic character and beauty of the countryside

and the protection and enhancement of valued landscapes which contribute to the quality of life of residents and visitors.

Is there an alternative vision or aims (or parts of) that we should be considering?

The vision itself is aspirational and to be commended in principle although it is not deliverable (NPPF para 16 b)) and there is a discontinuity between the aims and visions and outcomes.

Focus should be on more policy led settlement and/or site allocations based on the 3 overarching objectives (economic, social and environmental) used to determine the principle of sustainable developments as per NPPF para 8 rather than being developer-led and therefore profit-led. Developers should be required to provide a full explanation of how their proposals meet the minimum objectives.

More focus should be on development of brownfield sites and those sites which fail the "beauty" test to encourage these being brought forward and built out or enhanced. The brownfield register is not complete, at least not in Ringmer, and requires reviewing and updating. Details of the asset management register listing all land and property owned by LDC and their status should be supplied and included in any future assessments. There are a number of sites within Ringmer which may fall within the category of windfall sites being smaller such as domestic garage sites which could be allocated as exception sites for the provision of social market housing although these have not all been identified and assessed. Some sites are shown as reserved sites in Ringmer in Appendix 7 (note dated as of 31st March 2021) as allocated sites without planning permission although they are mainly single unit sites or below the threshold for inclusion or not available.

Sites which have current approved applications should be considered, although which have not been developed, potentially land banked, or which are extant, also on empty or under-utilised properties or sites.

Housing need at a local level not including in-migration should be explored in particular speculative developments encouraging further development, although which fail to supply housing for local people in most need who cannot afford market prices, whether leased or purchased. Analyse by settlement although also included those within the SDNP part of Lewes District to direct housing to where it is most needed and to provide a rationale for exception in the allocation of housing outside of the SDNP.

It is evident that the demand for smaller housing units either for first homes or downsizing is higher in the towns with access to sustainable travel and services, in particular in Lewes Town and this should be reflected in the disaggregation of housing delivery targets.

Prioritize social rented housing and support Community Land Trusts/charity-led housing organisations.

Spatial Strategy

Do you agree that the proposed range identified to determine the housing requirement is the correct approach? If not, please explain why.

Ringmer Parish Council support the lower end of the range proposed based on up-to-date housing projections (excluding artificial in-migration) and Local Housing Needs Assessment although it is accepted that these currently may not be quite met without further assessment. However, it would reduce the necessity of including inappropriate large scale developments.

We understand that the standard methodology using ONS 2014 projections uplifted by the illogical and misnamed "affordability" factor is the basis on which government housing targets are set and which LPAS have to include as their initial starting point. Despite promises to the contrary the ONS 2018 projection, which would lower the target, is now discounted and the Census 2021 is only expected to be introduced in 2025. We accept that the Council have been put into an untenable position to try and achieve the unsustainable targets but at the moment the distribution is unfair and appears to be a retrofit rather than plan led following a rigorous assessment of where housing is most appropriate and acceptable.

The 602 dpa excluding the SDNP therefore stands but is unachievable, unrealistic and does not consider the constraints and limitations imposed by the physical landscape and designations. It does not take into account the housing needs of the local community and the impact on the environment and landscape as well as the health and wellbeing of residents. The funding required to build and/or update the infrastructure and services in the area in particular rural countryside locations would either make any development unviable or result in inadequate provision prior to commencement let alone completion and occupation.

It is understood there is the lack of any formal agreement for the disaggregation between Lewes District PA and the SDNP in particular beyond the end of the current plan in 2030, based on the number of households i.e. 73% outside of the SDNP, although it is suggested that this may instead move to population.

Any calculations should therefore reflect the distribution of housing needs and preferences for building in large towns, where demand is highest. This is reflected in the December 2023 housing list register figures. This would be consistent with the NPPF that housing should be provided where it is required, located where it is needed and of the right type to meet residents local housing needs, which is not primarily in unsustainable Low Weald villages. Para 9 states that local circumstances should be taken into account, to reflect the character, needs and opportunities of each area.

The Council can within the NPPF identify its own housing need based on actual evidence; para 61 and footnote 25 allows the Council to identify exceptional circumstances, including relating to the particular demographic characteristics of an area which justify such an alternative approach to assessing housing need. Although the example given, obviously referring specifically to the Isle of Wight, it is only an extreme example and does not proposing other arguments.

Although Lewes Town is outside of the plan area, it may provide a rationale for an exception and for a separate housing target based on the plan area only and not including an area for which the Council has no responsibility or influence.

Considering the LAA, despite the Call for Sites, this has produced insufficient numbers of sites coming forward to meet proposed demand and previous allocations from 2018 have largely not come forward or have unknown availability, in conflict with the argument for high demand.

Do you think there is an alternative settlement hierarchy that we should consider? If so, what is it?

Separate characteristics from Ringmer and Broyleside at this not a single settlement and no new employment areas proposed for each.

The approach adopted in these proposals is faulty and diverges from that of the existing Local Plan and of other LPAs. At this stage, it would have been expected that the Council would have identified where demand is and of what type to give a broad indication of the distribution and numbers of housing to match need and based on that what the cumulative and consequent infrastructure is required. This should have been done before any specific sites had been identified and imposed. The Draft IDP is sadly deficient in this aspect and largely states that the utility companies and statutory consultees will provide capacity assessments and infrastructure improvements once detailed housing projections have been provided. This is despite the fact that the evidence and topic papers include some figures, mainly based on out of date data which could be used to provide capacity restrictions and inform spatial policies. As it is the reverse has happened where sites have been decided to be assessed based on speculative greenfield developers motivated by profit. This is particularly obvious, but not limited to, for foul water treatment and highways capacity.

The settlement hierarchy is largely based on size and not necessarily reflects the quality or quantity of the infrastructure and services which rely on delivery and supply from neighbouring towns. In Ringmer for example retail outlets are limited and are more consistent with a local village and other towns are used, who further depend on the business from “external” customers.

Building developments in rural areas and in particular large sites in settlements such as Cooksbridge and Ringmer would require an urgent and thorough reassessment of facilities and services and an upgrade to provide these appropriate to the increased population before sites are allocated. These require therefore increased investment and funding to enable these expansions.

The suggested approach is for a “blended” solution across all 6 options listed in the Issues & Options consultation with the exclusion (for now) of option 6 for a new town near Plumpton. Including the SDNP, the highest demand is in Lewes Town in particular for affordable rented properties. Outside of the SDNP, housing demand is highest in the coastal towns, where support services and sustainable infrastructure is concentrated as well as brownfield sites and a higher density of housing. In the case of Newhaven, property prices are lower and therefore more affordable linked with substantial investment to increase prosperity and employment.

Instead development in Rural Service Centres (Ringmer and Newick) and larger villages have been targeted to take the majority of any new housing figures. Even this is not evenly and fairly distributed, especially in relation to the large sites with no equivalent large site in Newick. Although it is difficult to reconcile figures from different sources or LAA Appendices, partly due to inconsistencies in timelines and out of date figures, a rough analysis based on Appendix 3.1 and Appendix 4.

This patently demonstrates how Ringmer in particular have been unfairly targeted for residential development by developers apparently supported by the Council.

A number of sites show availability as unknown ownership or availability which should have been investigated and confirmed as part of the assessment to avoid over-estimating whether or not sites are deliverable.

In addition, Ringmer has been identified for 4 of the 7 Defined Specific Sites, see Landscape Sensitivity Assessment 2023. With the removal of 11EC near Plumpton and the withdrawal by the landowner of one of the renewable energy sites, 62RG, (TBC) Ringmer now has 3 of the 5. Of these 51RG for a “potential medium scale mixed use” site including 900 dwellings has been provisionally assessed as amber and includes 28RG, 42RG, 56RG and 57RG. It is mentioned that this combined site is contiguous with the other “large site” 67RG for 140 dwellings and be combined subject to agreement, the same could equally apply to 55RG, bringing the total to 1070.

Ringmer has the only operational solar farm within the district at Upper Clayhill with another off Norlington Lane (opposite 51RG) having outline permission but not yet commenced. Of the 2 remaining, both assessed as amber, one 63RG is also in Ringmer and is being actively promoted with the application expected to be submitted in March 2024 following pre-application advice and consultation. This is despite the fact that the coastal towns have a higher level of sunshine and potential for solar roof installations and retrofit on commercial buildings.

There is also a possibility, although remote at the moment, that, should SEW plans for new or extended water resources at Arlington and Peacehaven, the backup proposal is for a new reservoir in Ringmer at Broyle Place with a pipeline across to the River Ouse.

Evidence therefore supports the unfair and inequitable distribution of development in Ringmer. This is possibly partly fueled by the view that, due to constraints and policies restricting building within the SDNP, Ringmer is being targeted by developers as a next best alternative due to its proximity to Lewes Town and that this is the main rationale for the disproportionate amount of proposed development and is not based on any proactive plan-led decisions. The statement that this is developer led is further supported by the quite frankly pathetic attempt of the Council to identify sites which have not been put forward by developers as evidenced in the Lewes Development Capacity Study Report, which “seeks to quantify the potential for accommodating new homes on land and buildings within or adjacent the top two tier settlements and key transport hubs in the Plan Area. This may contribute towards meeting the housing requirement of the District.” This has resulted in the identification of 11 sites providing 208 dwellings, not very impressive especially looking at the locations and unlikely availability. In Ringmer the only site which was looked at was to build 14 dwellings on the site of car park and garages behind the shopping precinct which mainly serves the existing businesses and the residents of the flats. There is very limited available parking in Ringmer and this would exacerbate on street parking.

Should these sites become allocated then it is essential that the required funding is provided prior to any development and committed to as part of the adopted plan to ensure that Ringmer has the infrastructure and services commensurate with its enlargement as a “small town” and as in effect a suburb or satellite of Lewes.

There seems to be an alarming indication that, despite local and neighbourhood policies as well as NPPF statements that the Council may be considering enlarging settlements and removing or

severely eroding settlement gaps and this will be strenuously opposed. There is a failure already to consider the two separate settlements of Ringmer and Broyleside as a single entity and assessing Broyleside as part of the Rural Service Centre rather than as a village.

Site assessments and Landscape Sensitivity Assessments are to be covered in a separate submission due to errors, misinformation and inconsistencies.

Climate Theme

Are there any further policies you would like to see included to respond to Climate Change? Why do you think they should they be included?

All commercial properties or conversions should include PV solar and where appropriate heat pumps, either air or ground source.

All new residential properties should have PV panels, regardless of tenure and orientation since we are advised that energy is still produced.

All affordable housing including flats should have the same efficiencies and reduced running costs as provided to larger market value properties.

Include community energy projects where multiple sites in settlements are considered and assessed cumulative proposals including e.g. a shared ground source heat pump.

Currently in terms of tenure blindness the treatment between market properties and affordable rent is inequitable and penalizes those residents who most require reduced running costs and who can least afford to retrofit.

Look at wider community energy schemes which can be provided not just to cumulative new developments but across the whole settlement to include benefits to existing residents.

Community energy schemes should be Neighbourhood Plan led and not Local Plan led.

Currently as with residential sites, renewable energy sites are developer led and proposed on greenfield sites and/or productive agricultural land. The Council should use the reports provided including the Renewable Sites Assessment as a basis for proposing the most appropriate brownfield sites especially to the south of the plan area based on the criteria given. Brownfield or contaminated sites which are not suitable for residential use would benefit therefore from this alternative use. Use of greenfield sites and agricultural land should not be permitted.

Enforcement of circular economy, retrofit and reuse of existing materials. this could be promoted as an incentive scheme.

Aim should be to reduce consumption and not continuously to try to increase capacity.

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?

Yes, requirement to demonstrate that they have minimised the impact on carbon sequestration by the use of appropriate materials, best practice in construction and good design and planning. Any

loss should be compensated on-site or by offset within the settlement area which can be monitored potentially in parallel with BNG. Areas within each settlement were identified within the BNG evidence and these could be promoted.

We would oppose the use of artificial offsite credit brokers or financial payment into pots which are not ring fenced for local community benefit.

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 they be included?

How will these policies be implemented in practice as experience shows that in general the Council fails to oppose developments on these grounds.

The retention of settlement gaps is a critical policy in NPs, which the Council purports to support, and must be defended rigorously for the reasons listed.

The maintenance of GBI corridors is crucial but currently is assessed on isolated development sites and the cumulative impact is not taken into account.

PROWs are dismissed with the acceptance of the developer that they can be diverted and "improved" i.e. routed through urban environments and paved over, impacting on the wider amenity value of such footways and destroying the functional integrity of the network of PROWs which have significant health and wellbeing benefits.

Consider a 7km buffer zone around the SDNP as per Ashdown Forest to enhance the application of the setting of the SDNP and to protect adjoining areas with appropriate contributions towards the management and monitoring of relevant SANGS or to the Carbon Capture Fund. In the case of the SDNP, this would not be at Newick or even at the new proposal in Wivelsfield but local to the SDNP boundary thus reinforcing the buffer. This would also support the International Dark Sky Reserve Status of the SDNP.

Generally needs rigorous assessment, greater reinforcement and enforcement and penalties.

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?

In general yes, but the policy seems to concentrate on tree planting, which although will help carbon capture but does very little to improve biodiversity unless accompanied by e.g. significant planting of native wild flowers. It has been demonstrated by the Woodland Trust that the planting of new woodlands alone quite often fails and a mixed and phased natural environment is required

Note that the Natural Environment Topic Paper requires that the unique characteristics of the landscape be strengthened and recognizes that the landscape contributes to the quality of life of residents and visitors and this is consistent with the NPPF. It fails to consider the value of

landscapes which do not fall within the narrow remit of the SDNP for example. Ringmer and Broyleside form part of the Lewes Connections Green Infrastructure Investment Area (Fig 1) but this is not reflected in practice.

It fails to recognize that unimproved grassland and pasture provides a significant benefit to biodiversity and are essential to the support of reptiles, insects, small mammals and ground nesting birds. Semi-improved or improved grassland is a contradiction in terms and disrupts natural breeding and pollination.

The planting of native wild flowers will improve the quality of the 'green pollinator corridors' such as 'Bee Lines' within the district, especially when bordering on the National Park. The Council should also consider consulting the Weald to Waves project led by Knepp to see if they can link up to this corridor.

The Council has been instrumental in the Cockshutt Stream Restoration Project and is to be commended for this. More projects of this type should be supported.

Consider use of green walls to improve carbon sequestration and reduce over-heating in blocks of flats.

Do you think the policy direction for Biodiversity is the right approach? If not please identify how it can be changed and why?

Increasing the net biodiversity gain to 20% will require proper, timely measurement of the biodiversity within a proposed development site, both before and after the development, plus the need to hold the developer to account if the 20% net gain is not achieved i.e. enforcement.

However, the current method by which biodiversity within a proposed development site should be revised so that it is properly measured, at different times of the year, before a final assessment is made. There seems to be a lack of consistency and no adequate and defined assessment to measure if BNG is indeed achieved nor any consistent methodology for ensuring that this is achieved with appropriate enforcement if not. There is also a lack of resource, budget and enforcement to ensure that this happens.

One of the problems with increasing the BNG to 20% or above is that this may impose additional costs on the developer of large sites and give them a further opportunity or loophole to try and argue that their viability assessment would require a downgrading of other commitments especially a reduction in affordable housing. It would be an unacceptable risk. A better approach may be to require other small scale improvements in open spaces, ecology areas, retention of trees and hedges and use of rain gardens and green walls to increase onsite provision. Failing that offsite provision should be adjacent or close to the site, at least within the settlement boundary.

BNG should be achieved on the site and not via commercial credit broker with financial incentives. If this cannot be achieved on site then any offset should be within the settlement in which the development is sited to mitigate local harm. SDNP is proposing setting up a large area at Ifield to provide BNG credits but the Biodiversity Study looked at individual settlements and assessed that

there were infill or larger areas which could be assigned as offset sites and provide BNG offsets within the LPA

Should the local plan consider preparing an urban greening policy which requires a minimum level of greening on a development site?

An urban greening policy should include over-heating, carbon sequestration and amenity value. It should also specify native planting.

However an urban policy could also apply to all the plan area as larger developments are creating effective urban or semi-urban estates within countryside locations and by doing so reducing the overall greening within settlements.

Developers should also be held to account when planned and designated 'green spaces' are not properly developed as has occurred in Ringmer on recent developments.

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 they be included?

Policies should be more proscriptive to ensure that developments actually deliver what is needed within each area and respect the character and context of the settlements.

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.

Yes. Although details need to be considered in the light of the requirements and demands within individual settlements which may differ rather than be considered as currently as a single rural sub-area.

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.

The assessment needs to consider different requirements with town and rural areas and in particular in Lewes Town where demand is the greatest.

The Council has failed so far to deliver it's aim for 40% affordable housing against a government minimum of 10%, not managing to quite agree even this low figure at Avery's site in Ringmer. The average provided in the evidence suggests 24% but this doesn't add up and could be <20%. The regulations allow for 25% of affordable housing to be intermediate or shared ownership and 75% affordable rent but there is no breakdown for social rent at 60% as opposed to affordable rent at 89% of market rent, often inflated to maintain profits. On this basis it might be more pragmatic to adopt an approach which guaranteed social housing as long as there are policies and funding to

ensure that these are delivered and funded in a reasonable timescale to meet the greatest need. If not then it may be preferable to stay with the existing system.

The priority given to the supply of social rented housing is supported as long as it is delivered although to date the Council's record in this regard is poor. The Council will need to produce detailed proposals detailing how this will be achieved as part of the legally binding planning obligations. The use of a commuted sum to make up the additional 15% is unlikely to result in the Council building or commissioning council housing (as evidenced by the situation at Caburn Field in Ringmer) unless the Council sets rates at a level which will ensure that such housing will be built and that the additional funding will be available. £40k per unit as with Caburn Field will guarantee that council housing will not be built. In this case 23 units out of 77 were agreed as affordable housing i.e. 30% but there was a get out clause to allow 12 of these to be built on Ringmer infill sites whilst maintaining the total of 77 units i.e 17% affordable. A limited amount so far after 3.5 years have actually been built out and occupied. It should also set conditions which require completion on the same terms as required as market properties to ensure that the properties get built.

The Council's draft Corporate Plan Key Area 5 proposes a four-year target of 500 new affordable and council homes. This covers an additional 300 new affordable homes, across the district, alongside 200 new council houses.

Infill sites should be prioritised and the Council's asset management database published to identify suitable brownfield and Council owned sites.

If at all possible reduce the amount of First Homes or at least apply policies to determine the specification rather than rely on individual negotiations with a developer.

It is not agreed that the proposal to require developers of >100 dwellings to include 5% for self or custom build properties. Siting within a large development is likely to be inconsistent with the aspirations of self-builders and would then revert to market housing, defeating the purpose of this requirement. It may also impact on viability. In addition, any construction and service fees would be outside of the control and management of the developer and the management company. Construction traffic would need to comply with the conditions of the CEMP. This should be removed and instead self or custom build encourage on small sites.

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.

Yes to ensure that those on lower quartile incomes would be able to have a home in the district in a location which provides the required level of support and services. Accommodation should be more weighted at social market rents and not affordable rents which will assist with differing needs of lower quartile incomes.

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.

No comment.

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?

Tourism in rural areas is attributable due to the open countryside and environments with the addition of public rights of ways. This also includes leisure lanes, for example Norlington Lane/Potato Lane in order to assist with health and wellbeing. Therefore policies should provide significant weight to protect localised areas from development which impact and destroy the environment.

Do you agree with the policy direction for employment and economic development? What other issues should the policy consider?

Constructing housing in locations where there is limited employment needs to be considered very highly as current policies do not allow local employment for local communities. Employment opportunities need to be developed in both rural areas and not just coastal towns in order to reduce car dependency to travel outside for work and therefore keeping income spent within the district.

Do you agree with our policy direction relating to retail and leisure? If not, what would you change and why?

Retail and leisure facilities in Ringmer are limited and having change since the survey was undertaken. A further two retail units in Springett Avenue have become vacant therefore leaving empty shops. It is understood high rents/business rates and service charges are attributable to this. If Ringmer is to be considered a primary shopping centre then the current offering is inadequate and requires reassessing. At present car dependent out-commuting to larger towns is required for day-to-day shopping needs.

Leisure facilities are currently limited and not adequate to support larger development. The community swimming pool has been closed for four years and appears no date for re-opening despite promises initial funding is in place for re-opening. Access to tennis courts and outdoor gym are not offered to the wider community as within school grounds.

Skate park was lost to redevelopment of Caburn Field during 2021 and developer contribution of £45,000 for replacement in new location goes no way near to the £185,000 for replacement.

Overall, reality has not matched policy aims.

Individual proposed developments should contribute to funding pot for new local facilities/or combination of funds from smaller developments to meet requirements.

Policy should encourage more diverse range of sport facilities and take into account the needs of a settlement. Dual purpose pitches and surfaces should be encouraged so that different sports can be played not just football.

Policies should encourage more diversity in the range of sports provided and take into account

Consideration should be given to providing smaller facilities in accessible locations such as open spaces.

With extreme weather conditions due to climate change, including increased rain and wind, coupled with impermeable ground conditions, priority should also be given to communal indoor facilities to encourage all year round opportunities for sport.

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?

Further consideration should be included:

- Highways - Earwig Corner, Church Hill/Ham Lane/Phoenix causeway
- Neves Lane Sewerage works
- Primary school/nursery school
- Retail – lack of parking
- Village hall at capacity
- No community facilities at Broyleside settlement

There are a few excellent policies within this area which we support, e.g. water policies however a remarkable lack of detail in others. It is clear that there is a large gap between aspiration and delivery as well as achievability and enforcement.

The Infrastructure Development Plan is very basic, provisional and limited in detail, relying almost solely on work and assessments to be undertaken after the sites have been allocated in the Draft Local Plan under Reg 19. Although this will go out for consultation, estimate June 2024 which is probably not achievable, this will then form the basis of the plan submitted to the Planning Inspectorate for examination. It will therefore be unrealistic for major changes and adequate consultation without jeopardising the requirement to have a minimum of 15 years life at adoption. Ref para 22 however, states that “where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery.” The large sites whether a new town near Plumpton or significant extensions to the villages of Cooksbridge, Hamsey and Ringmer clearly fall within that category and require a longer timescale to ensure that infrastructure is properly planned in advance of development.

The policies seek to ensure that development is only permitted where there is sufficient infrastructure capacity or where new or improved infrastructure can be provided to meet demands, and to protect existing community facilities and services and to ensure that new facilities are located where they are accessible (Topic Paper). This is inherent within the NPPF (2023) which requires an aligning growth and infrastructure (para 11a), that sufficient provision is made for infrastructure (para 20) and to ensure future resilience of communities and infrastructure to climate change impacts (para 153).

This is balanced against the financial contributions from developers and the impact on the deliverability of the site and overall plan (para 34) as determined by the viability assessment produced by the developer. This needs to be more rigorously assessed and challenged including the use of market property values at the top end of any realistic and independent review and the full disclosure of any costs. These should be reviewed at completion and any adjustments made as appropriate. Further viability reports should be made publicly available.

It appears the consultation does not take on board local knowledge or aims of sustainability and perhaps the Council need to have consider earlier communication/consultations with Town/Parish Councils to see how can be addressed/rectified.

A recent Appeal Inspector on examination of the Local Plan identified that the constraints of Earwig Corner limited the capacity Ringmer to absorb new housing and a cap was set to limit development until such time the improvements where made by developers of a strategic site. It should be noted that Ringmer Village and Broyleside settlement have achieved their targets and now exceed them. LDC should ask ESCC Highways to re-evaluate this particular the junction to and from Ringmer. ESCC have highlighted previously that the strategic development would critically impact the existing stress point not just at Earwig Corner although also at Church Lane, Cuilfail roundabout and the Southerham roundabout. A larger scale assessment should be undertake to establish the impact from other settlements and districts.

Impact on local roads, more frequently country lanes which are valued leisure routes should be given more weight when considering local community facilities.

Should there be a separate policy on resisting the loss of playing pitches?

National policy should also identify that some facilities are not fit for purpose and may need significant funding and either replace/upgrade. Protection should not just be limited to “playing pitches” it should be available in the context of all community open spaces for communal use. Equal provision should be to all other sports provision and should be no need for special status just for “playing pitches.”

Should a design-led policy for parking standards be progressed and included in the next version of the local plan?

With the lack of employment opportunities, increased pressure on school places, in particular nursery/primary and limited retail offering higher car dependency and lack of sustainable transport within rural areas means a common policy would be unacceptable.

East Sussex County Council car policy and calculator is out of date and does not take into consideration the increase in car sizes (SUV's) and the big push towards EV's which are also generally larger than 'standard' cars. Where garages are proposed theses are often a token gesture to parking and inevitably used for storage and not fit for purpose and pushing parking on-street. Policies should give more weight to local knowledge from local communities e.g requiring two parking spaces for 1 bedroom flat or larger communal parking areas.

Permitted development rights should not be allowed for conversion of garages into additional habitable accommodation.

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?

We have seen no evidence that cycle hire schemes encourage modal shift in particular in rural areas.

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 they be included?

In discussion with SDNP, a 7km buffer zone around the SDNP along the lines of a similar situation with respect Ashdown Forest, especially as both AONB and National Parks are considered of similar importance. This would provide more clarity for settlements which are adjacent to the SDNP rather than having to have discussions at the planning appeal stage when the boundary is only a few feet away running down the centre of the adjacent country lane for example.

Do you agree with the proposed policy directions that are being considered for further development? Are there alternatives that we should be looking at?

Proposed policies D1 to D5, the design guides or any supplementary documents need to be developed and to including how to be interpreted and enforced.

Need to consider Natural Environment not just the Built Environment when considering plan area outside of coastal towns and the characteristics of the Low Weald. Specific design guides need to be established to take on board local distinctiveness and sense of place not just an overall design guide.

Local adopted local Neighbourhood Plans need to be given more weight in the evaluation of planning applications.

Communities should be consulted to develop an overall set of rural design guides to be adopted in Neighbourhood Plans and consideration for Lewes DC to regauge with the Architectural Advisory Board.

Proposed policy D3 “.....separation of villages from one and other (one another)” should be changed to settlements rather than villages.

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?

Lewes District Council no longer participate in the Architectural Advisory Panel and current design code needs revising.

Any future developments need to pay particular attention to local vernacular architecture and rural settlements.

Residential development proposed to be sited in confined areas in least desirable locations e.g prone to surface water flooding, noise, traffic and pollution and without proposed open spaces and renewable energy provision need to be carefully considered and included in concept masterplans.

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?

Sewerage is a significant challenge and it is essential that provision for acceptable increases to cater for cumulative impact from previously granted, delivered and proposed development is available prior to the approval or that detailed plans for infrastructure are made available during the construction period and before the development commences.

The consultation and the topic paper suggests that the Ringmer Neaves Lane Waste Water Treatment Works has adequate Headroom however this is based on old data/projections including 2019 population figures and out of date committed housing development figures. Any numbers needs to make sure it includes all area and settlements within the catchment area and not just Ringmer. Using most recent information would identify that 100% headroom capacity has been exceeded or close to being exceeded even at lower flow rates specified within DM policies. It is clear that committed and granted developments as well as those in the pipeline shall exceed capacity. Sites proposed within the LAA appear to have not considered further funding to be allocated for increasing capacity or any plans to address this. Further detailed investigation is required prior to allocation of proposed sites.

Should the water quality policy specify standards for development for intensive livestock production?

No comment.

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.

Further comments should be sought from local communities/user groups to establish specific locations/requirements.