

Draft Local Plan Consultation 2020-2040 Site Assessments

[This response relates initially to the Large Site Assessments in LAA Appendix 4 although of necessity also includes other sites in the ILAA 2022 and Appendices 3.1, 3.3 and 5 of the LAA 2023. I refer also to the other Evidence documents and Topic Papers. Commenting on these separately would be onerous and lengthy.](#)

General Comments

It would have been expected that the consultants employed by the Council to carry out the site assessments as well as to produce the Evidence and Topic Papers and that Officers and Councillors would have ensured that the information and conclusions would have been verified and sanity checked, for example:

- That the assessments of the different sites submitted would have been performed with reference to an overall spatial strategy for the Plan Area which defined the most sustainable broad locations for sustainable development based on infrastructure limitations and other constraints.
- That the current infrastructure and the impact of further development together with realistic timescales and funding requirements would have been assessed in order to identify sustainable locations as a key initial stage prior to the publication of proposed sites.
- That rigorous assessments using the most up to date baseline data would have been mandatory as well as consistent.
- That they were informed by an understanding of the NPPF and PPG, local planning policies and the adopted Ringmer Neighbourhood Plan to address the above points and followed these in their methodology.
- That they were informed by some local knowledge of the sites assessed and the Low Weald villages and settlements in which the sites were located, this to include early consultation and communication with parish and town councils to correct mistakes, misinformation and errors.
- That the responses from the Issues and Options Consultation would have influenced the spatial proposals rather than a dependency on developer submissions and would have investigated other options.

Sadly, it is only too evident that these criteria have not been met.

The assessments fail to recognise the importance of the settlement gap between the separate settlements of Ringmer and Broyleside with their separate identity and character as well as the impact on the setting of the SDNP and its Dark Skies Reserve status and that on the High Weald AONB. The implication from the documents is that the Council is actively considering extension of settlement boundaries resulting in coalescence and increased housing density in unsustainable locations. Individual assessments also refer to the creation of a well-defined edge to the village reinforcing this perception.

There are general deficiencies and inconsistencies in the details of aspects of the site assessments, some of which are detailed below.

Infrastructure

Highways

The draft interim STEB (Shared Transport Evidence Base or TN-01) brief dated March 2022 and published in June 2023 was to consider and test “two initial development options based on sites promoted through the Local Plan Issues & Options consultation in 2021.” The purpose was to look at the “likely impacts of growth scenarios on the transport network and the potential need for mitigation with further testing of alternative growth options likely to be undertaken going forward.” An East Sussex Countywide Transport Model would be used to assess potential impacts of cumulative growth in the County and neighbouring areas. This will be presumably be undertaken later but would be required before sites are allocated to provide evidence for the viability of new development areas against the necessary funding for highway infrastructure improvements and mitigation. The main differences in the two initial Lewes development options, which could deliver between 8,820 and 9,714 houses, was that Option 1 included two of the large sites in Ringmer (51RG) and the Cooksbridge large site but not Plumpton new town and Option 2 visa versa which seems premature.

The link capacities in para 5.4.3 and 5.4.5 are based on 2019 traffic flow, factored to a 2040 projection including committed developments with planning permission, and are likely to have under-estimated the capacity constraints at individual junctions as this baseline data a) would not have considered the speculative developments committed since nor b) the impact of the completion of the works at Earwig Corner which was only signed off in early 2023 nor

c) the increase in HGVs in particular using Ringmer as a rat run in recent years. Even using these out of date figures it was evident that the A26 near Lewes was already approaching capacity as were the stress points at Church Lane, the Cuilfail tunnel roundabout, Southerham roundabout and Phoenix Causeway as well as Earwig Corner and that expected growth from the Wealden Local Plan would significantly add to this. The analysis shows that the highest increases are at A26 Earwig Corner and the Cuilfail roundabout where total flows will increase by up to 32% in the isolated and 63% in the cumulative assessment compared to the base.

Para 7.6 of the STEB also briefly considers the B2192 corridor in particular at Kennel Corner at the B2192/B2124 junction L33 and at the B2192/Church Hill/ Vicarage Lane junction L34 and require further assessment as there are no baselines (although some data may be available from developers surveys) but increased HGV traffic rat runs and the A26 “diversion” using Church Hill in the Ringmer Conservation Area need to be reviewed as they are likely to require mitigation with associated costs and disruption.

The Draft IDP is at a very early stage with utility companies awaiting confirmation of the locations and size, although the figures on housing trajectory might have provided a reasonable starting point. With reference to the Local Road Network, for both Options including the 3 original large sites, it is acknowledged that improvements at junctions L1, L2, L3, L4, L25, L26, L33 and L34 are likely to require enhancement and without this “the level of impact may pose a risk to the operability of the network” but there is no existing or planned provision. This should by itself have prompted the Council to reassess the distribution and concentration of sites.

Sustainable Transport

ESCC Highways under the Sustainable Transport section looked at accessibility to key services across different areas. The lowest levels of accessibility (0-20%) for both Option 1 and 2 were located in the most rural parts of the district, including key development clusters at Plumpton Green, Wivelsfield, Ringmer and Newick and highest levels of accessibility (80-100%) are located in the south of the district, along the coast close to the urban locations of Seaford and Newhaven.

The transport assessments refer to buses from the site to Uckfield and Tunbridge Wells. They did not exist when the assessment was made, and they do not exist now. The 28 service connects Brighton via Lewes and Eastbourne via Hailsham, although evening buses in particular do not go to Eastbourne. The 29 service does not go through Ringmer although

does serve Uckfield & Tunbridge Wells and would require connection to the bus stops on the A26. This is a very basic error.

There is repeated mention of the L2 cycle route in the 2020 LCWIP being approved although again this is incorrect. The report was approved by ESCC including a proposal to extend the Lewes to Ringmer cycle path which currently end at the western boundary of Ringmer and this was based on a 2018 Sustrans study however the L2 route extension was not considered a priority and no funding or resources were allocated to this.

The sustainable transport elements of the assessments are therefore over-estimated and invalid and align with the preferred options in the previous consultation although not with the proposed site allocations within settlements.

Sewage

The consultation and topic paper infer that there is adequate headroom at the Ringmer Neaves Lane WWTW although this is not borne out by the evidence documents which are based on old data and projections, including 2019 population projections and out of date committed development numbers. It also needs to include all areas and settlements within the catchment area not just Ringmer. Using up to date information clearly shows that 100% headroom capacity will be exceeded or close to being exceeded even at lower flow rates specified within DM policies. It is clear committed and allowed developments as well as those in the pipeline will exceed capacity let alone the proposed site capacities within the LAA with no funding allocated or plans to address this.

It is noted that Southern Water have not responded to the Issues and Options Consultation.

This does not seem to have been recognised in the recommendations and in fact it is stated that there is capacity and that no further mitigation is required.

Large Site Assessment

We note that the Large Site Assessment report includes 7 Defined Specific Sites as listed in the Landscape Sensitivity Assessments 2023. Of these 4 are in the settlements of Ringmer and Broyleside, including both residential/commercial and renewable energy sites.

Two of these sites are residential or mixed use:

51RG: “Land North of Ringmer”

The proposal is for of the order of 900 dwellings as a theoretical housing capacity, plus gypsy & traveller pitches, an unspecified amount of office and light industrial space, a potential country park, and potential education facilities on 57.7 Ha of farmland.

67RG: “Land at Howells Bank Farm”

The proposal is for 140 dwellings on 19.5 Ha of farmland.

Site **51RG** was submitted in the 2020 call for sites and ostensibly shown in the ILAA published in February 2022. The assessment appears now to be significantly out-of-date as well as superficial and inconsistent across sites and contrary to policies. The “grey” area in the ILAA does not match the “amber” site shown in the LAA.

Site **67RG** appears to have been submitted immediately prior to the present consultation and was not shown either in the Call for Sites nor as one of the “grey” sites in the ILAA. It is unclear why a proposal for 140 dwellings should specifically be included as a separate large site although it does also appear in Appendix 3.1.

Site 51RG

The ILAA did not include any assessment of the 3 original residential “grey” areas in the Plan Area as these were going to be subject to a future detailed assessment by AECOM at a later date.

The large site North of Ringmer however was identified as a potential site for 900 dwellings. The subsequent large site assessment in Appendix 4 provides some limited superficial assessment which is inadequate and lacking in detail and justification.

Ref Appendix 4, 51RG is stated as 57.7 Ha in size including 56RG and 57RG which have been filtered out as have 21RG and 48RG although these are not mentioned under gross area although 21RG is listed under planning history.

There is mention of an indicative master plan or parameter plan plus other evidence or documents which were used to inform the assessment although this has not been made available to residents or Ringmer Parish Council despite being requested as have Hamsey Parish Council for site 19HY. It is stated that the amount and location of individual components of the site have not been specified by the promoter although the proposed net density for the site is stated as 31dph which would indicate that only 29 Ha is to be allocated for residential use, presumably crammed into the western part of the site.

The Draft Landscape Sensitivity Assessment recommends development to be concentrated to along the southern and western parts of the site – the latter would be adjacent to the narrow and valued leisure lane Norlington Lane with impact of the countryside character of the settlement as well as on views from the SDNP and the High Weald AONB. No access is suggested from Norlington Lane which is unsuitable for any significant increase in vehicular traffic with no pavements or verges and stopping points. Access for all dwellings other than for 21RG would involve travel through the eastern part of the site which is recommended for open space, new woodland and “improved occupational opportunities” to reach the single access road on Lewes Road. This would mean that several thousand daily trips would have to drive through the “green” part of the site adding to noise and pollution and diminishing any remaining health and wellbeing benefits. There would be the potential loss of PROWs or at the least diminishment of their value and of productive agricultural land. The loss of this amenity is not given much weight in comparison to other sites. It is suggested that the natural landscape could be replaced by semi-improved landscapes or an artificial country park.

Much of the site is without either a 15 min or 20 min neighbourhood and there is no public transport along Norlington Lane nor would this be possible. Car transport will therefore be overwhelmingly the predominant form of transport.

The promoter expects a phased 10 year build out of the total scheme at a rate of 90dpa or 120 dpa if considering initial lead-in times for infrastructure enabling works which implies a period of 2.5 years for this phase and therefore only 225-300 houses are likely to be built for inclusion in the 5YHLS, presumably dating from the expected adoption of the Local Plan in 2025 so would not be built out until 2035. This presumably only covers site infrastructure and connections and not cumulative improvements to infrastructure in the settlements required to provide services to existing and proposed developments. It is possible that the total residential capacity would be reduced due to constraints, although this is unknown in the absence of a complete up to date assessment.

It is noted that large site 19HY, which includes 11HY allocated for 150 dwellings, is shown as having a gross dwelling capacity of 200-1100 dwellings, a significant range which allows the option of a much smaller development. In fact this could also apply to 11EC and to the Ringmer sites.

21RG covers 2.7 Ha with a capacity of 68 dwellings, assessed as deliverable and developable, and this was approved last year with access onto Bishops Lane as the sole access to this site only with all other access via Lewes Road.

42RG covers 4.4 Ha with a theoretical housing capacity of 130, assessed in the ILAA as not deliverable or developable with the “main concern being landscape impacts over extension of settlement along the B2192 and the coalescence between Ringmer and Broyleside” as well as the loss of agricultural land, highways impact and the risk of surface water flooding; none of these issues have changed. This is currently subject to a planning application for 98 dwellings which is yet to be determined. The main driver appears to be that it is available and being actively promoted. This includes a proposed access to the Lewes Road which access is promoted by the developer as being as adequate for these 98 homes, subject to Highways agreement, but not as the sole vehicular access to around a thousand homes plus business premises and a country park and perhaps also a school. Highways have indicated that there may not be capacity for access at this point for this single development when considered alongside the committed and proposed developments. If this application were to be approved, either by Lewes DC or at appeal, the remainder of site 51RG would become land-locked.

56RG “Land at Norlington Lane” covers 2.1 Ha with a potential housing capacity of 50 dwellings and was previously assessed as potentially deliverable and developable with some scope for development in combination with 55RG (to the west) and 57RG (to the east)

although concerns were raised about the access onto Norlington Lane, which is a narrow rural leisure lane for walkers, dog walkers and cyclists with no footpath or verges. It also would impact on heritage assets and all 3 of these sites are within the setting of the SDNP as well as being in active agricultural production on potentially BMV land.

57RG “Land at Lower Barn Farm” covers 3.6 Ha with a theoretical housing capacity of 80 dwellings, again considered potentially deliverable and developable mainly due to availability but it is “unknown whether an access from B2192 to serve a development of this scale is possible”. The access proposed is an existing farm track which is at the eastern edge of the settlement of Ringmer. This is the suggested access for 800 dwellings, i.e. 10 x bigger which is inconsistent with the previous concerns. It would also need to take account of the impact onto the B2192 Lewes Road (or “Lewes Lane”) of existing committed and proposed developments, subject to objections raised by the EA. alongside the access to The Academy.

There are no further full assessments for any of these sites giving LAA Indicative Housing Capacities as they have been filtered out and included within the 51RG large site.

55RG “Land at Norlington Farm East of Norlington Lane” is not included within 51RG although it is contiguous. It covers 1.3 Ha with a theoretical housing capacity of 30 dwellings and was assessed as potentially developable and deliverable, again as available, but with a number of concerns to be addressed and a caveat that it is “overall considered unsuitable for large scale development, but potentially could be suitable for smaller scale development which respects the character of the area.”

The 2023 LAA refers to “retaining the character of the settlement edge of Ringmer and avoiding any perception of coalescence between Ringmer, Broyle Side and properties along Norlington Lane. The approach to Ringmer along Norlington Lane has a rural character due to the surrounding agricultural landscape, any development should respect this approach to retain character.”

67RG Land at Howells Bank Farm

The site covers 19.5 Ha of which a small part was previously assessed as “unknown” (?) in the ILAA as site 44RG for 6 dwellings.

Approximately 5.5 Ha of the site is promoted for residential use at a density of net 25dpa. with the set of the site promoted for formal play, GBI and SUDS at the south west corner at risk of flooding. The site also has an existing watercourse and pond with a medium to high risk of flooding. These and ecological constraints restrict development on the site. It is possible that the site could also be used for local offsite BNG and wind energy(?). the recommendation appears therefore to be that be aligned to the linear settlement of Broyleside by building behind the existing ribbon development where possible.

The site is a countryside location outside of the planning boundary and adjacent to the local village settlement of Broyleside and falls completely within the settlement gap between Broyleside and Ringmer. It is also within the setting of the SDNP.

There is no existing access to the site although the promoter proposes a primary access from Broyle Lane which the landowner does not own and which is therefore a ransom strip. Broyle lane is similar to Norlington Lane in terms of its use and character at the northern end where the access would be. It is likely that the visibility and narrow width of the road would be counted against the accessibility of the site. There is a risk that commuters would use alternative routes than Broyle Lane especially Norlington Lane and Green Lane to avoid congestion on the B2192.

There are no services or facilities close to the site especially to schools and shops which all fall outside of the 20 min neighbourhood.

The site does include PROWs which connect to Ringmer village and link the communities.

It is unclear whether there is sufficient capacity in other infrastructure such as power, gas, water etc.

The promoter is suggesting that the site could be completed in 2027-2028 although this does not include infrastructure improvements and site assessments.

Integrated assessment

Sites 51RG and 67RG are contiguous and it is mentioned in the Landscape Sustainability Assessment that they could at a later date be considered together to form a single development, totally 1040 or if 55RH is included 1070 dwellings. By itself 51RG would remove the majority of the settlement gap along the north side of Lewes Road and cause effective coalescence of the two separate settlements; this was noted in the initial assessment of site 42RG as well as highlighted by the Planning Inspector in his decision on 2 appeals, APP/P1425/W/22/3298993 Land at Broyle Gate Farm (allowed) and APP/P1425/W/22/3299940 Land South of Lewes Road and Laughton Road (refused). The two sites together would complete the enclosure of the gap to the north.

The assessments are not compatible with national or local planning policies.

The assessment of both sites (and all the other Ringmer sites) ignores the NPPF requirement, emphasised in the Guidance, that new development should be located where residents will be likely to use sustainable travel modes. There is unambiguous census-based evidence available that residents in Ringmer, like those in other Low Weald villages, overwhelmingly use private motor vehicles to commute to employment and to use supermarkets and other services located in nearby towns (primarily Lewes and Uckfield). The same is true for new residents who have arrived in Ringmer to live in new housing built in 2021 & 2022. It is noted that all of site 67RG and much of site 51RG are not within a reasonable walking distance of the schools and services in Ringmer village and not consistent with the concept of a 15 or 20min neighbourhood. It is very likely that both sites would be even more car-dependent than existing Ringmer development. This should have been, in the interests of restricting climate change and the NPPF assessments, a prime consideration in the assessments.

The first stage of development for the new Lewes Local Plan was an Issues and Options consultation that considered alternative development strategies for the District. The views expressed and conclusions drawn are, however, simply ignored in the present draft Local Plan, which is instead entirely dependent on developer submissions. Developers necessarily have their own priorities, which cannot be expected to align with those of the community. One would expect site assessments to include an indication of how the sites proposed do align with the District's overall strategy. They do not – that is just ignored (possibly because there isn't one).

The existing Lewes Local Plan and the Ringmer Neighbourhood Plan both require housing densities of 20-30 dph although it is being suggested that housing densities in Rural Service Centres should be a minimum of 30dph, contrary to the Ringmer Neighbourhood Plan. This has not been adopted and would be contested and would not apply to Broyleside which is classified as a village within the settlement hierarchy and therefore the existing lower densities should be applied. This is to make good use of development land as required by the NPPF but also to ensure sufficient space for off-road parking to accommodate the private motor vehicles that census data show village residents will own, and to enable development that is physically compatible with the maintenance of 'village feel', the top Neighbourhood Plan priority. These sites propose to deliver 1040 dwellings in 77.2 Ha of land, which is far outside this range, without any justification. It is accepted that the dwelling estimates are very preliminary but at this stage in the draft Local Plan, preliminary estimates and assessments are not good enough.

The assessments of both sites refer to the Ringmer Neighbourhood Plan, made in 2016. Unfortunately, they both refer only to a single Neighbourhood Plan policy (5.4 Education Providers) and this reference is completely wrong. The policy they refer to does not exist, though there are several other Neighbourhood Plan policies that do exist, and are relevant, but are ignored. It is evident that the assessors have consulted only an early draft of the Neighbourhood Plan and not the actual adopted Neighbourhood Plan! That is a fairly significant error, that on its own substantially undermines the assessment.

The assessment of site 51RG says that the trees on the site are not subject to any tree preservation orders. That is because trees in the countryside are formally considered a crop, and the Lewes Trees Officer does not consider such trees as candidates for TPOs except in entirely exceptional circumstances. Were the site to be allocated for development then an assessment would be made and a number of the extant trees would be very likely to qualify. That is exactly what happened at the adjacent site described in the 51RG assessment as 'under construction' (it was actually completed more than a year ago).

Neither site assessments give sufficient weight to the loss of access to countryside PROWs and their value to residents and visitors. So called "enhancement" or "improvement" with or without diversions are in fact a degradation at the best. The impact will be to destroy the significant number of countryside footpaths which cross these two sites and which contribute to the enjoyment and wellbeing of residents. Further it seems that these are not given the same weighting in the landscape and visual assessments as other sites in other settlements are.

Errors due to lack of local knowledge

The assessments betray ignorance of information that is readily available about Ringmer village and the Broyleside and the sites within these settlements which are being assessed. The assessors have made no attempt to enlist the local knowledge that is available, and which they themselves clearly lack. For example:

The assessment of site 51RG refers to the site being connected to existing footpaths on the B2124. That is just wrong. The site connects to the B2192.

The assessment of site 51RG refers to the B2192 (the main road through Ringmer) as 'Lewes Lane'. That is not, and never has been, its name. The assessment also notes that it is unlikely access could be taken from Norlington Lane. That is quite an understatement. Vehicular access for 1,000+ houses, including heavy vehicles, by the narrow and twisting Norlington Lane, crucial for local recreational use and lined with listed buildings, would be quite out of the question.

The agricultural land quality assessment for site 51RG describes it as grade 3. That is incorrect for the majority of the site, and is due to reliance on misleading large scale plans. Most of Ringmer parish is on Weald Clay or Gault Clay and such land is generally grade 3 or better. However, much of site 51RG is on a band of Lower Greensand that runs through the parish and is of much higher quality. That is why the medieval settlement of Norlington exists, and much of site 51RG comprises one of its open arable fields. The soil quality of the remainder of these Open Fields, just across Norlington Lane, was carefully assessed in 2023 in connection with a solar farm application. Lewes District Council are well aware of this reassessment, but the assessors apparently are not. Much of the land was, in accordance with local belief, professionally assessed as grade 1, a category that is very scarce in East Sussex. The great majority was either grade 1 or grade 2. It is very probable that the land in site 51RG, just across the lane, on the same Lower Greensand formation and part of the same medieval Open Field system, is of the same high quality. This land has been for some decades used for intensive arable production, producing annual crops of wheat and sweetcorn for human consumption. Sweetcorn crops can only be grown on high quality land like this. No one attempts to grow it on Weald Clay or Gault Clay. In fact, assessment of the component sites supported this and referred to a higher ALC and that they are in active agricultural use supporting local food production.

The assessment of site 67RG assumes access could be obtained to Broyle Lane. However, the site owner does not own any part of the frontage to Broyle Lane suitable for such an access within the site boundary shown [they do own some of the lane frontage further north, but well beyond the site boundary shown]. That would have been obvious had the assessor ever visited the site.

The description of both sites describes Ringmer as a “*popular satellite village for Lewes*”. That description appears to be taken from a 1960s local plan. It is no longer accurate in any way as a description of the current Ringmer housing market – Lewes for example has fast trains to London and is popular with London commuters, but because of peak transport issues and the cost of parking in Lewes Ringmer is not a practicable start point for a London commuter. This is reflected in house prices. The description of Ringmer as a “*satellite of Lewes*” did make a brief reappearance in the very early drafts of the 2003 Local Plan but was bitterly resented, as well as being factually incorrect, and was speedily dropped. No such reference appears anywhere in the current (2016) Lewes Local Plan, and certainly not in the Ringmer Neighbourhood Plan. There could not be clearer evidence of the assessors’ complete misunderstanding of Ringmer and its community.

Both assessments make repeated references to distances from the local schools, as if there would be capacity there for residents at the new properties. It is clearly evident that there would not. At the start of the 2023/4 academic year Ringmer Primary School had 315 places and just over 300 children registered there (from Ringmer’s existing 2,200 homes). Its site is very cramped now, after previous expansion in 2016 to accommodate the growth envisaged in the Local & Neighbourhood Plans, and there is no possibility of further expansion on the current site. There are already an additional 350-400 further homes to be built in Ringmer (either Neighbourhood Plan sites still to be delivered or additional sites that now have planning permission but are not yet constructed). The children from these dwellings, let alone those from a further 1,040 dwellings, could clearly not be accommodated within existing provision. East Sussex County Council has as yet developed no plan to meet this additional need. The assessment should have borne in mind when a new school, not yet at the start of the planning process, might actually be delivered.

Similar conclusions apply to numerous other aspects of local infrastructure. The only Ringmer Nursery School cannot meet existing need, let alone the new need to be created by the change in national policy shortly to be implemented. Ringmer’s health centre cannot meet existing need (though more due to lack of doctors and other staff than lack of premises, which are good); the only Ringmer dentist has recently informed his few remaining NHS patients that they will from March 2024 need to seek treatment elsewhere. There is no NHS dental

treatment available elsewhere in this part of East Sussex or in Brighton or Eastbourne, according to those who have sought information through the correct NHS channels. The Ringmer sewage works that would serve the proposed developments takes combined sewage and rainwater from most extant Ringmer development. It is operating at close to capacity even in dry weather, and is overwhelmed, releasing untreated sewage into our local streams and rivers, every time there is even moderate rain. Southern Water has no current plan to resolve this problem – retrofitting SUDs systems to high density development is a nightmare and will not be accomplished within the Local Plan period. Development on anything like the proposed scale would overwhelm all these key elements of infrastructure.

In the assessments only a single aspect of infrastructure, the congested roads at Earwig Corner and past Lewes linking Ringmer with the national highway network at Southerham gets any mentions at all. Adding more than 50% to the size of an already-large village will inevitably overwhelm numerous aspects of that village’s infrastructure. That should have been obvious to those assessing 51RG.

The information provided is not up to date.

Other Potentially Developable and Deliverable Sites

Site 30RG “Land East of Broyleside”

6.27Ha with LAA Indicative Residential Capacity of 110 dwellings between Broyle Lane and B2192.

There may be ecological constraints as well as surface water flooding, archaeological and highways constraints. The site was in the 2018 SHELAA but is not listed in the ILAA assessment.

The site is outside of the settlement boundary. Unknown availability.

The LAA assessment states that there is no ransom strip which is incorrect as is patently obvious from the map. The land adjacent to the B2192 is owned by the residents of The Yeomans and is not available. A new access from B2192 would require loss of mature protected street oak and hawthorn trees. Unknown if another access on this side would be acceptable given existing two access in this location plus two new additional access points as a result of two recent appeals. It is stated that it is unknown if access would be achievable from Yeomans Close, this is relatively narrow and unlikely to sustain significant increase in

traffic if allowed or if access could be provided to Broyle Lane via existing roads but in practice neither of these would not be likely.

Site 38RG “Land South of Upper Broyle Farm”

This is shown on the Ringmer site map as red but in Appendix 3.1 as amber.

1.2 Ha with indicative capacity for 28 dwellings. However, it has a planning application for agricultural improvement and is therefore unlikely to be available for housing as well as having no existing access to Broyle Lane.

Site 60RG “Land on West Side of Half Mile Drove”

4.74 Ha with indicative residential for 71 dwellings. Outside of both settlement and planning boundaries and would significantly extend both.

Although available it is remote from any services has ecological, archaeological and highways constraints. Access is proposed from Half Mile Drive which is a narrow lane which may be unsuitable for access for a development of this size without significant improvement. Although adjacent to the recently to the recently allowed sites which form part of 48RG, there is no access via this site as the boundary is allocated as an ecological area with open spaces, an attenuation pond and a green buffer.

Overview

The draft Local Plan submitted for consultation is self-evidently a developer-led plan, rather than a community-led plan. While it is entirely right that the Local Plan process should include a Call for Sites inviting developers to submit sites for consideration, it is completely wrong that that should be the **only** significant approach used to identify the spatial strategy for new housing. The NPPF in fact requires that the process requires plan makers to pro-actively seek alternatives by doing a separate examination of alternative sites other than those which are developer led and to exhaust other options such as greenfield sites. A proper community-led Local Plan would have started with an assessment of the District’s quantitative and qualitative housing needs, and then used the District’s admirable record in Neighbourhood Planning to derive a spatial strategy to work out how to meet those needs within the plan area outside of the SDNP. A need for affordable housing in Peacehaven is not met by the delivery of executive dwellings in Chailey. In planning to meet the critical shortage of affordable-rented housing, the right location is especially important. Inevitably any developer-led plan, such as that

offered in this draft, will promote only the delivery of housing most profitable to developers, who will reliably promote market housing in car-dependent greenfield sites in rural areas, where the largest profits are to be made. That is entirely in conflict with the approach demanded by the NPPF and its associated guidance, and with the 'Green' aspirations of the draft Local Plan, but it is exactly what has happened here.