

Lewes Local Plan Part 2 Comments from CPRE

These comments are made on behalf of the Lewes District Branch of CPRE Sussex [CPRE below]

Paragraphs 1.5-1.8. The role given to Neighbourhood Plans is welcomed.

Table 1 (page 11). The numbers in this table do not appear to add up as they should. It is also unclear what role this table plays in the overall Local Plan Part 2, as the numbers do not appear to be used later.

Policy DM1, paragraph 3. It would be very helpful if the Council could coordinate its policies to protect Ashdown Forest with those of neighbouring District Councils whose plans are similarly affected. This is surely required by the Duty to Cooperate. The spectacle of neighbouring councils wasting public money taking legal action against one another is unedifying.

Policy DM2 (Exception Sites). CPRE supports the principle of Exception Site housing in the District's rural areas. However, the proposal that market housing should be allowed within Exception Site developments (even exceptionally) does not seem to align with national policy and appears unwise. At the very least there should be a maximum proportion of market housing, and that too should be confined to the types of housing required by local first time buyers.

Policy DM3 (Rural Workers). CPRE supports this policy, including the extension of the definition of 'rural workers' beyond agriculture and forestry.

Policy DM5 (Replacement Dwellings in the Countryside). CPRE supports this policy.

Policy DM6 (Equestrian Development). CPRE supports this policy. Could provision (5) please include a reference to avoiding light pollution in the countryside, in accordance with the NPPF?

Policy DM9 (Farm Diversification). CPRE strongly supports this policy.

Policies DM10 & DM11 (Rural Employment). CPRE strongly supports these policies, which should not be too restrictive. There is currently a strong demand for rural employment sites (providing they are priced reasonably) and they have considerable potential to benefit the County economy. Rural employment sites should be protected from conversion to other uses, in so far as national policy allows.

Policy DM12 (Static Caravan Sites). Such sites are often eyesores, with strongly negative landscape impact. However, there are some locations where they can be inconspicuous [e.g. behind the Wok Inn on the B2192, in Wealden District but immediately adjacent to the Lewes District boundary] and static caravans do have the potential to provide temporary relief for rural housing need. The last sentence could perhaps make provision for occasional exceptions where stringent criteria can be met?

Policy DM14 (Green Infrastructure). Could this policy be rephrased to encourage more strongly the protection of existing Green Corridors and, where possible, the creation of new ones?

Policy DM19 (Good Agricultural Land). The inclusion of this policy is welcomed, though it adds little to the (widely ignored) NPPF provisions.

Policy DM24 (Protection of Biodiversity). This policy should also include the protection of ancient woodland and long-established hedgerows, which are extremely important in the struggle to retain biodiversity in the Sussex Weald. Ponds and ditches are also an important and diminishing resource for wildlife.

Policy DM27 (Landscape). Policy DM27(3) is strongly supported.

Policy DM31 (Advertisements). There needs to be a stronger policy to resist inappropriate advertisements in the countryside. To avoid light pollution they should never be illuminated.

Policy DM33 (Heritage Assets). Conservation Areas should be included in the policy.

Policy DM35 (Footpaths, Cycleways and Bridleways). The policy should seek to extend these networks where possible, in addition to protecting what we have. It is disappointing to see no attempt made to ensure that Lewes District (outside the National Park) takes advantage of the government's 2017 Cycling and Walking Investment Strategy. To many Sussex residents the Low Weald is as beautiful a landscape as the Downs.

Additional Policies required

1. The draft South Downs National Park included a strong policy to ensure that the sizes of new dwellings provided matched the actual need identified in the Local Plan Part 1. This Plan should include a similar policy.
2. Access to natural or semi-natural countryside is an important provision for urban residents. The Local Plan should include policies seeking to provide such recreational space where it is needed.

Appendix 4 & Appendix 5. The principle of including such appendices protecting additional local heritage assets is strongly supported. However, it is essential that the properties to be protected should be identified in consultation with local residents, who will have much to add to this process. It is surprising that there is only one building appropriate for local listing identified in Newick and none at all in Wivelsfield, Street, Ditchling (outside the National Park) or East Chiltington. One might also expect at least the occasional hidden gem in Newhaven and Seaford. Have those communities been consulted? The proposals for Ringmer appear at variance from those in the Ringmer Neighbourhood Plan. It is important that there is consistency between the different documents that make up the overall suite of development plan documents.

Lewes District Council Affordable Housing Supplementary Planning Document Comments from CPRE

These comments are made on behalf of the Lewes District Branch of CPRE Sussex [CPRE below].

CPRE recognises the high and unmet need for affordable housing in rural areas, where many rural workers and their families are unable to find accommodation in the communities in which they have grown up, in which they may work and where their social and family life is based. We support the provision of the highest possible proportion of affordable housing within the allocations to rural villages and additional provision via exception site developments where this can be achieved.

Paragraph 3.11 (housing mix) should not apply to rural communities, whose needs vary and may differ from those of urban areas or the District as a whole. In villages a higher proportion of family houses should be provided to make provision for local workers and their families at risk of being squeezed out of their communities. Village communities in Lewes District have an excellent record in bringing forward exception site developments, but in every case we are aware of have supported a mix with a much higher proportion of 2-bed and 3-bed family accommodation than is proposed in Paragraph 3.11.

The proportions of different housing sizes in paragraph 3.11 appear to be based on the demographics of need for affordable-rented housing in the District as a whole. However, the demographics of those seeking (and able to afford) intermediate housing are likely to be very different, and do not seem allowed for. Paragraph 3.11 should require different housing mixes for different affordable tenures. Otherwise we shall see inappropriate proposals (e.g. the recent Bovis Homes application for Bishops Lane, Ringmer) in which almost all the affordable-rented homes were 1-bed flats, while 100% of the intermediate housing was identical 2-bed houses. The policy needs to ensure that there is a good choice of homes provided for each tenure, as required to meet the provisions of the NPPF.

There is also a need for smaller units, ideally bungalows, specifically designed for older rural residents wishing to downsize from existing affordable housing while remaining within their communities. This would free up existing family housing.

Paragraph 8.2 is welcomed

Delivery of affordable housing by traditional Housing Associations has stalled in recent years for a range of reasons. New approaches to the delivery of affordable housing are to be welcomed, including approaches that may by-pass the HCA, such as via Community Land Trusts.

Paragraph 8.4 is too prescriptive, in the light of paragraph 8.2.

New approaches to delivery that bring in additional finance may well have (and raise new finance on the basis of) their own criteria for tenant selection, which may not correlate exactly with the Council's own housing policy. Community Land Trusts, for example, may wish to give a higher priority to local connection than the Council's allocation policy, or they may wish to define 'local connection' in a different way. The wording of paragraph 8.4 needs to be relaxed to reflect this, while maintaining an insistence that allocations of affordable housing must meet identified housing need from District households unable to house themselves without public subsidy.

Paragraph 9.2 (Monitoring)

This paragraph currently reads: *"9.2 In the event of a fall of 10 per cent or more in East Sussex average house prices (Land Registry House Price Index June 2011 baseline) the local planning authority will review the targets and thresholds of this policy guidance."*

Targets and thresholds should also be reviewed if house prices rise. In the text above the word 'fall' should be replaced by the word 'change'.