



Lewes District Local Development Framework

Core Strategy  
Preferred Options

**Preferred Options  
Evidence Base**

Background Reports

September 2006



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## **The Purpose of this Document**

This document has been published to provide detailed background to the Preferred Options for the Core Strategy for the Lewes District Local Development Framework, which has been published for public consultation.

We decided to publish the background evidence as a separate document in order to keep the Preferred Options document as concise as possible because we know that many people will not want to read through all the background information.

However, anyone who wishes to understand how we arrived at our conclusions on each of the issues that we examined can do so by reading the sections that follow in this document, which correspond with each of the issues in the Preferred Options Document.

The Preferred Options document itself can be obtained from;  
Planning and Environmental Services  
Lewes District Council  
Southover House  
Southover Road  
Lewes  
BN7 1AB

## Background

Local Development Frameworks, and their various comments including the Core Strategy, need to be soundly based in terms of their content and the process by which they are produced. They should be based upon a robust, credible evidence base. The Council recognises that the stronger the evidence base, the more robust the Local Development Framework is likely to be.

A starting point for the collation of the evidence base for the Core Strategy was to take on board all the relevant national planning policy guidance as well as policies/approaches advocated in the emerging South East Plan. In order to keep the Core Strategy concise, and in the spirit of the LDF planning regime, it is not appropriate to reiterate policies which have been set at these higher levels.

It is also important to base the Core Strategy on robust facts. The Council already held some basic information but it has been necessary to build on this to ensure that we have sufficient social, environmental, economic and physical information to identify the spatial characteristics of the District. The Council has also involved local communities, stakeholders and commercial interests in the development of the evidence base by means of participation (e.g. Open Houses and Engagement Parties) and taking on board the relevant elements of documents prepared by organizations outside the Council (e.g. Community Strategy, Local Transport Plan).

The information underpinning the evidence base needs to be kept up to date. Therefore, the preparation, and publication, of the Council's Annual Monitoring Report has a vital role. In addition, some topics may need further up to date survey work to be undertaken.

For each issue identified in the Preferred Option of the Core Strategy the Council has gathered the following information for the evidence base;

- Preferred option name and number (corresponds to the Preferred Options referencing)
- Most relevant national planning guidance/planning policy
- Regional Plan (South East Plan)
- Specific background documents
- What we were told as a result of consultation
- What the Community Strategy says

Evidence base for the Preferred Options on Cross Cutting (POCC)  
issues

## **Evidence Base for POCC 1: How can we address the causes of Climate Change?**

### **Most relevant national planning guidance/ planning policy**

*Planning Policy Statement 1: Delivering Sustainable Development* - Local planning authorities should ensure that development plans contribute to global sustainability by addressing the causes and potential impacts of climate change through policies which reduce energy use, reduce emissions (for example, by encouraging patterns of development which reduce the need to travel by private car, or reduce the impact of moving freight), promote the development of renewable energy resources, and take climate change impacts into account in the location and design of development.

*Planning Policy Guidance 14 – Development in unstable areas* - sets out the broad planning and technical issues to be addressed in respect of development on unstable land.

*Planning Policy Statement 22: Renewable Energy* - Renewable energy developments should be capable of being accommodated where technology is viable and other impacts can be addressed satisfactorily. Local development documents should contain policies designed to promote and encourage the development of renewable energy resources. The wider environmental and economic benefits of all renewable energy proposals are material considerations that should be given significant weight in determining planning applications.

*Planning Policy Guidance 25 – Development and Flood Risk* – the aim of this PPG is to set out that local planning authorities need to ensure that flood risk is properly taken into account in the planning of developments to reduce the risk of flooding and the damage which floods cause.

*Planning Policy Statement 25 – Development and Flood Risk* – This statement sets out the general direction to deal with flood and coastal erosion risk management policy over the next 10-20 years.

*Written Ministerial Statement 8 June 2006 Communities and Local Government Planning Policy Statement 22* -The Government expects all planning authorities to include policies in their development plans that require a percentage of the energy in new developments to come from on-site renewables, where it is viable.

### **Regional Plan (South East Plan)**

*Policy EN1: Development design for energy efficiency and renewable energy* - Encourage developers to submit an assessment of a development's energy demand and provide at least 10% of this demand from renewable sources for housing schemes over 10 dwellings and commercial schemes of over 1,000 sq m. Local authorities should also encourage energy efficiency through the use of appropriate materials, technologies, design, layout and orientation, with the use of best practice guidance such as BREEAM and NHER.

*Policy EN2: Combined heat and power (CHP)* - This should be encouraged in all developments, and the use of biomass fuel should be investigated and promoted.

*Policy EN3: Regional renewable energy targets* - 10% of renewable electricity generation capacity by 2020. Renewable energy electricity generation greatest from onshore/offshore wind, biomass and solar. Renewable energy heat generation greatest from solar and biomass.

*Policy EN5: Location of renewable energy development* - Renewable energy should be encouraged, but located and designed to minimise adverse impacts on landscape, wildlife and amenity. Within sensitive landscapes, e.g. AONBs, development should generally be small scale or community based.

*Policy EN6: Development criteria* - Local authorities should support in principle the development of renewable energy, with criteria based policies to consider the development's contribution towards renewable energy targets and CO2 savings as well as practical considerations.

### **Specific Background Documents**

*Our Energy future – creating a low carbon economy – Energy White Paper DTI 2003:* Government objectives are to generate 10% of UK energy from renewable sources by 2010 and to cut carbon dioxide emissions by some 60% by 2050. Over the next twenty years or so the UK will need to replace or update much of its energy infrastructure. The opportunity to shift the UK decisively towards becoming a low carbon economy where higher resource productivity - producing more with fewer natural resources and less pollution - will contribute to higher living standards and a better quality of life.

*Strategy for a changing climate –Climate Change Guide and climate change Action Plan for Lewes District consulting draft May 2006* - Working document for use as part of Lewes District Council's Climate Change Strategy ongoing consultation.

*BREEAM – Building Research Establishment Environmental Assessment Method* [www.breeam.org](http://www.breeam.org) includes Ecohomes and BREEAM standards which seek to balance environmental performance with the need for a high quality of life and a safe and healthy internal environment for homes and businesses.

*NHER – National Home Energy Rating* [www.nher.co.uk](http://www.nher.co.uk) This scheme provides energy ratings and energy efficiency support.

### **What we were told as a result of consultation**

There was good support for renewable energy systems and methods to promote sustainable water management that can be fitted for use within existing and new build developments. The need to ensure that development is located close to areas with good public transport links in order to reduce the need to travel by car was also well supported, with support for increased urban densities and mixed uses to reduce vehicle use.

### **What the Community Strategy says**

The Community Strategy says that local communities strongly support action to protect and enhance the local environment, and identifies environmental stewardship as important.

**Other options which have been sieved out of the process, and why (i.e. summary of Sustainability Appraisal).**

Doing nothing to address the causes of climate change as an option performed very poorly in the Sustainability Appraisal. The main principle objective behind the Sustainability Appraisal is to promote sustainable development and, therefore, addressing the causes of climate change, so “doing nothing” fails to address this issue.

## **Evidence Base for POCC2: How can we help reduce Social Deprivation?**

### **Most relevant national planning guidance/ planning policy**

None directly relevant.

### **Regional Plan (South East Plan)**

*Policy S1 – Social inclusion* – Should fully consider the spatial distribution of deprivation in the region.

*Policy SCT2 - Sussex Coast sub region - Enabling economic regeneration* – Direct efforts to areas of greatest need.

*Policy SCT5 - Sussex Coast sub region – Education and skills* – Training to regenerate special needs areas.

*Policy SCT6 – Co-ordination, Leadership and Promotion of the Sub Region* – Focus on delivering economic and social regeneration in the Newhaven Area.

### **Specific Background Documents**

*Index of Multiple Deprivation (IMD)* – Provides a detailed picture of the problems and inequalities within the District.

*Lewes District Council Housing Strategy 2006-2009* – in pursuance of the objectives of the Housing Strategy the Council has adopted the following priorities:

- balancing housing markets.
- enabling the delivery of new affordable homes.
- Tackling the causes of homelessness.
- Stock improvement programmes and decent homes.
- Providing housing with support services for vulnerable people.
- Developing partnerships.
- Promoting equality in services and valuing diversity in our communities.
- Encouraging sustainable communities.

### **What we were told as a result of consultation**

It was highlighted by some respondents that some deprivation is masked by areas of affluence. Also it was mentioned that if infrastructure/facilities/services were provided and/or improved, this would contribute towards addressing social deprivation. People also said that many cannot afford to buy or even rent a property in the district as living costs are so high.

- Providing for key workers and others who “can work, can’t buy.”
- Saving energy and tackling fuel poverty.

### **Other Options which have been sieved out of the process, and why (i.e. summary of Sustainability Appraisal)**

The option to do nothing has been rejected because it would exacerbate, and widen the gap, between areas of high and low deprivation, and so perpetuate social exclusion.

## **Evidence Base for POCC 3: How can we improve the quality of the built environment?**

### **Most relevant national planning guidance/policy**

*Planning Policy Statement 1: Delivering Sustainable Development* - Stresses the importance of high quality design and encourages local authorities to establish clear design policies and principles.

*Planning Policy Guidance 3: Housing* - Good design and layout of new development can help to achieve the Government's objectives of making the best use of previously-developed land and improving the quality and attractiveness of residential areas. In seeking to achieve these objectives, local planning authorities and developers should think imaginatively about designs and layouts which make more efficient use of land without compromising the quality of the environment.

*Consultation Paper on New Planning Policy Statement 3 (PPS3): Housing* - Local development frameworks should set out a strategy for housing provision within the context of the relevant sub-regional housing market area.

Separate targets should be set for social-rented and intermediate housing where appropriate. Local planning authorities should set a minimum site-size threshold, expressed as numbers of homes or area, above which affordable housing will be sought. The indicative national minimum threshold is 15 dwellings, but local planning authorities may set a different threshold or series of thresholds where this can be justified. In determining the minimum site-size threshold (and any higher thresholds), local planning authorities will need to take into account the level of affordable housing to be sought, site viability, the impact on the delivery of housing provision, and the objective of creating mixed and sustainable communities.

*Better places to live: A companion guide Department of Communities and Local Government (formerly ODPM)* – This document is a guide that challenges local authorities and developers to think more imaginatively about design and layout and includes many case studies.

### **Regional Plan (South East Plan)**

*Policy H5: Housing density and design* - Local authorities will prepare guidelines for the design of new housing in their areas that encourage the use of sustainable construction methods and address the changing lifestyles of new housing design. Design which is inappropriate in its context, or fails to take the opportunities available for improving the character or quality of an area, and the way it functions, should not be accepted.

*Policy CC11: Supporting an Ageing Population* – LDF should address a number of issues that contribute to the social needs of older people, including reasonable access to services and facilities.

### **Specific Background reports**

*Crime and Disorder Data Information Exchange by Caddie*. This website has up to date information about crime, although the District is not a high crime area.  
[www.caddie.gov.uk](http://www.caddie.gov.uk)

*Index of Multiple Deprivation* – Overall the Lewes District scores well on indicators relating to crime and living environment.

**What we were told as a result of consultation**

The comments received from the consultation undertaken were to be brave with modern designs and to avoid mediocrity in design. Concern was raised with regard to the poor design of housing development. Comments were also made on the need for sustainable design and that crime and accessibility is considered when designing new developments.

It was stated that high density development can be well designed.

**What the Community Strategy says**

The Community Strategy mentions the need to develop houses which have a good design.

**Other options which have been sieved out of the process, and why (i.e. summary of Sustainability Appraisal)**

Do nothing, have no policies regarding design. This option could result in an area which has unattractive or inappropriate new development, which would result overall in a poor environment for

## **Evidence base for Preferred Options on general environment (POGE) issues**

**Evidence Base for POGE 1 : How can we achieve the balance of protecting the natural environment whilst at the same time taking account of pressures for development?**

**Most relevant national planning guidance/planning policy**

Planning Policy Statement 7: Sustainable Development in Rural Areas: Promotes sustainable economic growth and diversification, ensuring people have places to live and protecting landscapes.

Planning Policy Statement 1: Delivering Sustainable Development: Overall guidance dealing with social progress which recognises the needs of everyone, effective protection of the environment, the prudent use of natural resources, and the maintenance of high and stable levels of economic growth and employment.

Planning Policy Statement 9: Biodiversity and Geological Conservation: To conserve, enhance and restore the diversity of England's wildlife and geology.

Planning for Biodiversity and Geological Conservation: A Guide to Good Practice: Provides good practice guidance, via case studies and examples, on the ways in which regional planning bodies and local planning authorities can help deliver the national policies in PPS9.

Local Sites – Guidance on their identification, selection and management (DEFRA): Non statutory local sites make a vital contribution to delivering both the UK and the local Biodiversity and Geodiversity Action Plans.

**Regional Plan (South East Plan)**

*Policy CC10b - Strategic gaps* - Where there is a need to prevent the coalescence of settlements in order to retain their separate identity, local authorities may identify the location and boundaries of strategic gaps.

*Policy NRM4 Areas for biodiversity improvement* - Policy to avoid a net loss of biodiversity, and to actively pursue opportunities to achieve a net gain in biodiversity and priority habitats across the region.

*Policy C2 - AONB* - Priority should be given to conservation and enhancement of natural beauty in the region's Areas of Outstanding Natural Beauty (AONBs).

*Policy BE4 - Boundaries of urban rural fringe* - Identification of the urban/rural fringe around settlements and ways to manage it.

*Policy C3 - Landscape and Countryside management* - This policy encourages high quality management of the region's open countryside.

*Policy CC12 - Character of the Environment and Quality of Life* - This policy deals with the conservation, and where appropriate the enhancement of the character, distinctiveness, and sense of place of settlements and landscapes.

**Specific Background Documents:**

*South Downs Management Plan*: This Plan has environmental and social principles that underpin the objectives, policies and actions that will help to protect and enhance

the landscape, whilst helping people to enjoy it and to live and work in the area, without damage to its natural beauty.

*From Rio to Sussex: Action for Biodiversity by Sussex Biodiversity Partnership - A Biodiversity Action Plan for Sussex: to focus resources to conserve and enhance biodiversity by means of local partnerships, taking account of both national and local priorities.*

*Environment Agency: State of the Environment South East: Environmental indicators and data for the South East.*

**What we were told as a result of consultation:**

Generally most people placed a very high priority on protecting the environment due to the nationally and internationally important landscape in this area. Protecting the environment came out consistently as the top issue of the highest importance in this District.

**What the Community Strategy says:**

Environmental stewardship is specifically mentioned in the Lewes section of the strategy, however one of the main priorities for the Community Strategy as set out in the Vision is to Value the Environment.

**Other options which have been sieved out of the process, and why (i.e. summary of Sustainability Appraisal).**

By running the options through the Sustainability Appraisal, flexibility to develop some areas of national importance was identified as a sustainable option. This highlights where the results of the Sustainability Appraisal are in conflict with national guidance, where stricter protection is required.

Protecting the Area of Outstanding Natural Beauty, unless development is of national importance, came through the Sustainability Appraisal badly as it was not flexible enough to allow certain small scale sensitive development in areas that are sustainable, but on the other hand allows flexibility for development that is likely to have a significant impact on the environment. Similarly, controlling the number of tourists to the area by limiting the amount of tourist accommodation came through badly. Particularly in terms of the economic impact as it limits spending in the area which partly relies on the tourist economy.

Strategic Gaps, in accordance with the South East Plan, were also considered but other designations, such as Area of Outstanding Natural Beauty and Sites of Special Scientific Interest, protect these areas. It was therefore considered inappropriate to have this additional layer of designation.

**Evidence Base for POGE 2: How can we ensure that the historic environment is protected?**

**Most relevant national planning guidance/ planning policy**

*Planning Policy Guidance 15: Planning and the historic environment:* Local plans should set out clearly the planning authority's policies for the preservation and enhancement of the historic environment in their area, and the factors which will be taken into account in assessing different types of planning application.

*Planning Policy Guidance 16: Archaeology and planning:* Development Plans should include policies for the protection, enhancement and preservation of archaeological sites and their settings.

**Regional Plan (South East Plan)**

*Policy BR7 – Management of the historic environment* - Sets out that we should adopt policies which support the conservation and where appropriate the enhancement of the historic environment.

**Specific Background Documents**

*A way forward for the economy of Lewes District* - The quality townscape, heritage and culture is an increasingly important economic resource for tourism and other economic activities.

*Regional Economic Strategy by SEEDA* - Recognises the environment as an important resource for the regional economy.

**What we were told as a result of consultation**

The need to allow sympathetic development in historic areas was supported. Consultees also wanted to see modern buildings being mixed in with historic buildings.

**What the Community Strategy says**

The Community Strategy states that the District has a diverse built environment.

**Other options which have been sieved out of the process, and why (i.e summary of the Sustainability Appraisal)**

The option of 'no development that affects the character' performed poorly against the sustainability appraisal as it did not have positive impacts in terms of meeting the economic and social objectives by allowing change.

## **Evidence Base for POGE 3 – How can we deal with the threat from flooding?**

### **Most relevant national planning guidance/planning policy**

*Planning Policy Guidance 20: Coastal Planning* – Rising sea levels and recent cases of severe coastal flooding have focused attention on minimising both the risk to life and damage to property. This should be done by identifying areas likely to be at risk from flooding. A precautionary approach is also required for policies relating to land affected, or likely to be affected, by erosion or land instability. In the case of receding cliffs, development should not be allowed to take place in areas where erosion is likely to occur during the lifetime of the building. These areas should be clearly identified and mapped, and shown in development plans.

*Planning Policy Guidance 25: Development and Flood Risk* – Sets out the need for sequential test to be taken with regard to development proposals. Strategic Flood Risk Assessment to be prepared which will determine whether development policies of land allocations will increase the risk of flooding.

*Planning Policy Statement 25: Consultation Document* – Again advocates a sequential approach to determining the suitability of land for development in flood risk areas. Departure will only be justified in exceptional circumstances where it is necessary to meet the wider aims of sustainability. There is a need to carry out a Strategic Flood Risk Assessment.

### **Regional Plan (South East Plan)**

*Policy NRM3: Sustainable Flood Risk Management* - Sequential approach to development in risk areas set out in PPG25 should be followed.

*Policy NRM6: Coastal Management* - This policy sets out that an integrated approach to coastal zone planning is required. Also local development Documents should take account of climate change; promote and establish cross border arrangements to facilitate an integrated approach to the implementation of the Shoreline Management Plan; ensure that development does not prejudice options for managed realignment, restrict development on the coastline unless it requires a rural coastal location; prevent development on unstable land and realise opportunities for sustainable coastal defences.

### **Backgrounds reports**

*Shoreline Management Plan by South Downs Coastal Group* – This provides short and long term assessment of the risks associated with coastal flooding and erosion and presents a policy framework to address these risks to people and the developed, historic and natural environment in a sustainable manner. The document informs wider strategic planning. The area the document covers is the coast from Selsey Bill to Beachy Head.

*Sussex Ouse Flood Management Strategy by Environment Agency (Binnie, Black, and Veatch)* – This is a catchment strategy for the Ouse to consider the long term management of the flood defences within the catchment. It recommends continuation and improvement of the flood warning system for the Ouse Catchments.

*Saltdean to Newhaven Coast Defence Strategy by Environment Agency* – Detailed coastal strategy on preferred approach to coastal management for next 50 years, identifying range of coast defence options and preferred approach.

*River Ouse to Seaford Coast Defence Strategy by Environment Agency (Binnie, Black, and Veatch)* – Includes River Ouse from the sea to the A27 and Seaford Bay. Will be subject to consultation later this year.

*Cuckmere and Sussex Haven Flood Management Plan by Environment Agency* – Affects a very small, but important part, of Lewes District in the lower Cuckmere Valley.

*Wivelsfield Land Drainage Study by Royal Haskoning*– Analysis of, and recommendations for mitigating, land drainage problems in Wivelsfield Green which despite its location on the Ouse/Adur watershed has had significant flooding problems over recent years.

#### **What we were told as a result of consultation**

There is a need to protect the coast and ensure that there is no housing on the cliff tops. Also development should not be allowed on the floodplain or coastal areas at risk. Some people saw the building of new development or expansion of existing development on floodplains as necessary and worth the risk of occasional flooding. Others saw building on floodplains as short sighted.

It was suggested that new housing could be built on stilts with car parking below. This may allow housing to be built on flood plains.

#### **What the Community Strategy says**

Coastline issues are not mentioned in the Community Strategy. The need for improved flood defences in Lewes is mentioned.

#### **Other options which have been sieved out of the process, and why (i.e. summary of Sustainability Appraisal)**

The options to develop areas that are affected by flooding, either coastal or fluvial, were rejected as a sustainable option. It is recognised that flooding is likely to be exacerbated by global warming.

**Evidence base for POGE 4: How can we look after and provide important and varied habitats in the District?**

**Most relevant national planning guidance/ planning policy**

*Planning Policy Statement 9: Biodiversity and Geological Conservation*

This sets out that there should be the aim to maintain, and enhance, restore or add to biodiversity and geological conservation interests. Plan policies should promote opportunities for the incorporation of beneficial biodiversity and geological features within the design of development. Local development documents should indicate the location of designated sites of importance for biodiversity and geo-diversity, making clear distinctions between the hierarchy of international, national, regional and locally designated sites; and identify any areas or sites for the restoration or creation of new priority habitats which contribute to regional targets, and support this restoration or creation through appropriate policies.

*Local Sites – Guidance on their identification, selection and management (DEFRA):*

This guidance recognises that non statutory local sites make a vital contribution to delivering both the UK and the local Biodiversity and Geodiversity Action Plan.

**Regional Plan (South East Plan)**

*Policy NRM4 - Conservation and improvement of biodiversity* - Authorities shall avoid a net loss of biodiversity, should provide protection for nationally and internationally designated sites, and maintain and establish accessible green networks and open green space in urban areas.

**What we were told as a result of consultation**

Throughout the different consultation exercises the community expressed the need to protect the District's biodiversity from perceived threats such as development.

**What the Community Strategy says**

One of the aims of the Community Strategy is to value the environment. Also the Lewes Partnership recognises the importance of environmental stewardship.

**Other options which have been sieved out of the process, and why (i.e. summary of Sustainability Appraisal).**

The option to 'protect less' performed badly against the sustainability appraisal as it would result in the loss of important habitats which cannot be replaced.

## **Evidence base for Preferred Options on infrastructure (POI) issues**

**Evidence Base for POI 1: How can we ensure that adequate infrastructure is provided in the District?**

**Most relevant national planning guidance/policy**

*PPS12 – Local Development Frameworks* - Improved delivery arrangements for infrastructure are required.

Local planning authorities must develop a strategic approach to infrastructure provision when preparing Local Development Documents.

Local Development Documents should include policies and guidance on the role of development contributions towards infrastructure.

**Regional Plan (South East Plan)**

*Policy CC5 - Infrastructure and implementation* - Local Development Documents should identify the necessary additional infrastructure and services required to serve the area, and the development they propose together with the means. Local Authorities have to be satisfied that the necessary infrastructure is, or will be, available in time to serve the new development.

*Policy S8 - Community Infrastructure* - The mixed use of community facilities should be encouraged by local authorities, public agencies and other providers, through Local Development Documents.

*Policy NRM2 – Strategic Water Resource Development* - Strategic water resource options that may be required include a reservoir at Clay Hill (N E of Lewes) by 2014/5. Desalination may also be required.

*Policy SCT7 – Sussex Coast Sub region* – Housing stock increase subject to the provision of all necessary infrastructure.

*Policy SCT9 – Sussex Coast Sub region* – Authorities should work to ensure that all necessary infrastructure can be provided in time to serve the development.

SE Plan Implementation Plan: Identifies the following Strategic Infrastructure in the District:

- A27 Beddingham Improvements
- Newhaven Port Access Road
- A259 South Coast Quality Bus Corridor
- New reservoir at Clayhill

**What the community strategy says**

The Community Strategy sets out that there is a need for better recreation facilities and transport improvements, as roads are congested.

**What we were told as a result of consultation**

Infrastructure has been a key theme throughout the consultation undertaken.

Concern was expressed particularly with regard to water, transport and healthcare. It was also stated that we need development of a sufficient size to provide new infrastructure.

**Other options which have been sieved out of the process, and why (i.e. summary of Sustainability Appraisal)**

The option to do nothing performed poorly against the sustainability appraisal. This would result in a District which would not be functioning adequately, without the services and facilities necessary to support development.

**Evidence Base for POI 2: How can we protect existing, and provide new, leisure facilities in the District?**

**Most relevant national planning guidance/ planning policy**

*Planning Policy Statement 1: Delivering Sustainable Development* - Overall statement dealing with social progress which recognises the needs of everyone, effective protection of the environment, the prudent use of natural resources, and the maintenance of high and stable levels of economic growth and employment.

*Planning Policy Guidance 17: Planning for open space, sport and recreation* - Guidance to ensure effective planning for open space, sport and recreation.

**Regional Plan (South East Plan)**

*Policy S1 Social Inclusion* - When developing strategies, local planning authorities should fully consider the spatial distribution of deprivation in the region and ensure policies and programmes are implemented to address these issues at a local level.

*Policy S3 - Supporting Healthy Communities*: This policy is about embracing preventative measures to address the causes of ill health by reflecting the role of the planning system.

*Policy S7- Cultural and Sporting activities*: This policy encourages increased and sustainable participation in sport, recreation and cultural activity.

*Policy S8 - Community Infrastructure*: This policy encourages the mixed use of community facilities.

**Specific Background Documents:**

*Informal Open Space Report by East Sussex County Council*: Identifies areas in the District where there is a shortfall in open space and where it is necessary to provide more informal open space.

*Outdoor Playing Space Review by PMP*: This report gives a current picture, and a future supply and demand analysis, for outdoor play space.

**What we were told as a result of consultation:**

Throughout all the consultation exercises the lack of facilities for young people came up often and was an important issue.

**What the Community Strategy says:**

One of the aims of the Community Strategy is to improve local facilities. In addition, the local partnerships have identified the following issues;

**Newhaven**: Working with young people in Newhaven to improve and make better use of existing facilities and working with other partners to find ways of funding new facilities. Working with partners in Newhaven & Peacehaven to develop a 'SureStart Programme' to give children aged 0-4 and their parents access to better services.

**Lewes**: Youth and Community Facilities.

**Peacehaven and Telscombe**: Better Community Facilities.

**Seaford**: Identifies need for better facilities for young people.

**Rural**: Improved opportunities for young people.

**Other options which have been sieved out of the process, and why (i.e. summary of Sustainability Appraisal).**

Do nothing was sieved out of the process as it is not a sustainable option and would not address the issues such as improving accessibility to facilities, reducing the need to travel to facilities and the improvement of deprived areas.

New facilities need to be provided where there is a deficit and it is important that existing ones are retained. Also, there is a need to understand what facilities are needed and the best location for them.

**Evidence Base for POI 3: How can we move around the District in a effective and sustainable manner?**

**Most relevant national planning guidance/planning policy**

*Planning Policy Guidance 13: Transport:* This Guidance promotes more sustainable patterns of development and making better use of previously developed land, and recognizes the need to focus additional development in existing towns and cities.

*Planning Policy Guidance 3 – Housing:* This emphasises the need to create sustainable patterns of development by building in ways which exploit and deliver accessibility to public transport to jobs, education and health facilities shopping, leisure and local facilities. It also seeks to reduce car dependence by facilitating more walking and cycling and by improving linkages by public transport between housing, jobs, local services and amenities.

**Regional Plan (South East Plan)**

*Policy T1 – Manage and invest –* Policies are needed to rebalance the transport system in favour of non car modes as a means to access services and facilities. Encouragement will be given to ensure that development is located and designed to reduce journeys.

*Policy T3 Regional Spokes-* Local development documents will include policies and proposals that support and develop the role of regional spokes.

*Policy T5 - Mobility Management -* This policy sets out that Local Development Documents will seek to achieve a rebalance of the transport system in the favour of non car modes.

*Policy T7- Parking –* The use of parking policy to discourage car use.

*Policy T8 – Travel Plans and Advice -* All major travel generating development must have travel plans.

**Specific Background Documents**

*Local Transport Plan 2 by ESCC–* Seeks to improve access to services by providing greater travel choices and influencing land-use decisions, manage demand and reduce the need to travel by private car, reduce congestion and improve the efficiency of the transport network, improve maintenance and management of the transport network. The implementation plan identifies the A27 Beddingham Improvement Scheme, and the Newhaven Port Access Road as strategic requirements.

**What we were told as a result of consultation**

A mix of options should work together to deal with this issue. There is a need to improve cycle safety, control car speeds, educate people about the implications of car use, and there is a need for trains to stop more often at the smaller stations in the District. All these options provide alternatives to the private car. Throughout all of the consultation work undertaken the importance of reopening the railway line between Lewes and Uckfield has been stressed.

**What the Community Strategy Says?**

There is nothing specific in the Community Strategy in relation to the issue of transport. However, the Lewes, Peacehaven and Telscombe, Seaford and the rural partnerships all highlight one of their priorities to be improvements to transport.

**Other options which have been sieved out of the process, and why (i.e. summary of Sustainability Appraisal).**

All options came out similarly in sustainability terms. However only the option to improve the road network had any negative impacts on the sustainability objectives as it conflicted with the majority of the social/economic and environmental objectives.

**Evidence Base for PO14: Newhaven port is particularly important to the District.**

**Most relevant national guidance/ policy**

*Planning Policy Guidance 13:* Emphasizes the need to take advantage of opportunities for freight generating development to be served by waterways by influencing the location of development and by identifying and, where appropriate, protecting realistic opportunities for waterway connections to existing manufacturing, distribution and warehousing sites.

**Regional Plan (South East Plan)**

*Policy T10 – Ports and Short Sea Shipping* – Maintain and enhance the role of Newhaven for a `niche` market. Encouragement should be given to investment in landside infrastructure to support short sea shipping.

*Policy SCT2- Enabling economic regeneration* – Increased priority to investment decisions and other direct support for the sub-region including increasing the priority given to Sussex coast (from Shoreham to Rye).

*Policy SCT3 – Management of existing employment sites and premises* – Develop and co-ordinate with other agencies delivery mechanisms to unlock and implement sites with economic development potential, including port sites at Newhaven.

*Policy SCT4 – Employment priority in land allocations* - should give priority to delivering employment development in strategically accessible locations.

*Policy SCT6 – Co-ordination, leadership and promotion of the sub-region* – should agree long term vision and together develop joint, multi-agency plans and frameworks with specific reference to the Newhaven area (to continue the regeneration of the town to strengthen its economic base and revitalise the port and improve the environment).

**Specific Background Documents**

*An Analysis of Business Growth Potential in Lewes District by Step Ahead* – This study recognises the potential of the port to become more central to the way tourists enter the District. Trying to increase the proportion of visitors that stay over night in the district would help to increase the economic impact that tourism has on the local economy.

*East Sussex Economic Strategy by the East Sussex Economic Partnership* -Highlights that Newhaven is a "priority Building Block of the County-wide Economic Strategy". It specifically identifies Newhaven as a Gateway to Europe and recognises the need to maximise Newhaven's potential in terms of investment in integrated transport.

*Local Transport Plan 2 by East Sussex County Council* - Recognises that Newhaven port potentially offers a strategic role for the town. Therefore, it promotes the development of a Port Access Road (PAR) to improve the access to the port and associated land. The PAR could be important in reviving Newhaven as an important gateway to Europe. The LTP2 also identifies the need to re-establish the Town Railway Station as a transport interchange.

*Newhaven Eastside Masterplan by Roger Tym and Partners* - This report concludes that the present policies in the adopted Local Plan for Newhaven are sound in the medium term. Therefore, it advocates Railway Quay can be released for mixed,

predominantly housing, if not required for port use. It recommends that Eastside Business Park site should be developed for employment uses. The port is seen to have a viable future as a niche port for at least the medium term, and the report recommends support for its current role. However, it recognises that in the longer term further redevelopment of port land for leisure uses such as a marina, or mixed residential uses should not be ruled out.

*East Sussex, Brighton and Hove Minerals Local Plan* - North Quay is of strategic importance for the landing of marine dredged aggregates for the County.

*East Sussex, Brighton and Hove Waste Local Plan* – North Quay is allocated for an Energy from Waste plant to dispose of municipal waste arisals in the plan area.

*A way forward for the economy of Lewes District by Lewes District Council* – envisages the port providing a gateway to Lewes, County and indeed the South East.

#### **What the Community Strategy says**

Nothing specific relating to the economic profile of Newhaven in the Community Strategy. However, the local partnership (Newhaven Strategic Network) has carried out the following work;

*Newhaven – New future 10 year Masterplan* – This Plan recognises the importance of the port and encourages businesses to take full advantage of the port's position to bring economic growth to the town. It confirms that the port provides an important location for the import of the East Sussex's sea dredged aggregates as well as the home to Newhaven's fishing fleet. However, it recognises that the port itself is in poor condition.

#### **What we were told as a result of consultation**

It was recognised that Newhaven port should provide a gateway to England and also plays an important part in defining the character and uniqueness of Newhaven.

#### **Other options which have been sieved out of the process, and why (i.e. summary of Sustainability Appraisal)**

Maintaining all port land for port use, and designating a simplified planning zone did not emerge as the best options for sustaining the port's future. There were too many unknowns associated with the option of building closer links with Europe to make that a viable option.

It may be feasible to designate part of the Port area as a Simplified Planning Zone in order to allow more flexibility for port-related uses.

## **Evidence base for Preferred Options on housing (POH) issues**

**Evidence Base for POH1: How are we going to provide adequate land for housing the population of our district?**

**Most Relevant National Planning Guidance/Planning Policy**

[Planning Policy Statement 1: Delivering Sustainable Development](#) - Overall statement dealing with social progress which recognises the needs of everyone, effective protection of the environment, the prudent use of natural resources, and the maintenance of high and stable levels of economic growth and employment.

[Planning Policy Guidance 3: Housing](#) - The Government intends that everyone should have the opportunity of a decent home. They further intend that there should be greater choice of housing and that housing should not reinforce social distinctions. The housing needs of all in the community should be recognised, including those in need of affordable or special housing in both urban and rural areas.

*Planning Policy Statement 3: Housing (Consultation draft)* - Local development frameworks should set out a strategy for housing provision within the context of the relevant sub-regional housing market area. Separate targets should be set for social-rented and intermediate housing where appropriate. Local planning authorities should set a minimum site-size threshold, expressed as numbers of homes or area, above which affordable housing will be sought. The indicative national minimum threshold is 15 dwellings, but local planning authorities may set a different threshold or series of thresholds where this can be justified. In determining the minimum site-size threshold (and any higher thresholds), local planning authorities will need to take into account the level of affordable housing to be sought, site viability, the impact on the delivery of housing provision, and the objective of creating mixed and sustainable communities.

*Planning Policy Statement 7: Planning policies in Local Development Documents* should facilitate and promote sustainable patterns of development and sustainable communities in rural areas. This should include policies to sustain, enhance and, where appropriate, revitalise country towns and villages (including through the provision of affordable housing) and for strong, diverse, economic activity, whilst maintaining local character and a high quality environment

**Regional Plan (South East Plan)**

*Policy H1: Housing provision:* In the South East provision will be made for an annual average of 28,900 net additional dwellings between 2006 and 2026, the component in the Lewes District is 4400 units (i.e. 220 per annum). Local authorities should adopt a plan, monitor, and manage approach (still subject to public examination).

*Policy H2: Delivering adequate levels of housing:* Local authorities will prepare and keep under review Housing Delivery Action Plans, phasing the development of large sites with the provision of infrastructure to ensure that overall housing allocations can be met.

*Policy H3: The location of housing:* Advice on planning i.e. near to services in sustainable locations and not large single tenure estates, mixed use areas, 60% of housing should be met on brownfield land. Local authorities to complete Urban Potential Studies.

*Policy H4: Affordable Housing:* Overall regional target that 25% of all new housing

should be social rented accommodation and 10% other forms of affordable housing. Where justified by housing need assessments, Local Development Documents should specify the tenure of housing being sought. There will be a presumption in favour of on-site affordable housing provision.

*Policy H5: Housing Density and Design:* Higher housing densities will be encouraged, with an overall regional target of 40 dwellings per hectare, local authorities will prepare design guidelines.

*Policy H6: Type and Size of New Housing:* Produce housing need and market assessments to establish type and size of new housing needed in the district.

*Policy H7: Making Better use of Existing Stock:* Local authorities should assess the existing housing stock in their areas and implement measures to reduce the number of vacant, unfit and unsatisfactory dwellings.

*Policy SCT1: Sussex Coast Sub-Region- Core Sub-Regional Strategy :* Need to achieve a better balance between provision of housing and capability of local environment and economy to absorb it in a sustainable way.

*Policy SCT7 – Sussex Coast Sub-Region – Broad Amount and Distribution of Future Housing Development :* Local Development Documents to make provision for 3400 units subject to provision of necessary infrastructure.

*Policy SCT 8 - Sussex Coast Sub-region – Affordable housing:-* At least 40% of housing should be affordable and the threshold is 15 units or more unless lower threshold can be justified.

*Policy GAT2 Gatwick Sub Regional Strategy – Housing distribution:* No specific allocation for Lewes District.

*Policy GAT3 Gatwick Sub Regional Strategy – Affordable housing:* Should aim for target of 40% affordable housing.

*Regional Housing Board Strategy for 2006 onwards:* States that the Housing Corporation will in general only fund affordable housing on sites that deliver a density of at least 40 dwellings per hectare. It prioritises the provision of more affordable housing, bringing decent homes within reach of people on lower incomes and improvement to the quality of new housing and existing stock.

### **Specific Background Documents**

*Lewes District Housing Needs Survey Final Report by DCA* – This highlights the affordability problem in the District arising from the relationship between local incomes and the supply of cheap housing stock. It sets out that subsidised affordable housing should be negotiated on all suitable sites. The Council should set a target for each site taking into account existing supply, survey demand and other regeneration issues, planning, sustainability and economic factors.

The proportion of affordable housing provided on new sites should encompass more subsidised low cost market housing than would have been that case four years ago. The annual level of outstanding affordable need is 230 units.

*Affordable Rural Housing Commission by DEFRA* – This sets out that delivering rural housing must be part of the mainstream planning system. Exception sites are a

useful tool but should not be relied on, local need should be met through the allocation of sites for affordable and market housing in local planning documents.

Local Development Frameworks should focus significant development on market towns or local service centres which are well served by public transport and other facilities. Sites should be allocated for purely affordable housing in larger villages.

*Homes for rural communities - Report of the Joseph Rowntree Foundation Rural Housing Policy Forum* - The national threshold at which planners are obliged to require some affordable housing is set at 24 homes. This has little relevance for most rural housing schemes which typically comprise 4-8 homes, and helpfully the draft PPS3 has recognised this. Local authorities have the power to lower the threshold so that smaller developments must also include some affordable housing for local people.

We urge more local authorities to experiment with allocating sites for affordable housing in their LDFs, and for Government to monitor the success of this approach. The price of these should also be limited to a maximum of £10,000 per plot.

*Housing Strategy 2006-2009 by Lewes District Council* – In pursuance of the objectives of the Housing Strategy the Council has adopted the following priorities.

- Balancing housing markets
- Enabling the delivery of affordable homes
- Tackling the causes of homelessness
- Stock improvement programmes and decent homes
- Providing housing with support services for vulnerable people
- Developing partnerships
- Promoting equality in services and valuing diversity in our communities
- Encouraging sustainable communities
- Providing for key workers for others who “can work, can’t buy”.

*Can Work- Can't Buy by the Joseph Rowntree Foundation* – This Study was undertaken across the Country examining the ability of working households, both existing and new forming to become households. The Study in relation to Lewes District showed that in 2003 the District was the 10<sup>th</sup> highest price-to-income ratio out of over 350 local authority areas in the country at 5.86 to 1.

*District Council's Housing Register (June 2006)*- In total some 364 households responded. The results indicate that people seeking affordable housing have a strong tendency to prefer remaining in their present settlements, near families and other sources of support, in good quality neighbourhoods and accessible to work.

*A Way Forward for the Economy of Lewes District* – Envisages more affordable housing to be available to enable employers to attract a suitable workforce.

#### **What the Community Strategy says:**

The Community Strategy does not specifically mention the issue of housing only the shared aim of wanting a safe place to live, amongst other aims. However, the Lewes Partnership specifically mentions the need for affordable housing and the Rural Partnership highlights that the planning for housing is a concern, including ones that are affordable and good design.

#### **What we were told as a result of consultation:**

During the Open Houses we informed the public that we needed to make a choice about where housing should be located in the district and gave them the opportunity to give their opinion as to where development should be located in the District.

This exercise was to just to give us an indication of public opinion. However, they did not have access to a range of and was not informed by access to background evidence, such as the facilities and services in each settlement, the environmental designations, the floodplain, sensitive views/landscapes and all the other considerations that must be made when making a decision as to the best location of housing. It should be noted that this is also a very small representation of opinion.

The results of this exercise showed that generally there seem to be a spread of where development should be located, and that generally the southern settlements wanted to see development in the northern areas.

The comments that we received during the Open Houses also specifically dealt with the issue of housing and in general in Seaford people didn't want anymore development and for it to be put in Lewes or Haywards Heath. In Newhaven there was several comments on protecting the cliff areas from new housing, in Peacehaven no more housing was the general comment, in Lewes brownfield rather than greenfield sites should be developed and in Newick development should be located in existing areas.

Within the cross department 'Engagement Party' consultation housing was a particular subject which was covered. Some of the key points that came out from this workshop was that housing allocations need to be large in order to provide all the others services and infrastructure and suggested areas for housing allocations was Cooksbridge, Ringmer and areas adjacent to Burgess Hill.

At the Parish Council and councillor event the main issues that came out were, the importance of infrastructure to match the new housing, that the district boundary is increasingly irrelevant as people look to Burgess Hill etc for services and facilities, affordable housing for employees in the District, close analysis of the type of new business units needed, and the retention of employment sites important. At the stakeholders event the main issues raised in relation to housing were the need for good design e.g. open spaces around high density housing, bike storage, and that planners need to be pro-active to get good design and look at imaginative design for areas at risk from flooding e.g. homes built on stilts.

During the consultation on the Core Strategy issues and options most people supported the idea of using the sequential approach to deliver housing in the district and the most popular area for development growth was to concentrate all development at the north west tip of the district in areas adjacent to Burgess Hill and Haywards Heath, but also even distribution to the towns only.

Applicants on the District Council's Housing Register (often called Waiting List) were consulted by postal survey in June 2006. Some 364 households responded. They were invited to specify up to 3 area choices. The most sought after locations were the four main towns. In addition, they were asked to specify as many reasons as they wished for wanting to live in the area. The most frequent reasons for their area preferences were: Near family or carer (206 responses), always lived there (126), quality of neighbourhood (117), employment/closer to work (103). These results indicate that people seeking affordable housing have a strong tendency to prefer remaining in their present settlements.

**Options which have been sieved out of the process, and why (i.e. summary of Sustainable Appraisal)**

One of the options for housing growth is to distribute housing evenly throughout the District which would lead to small housing sites evenly spread across the District. However, this could mean that by spreading development evenly throughout the District there would be an increase in the need to travel to services and facilities. This would not create enough demand for local facilities thus increasing car use and increase congestion. Also, the housing need is not evenly spread around the District. This option was therefore rejected as it was not a realistic option to enable the provision of housing in the District.

Developing new housing by having a smaller expansion of many of the villages is also a possible option; however, it would have many negative effects similar to distributing development evenly around the District. Developing villages would isolate people from services and facilities provided only in larger centres. Distributing development amongst the villages is unlikely to provide settlements of a size able to support the range of services that people need. The resulting impact of this is that further car journeys would be needed with the resulting negative effects. This option was, therefore, rejected.

Throughout the consultation many people suggested the development of the areas adjacent to Burgess Hill and Haywards Heath in the north western tip of the District. Development of this area would obviously be reliant on services/facilities in Burgess Hill and Haywards Heath in Mid Sussex as these are the closest centres with a range of facilities. By concentrating development in this area it may be possible to provide a significant amount of affordable housing, as it would give a significant amount of development in an area where there are arguably not as many planning constraints as some other areas. However, those living in the affordable housing would be people associated with Burgess Hill and that may not address the localised affordability problems throughout the District. There are, however, benefits to this option as development would be closely located to large urban centres and it may be possible to provide the relevant infrastructure.

Similarly there could be the expansion of one town. However, this also has some difficulties as it would mean a significant amount of land would need to be developed in one location. Clearly the coastal settlements are not able to cope with such a strategy in terms of infrastructure, the structure of the settlements and also environmental designations as they are closely hemmed in between the Downs and the sea. Lewes also has many constraints with environmental designations and the floodplain, but it may be able to expand to a limited extent. The benefits of concentrating development in one area is that significant services and facilities and infrastructure are more likely to be provided, as opposed to smaller sites on edges of settlements, which tend to utilise existing local facilities and services and infrastructure.

If development took place only in the towns this would mean the housing would be distributed between Lewes, Seaford, Newhaven, the edge of Burgess Hill and Peacehaven/Telscombe. As mentioned above the southern towns in the district have local issues that are particularly important and were not given extra weight in the sustainability appraisal, e.g. the physical structure of the settlements, traffic congestion on the A259, and the remoteness from services of the outer edges of Peacehaven and Seaford, which make many people rely on the private car for everyday services. Even distribution of housing allocations to the towns is not therefore seen as the best solution to deal with housing growth and has been rejected as an option.

Another option could be to develop one village significantly; the success of this would depend very much on which village was developed as some are remote and inaccessible by public transport, such as Barcombe, others are within the AONB such as the southern villages and some have substantial conservation areas such as Barcombe, Glynde, Newick, Ditchling and Chailey. The substantial development of one village could lead to some services and facilities being provided locally. However it would not provide all services in the short term and possibly not even in the long term, so access by public transport to areas where there is a larger range of services and facilities would be necessary.

## **Evidence Base for Issue POH2 - What are the housing needs of the District?**

### **Most Relevant National Planning Guidance/ Planning Policy**

*Planning Policy Statement 1: Delivering Sustainable Development* - Planning should facilitate and promote sustainable and inclusive patterns of urban and rural development by ensuring that development supports existing communities and contributes to the creation of safe, sustainable and socially inclusive communities, with a suitable housing mix. Planning policies should promote high quality inclusive design in the layout of new developments and individual buildings in terms of function and impact, not just for the short term but over the lifetime of the development.

*Planning Policy Guidance Note 3: Housing* – The Government's household projections indicate an increase in the number of new households over the longer term, much of this will be brought about by a change in the composition of households, rather than by an overall increase in population. The majority of the projected growth will be in one-person households. Local authorities should therefore adopt policies which take full account of changes in housing needs in their areas and which will widen the range of housing opportunities to allow these to be met.

*Planning Policy Statement 3: Housing (Consultation draft)* – One of the Government's stated objectives in this statement is to ensure that a wide choice of housing types is available, for both affordable and market housing, to meet the needs of all members of the community.

*Planning Policy Statement 7: Sustainable Development in Rural Areas* -To raise the quality of life and the environment in rural areas through promoting thriving and inclusive rural communities. Decisions should be based on social inclusion, recognizing the needs of everyone.

*Planning and Access for Disabled People: A Good Practice Guide by the ODPM.*  
Good Practice Point 1: All parties involved in the planning and development process should the benefits of, and endeavor to bring about, inclusive design.

### **Regional Plan (South East Plan)**

*Policy H6 Type and Size of New Housing* – An appropriate range of housing opportunities is required in terms of a mix of housing types, sizes and tenures.

*Policy H7 - Making better use of existing stock* – Local Authority should assess the existing housing stock in their areas and implement measures to reduce the number of vacant, unfit and unsatisfactory dwellings.

*Policy S1 Social Inclusion* – Local Planning Authorities should recognise more localised pockets of deprivation and exclusion in both urban and rural areas, and ensure policies and programmes are implemented to address these issues at a local level.

### **Specific Background Documents**

*Meeting Part M and designing Lifetime Homes by Joseph Rowntree Foundation 1999* - New homes designed to meet the needs of most households, incorporating accessibility and design features that make the home flexible enough to meet

changing demands throughout the lifetime of the occupants. Lifetime Homes standards and the Scheme Development Standards go a little further than Part M of the Building Regulations in their requirements for adaptability and flexibility.

*Lewes District Housing Needs Survey Final Report by DCA* – Concludes that there is a demand in the District for flats and terraced properties. Flats and terraces make up 36% of existing stock (45% nationally) but over 90% of new household need is for flats and terraces. The recommendation is to provide a mix of housing types, but mainly flats and terraced houses to meet the needs of new and existing households, for smaller units and to provide a balanced housing market.

The needs survey also recommends considering adopting Lifetime Homes standards for new housing. 22% of existing households in the district contain somebody with a support need, and 10% of all dwellings have been adapted to meet the needs of a disabled person. Along with this, the retired population will increase by 35.5% by 2021 thereby increasing the number of District households who may have special needs.

*Lewes District Council Housing Strategy 2006-2009 by Lewes District Council* : In pursuance of the objectives of the Housing Strategy, the Council has adopted the following priorities.

- Balancing housing markets
- Enabling the delivery of affordable homes
- Tackling the causes of homelessness
- Stock improvement programmes and decent homes
- Providing housing with support services for vulnerable people
- Developing partnerships
- Promoting equality in services and valuing diversity in our community
- Encouraging sustainable communities
- Providing for key workers and others who can work, cant buy.

### **What we were told as a result of consultation**

The District needs smaller units, including high quality purpose built flats, with a good mix of housing types and sizes for all price brackets, including first time buyers. Planning should specify the housing mix permitted at each location after consulting the local community, thus allowing for local needs rather than just executive developments. There was an awareness of changing household needs in the district and a desire to direct new development to meet these needs.

### **What the Community Strategy says**

The Community Strategy does not say anything directly relating to this issue.

**Evidence Base for POH3: How can we enable homes to be more affordable for those residents in need of accommodation but unable to compete in the housing market?**

**Most relevant national planning guidance/ planning policy**

*Planning Policy Guidance 3: Housing* - Policies should define what the authority considers to be affordable in the local plan area in terms of the relationship between local income levels and house prices or rents for different types of households; indicate how many affordable homes need to be provided throughout the plan area, including the different types of affordable housing needed by households of different characteristics, taking account of rural as well as urban needs; and identify suitable areas and sites on which affordable housing is to be provided and the amount of provision which will be sought. Affordable housing provision in rural areas should be supported by a rural exception site policy.

Decisions about the amount and types of affordable housing to be provided in individual proposals should reflect local housing need and individual site suitability and be a matter for agreement between the parties.

*Consultation Paper on New Planning Policy Statement 3 (PPS3): Housing* - Local development frameworks should set out a strategy for housing provision within the context of the relevant sub-regional housing market area. In addition, separate targets should be set for social-rented and intermediate housing where appropriate.

Local planning authorities should set a minimum site-size threshold, expressed as numbers of homes or area, above which affordable housing will be sought. The indicative national minimum threshold is 15 dwellings, but local planning authorities may set a different threshold or series of thresholds where this can be justified. In determining the minimum site-size threshold (and any higher thresholds), local planning authorities will need to take into account the level of affordable housing to be sought, site viability, the impact on the delivery of housing provision, and the objective of creating mixed and sustainable communities.

**Regional Plan (South East Plan)**

*Policy H4: Affordable Housing* - Policies should deliver a substantial increase in the amount of affordable housing in the region. LDD's should set targets. Regional target is 25% of all new housing should be social rented and 10% other forms of affordable housing.

*Policy SCT8 – Sussex Coast Sub region - Affordable Housing* - Guideline of at least 40% of new housing should be affordable, authorities can increase or decrease this provision if it can be justified. Affordable housing should be sought on all sites of 15 units or more unless authorities can justify a lower threshold locally. The type, size and nature of affordable housing should recognise the need for different sections of the community.

*Policy GAT3 – Gatwick sub region Affordable Housing* - This sets out a policy target of 40% affordable housing.

**Specific Background Documents**

*Lewes District Housing Needs Survey Final Report by DCA* - highlights the affordability problem in the District arising from the relationship between local incomes and the supply of cheap housing stock. It sets out that subsidised

affordable housing should be negotiated on all suitable sites. The Council should set a target for each site taking into account existing supply, survey demand and other regeneration issues, planning, sustainability and economic factors.

The proportion of affordable housing provided on new sites should encompass more subsidised low cost market housing than would have been that case four years ago. The annual level of outstanding affordable need is 230 units.

*South East Regional Housing Strategy 2006* - Provision of more affordable homes, bringing decent homes within the reach of people on lower incomes, improving the quality of new and existing housing stock.

*Affordable Rural Housing Commission by DEFRA* - Delivering rural housing must be part of the mainstream planning system. Exception sites are a useful tool but should not be relied on, local need should be met through the allocation of sites for affordable and market housing in local planning documents.

Local Development Frameworks should focus significant development on market towns or local service centres which are well served by public transport and other facilities. Allocate sites purely for affordable houses in larger villages.

*Homes for Rural Communities - Report of the Joseph Rowntree Foundation Rural Housing Policy Forum* - The national threshold at which planners are obliged to require some affordable housing is set at 24 homes. This has little relevance for most rural housing schemes which typically comprise 4-8 homes, and helpfully the draft PPS3 has recognised this. Local authorities have the power to lower the threshold so that smaller developments must also include some affordable housing for local people.

It urges more local authorities to experiment with allocating sites for affordable housing in their LDFs, and for Government to monitor the success of this approach. The price of these should also be limited to a maximum of £10,000 per plot.

*Lewes District Council Housing Strategy 2006-2009* – in pursuance of the objectives of the Housing Strategy the Council has adopted the following priorities:

- balancing housing markets.
- enabling the delivery of new affordable homes.
- Tackling the causes of homelessness.
- Stock improvement programmes and decent homes.
- Providing housing with support services for vulnerable people.
- Developing partnerships.
- Promoting equality in services and valuing diversity in our communities.
- Encouraging sustainable communities.
- Providing for key workers and others who “can work, can’t buy.”
- A target in the Strategy is to provide 300 new affordable homes between March 2006 – March 2010.

*Can Work- can't Buy by the Joseph Rowntree Foundation* – this Study was undertaken across the Country examining the ability of working households, both existing and new forming to become households. The Study in relation to Lewes District showed that in 2004 there was ratio the District of 4.96 to 1 (i.e. £192,975 average house price divided by annual earnings of £38,887). For comparison annual household earnings in the region were £4,1426 with average house prices of £188,453.

*A Way Forward for the Economy of Lewes District by Lewes District Council – Envisages more affordable housing to be available to enable employers to attract a suitable workforce.*

#### **What we were told as a result of consultation**

It was recognised that there is a need to increase the amount of affordable housing in the District – i.e. by lowering site number/size thresholds and raising the percentage above 25%. The importance of providing affordable housing in the District was acutely felt given the rising house prices and the severe problems for first time buyers to get on the housing ladder.

Also, the elements within the 'affordable housing' category need to be given more thought – i.e. how much rented, shared ownership etc.

The need to 'pepper-pot' or integrate affordable housing was recognised.

Applicants on the District Council's Housing Register (often called Waiting List) were consulted by postal survey in June 2006. Some 364 households responded. In total 313 respondents supported building new homes for local people, and only 3 objected.

\* These results also indicate that people seeking affordable housing have a strong tendency to prefer remaining in their present settlements. Overall, 235 required accommodation now; with the rest in the next 1-3 years.

#### **Other options which have been sieved out of the process, and why (i.e. summary of Sustainability Appraisal)**

The option to allow the market to decide what houses should be built has been sieved out of the process because this option does not necessarily meet the household needs of the District, as identified in the Lewes District Housing Needs Survey 2005. It could allow development to be carried out that will decrease the amount of suitable accommodation available to a growing number of small households. This is through the development of larger homes on the restricted supply of land suitable for housing, rather than using this land as a resource to meet the needs of the District's households. This option is contrary to national and regional guidance, and the Lewes District Housing Needs Survey 2005. It is the least sustainable option in the Sustainability Appraisal, and is conflicts with what we were told as a result of consultation.

### **Evidence Base for POH 4: How can we ensure that we provide accommodation for Gypsy and Travellers?**

Since the Criminal Justice and Public Order Act 1994 repealed the duty of local authorities to provide Gypsy and Traveller sites, the number of unauthorised encampments has significantly increased. New government guidance requires local authorities to assess the need for Gypsy and Traveller accommodation and to make appropriate provision through their development plans.

### **Most relevant national planning guidance/ planning policy**

*Circular 1/2006* – Requires Regional Spatial Strategies to determine the needs across the whole region and identify the number of pitches required for each local planning authority. Local authorities then have to allocate suitable sites within their local development documents.

Where there is a clear and immediate need, local planning authorities should bring forward development plan documents containing site allocations in advance of regional consideration of pitch numbers and completion of accommodation assessments.

The Circular also requires local planning authorities to put into their Core Strategy criteria based policy to be used for the selection of Gypsy and Traveller sites to be allocated in the LDF. This also should be used to help the determination of planning applications for sites. The criteria must be fair, reasonable, realistic and effective in delivering appropriate sites. The Circular also states that the criteria must not be worded in such a way that rules out or places undue constraints on the development of Gypsy and Traveller sites.

The planning system should recognise, protect and facilitate the traditional travelling way of life of Gypsies and Travellers, whilst respecting the interests of the settled community.

The Government seeks to create and support sustainable, respectful and inclusive communities, where Gypsies and Travellers have fair access to suitable accommodation, education, health and welfare provision.

### **Regional Plan (South East Plan)**

*Provision for Gypsies and Travellers: Interim Statement* - As only a minority of local authorities have completed their accommodation assessments, an early partial review of the South East Plan will be required in the light of Local Gypsy and Traveller Accommodation Assessments.

### **Specific Background Documents**

*Gypsy and Traveller Accommodation Study* - by DCA  
Respondents preferred smaller sites and prefer to live on a site owned by themselves or their family. The preferred type of site would be a mobile home permanent site.

Many Gypsies have very poor access to schools and health facilities.

There are some Gypsies in the area who are living in permanent accommodation; this may be a result of the lack of suitable sites.

**What the Community Strategy says**

No mention of Gypsies and Travellers in the community strategy.

**What we were told as a result of consultation**

No mention of Gypsies and Travellers in the consultation.

**Other options which have been sieved out of the process, and why (i.e. summary of the Sustainability Appraisal)**

The only other option considered was to 'do nothing'. This would result in continuing problems with unauthorised encampments, which would not be located in the most sustainable locations and would not be satisfactory for either Gypsies and Travellers, or the settled community.

## **Evidence base for Preferred Options on employment (POE) issues**

## **Evidence Base for POE 1: How Can we Encourage Development of the Economic Growth Sectors?**

### **Most relevant national planning guidance/ planning policy**

*Employment Land Reviews: Guidance Note* - The primary purpose of this guide is to provide planning authorities with effective tools with which to assess the demand for, and supply of, land for employment.

*Planning Policy Statement 1: Delivering Sustainable Development* - Promotion of local economies by providing, in support of the Regional Economic Strategy, a positive planning framework for sustainable economic growth to support efficient, competitive and innovative businesses.

*Planning Policy Guidance 4: Industrial, commercial development and small firms* – The governments key aim is to encourage continued economic growth in a way which is compatible with the environmental objectives.

### **Regional Plan (South East Plan)**

*Policy RE1- Supporting regionally important sectors and clusters* – Local authorities should work in partnership to promote and support the development of regionally important sectors. Supporting the role of knowledge driven industry is important to realising sustainable economic growth.

*Policy RE3 - Human resource development* - human resource development should be recognised as central component in harnessing and promoting economic success.

*Policy SCT1- Core sub-regional strategy-* Promote sustainable economic growth and regeneration of the Sussex Coast.

*Policy SCT2 - Enabling Economic regeneration* - Increased priority to investment decisions for the sub-area.

*Policy SCT3 – Management of existing employment sites and premises* – Need to deliver sufficient appropriate sites and premises for business and other uses that will help to facilitate the local economy.

*Policy SCT4 – Employment priority in land allocations* - Should give priority to delivering employment development in strategically accessible locations.

### **Specific Background Documents**

*An Analysis of Business Growth Potential in Lewes District by Step Ahead* – Nationally financial and business services contributes one quarter of economic output (24%), but in the Lewes District it is estimated to contribute just over one tenth (13%). Diversifying the local economy should be a priority, particularly trying to attract and retain companies from the universities, Sussex Innovation Centre and Newhaven Enterprise Gateway, with the provision of quality accommodation.

*East Sussex Area Investment Framework – Action Plan by East Sussex Economic Partnership* – This Plan identifies the need to take forward the Enterprise Gateway

proposal for Newhaven, to develop an integrated package of infrastructure development, to secure the physical regeneration of key strategic sites in Newhaven, and to tackle deprivation and social exclusion in Newhaven.

*Land use in East Sussex by Vaill Williams* – This study entailed analysis of the commercial property market and a business survey. The study concluded that there should be continued road improvements and general environmental enhancements; more small business units in Lewes (through public sector land and programmes or via enabling development); and that Lewes may benefit from the provision of larger units of accommodation for businesses

*South East England Regional Economic Strategy*- Prioritizes the development of skills, enterprise and innovation as the basis for sustainable economic growth.

*A Way Forward for the Economy of Lewes District - an interim economic development strategy by Lewes District Council* – This document has been prepared to set out the high level context for future decisions that will affect the local economy. It envisages the active encouragement of a stronger presence of growth sectors in the local economy especially knowledge based and financial services, and acknowledges the associated role of skills training.

#### **What we were told as a result of consultation**

A common theme in the consultation was the recognition of the need to diversify the economy; including reinforcing the art and cultural clusters and to forge better links with the universities. Indeed, during the consultation on the issues and options, the need to build links with the universities was considered to be the most important option.

#### **What the Community Strategy says**

Nothing specific relating to the economic profile of Newhaven in the Community Strategy. However, the local partnership (Newhaven Strategic Network) has carried out the following work;

*Newhaven – New Future 10 year Master Plan* – The plan describes Newhaven's key social, educational and economic priorities and looks at helping businesses to grow, encouraging new business, making Newhaven more accessible, revitalising the port, maximising tourism opportunities and the creation of a busy town centre.

#### **Other options which have been sieved out of the process, and why (i.e. summary of Sustainability Appraisal)**

The issues that have been sieved out of the process are those which still place the emphasis on the manufacturing sector as this sector is forecast to continue to diminish.

## **Evidence Base for POE 2: How can we reduce the gap between poorly paid work and high living costs?**

### **Most relevant national planning guidance/ planning policy**

*Planning Policy Statement 1: Delivering Sustainable Development* - Overall statement dealing with social progress which recognises the needs of everyone, effective protection of the environment, the prudent use of natural resources, and the maintenance of high and stable levels of economic growth and employment.

*Planning Policy Guidance 4: Industrial, commercial development and small firms* - One of the Government's key aims is to encourage continued economic development in a way which is compatible with its stated environmental objectives. Economic growth and a high quality environment have to be pursued together.

*Planning Policy Guidance 5: Simplified planning zones* - This may be relevant in terms of stimulating private sector growth in run down areas. A Simplified Planning Zone is an area where there are reduced planning controls, which make it more attractive for some businesses to locate to the area.

### **Regional Plan (South East Plan)**

*Policy H4 - Affordable Housing* - Overall regional target that 25% of all new housing should be social rented accommodation and 10% other forms of affordable housing. Where justified by housing need assessments, Local Development Documents should specify the tenure of housing being sought. There will be a presumption in favour of on-site affordable housing provision.

*Policy H6 - Type and Size of New Housing* - Produce housing need and market assessments to establish type and size of new housing needed in the district.

*Policy H7 - Making Better use of Existing Stock* - Local authorities should assess the existing housing stock in their areas and implement measures to reduce the number of vacant, unfit and unsatisfactory dwellings.

*Policy RE1 - Supporting Regionally Important Sectors and Clusters:* Local authorities should work in partnership to promote and support the development of regionally important sectors. Supporting the role of knowledge driven industry is important to realising sustainable economic growth.

*Policy RE2 - Employment and land provision* - Assessment of employment needs of the local economy and workforce and provision of sites.

*Policy RE3 - Human Resource Development* - This policy states that local authorities should work with partners to ensure a healthy labour market in which employers and individuals get effective help in improving their skills needs.

*Policy RE5 - Addressing Intra-Regional Disparities* - Maintain and enhance the economic success of parts of the region and release the potential of areas which are underperforming.

*Policy SCT5 - Education and Skills* - This is a specific policy relating to the South Coast region, which includes Newhaven and Seaford. In conjunction with Policy RE3, local authorities should work jointly with the Learning and Skills Council, local

education providers, universities, colleges and the business community to deliver co-ordinated programmes to ensure that the local workforce is trained appropriately and flexibly.

*Policy TC3 – New Development and Redevelopment in Town Centres* – This policy deals with the impact of new development in terms of vitality and viability of the town centre.

*Policy TC4 – Creating and Supporting Town Centres* – The role and regeneration of town centres should not be undermined by further in out-of centre locations. Local planning authorities should adopt a sequential approach in selecting appropriate sites for town centre uses.

*Policy TCR1- Coastal Resorts* – Diversify economic base and improve tourism facilities in way which promote higher value activities.

*Policy SCT1- Sussex Coast Core – Sub-regional Policy* Priority for sustainable economic growth and affordable economic balance.

*Policy SCT2- Enabling Economic Regeneration* - Economic regeneration priority areas.

*Policy SCT5 – Education and Skills* – Training local workforce to benefit from new job opportunities.

*Policy SCT8 – Affordable housing* – Guideline for 40% of new housing to be affordable, site threshold of 15 units, but authorities can vary the figures if justified locally.

*Policy GAT3 – Gatwick Sub-region, Affordable Housing* - Target of 40% affordable housing.

*Policy GAT4 – Economic Development* – Priority for high value-added economic growth.

#### **Specific Background Documents:**

*Business Growth Potential Lewes District 2005 by Step Ahead* - This report recommends that there should be adequate employment sites to meet current and future demand, particularly high quality B1 (office uses). It also states that the economic base should be diversified in strong growth sectors such as financial/business services, cultural/creative and advanced engineering sectors. The report places emphasis on the future success of the district being dependent on how effectively it manages to diversify away from more traditional areas of employment and whether it is able to successfully broaden the economic base.

*A Way Forward for the Economy of Lewes District by Lewes District Council, 'An Interim Economic Development Strategy' by Lewes District Council* – This document as been prepared to set out the high level context for future decisions that will affect the local economy.

*East Sussex Small Business Units and Employment Land Demand Study 2004 by Vail Williams* - This study entailed analysis of the commercial property market and a business survey. The study concluded that there should further road improvements and general environmental enhancements; small business units in Lewes (through public sector land and programmes or via enabling development); and that Lewes may benefit from the provision of larger units of accommodation.

*Lewes District Housing Need Study 2005 by DCA* - Looks at the housing need in the District and the housing market. Its main findings are that 91% of people live in adequate accommodation, 75% of concealed households cannot afford private rental and 84% cannot afford home ownership. The social stock is 11.4% and the national average is 19.3%. In addition the retired population will increase by 35.5% by 2021. Therefore, there is a need to develop a more balanced housing stock.

**What the Community Strategy says:**

The Community Strategy makes specific reference to the economy and its importance in the Lewes and Newhaven section, particularly with regard to a vibrant local economy. Lewes partnership saw the provision of affordable housing as a priority, as did the rural community.

*Lewes District Housing Strategy, 2006-2009* seeks to achieve the following priorities:

- Balancing housing markets
- Enabling the delivery of affordable homes
- Tackling the causes of homelessness
- Stock improvement programmes and decent homes
- Providing housing with support services for vulnerable people
- Developing partnerships
- Promoting equality in services and valuing diversity in our community
- Encouraging sustainable communities
- Providing for key workers and others who can work, cant buy.

*Can Work- can't Buy by the Joseph Rowntree Foundation* – this Study was undertaken across the Country examining the ability of working households, both existing and new forming to become households. The Study in relation to Lewes District showed that in 2003 the District was the 10<sup>th</sup> highest price-to-income ratio out of over 350 local authority areas in the country at 5.86 to 1.

**What we were told as a result of consultation:**

Consultees considered that there is a need to have closer relations with employers and their intentions for growth etc. It was recognised that the district has a low wage economy on the coast and that manufacturing jobs are needed for the local workforce's skills. Also there is a need for more affordable housing for people who have low skill/low wage jobs, and also for key workers. There is a need to skill up people, with academic and vocational training for low skilled workers.

**Other options which have been sieved out of the process, and why (i.e. summary of Sustainability Appraisal).**

None of the options scored significantly better or worse than the others. There were a significant amount of `unknowns` in this appraisal, particularly for the option of accepting that the District performs a dormitory role for high earners who work elsewhere, to do nothing and accept the current situation.

## **Evidence Base for POE 3: How can we adapt to meet the needs of a changing economy?**

### **Most relevant national planning guidance/ planning policy**

*Planning Policy Statement 1: Delivering Sustainable Development:* Promotion of economies by providing, in support of the Regional Economic Strategy, a positive planning framework for sustainable economic growth to support efficient, competitive and innovative business, commercial and industrial sectors.

*Planning Policy Guidance 5: Simplified Planning Zones:* This maybe relevant in terms of stimulating private sector growth in run down areas. This PPG explains how they could be used to regenerate areas.

*Planning Policy Guidance 4: Industrial, commercial development and small firms:* The government's key aim is to encourage continued economic growth in a way which is compatible with environmental objectives.

### **Regional Plan (South East Plan)**

*Policy RE1 Supporting Regionally Important Sectors and Clusters* - Local authorities should work in partnership to promote and support the development of regionally important sectors. Supporting the role of knowledge driven industry is important to realising sustainable economic growth.

*Policy RE2 Employment and land Provision* - Assessment of employment needs of the local economy and workforce and provision of sites.

*Policy RE3 Human Resource Development* - Human resource development should be recognised as central component in harnessing and promoting economic success.

*Policy RE5 Addressing Intra-Regional Disparities* - Maintain and enhance the economic success of parts of the region and release the potential of areas which are underperforming.

*Policy SCT1- Core sub-regional strategy-* Should pursue and promote sustainable economic growth and regeneration of the Sussex Coast.

*Policy SCT2 - Enabling Economic regeneration* - Should give increased priority to investment decisions for the sub-area.

*Policy SCT3 – Management of existing employment sites and premises* – Need to deliver sufficient appropriate sites and premises for business and other uses that will help to facilitate the local economy.

*Policy SCT4 – Employment priority in land allocations* - Should give priority to delivering employment development in strategically accessible locations.

*Policy SCT5 – Education and skills* – Should work jointly with education providers to deliver co-ordinated programmes to ensure that local workforce is trained appropriately and flexibly.

### **Specific Background Documents:**

*Business Growth Potential Lewes District 2005 by Step Ahead* -This report recommends that there should be adequate employment sites to meet current and future demand, particularly high quality B1 (office uses). It also states that the economic base should be diversified in strong growth sectors such as financial business services, cultural and creative sectors and advanced engineering. The report places emphasis on the future success of the district being dependent on how effectively it manages to diversify away from more traditional areas of employment and whether it is able to successfully broaden the economic base.

*Draft Regional Economic Strategy by SEEDA* – Supports smart growth through enterprise, innovation and skills development.

*East Sussex Small Business Units and Employment Land Demand Study 2004 by Vail Williams* - This research entailed an analysis of the commercial property market and a business survey involving 406 firms around the county. It identifies a need for both small business units and provision of larger units of business accommodation.

*A Way Forward for the Economy of Lewes District: an interim economic development strategy by Lewes District Council* – This document as been prepared to set out the high level context for future decisions that will affect the local economy. Priorities include diversification of the economy, more business activity and more local employment. This would need more skills training and affordable housing to maintain a suitable workforce. Growth of the knowledge based creative and financial services sector are encouraged, together with an overall increase in entrepreneurial activity. Sustainable tourism is based around the natural and historic heritage and cultural activity.

#### **What we were told as a result of consultation:**

There were some varied comments regarding this issue. Some comments were made regarding tourism in the district and the role of tourism in terms of the economy. Some people highlighted the need for local employment also.

#### **What the Community Strategy says:**

The Community Strategy makes specific reference to the economy and its importance in the Lewes section, which has a priority to ensure a vibrant local economy and in Seaford more specifically to improve the Cradle Hill Industrial Estate.

*Newhaven – New Future 10 year Master plan* – The plan describes Newhaven’s key social, educational and economic priorities and looks at helping businesses to grow, encouraging new business, making Newhaven more accessible, revitalising the port, maximising tourism opportunities and the creation of a busy town centre.

#### **Other options which have been sieved out of the process, and why (i.e. summary of Sustainability Appraisal).**

The following options were ‘sieved out’ and rejected: a) accepting that the District performs a dormitory role with more out commuting. This would not be a sustainable option as it would mean jobs and often services would be provided out of the district thereby increasing the need to travel. This option performed badly in the sustainability appraisal. b) Doing nothing to address this issue. This would not broaden the economic and would leave the economy increasingly weaker. These two options were sieved out of the process because it was felt that action was needed to address this issue, supported by the results in the sustainability appraisal.

**Evidence Base for POE 4: How can we capitalise on high quality local small scale business?**

**Most relevant national planning guidance/ planning policy**

*Planning Policy Statement 1: Delivering Sustainable Development* - Promotion of economies by providing, in support of the Regional Economic Strategy, a positive planning framework for sustainable economic growth to support efficient, competitive and innovative business, commercial and industrial sectors.

*Planning Policy Guidance 4: Industrial, commercial development and small firms* – The Government’s key aim is to encourage continued economic growth in a way which is compatible with the environmental objectives.

**Regional Plan (South East Plan)**

*Policy RE2 Employment and land Provision:* Assessment of employment needs of the local economy and workforce and provision of sites.

*Policy SCT 4 Sussex Coast Sub Region* – Employment priority in land allocations: Priority to delivering employment development to enable expansion or relocation.

*Policy SCT 6 Sussex Coast Sub Region* – Promotion of the sub-region.

**Specific Background Documents**

*Business Growth Potential Lewes District 2005 by Step Ahead* - There is a demand for office space, mainly for smaller units and move on accommodation.

The business start up rate in Lewes is lower than in Sussex and the South East. However this may be because many of the District’s start ups are self employed or free lancers, who may not be captured by VAT start up data.

There is evidence that the property market in the Lewes District is localised, and that demand for commercial property is mainly from the growth and start up of indigenous firms rather than businesses looking to relocate here from elsewhere. The small size of the commercial property market, low rental values and a lack of dynamism have led to a lack of investment in the commercial building stock, which is now ageing and much of which is unsuitable to meet the needs of modern businesses. Empty sites and properties were perceived to be the result of a lack of the right quality of stock, rather than a lack of demand.

*Draft Regional Economic Strategy by SEEDA* – Supports smart growth through enterprise, innovation and skills development.

*A Way forward for the economy of the Lewes District.* Priority for the promotion of entrepreneurial activity, support for home working, and creation of conditions to enable businesses to remain and grow in the area.

**What we were told as a result of consultation**

Promoting and marketing the District and allocating sites were considered to be the best option.

**What the Community Strategy says**

No reference to this issue.

**Other options which have been sieved out of the process, and why (i.e. summary of the Sustainability Appraisal).**

The option to do nothing performed poorly in the sustainability appraisal and therefore does not perform part of the preferred option. It performed particularly poorly against the social and economic objectives as such an approach could mean that the economy of the District would be weakened and not take advantage of its assets.

**Evidence Base for POE 5: How can we ensure that the District has a successful retail offer?**

**Most relevant national planning guidance/ planning policy**

*[Planning Policy Statement 1: Delivering Sustainable Development](#)* - Sets out a range of policies aimed at facilitating sustainable patterns of urban and rural development, including the need to ensure that new developments provide good access to jobs and key services for all members of the community.

*Planning Policy Statement 6: Positive Planning for Town Centres* – The key objective is to promote their vitality and viability of town centres. This will be done by planning for the growth and development of existing centres through focusing development in the centres and encouraging a wide range of services in a good environment accessible to all. Development outside existing centres will be strictly controlled.

**Regional Plan (South East Plan)**

*Policy TC1- Development of Town Centres* – Accessible, attractive and vibrant town centres are fundamental to sustainable development of South East.

*Policy TC2 – Strategic Network of Town Centres* – None of the Town Centres in Lewes District are identified as primary, or secondary, regional centres. However, there are many other centres that meet local needs

*Policy TC4 – Creating and supporting Town Centres* – No need has been identified for any further out of centre regional or sub-regional shopping centres, or large extensions to existing centres are needed.

**Specific Background Documents**

*Lewes Retail Study by GVA Grimley* – The purpose of this study is to guide and inform retail and leisure planning within the District including an assessment of each centre's expected economic growth or decline; an assessment of the overall need for additional retail and leisure floorspace; and an assessment of the capacity of the existing centres to accommodate new development.

*Audit of existing uses within the town centres of the Lewes District as at spring 2004 by Lewes District Council* - This audit has been carried out to collate data on the type and diversity of premises within the town centres of the Lewes District. It was the starting point for more detailed work to look at town centres.

*Audit of existing retail uses outside the town centres of the Lewes District as at December 2004 by Lewes District Council* – This audit lists all the existing uses outside the town centres to complement the audit above. The audit, therefore, covers such areas as shops on the edge of town centres, out of town retailing, rural, village and local shops.

*A way forward for the District – Economic Strategy by Lewes District*- This strategy encourages the establishment of a wide range of retail and food and drink uses to increase trade in the town centres. It states that it is also important to safeguard the specialist qualities of the town centres, as well as provision for national retailers where appropriate. Also, it recognises that it is important to resist threats to the economic viability of town centres and also the importance of having high earners living in the catchment area of town centres.

**What we were told as a result of consultation**

During the consultation events it was stated that Lewes should retain its special and valuable difference as a shopping centre with many independent traders. People considered that the town centre of Seaford had the potential to improve and improve its retail offer. With regard to Newhaven it was considered by some people that there was a need to provide more upmarket shops and to make the town centre bigger. In Peacehaven people considered that the infrastructure in general was poor, especially the provision for shopping. In the rural area it was recognised that it was important to retain vital village communities (including village stores).

**What the Community Strategy says;**

An aim of the Community Strategy is to improve local facilities, including retail. The Newhaven Partnership states that the town centre needs improving, the Lewes Partnership welcomes a vibrant economy, Peacehaven would like to achieve a thriving local commercial and retail service and Seaford would like to promote Town Centre regeneration.

**Other options which have been sieved out of the process, and why (i.e. summary of Sustainability Appraisal).**

The option to do nothing was rejected as this could result a weak economic base as well as providing retail uses in unsustainable locations.

## **Evidence base for preferred options on geographical (POG) issues**

## Evidence Base for POG1 – What role should Lewes have in the future?

### Most relevant national planning guidance/ planning policy

*Planning Policy Statement 1: Delivering Sustainable Development* – The LDF must seek to achieve sustainable development, proactively manage development through positive planning, have clear visions for communities and have an open and inclusive planning process.

*Planning Policy Guidance 3: Housing* - The Government intends that everyone should have the opportunity of a decent home; that there should be greater choice of housing and that housing should not reinforce social distinctions. The housing needs of all in the community should be recognised, including those in need of affordable or special housing in both urban and rural areas.

*Planning Policy Guidance 4: Industrial and Commercial Development and Small Firms* - Encourages continued economic development in a way which is compatible with its stated environmental objectives.

*Planning Policy Statement 6: Planning for Town Centres* - This policy sets out that there should be a sequential approach to site identification; development should take place in the town centre first.

*Planning Policy Guidance 13* - Promotes the vitality and viability of existing town centres, which should be the preferred location for new retail and leisure developments.

*Planning Policy Guidance 15: Planning and the historic environment* - Local plans should set out clearly the planning authority's policies for the preservation and enhancement of the historic environment in their area, and the factors which will be taken into account in assessing different types of planning application.

*Planning Policy Guidance 21: Tourism* - outlines the economic significance of tourism and its environmental impact, and therefore its importance in land-use planning. It explains how the needs of tourism should be dealt with in development plans and in development control.

*Employment Land Reviews: Guidance Note* - The primary purpose of this guide is to provide planning authorities with effective tools with which to assess the demand for and supply of land for employment.

*Planning Policy Statement 1: Delivering Sustainable Development*- Promotion of economies by providing, in support of the Regional Economic Strategy, a positive planning framework for sustainable economic growth to support efficient, competitive and innovative business, commercial and industrial sectors.

*Planning Policy Guidance 4: Industrial, commercial development and small firms* – The government's key aim is to encourage continued economic growth in a way which is compatible with the environmental objectives.

### Regional Plan (South East Plan)

*Policy RE1 - Supporting Regionally Important Sectors and Clusters*: Local authorities should work in partnership to promote and support the development of regionally important sectors. Supporting the role of knowledge driven industry is important to realising sustainable economic growth.

*Policy RE2 - Employment and land Provision:* Assessment of employment needs of the local economy and workforce and provision of sites.

*Policy RE3 - Human Resource Development:* Human resource development should be recognised as central component in harnessing and promoting economic success.

*Policy RE5 - Addressing Intra-Regional Disparities:* Maintain and enhance the economic success of parts of the region and release the potential of areas which are underperforming.

*Policy TC1 – Development of Town Centres -* Local Development Documents should promote good quality development where it is desirable to regenerate and renew town centres.

*Policy BE5 – The role of small rural towns -* Encourage schemes to strengthen the viability of small rural towns and provide small scale housing and protect and enhance the character and develop public transport networks.

*Policy STC1 Sussex Coast Sub Regional Policy - Core sub-regional strategy –* Promotion of sustainable economic growth and regeneration of the Sussex coast.

*Policy STC2 Sussex Coast Sub Regional Policy - Enabling economic regeneration –* National, regional and other relevant agencies and authorities should give increased priority to investment decisions, with priority given to Shoreham to Rye area.

*Policy SCT3 – Sussex Coast Sub Regional Policy - Management of existing employment sites and premises –* Need to deliver sufficient appropriate sites and premises for business and other uses that will help to facilitate the local economy.

*Policy SCT4 – Sussex Coast Sub Regional Policy - Employment priority in land allocations -* Should give priority to delivering employment development in strategically accessible locations.

*Policy SCT5: Sussex Coast Sub Regional Policy - Education and Skills:* In conjunction with Policy RE3, local authorities should work jointly with the Learning and Skills Council, local education providers, universities, colleges and the business community to deliver co-ordinated programmes to ensure that the local workforce is trained appropriately and flexibly.

*Policy SCT 7: Sussex Coast Sub Regional Policy - Broad amount and distribution of future housing development*

*Policy SCT 8: Sussex Coast Sub Regional Policy - Affordable Housing -* Local Development Documents will establish appropriate policies and targets for the provision of affordable housing in their area.

*Policy SCT 9: Sussex Coast Sub Regional Policy- Infrastructure -* Local Authorities should work with other relevant agencies and infrastructure providers to ensure that all the necessary infrastructure can be provided in time to serve the development proposed.

### **Specific Background Documents**

*Business Growth Potential Lewes District 2005 by Step Ahead:* This report recommends that there should be adequate employment sites to meet current and future demand, particularly high quality B1 (office uses). It also states that the

economic base should be diversified in strong growth sectors such as financial sectors/ business services, cultural/creative and advanced engineering. The report places emphasis on the future success of the District being dependent on how effectively it manages to diversify away from more traditional areas of employment and whether it is able to successfully broaden the economic base.

*Draft Regional Economic Strategy by SEEDA* – Supports smart growth through enterprise, innovation and skills development.

*East Sussex Small Business Units and Employment Land Demand Study 2004 by Vail Williams* - This research entailed an analysis of the commercial property market and a business survey. Some of the main findings were a need for small business units in Lewes District and that Lewes has a narrow range of industrial units available and the provision of larger units of accommodation would be beneficial.

*A Way Forward for the Economy of Lewes District: An interim economic development strategy by Lewes District Council* – This document has been prepared to set out the high level context for future decisions that will affect the local economy. Priorities include diversification of the economy, more business activity and more local employment. This would need more skills training and affordable housing to maintain a suitable workforce. Growth of the knowledge based creative and financial services sector are encouraged, together with an overall increase in entrepreneurial activity. Sustainable tourism is based around the natural/historic heritage and past and present cultural activity.

*Retail Study of Lewes District by GVA Grimley*– Lewes should be promoted as the main focus for retail and leisure activity within the District. The Core Strategy should seek to direct new investment into the town centre in order to maintain and enhance the centre's role as the District's principal leisure, cultural and visitor destination. This should aim to reinforce the centre's distinctive character and enhance the eclectic mix of specialist/niche retailer and service operators.

*An Analysis of Business Potential in Lewes District by Step Ahead* - Lewes is the most affluent town and accounts for nearly half of the district's employment. The high level of public sector employment has protected the town from losses in traditional manufacturing and its strong cultural heritage has attracted high earning residents, which has expanded the growth in the retail and hospitality sectors. The business sector is, however, underdeveloped.

The hotel and restaurants sector also supports tourism in the district and just under one fifth of tourism spending in 2002 in the Lewes District was in this sector. The retail offer in the district is important to tourism, particularly antique shops and galleries, and contributes over one fifth of the total tourism revenue.

*Local Transport Plan 2* – East Sussex County Council – Seeks to improve access to services by providing greater travel choices and influencing land use decisions, manage demand and reduce the need to travel by private car, reduce congestion and improve the efficiency of the transport network, improve maintenance and management of the transport network.

*West Kent and East Sussex Tourism retention Study (2004) by Tourism Solutions* – This study seeks to quantify the extent of the loss of tourist accommodation in Lewes District (as well as Wealden and Tunbridge Wells). It also seeks to provide evidence of demand for use in challenging change of use applications and suggests practical measures that can be put in place by councils to protect the sector.

*A Way Forward for the Economy of Lewes District - an interim economic development strategy by Lewes District Council – this document has been prepared to set out the high level context for future decisions that will affect the local economy.*

#### **What the Community Strategy says**

The Community Strategy sets out that Lewes wants to see improved flood defences; a vibrant local economy; affordable housing; youth and community facilities; environmental stewardship and transport improvements.

#### **What we were told as a result of consultation**

Lewes should be a self sustaining local centre and a niche for independent retail shops. The town should also be a tourist centre and have more local employment.

Lewes must be economically vibrant, but increasingly tourism will provide the economic base.

Recreation and leisure has been shown to provide economic benefits. This should be encouraged. If the town were to be in the National Park, it would be an opportunity to make it a pedestrian friendly town.

#### **Other options which have been sieved out of the process, and why (i.e. summary of Sustainability Appraisal).**

The option for the town to have purely a dormitory role performed poorly in the sustainability appraisal as it would result in a lack of adequate economic and social infrastructure, which would lead to it being an unsustainable settlement.

## **Evidence Base for POG 2: What role should Newhaven have in the future?**

### **Most relevant national planning guidance/ planning policy**

*Planning Policy Statement 1: Delivering Sustainable Development* - Overall statement dealing with social progress which recognises the needs of everyone, effective protection of the environment, the prudent use of natural resources, and the maintenance of high and stable levels of economic growth and employment.

*Planning Policy Guidance 3: Housing* - The Government intends that everyone should have the opportunity of a decent home; that there should be greater choice of housing; and that housing should not reinforce social distinctions. The housing needs of all in the community should be recognised, including those in need of affordable or special housing in both urban and rural areas.

*Planning Policy Guidance 4: Industrial, commercial development and small firms* – The government's key aim is to encourage continued economic growth in a way which is compatible with the environmental objectives.

*Planning Policy Statement 6: Planning for Town Centres* - The Government's key objective for town centres is to promote their vitality and viability by planning for the growth and development of existing centres; and promoting and enhancing existing centres; by focusing development in such centres and encouraging a wide range of services in a good environment, accessible to all.

*Planning for Town Centres: Guidance on Design and Implementation Tools* - This Guidance supports PPS6 and deals specifically with design issues relating to planning for town centres and some of the main tools available to secure the implementation of town centre planning policies and proposals.

*Planning Policy Guidance 20: Coastal planning* - Deals with the special value of the coast and concerns about rising sea levels and the need for development to be sustainable.

*Planning Policy Guidance 21: Tourism* - This PPG outlines the economic significance of tourism and its environmental impact, and therefore its importance in land-use planning. It explains how the needs of tourism should be dealt with in development plans and in development control.

*Employment Land Reviews: Guidance Note* - The primary purpose of this guide is to provide planning authorities with effective tools with which to assess the demand for and supply of land for employment.

*Good Practice Guide on Planning for Tourism* – LDF's need to deal with tourism issues. It is appropriate for the Core Strategy to deal with objectives relevant to tourism.

## **Regional Plan (South East Plan)**

*Policy RE2 - Employment and land provision* – policies should provide for a range of sites and premises and protect existing land/businesses.

*Policy RE5 - Addressing intra-regional economic disparities* - On the Sussex Coast the priority is to deliver economic development by allocating land, protecting sites and considering which sites to improve.

*Policy T10 – Ports and short sea shipping* - Newhaven should maintain and enhance its role as a niche port.

*Policy T11 – Freight and site safeguarding* – Should safeguard wharves and other sites that are critical in developing the transport system.

*Policy TSR1 - Coastal resorts* – Need to establish a vision and strategy for the future of tourism and to identify “core areas”.

*Policy TSR 4- Tourism attractions* – Need to improve quality of all existing attractions to meet changing customer demands.

*Policy TSR5 - Tourist Accommodation* – Need to consider diversity of accommodation and take account of location, encourage extension (where appropriate), protect existing stock, encourage the provision of affordable staff accommodation and facilitate the upgrading and enhancement of existing unserviced stock.

*Policy TSR6 - Visitor management* - should identify areas which would benefit from development and implementation of visitor management.

*Policy STC1 Sussex Coast Sub Region, Core sub-regional strategy* – Promotion of sustainable economic growth and regeneration of the Sussex coast.

*Policy STC2 Sussex Coast Sub Region, Enabling economic regeneration* – National, regional and other relevant agencies and authorities should give increased priority to investment decisions, with priority given to Shoreham to Rye area.

*Policy SCT3 Sussex Coast Sub Region, Management of existing employment sites and premises* – Need to deliver sufficient appropriate sites and premises for business and other uses that will help to facilitate the local economy.

*Policy SCT4 Sussex Coast Sub Region Employment priority in land allocations* - Should give priority to delivering employment development in strategically accessible locations.

*Policy SCT6 Sussex Coast Sub Region Co-ordination, leadership and promotion of the sub-region.* - Newhaven area: should continue the regeneration of the town to strengthen its economic base, revitalise the port and improve the environment.

*Policy SCT9 – Infrastructure* – Local authorities should work jointly with agencies and infrastructure providers to ensure all necessary infrastructure in place to serve developments.

### **Specific Background Documents**

*South East England Regional Economic Strategy*- Prioritises the development of skills, enterprise and innovation as the basis for sustainable economic growth.

*East Sussex Area Investment Framework – Action Plan by East Sussex Economic Partnership* – this Plan identifies the need to take forward the Enterprise Gateway proposal for Newhaven, to develop an integrated package of infrastructure development to secure the physical regeneration of key strategic sites in Newhaven and to tackle deprivation and social exclusion in Newhaven.

*Land use in East Sussex by Vaill Williams* – This research entailed an analysis of the commercial property market and a business survey involving 406 firms around the county. With regards to Newhaven it specifically highlighted that it was the top ranking town for staff/firm ratio (44.93 compared to Battle which was ranked as the lowest with 4.40). The study reported that this was due to its industrial base and the influence of a small number of large employers interviewed.

*An Analysis of Business Growth Potential in Lewes District by Step Ahead* – This report recommends that there should be adequate employment sites to meet current and future demand, particularly high quality B1 (office uses). It also states that the economic base should be diversified in strong growth sectors such as financial and business services, cultural and creative businesses and advanced engineering. The regeneration and diversification of the economic base in Newhaven should be a priority. Need to develop a high quality visitor economy.

*A Way Forward for the Economy of Lewes District - an interim economic development strategy by Lewes District Council* – this document as been prepared to set out the high level context for future decisions that will affect the local economy. Priorities include playing a positive role in the regeneration of the Sussex Coast economy through more business activity, employment and economic diversification, raising workforce skills, supporting vibrant town centres and being a gateway into Sussex from Europe and beyond.

*East Sussex Economic Strategy by the East Sussex Economic Partnership* -highlights that Newhaven is a "priority building block of county-wide Economic Strategy". It specifically identifies Newhaven as a "Gateway to Europe" and recognises the need to maximise Newhaven's potential in terms of investment in integrated transport

*Local Transport Plan 2 by East Sussex County Council* - Recognises that Newhaven port potentially offers a strategic role for the town. Therefore, it promotes the development of a Port Access Road (PAR) to improve the access to the port and associated land. The PAR could be important in reviving Newhaven as an important gateway to Europe

*Newhaven Eastside Masterplan by Roger Tym and Partners* – This study was commissioned by Newhaven Strategic Network, in partnership with Lewes District Council. This report concludes that the present policies in the adopted Local Plan for Newhaven are sound in the medium term. Therefore, it advocates Railway Quay can be released for mixed, predominantly housing, East side Business Park should be developed for employment uses and the port should be supported in its current role as it has a viable future. However, in the longer term further redevelopment of port land for leisure uses such as a marina, or mixed residential uses should not be ruled out.

*West Kent and East Sussex Tourism retention Study (2004) by Tourism Solutions* – This study seeks to quantify the extent of the loss of tourist accommodation in Lewes District (as well as Wealden and Tunbridge Wells). It also seeks to provide evidence of demand for use in challenging change of use applications and suggests practical measures that can be put in place by councils to protect the sector.

*Draft Private Sector Housing Renewal Strategy by Lewes District Council* – The purpose of this strategy is to seek to ensure that the private sector housing stock of the District is fit for purpose.

## **What the Community Strategy says**

The local partnership (Newhaven Strategic Network) considers that the town centre needs improving; that there should be better facilities, and a holistic regeneration strategy for Newhaven. The Newhaven Strategic Network has also had the following studies carried out;

*Newhaven – New future 10 year Masterplan* – This Plan sets out the vision for Newhaven from the communities point of view. Their vision for Newhaven is based around three key outcomes – successful people, successful business and a sustainable environment. To achieve they consider that they need to tackle Newhaven’s deprivation, build better facilities and develop a stronger community.

*A retail strategy for town centre development and growth (DTZ)* –This report related specifically to Newhaven and it was undertaken to provide a “health check, to provide an assessment of the future likely capacity and provide advice on development and other investment opportunities within the town centre.

### **Some of the issues that were raised as a result of consultation**

The common view was there is a need to decide what role the port is going to have in the future. It was suggested that there was a need to consolidate some of the Port land and allocate surplus areas for other uses. There was support for the development of a rail freight service as the town and port has direct rail access. It was also suggested that the three stations could be consolidated into one station.

It was suggested that retail outlets for lower income people should be retained and also food retail should be retained in the town to cater for people without access to private transport. In addition, it was suggested that the only way to attract /retain businesses in the town is to have free car parks so that the town centre can compete with out of town shops.

Newhaven town centre was considered to be moribund and unattractive with the town not taking account of the waterfront which could be a unique selling point to attract investment and trade.

There was support for the town to maintain its port and visitor role and also to expand the port for freight. For Newhaven to continue as a hub for manufacturing and the need to strengthen the role of the town centre was also strongly supported.

It was considered that there is a need to maintain the diversity of employment in the District and retain space for employment in the interest of sustainable communities. It was recognised that there was a need to up skill people in some areas, particularly in Newhaven. There was some support for Newhaven to be retained as a manufacturing base for the area, but it was also recognised that some of the existing sites need upgrading.

### **Other options which have been sieved out of the process, and why (i.e. summary of Sustainability Appraisal)**

The options that have been sieved out of the process are those which seek to encourage Newhaven to be the hub for manufacturing and the expansion of the port for freight and the retention of all the land for port uses. Also, the option of letting the market takes its course (in relation to the poor economic profile of Newhaven) even if it results in the loss of land for businesses came out poorly in the Sustainability Appraisal. This is because it rated poorly against the economic, social and environmental criteria. The main positive impact of this option was that it may result in more land being available for housing, if no longer required for port priority, but it

would not be a very sustainable option as it is likely to result in limited jobs locally and therefore people would need to travel to work.

### **Evidence Base for POG 3: What role should Peacehaven and Telscombe have in the future?**

#### **Most relevant national planning guidance/planning policy**

[Planning Policy Statement 1: Delivering Sustainable Development](#) - Overall statement dealing with social progress which recognises the needs of everyone, effective protection of the environment, the prudent use of natural resources, and the maintenance of high and stable levels of economic growth and employment.

*Planning Policy Statement 3: Housing* - The Government intends that everyone should have the opportunity of a decent home. They further intend that there should be greater choice of housing and that housing should not reinforce social exclusion. The housing needs of all in the community should be recognised, including those in need of affordable or special housing in both urban and rural areas.

*Planning Policy Guidance 4: Industrial and Commercial Development and Small Firms* - Encourages continued economic development in a way which is compatible with its stated environmental objectives

[Planning Policy Statement 6: Planning for Town Centres](#) - The Government's key objective for town centres is to promote their vitality and viability by: planning for the growth and development of existing centres; and promoting and enhancing existing centres, by focusing development in such centres and encouraging a wide range of services in a good environment, accessible to all.

[Planning for Town Centres: Guidance on Design and Implementation Tools](#) - This Guidance supports PPS6 and deals specifically with design issues relating to planning for town centres and some of the main tools available to secure the implementation of town centre planning policies and proposals.

[Planning Policy Guidance 20: Coastal planning](#) - Deals with the special value of the coast and concerns about rising sea levels and the need for development to be sustainable.

*Good Practice Guide on Planning for Tourism* – LDF's need to deal with tourism issues. It is appropriate for the Core Strategy to deal with objectives relevant to tourism.

#### **Regional Plan (South East Plan)**

*Policy TC1 – Development of Town Centres:* Local Development Documents should promote good quality development where it is desirable to regenerate and renew town centres

*Policy BE5 – The role of small rural towns:* Encourage schemes to strengthen the viability of small rural towns and so provide small scale housing, protect and enhance the character and develop public transport networks.

*Policy SCT1- Core sub-regional strategy-* should pursue and promote sustainable economic growth and regeneration of the Sussex Coast.

*Policy SCT2 - Enabling Economic regeneration* - Should give increased priority to investment decisions for the sub-area.

*Policy SCT3 – Management of existing employment sites and premises* – Need to deliver sufficient appropriate sites and premises for business and other uses that will help to facilitate the local economy.

*Policy SCT4 – Employment priority in land allocations* - Should give priority to delivering employment development in strategically accessible locations.

*Policy SCT5 - Education and Skills:* This is a specific policy relating to the south coast region, which includes Peacehaven. In conjunction with Policy RE3, local authorities should work jointly with the Learning and Skills Council, local education providers, universities, colleges and the business community to deliver co-ordinated programmes to ensure that the local workforce is trained appropriately and flexibly.

### **Specific Background Documents**

#### *Lewes Retail Study by GVA Grimley*

The retail offer in Peacehaven is limited and split between the two areas of the A259 and the Meridian Centre. The Meridian Centre has an inferior environment relative to other destinations and appears to be struggling to attract trade. The South Coast Road A259 attracts only a limited local trade and is an unappealing retail location.

#### *An Analysis of Business Potential in Lewes District by Step Ahead*

Peacehaven has not capitalised growth the way that Lewes has been able to.

*A Way Forward for the Economy of Lewes District - an interim economic development strategy by Lewes District Council* – this document has been prepared to set out the high level context for future decisions that will affect the local economy.

*Land use in East Sussex by Vaill Williams* – This study entailed analysis of the commercial property market and a business survey. The study concluded that there should be continued road improvements and general environmental enhancements; more small business units in Lewes (through public sector land and programmes or via enabling development); and that Lewes may benefit from the provision of larger units of accommodation for businesses

*Draft Regional Economic Strategy by SEEDA* – Supports smart growth through enterprise, innovation and skills development.

*Business Growth Potential Lewes District 2005 by Step Ahead* -This report recommends that there should be adequate employment sites to meet current and future demand, particularly high quality B1 (office uses). It also states that the economic base should be diversified in strong growth sectors such as financial business services, cultural and creative sectors and advanced engineering. The report places emphasis on the future success of the district being dependent on how effectively it manages to diversify away from more traditional areas of employment and whether it is able to successfully broaden the economic base.

*East Sussex Area Investment Framework – Action Plan by East Sussex Economic Partnership* – This Plan identifies the need to take forward the Enterprise Gateway proposal for Newhaven, to develop an integrated package of infrastructure development, to secure the physical regeneration of key strategic sites in Newhaven, and to tackle deprivation and social exclusion in Newhaven.

*Local Transport Plan 2 by ESCC*– Seeks to improve access to services by providing greater travel choices and influencing land-use decisions, manage demand and

reduce the need to travel by private car, reduce congestion and improve the efficiency of the transport network, improve maintenance and management of the transport network. The implementation plan identifies the A27 Beddingham Improvement Scheme, and the Newhaven Port Access Road as strategic requirements.

**What we were told as a result of consultation**

The main issue was the problem of congestion along the A259 and that it cannot cope with more traffic. Therefore the issue of ensuring adequate infrastructure before more development came up quite often. Also the issue of local jobs was raised i.e. that there needs to be more locally to reduce out commuting.

**What the Community Strategy says**

The Community Strategy has a specific section for Peacehaven and Telscombe and identified that better community facilities, improved transport, having a thriving local commercial and retail sector, improved local access to education and skills training and improved local sports & leisure facilities were all needed.

**Other options which have been sieved out of the process, and why (i.e. summary of Sustainability Appraisal)**

One option would be to leave the settlement to be primarily residential and not focus on improving shopping and employment in Peacehaven. This would continue the existing problem of a settlement with weakly developed local services; this, in turn, causes out commuting and exacerbates the problem of local congestion. This, therefore, is not a realistic option.

There is also a need to consolidate shopping provision. Therefore, doing nothing would not be a realistic option.

## **Evidence Base for POG 4: What role should Seaford have in the future?**

### **Most relevant national planning guidance/ planning policy**

*Planning Policy Statement 1: Delivering Sustainable Development* – The LDF must seek to achieve sustainable development, proactively manage development through positive planning, have clear visions for communities and have an open and inclusive planning process.

*Planning Policy Guidance 3: Housing* - The Government intends that everyone should have the opportunity of a decent home; that there should be greater choice of housing and that housing should not reinforce social distinctions. The housing needs of all in the community should be recognised, including those in need of affordable or special housing in both urban and rural areas.

*Planning Policy Guidance 4: Industrial and Commercial Development and Small Firms* - Encourages continued economic development in a way which is compatible with its stated environmental objectives.

*Planning Policy Statement 6: Planning for Town Centres* - This policy sets out that there should be a sequential approach to site identification; development should take place in the town centre first.

*Planning Policy Guidance 13* - Promotes the vitality and viability of existing town centres, which should be the preferred location for new retail and leisure developments.

*Planning Policy Guidance 15: Planning and the historic environment* - Local plans should set out clearly the planning authority's policies for the preservation and enhancement of the historic environment in their area, and the factors which will be taken into account in assessing different types of planning application.

*Planning Policy Guidance 21: Tourism* - outlines the economic significance of tourism and its environmental impact, and therefore its importance in land-use planning. It explains how the needs of tourism should be dealt with in development plans and in development control.

*Employment Land Reviews: Guidance Note* - The primary purpose of this guide is to provide planning authorities with effective tools with which to assess the demand for and supply of land for employment.

*Planning Policy Statement 1: Delivering Sustainable Development*- Promotion of economies by providing, in support of the Regional Economic Strategy, a positive planning framework for sustainable economic growth to support efficient, competitive and innovative business, commercial and industrial sectors.

*Planning Policy Guidance 4: Industrial, commercial development and small firms* – The governments key aim is to encourage continued economic growth in a way which is compatible with the environmental objective

## **Regional Plan (South East Plan)**

*Policy TC1 – Development of Town Centres* - Local Development Documents should promote good quality development where it is desirable to regenerate and renew town centres.

*Policy BE5 – The role of small rural towns* - Encourage schemes to strengthen the viability of small rural towns and so provide small scale housing, protect and enhance the character and develop public transport networks.

*Policy STC1- Core sub-regional strategy* – Promotion of sustainable economic growth and regeneration of the Sussex coast.

*Policy STC2 - Enabling economic regeneration* – National, regional and other relevant agencies and authorities should give increased priority to investment decisions, with priority given to Shoreham to Rye area.

*Policy SCT3 – Management of existing employment sites and premises* – Need to deliver sufficient appropriate sites and premises for business and other uses that will help to facilitate the local economy.

*Policy SCT4 – Employment priority in land allocations* - Should give priority to delivering employment development in strategically accessible locations.

*Policy SCT5 - Education and Skills* - This is a specific policy relating to the south coast region, which includes Newhaven and Seaford. In conjunction with Policy RE3, local authorities should work jointly with the Learning and Skills Council, local education providers, universities, colleges and the business community to deliver co-ordinated programmes to ensure that the local workforce is trained appropriately and flexibly.

*Policy SCT 7- Broad amount and distribution of future housing development.*

*Policy SCT 8 - Affordable Housing* - Local Development Documents will establish appropriate policies and targets for the provision of affordable housing in their area.

*Policy SCT 9 - Infrastructure* - Local Authorities should work with other relevant agencies and infrastructure providers to ensure that the necessary infrastructure can be provided in time to serve the development proposed.

### **Specific Background Documents**

*Retail Study of Lewes District by GVA Grimley* - Seaford Town Centre successfully serves its local catchment in the face of growing competition from Eastbourne. It is evident from the wide range of goods and services provided that the town as a whole is relatively self sufficient.

Whilst it serves only a local catchment, Seaford is a viable and vibrant centre that serves all the functions of a town centre defined by PPS6. The study has confirmed that Seaford is a stable centre. In order to reinforce the vitality and viability of the centre, the LDF should aim to consolidate existing provision, whilst building on the centre's existing strengths to help increase its market share.

Seaford does not fully exploit its potential as a visitor attraction. The spatial framework provided through the LDF needs to be complemented by wider Council initiatives aimed at successfully attracting more visitors.

*An Analysis of Business Potential in Lewes District by Step Ahead* – Seaford has been able to rely on public sector employment, but jobs are mainly in the health and education sector, which support the town's families and older residents.

The demographic profile is likely to influence the structure of the town's economy. Nearly one third of its residents are over the age of 60 years. Whilst Seaford remains an attractive place for older people to retire to, the demand for health and social care services is likely to remain high, and the town's ability to attract a critical mass of innovative high growth businesses that serve local markets may be limited. It is dominated by low and intermediate level businesses, primarily serving local markets.

#### **Seaford Local Area Transport Strategy**

Aims to improve pedestrian links; to explore opportunities for increasing the frequency of buses; to increase the number of commuters on bus and rail; to develop school travel plans, and to obtain contributions from development towards the implementation of the transport schemes identified in the strategy.

### **What we were told as a result of consultation**

In the issues and options consultation, there was quite an equal balance of opinion. However, strengthening the town centre and improving local services came out as quite a high priority.

### **What the Community Strategy says**

The Seaford Community Partnership states that the community wants seafront improvement and increased tourism, improved local transport, a community centre and first stop shop, improvement of Cradle Hill industrial estate and town centre regeneration.

### **Other options which have been sieved out of the process, and why (i.e. summary of Sustainability Appraisal).**

Allowing Seaford to become even more of a dormitory town may lead to an even higher concentration of elderly people who demand services and facilities. Increasing the dormitory role could lead to Seaford being less of a mixed community with local people becoming more reliant on work, services and facilities in other centres,

increasing the need to travel. This option was therefore sieved out of the process, which was supported by the results of the sustainability appraisal.

**Evidence Base for POG 5: What role should the rural area have in the future?  
Most relevant national planning guidance/ planning policy**

*Planning Policy Statement 1: Delivering Sustainable Development* - Overall guidance dealing with social progress which recognises the needs of everyone, effective protection of the environment, the prudent use of natural resources, and the maintenance of high and stable levels of economic growth and employment.

*Planning Policy Guidance 3: Housing* - Seek to meet the needs of local people for affordable housing in rural areas by making effective use of affordable housing policy. Rural affordable housing may be augmented by an exception policy. This enables local planning authorities to grant planning permission for land within or adjoining existing villages which would not normally be released for housing, in order to provide affordable housing to meet local needs in perpetuity.

*Planning Policy Statement 7: Sustainable Development in Rural Areas* -Promotes sustainable economic growth and diversification, ensuring people have places to live and work.

Planning policies in Local Development Documents should facilitate and promote sustainable patterns of development and sustainable communities in rural areas. This should include policies to sustain, enhance and, where appropriate, revitalise country towns and villages (including through the provision of affordable housing) and for strong, diverse, economic activity, whilst maintaining local character and a high quality environment.

The Local Planning Authority should be supportive of well conceived farm diversification schemes for business purposes that contribute to sustainable development objectives and help to sustain the agricultural enterprise, and are consistent with their scale and rural location.

*Planning Policy Guidance 13: Transport* - The objective of PPG13 is to integrate transport and planning at national, regional and local levels to encourage sustainability, public transport and accessibility.

**Regional Plan (South East Plan)**

*Policy RE2 – Employment and land provision* - LDD should be supportive of the agricultural, horticulture and forestry industries, and rural economic diversification.

*Policy H1 – Housing provision* – Sets out the housing provision for the District of 4400 units, up to the year 2026.

*Policy H4 – Affordable housing* - LDD's to contain policies to deliver a substantial increase, in the amount of affordable housing. In rural areas should promote small scale affordable housing sites within, or well related to, settlements.

*Policy CT2 - Areas of Outstanding Natural Beauty*- Planning authorities should have regard to statutory AONB Management Plans.

*Policy BE6 – Village Management* – Should positively plan for limited small scale affordable housing, business, and service development in villages to meet defined local need.

*Policy TSR2* – Encourage tourism and recreation based rural diversification where they provide jobs for local residents and are a scale and type appropriate to their location.

### **Specific Background Documents**

*Lewes District Council Housing Needs Strategy Final Report by DCA* - Highlights the affordability problem in the District arising from the relationship between local incomes and the supply of affordable housing stock. It recommends that subsidised affordable housing should be negotiated on all suitable sites. The Council should set a target for each site, taking into account existing supply, survey demand and other regeneration issues, planning, sustainability and economic factors.

*Affordable Rural Housing Commission by DEFRA* - Delivering rural housing must be part of the mainstream planning system. Exception sites are a useful tool, but should not be relied on. Local need should be met through the allocation of sites for affordable and market housing in local planning documents.

*Homes for Rural Communities by the Joseph Rowntree Foundation Rural Housing Policy Forum* - The national threshold at which planners are obliged to require some affordable housing is set at 24 homes. This has little relevance for most rural housing schemes which typically comprise 4-8 homes, and helpfully the draft PPS3 has recognised this. Local authorities have the power to lower the threshold so that smaller developments must also include some affordable housing for local people.

*LDC Housing Strategy 2002-2007* seeks to address the following problems:

- The need for affordable housing
- Assisting key workers
- Reducing homelessness
- Meeting supported housing needs
- Meeting the needs of black and minority ethnic groups
- Improving the quality and suitability of the housing stock
- Promoting regeneration
- Encouraging sustainable rural areas

*An Analysis of Business Potential in Lewes District by Step Ahead*- The greatest falls in employment were in agriculture, which now provides less than 1,000 jobs in the District. Although employment in agriculture has been declining, the agricultural sector has a vital role in the Lewes District economy and a direct and indirect role on tourism, maintaining the quality of the countryside. In recent years the rural economy has diversified with an increasing amount of rural accommodation, such as bed and breakfasts and converted barns for business premises. Employment in rural parts of Lewes District increased above trend, by a third between 1995 -2002. The role of the countryside in the local economy is likely to increase as the whole of the District is broadband enabled, creating more opportunities for home working from rural locations and the potential for the development of high quality business accommodation. 22% of employment in Lewes District in 2002 was in the rural area. This is more than any of the towns, except Lewes.

*Regional Economic Strategy by SEEDA* - Rural priorities include enabling farmers to capitalise on the opportunities for new products and processes, stimulation of knowledge and IT based entrepreneurialism, tackling rural deprivation, developing

tourism linked to the high quality environment.

*A Way Forward for the Economy of Lewes District by Lewes District Council -*  
Priorities are diversification of the economy and greater presence of growth sectors; and using the natural environment, heritage and culture as an economic resource for tourism.

#### **What we were told as a result of consultation**

There was general agreement that rural services/facilities should be retained and/or provided, but it was recognised that the local people needed to use these facilities if they were to be sustained. The lack of affordable housing in the rural area was identified. However, people generally wanted to protect greenfield sites. Infill sites within the settlements were generally considered to be acceptable. The provision of more social housing and the lowering of the threshold for the provision of it was also supported.

The option to promote farm diversification, allowing business and tourist uses was supported most highly. Other comments received covered the following:

- Encourage local farmers to sell their produce, produce something different, vineyards, out of town businesses in redundant farm buildings create more employment but also more car travel.
- Barns and outbuildings can be well developed to assist farmers to survive Influence of the Common Agricultural Policy.

#### **What the Community Strategy says**

The Community Strategy sets out that the community wants a strong rural economy.

#### **Other options which have been sieved out of the process, and why (i.e. summary of Sustainability Appraisal**

The options to develop more housing and to do nothing and accept that most services will be in nearby towns, scored poorly in the Sustainability Appraisal.