



# **Lewes District Council Local Development Framework**

## **Core Strategy Preferred Options Development Plan Document 2006**

### **Summary of responses**

**May 2010**

**LDF**  
Local Development Framework

## Introduction

The Lewes District Local Development Framework (LDF) is a spatial plan that sets out a vision for the District over the next 15 years. It will identify how the Council will meet the challenges of managing pressures and changes affecting a wide range of spatial issues.

A key document in the LDF is the Core Strategy, which has a pivotal role in delivering the objectives and priorities of the Council's 'Sustainable Community Strategy' and is where the Council's vision, aims and objectives relating to the future pattern of development within the District to 2026 are set out.

Lewes District Council published a Core Strategy Preferred Options document for consultation in September 2006. Within the document, a total of 25 issues that impact upon the District were considered and the Council's preferred policy approach for dealing with them were identified. A total of 405 individual comments were submitted relating to specific policies (some respondents submitted representations on more than one policy).

Following receipt of these representations the Preferred Options document was never progressed. This was for a number of reasons, including changes to national and regional policy, changes to the regulations that govern the production of the LDF and that the Council wished to reflect a supplemented evidence base and certain changes in circumstances.

The purpose of this paper is to summarise the comments received on each policy area, following the order in which they were presented in the Core Strategy Preferred Options (September 2006) document. Where relevant the comments received will be used to inform and shape the Council's emerging Core Strategy, which will be progressed towards an anticipated adoption in 2012.

The Issues and Emerging Options Topic papers, which will represent the first formal consultation on this emerging Core Strategy, have been published alongside this document. As well as summarising the comments made on the Preferred Options document from 2006, this paper identifies how these comments have been addressed in the aforementioned Topic Papers, where relevant.

**It is worth noting that many of the comments that were made on the Preferred Options document (2006) will be addressed later on in the process of preparing the Core Strategy or are no longer applicable due to a change in national and/or regional policy, or the regulations that govern the procedures for preparing a Development Plan Document, such as a Core Strategy.**

## **Feedback from consultation**

### Policy POCC1: How can we address the causes of climate change?

The comments received on this policy area can be summarised as follows;

There was concern that no justification was demonstrated as to why 15% renewable provision on site was preferable and that climate change was not referred to in local (Lewes District specific) terms but in general terms.

It was also criticised that there was no justification presented for setting the threshold for the policy at six or more residential units and that the requirements would place additional financial burdens upon the viability of development, which has also not been justified.

It was stated that the policy also gives insufficient flexibility to consider site by site attributes, which would prevent developers finding the most affordable and practical way to meet the requirements based on the site attributes and technologies available to them. This requirement and lack of flexibility could stifle regeneration and development.

Energy efficiency of the existing housing stock was highlighted as being worse than in new housing and so renewable energy requirements should not just relate to new builds and conversions but to all developments.

It was also suggested that energy efficiency should remain a matter for the building regulations and that the 15% target should be dropped and replaced with meeting the maximum renewable energy in accordance with the relevant building regulations for the development.

Although there were respondents in favour of the policy there were also requests for greater aspiration and more stringent targets (such as 20% renewables or adopting a zero carbon approach) as the Core Strategy would otherwise be inadequate to reduce the eco footprint of the district.

Among the supporters there was also some concern that while the DPD policy needed to be expressed strategically, it should also be an opportunity to explain exactly what is meant by 'on-site renewables', 'sustainable construction' etc and to set out how these measures can actually be achieved (by way of an appendix or link to SPD/checklists etc).

It was also suggested that a specific figure should be put on incorporated energy efficiency measures (sustainable construction and energy efficiency), otherwise it would be easy for the renewables target to be worth very little in overall carbon savings.

Some considered that the strategy should be more proactive in encouraging the development of renewable schemes, both as part of new development and for the provision of upgrading existing buildings and providing community schemes.

What has happened in this policy area since 2006 and how will issues raised by the respondents to this policy be addressed in the emerging Core Strategy?

Addressing locally contributing causes of climate change will form a key element of the emerging Core Strategy. This has been recognised in a number of the Topic Papers, particularly the ones concerning the Characteristics, the Vision and the Strategic Objectives. In order to develop such a strategy the District Council is producing a Renewable Energy and Low Carbon Development Study. The outcomes from this study will be used to inform options for this policy area and help identify the preferred policy approach.

By having this policy evidenced by a robust piece of evidence will address the majority of the comments that were made on this policy area in the Preferred Options document in 2006.

POCC 2: How can we help reduce social deprivation?

The comments received on this policy area can be summarised as follows;

The comments on this policy related mainly to the provision of affordable housing. Such comments included that affordable housing should be in close proximity to employment, include family sized accommodation and be affordable to key workers.

Criticism was raised that the policy was not clear on how the strategy will reduce social deprivation and that specific mention has not been made on individual locations such as Newhaven.

The provision of infrastructure and meeting community needs were also cited as being important in dealing with social deprivation.

What has happened in this policy area since 2006 and how will issues raised by the respondents to this policy be addressed in the emerging Core Strategy?

The issue of social deprivation in certain parts of the District has been identified in Topic Paper 2 (Issues and Challenges) under the heading of 'Creating healthy, sustainable communities'. In addition, the vision that is presented in Topic Paper 3, along with the strategic objectives in Topic Paper 4, recognise the need to address social deprivation in certain parts of the district and reduce some of the social disparities that currently exist in Lewes district. At this stage in the production of the Core Strategy a strategy that seeks to reduce social deprivation has yet to be established. This will be set out in the Preferred Strategy document.

A policy framework for the delivery of infrastructure and appropriate affordable housing will form part of the emerging Core Strategy document.

### POCC 3 How can we improve the quality of the environment?

The comments received on this policy area can be summarised as follows;

Support was given for aspects in the policy on good design, building technologies and regard being had to sustainability, but concern was raised on how innovative and original design can respect local context and architecture. There was also concern raised that the wording of the policy was too prescriptive and inappropriate, particularly as it was without a sound evidence base and the strong backing of wider strategic planning policy.

Also in respect of design, a query was raised as to whether there are any more locally distinctive implications for specific locations identified for development.

Concern was raised that the preferred option failed to make the link between achieving more efficient densities of development, regeneration and design quality. It was also stated that all new developments should be integrated within existing built up areas to ensure that sustainable development is created.

A suggestion was made that on-site renewables, sustainable construction and energy efficiency techniques should be further explained or deleted.

A comment was made that the empty buildings in Newhaven should be improved and that extra space around new build developments should be given. A view was also given that buildings in excess of 5 stories in height is not good 'town planning'.

### What has happened in this policy area since 2006 and how will issues raised by the respondents to this policy be addressed in the emerging Core Strategy?

A number of the comments that were made on this policy area were very detailed and at this 'Issues and Options' stage of the Core Strategy it is not appropriate to provide a detailed commentary on how the quality of the built environment will be improved. However, the comments made will influence the actual wording of any policy on the built environment that is contained within the Preferred Strategy stage of the Core Strategy.

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

The comments received on this policy area can be summarised as follows;

Some respondents felt that the preferred option should refer to the National Park, its present legal and planning status and estimated date of designation. Also reference should be made to South Downs Management Plan and to the South Downs Integrated Landscape Character Assessment.

It was considered that the policy should also have reference to housing to meet socio-economic needs within the area as well as giving a clear indication of the presumption against major development, except in exceptional circumstances (major development should be defined).

The reference within the policy to allow housing and facilities to meet local needs was welcomed by some, but concern was raised that this caveat will be exploited. Also the suggestion that further settlements will have development boundaries if insufficient residential sites do not come forward, was not considered to make sense to certain respondents, as they felt that those settlements with development boundaries should be expanded.

The use of the sustainability ranking data was both supported and opposed and reference was made to the fact that some settlements have not been included in the appraisal. Also, concern was raised that there were inaccuracies in the information that underlay the identification of the most sustainable settlements. The settlement hierarchy should be clear to ensure sites come forward in a sustainable manner, but a more sophisticated application of sustainability appraisal should be used. It was commented that the spatial distribution of development has produced an illogical list of settlements.

It was commented that the sustainability analysis did not take account of the development potential of the settlements, nor did it consider whether/how new development could add to the range of facilities or make them more sustainable through the provision of infrastructure. There was a suggestion that the built environment and landscape issues should also be looked at within the sustainability of settlements assessments. An opinion was given that the sustainability of the settlements should be revisited before the submitted version of the Core Strategy.

The preferred option should highlight the need to protect and enhance locally, nationally or internationally important designated wildlife, plus the general biodiversity value of all the sites. Also the identification of further settlements for development should be guided by the SFRA.

It was suggested that the settlements should be listed alphabetically so not to give the impression that they have been ranked in order, and it was commented that the policy should acknowledge that previously developed land and undeveloped land within development boundaries would be acceptable for development.

A number of representations suggested that the Preferred Option is unsound as it implies that there is no scope for major development anywhere in the District. Also, it was stated by some respondents that there is inconsistency between policies POGE1 (as detailed above) and POH1 (how adequate land for housing will be provided). Although not specifically relating to this policy, objection was also raised on the omission of a key diagram and housing trajectory within the document.

The clarity of the policy was brought into question as it was not considered clear as to whether development would, or would not, be supported within areas within the AONB, or other similarly constrained areas. Concern was also raised regarding the inclusion of some of the valuable planned historic downland villages within the settlement hierarchy.

It was considered by some that the authority should consider what development may be required outside of the development boundaries. As it has not yet done so, the strategy is not based upon a robust and reliable evidence base.

The provision of development boundaries was generally supported although there were a number of individual comments in respect of specific settlements.

It was considered that the Local Authority should make specific reference to managing land around the urban fringe but concerns were raised regarding the expansion of settlements that are close to congested parts of the A27.

What has happened in this policy area since 2006 and how will issues raised by the respondents to this policy be addressed in the emerging Core Strategy?

The Issues and Emerging Options Topic Papers refer to the 'Rural Settlement Study' that the Council is currently preparing. This study builds upon the background document that many respondents referred to in making comments on this policy entitled "The Sustainability of Settlements in the Lewes District".

Many of the comments that were made on this document have and will be addressed in the emerging Rural Settlement Study, which will eventually inform a policy approach for development in the settlements away from the towns in the District. This approach will consider the need to protect the natural environment, including the South Downs National Park.

POGE 2 : How can we ensure that the historic environment is protected?

The comments received on this policy area can be summarised as follows;

Disappointment was raised that this policy did not actively protect the historic environment. It was also commented that conservation areas and listed buildings are only part of the Districts cultural heritage, and that there are many other features of local significance that add to the vitality and character of the historic environment, as well as the wider historic landscape. In respect of this point, concern was raised that the policy had no mention of the historic battlefield or unscheduled but nationally important archaeology sites.

One respondent also felt that the policy did not provide a satisfactory basis for considering development proposals affecting archaeological remains and conflicted with advice given by English Heritage.

A view was expressed that high quality contemporary development can contribute to enhancing the character and appearance of conservation areas. The support of innovative design that would make an architectural statement for this century was supported, but concern was raised that the policy did not add to national policy or support local distinctiveness. It was queried as to whether the policy impacts on the location of development, or whether it is wholly directed towards good design.

What has happened in this policy area since 2006 and how will issues raised by the respondents to this policy be addressed in the emerging Core Strategy?

Topic Paper 6 has identified a number of potential strategy and policy areas that could be included within the Core Strategy. One such area is Design and the Historic Environment. At this stage the Council cannot commit to how planning for the historic environment will be addressed in the Core Strategy, but will need to be mindful of the new Government Planning Policy Statement 5: Planning for the Historic Environment, which post dates the original Preferred Options 2006 Development Plan Document. If it is the case that the approach that the Council takes to this policy area is to merely repeat national and regional planning policy then such a policy/strategy area would not be included within the Core Strategy. This is because a Core Strategy should be 'locally distinctive' and not just repeat national and/or regional planning policy.

However, based on the evidence base work and the feedback that is received on the Topic Papers it may be established that the most appropriate approach for a strategy/policy for the historic environment is to have a locally distinctive policy.

POGE 3 – How can we deal with the threat from flooding?

The comments received on this policy area can be summarised as follows;

In responding to this policy, certain locations within the District were cited by respondents as having localised flooding problems.

Many respondents set out their views as to whether or not development should be allowed in areas of flood risk (the majority felt it should not) and what should happen to urban areas that are presently at risk from flooding. Such views included, that existing brownfield sites are reverted to wetlands and that no additional development should be allocated to areas at risk of flooding such as Lewes town, Newhaven and Seaford (particularly given that the level of risk is likely to increase due to climate change).

Some respondents to the policy were of the opinion that the policy was too restrictive and that to require sustainable drainage systems for every development is unrealistic.

It was considered by one respondent that the policy should make reference to the impact that farming practices have on flooding.

The policy referred to maintaining coastal defences where feasible. One respondent commented that if this was not feasible in certain locations then managed retreat should take account of wildlife interests and recreational interests, and consider how opportunities can be developed to offset or compensate for their loss.

It was commented that the preparation of the SFRA is not itself a policy position and that there should be a policy presumption against development in the floodplain, unless it is shown that development will enhance the storage capacity and function of the floodplain.

What has happened in this policy area since 2006 and how will issues raised by the respondents to this policy be addressed in the emerging Core Strategy?

The issue of flood risk in the District is something that has been recognised in a number of the Topic Papers. The issues and challenges for the Core Strategy, as identified in Topic Paper 2, recognise that the emerging document will need to address the risk of flooding. In turn this is reflected in Topic Papers 3 (Vision) and 4 (Strategic Objectives). For example part of the Vision in Topic Paper 3 states that “measures to reduce risk to the district from the increased frequency and severity of flood events will have been introduced, particularly in the urban areas.”

Since the Preferred Options document was published in 2006, the District Council has prepared a Strategic Flood Risk Assessment (SFRA) as part of its evidence base. This SFRA will be used to inform any policy approach that the District Council takes with regards to development and flood risk. Such an approach will need to be in accordance with Planning Policy Statement 25. The Preferred Strategy document will identify the Council’s preferred approach for dealing with this policy area.

POGE 4 - How can we look after and provide important and varied habitats in the District?

The comments received on this policy area can be summarised as follows;

A number of respondents to this policy were supportive of the proposed approach. However, suggestions for improving the policy were put forward, including mentioning the Biodiversity Action Plan within the policy and making reference to the existing wildlife, habitats and habitat buffer strip areas, as well as opportunities to enhance unrecognised sites and features. It was also stated that the ‘allocate then mitigate’ approach to biodiversity should no longer be used. Instead areas should be assessed, valued and enhanced ahead of development.

One respondent stated that within the policy, or supporting text, reference should be made to the hierarchy of designations in PPS9 - Biodiversity and Geological Conservation, in selecting any broad locations for development.

Some respondents queried what this preferred option added to national policy and how it could be considered to be locally distinctive.

What has happened in this policy area since 2006 and how will issues raised by the respondents to this policy be addressed in the emerging Core Strategy?

Topic Paper 6 has identified a number of potential strategy and policy areas that could be included within the Core Strategy. One such area is Climate Change, Flood Risk and Environmental Resource Management, which would cover the subject of biodiversity habitats. At this stage the Council is unsure as to how planning for this subject area will be addressed in the Core Strategy. If it is the case that the approach that the Council takes is merely repeating national and regional planning policy then such a policy/strategy area would not be included within the Core Strategy.

However, based on the evidence base work and the feedback that is received on the Topic Papers it may be established that the most appropriate approach for a strategy/policy for the District's important and varied habitats is to have a locally distinctive policy.

If there is a case for including a locally distinctive policy in the Core Strategy, concerned with the District's important and varied habitats, the suggestions that were put forward for improving the policy in the 2006 Preferred Options document will be considered.

As part of the evidence that is being prepared to inform the Core Strategy, a Green Infrastructure Study will be prepared. The Planning of Green Infrastructure is important for protecting and enhancing the environment and creating new assets for the benefit of wildlife and existing and new communities. The outcomes from this study will be a key influence on the aforementioned policy area (Climate Change, Flood Risk and Environmental Resource Management).

PO11 How can we ensure that adequate infrastructure is provided in the District?

The comments received on this policy area can be summarised as follows;

There was support for the conditional approach to infrastructure delivery (ie, it is in place, or will be provided before the development is completed). Conversely objections were received suggesting that this requirement is too unreasonable and unrealistic and that it should not be the developer's role to meet the existing shortfalls in infrastructure. There was support for the principle of safeguarding land that might be required for strategic infrastructure in the District.

A suggestion was put forward that infrastructure should include 'culture' and that financial contributions should go towards community services and cultural facilities where a shortfall exists. One respondent wanted the policy to make reference to the police as an infrastructure provider.

It was also considered that developer contributions that are only to be spent in support of a development permitted is too restrictive and conflicts with SEERA's proposals for an infrastructure fund and Government policy on pooled contributions.

A number of respondents supported the part of the policy that sought the protection of the route for the Lewes to Uckfield railway line and for its use for recreational purposes in the interim period. However, there were some respondents who felt that to safeguard this land for the railway line is premature.

Both support and objections were received for the part of the policy that was concerned with the proposal for a new reservoir at Clayhill.

Objection was made to the omission of a specific reference to the need for a proposed wastewater treatment works/sludge recycling facility, which would serve Brighton, Hove and Peacehaven, from the list of key strategic infrastructure projects that land will be safeguarded for.

Some respondents considered that developer contributions to support infrastructure provision should be required as part of the package of requirements.

A suggestion was received that the preferred option should make reference to 'green infrastructure' and its different forms.

What has happened in this policy area since 2006 and how will issues raised by the respondents to this policy be addressed in the emerging Core Strategy?

Since the Preferred Options document was published in 2006, the position concerning infrastructure planning has changed somewhat. As well as regulations being introduced that allow for Local Planning Authorities to implement the Community Infrastructure Levy (CIL), the production of a Core Strategy now needs to be accompanied by an Infrastructure Delivery Plan (IDP). The IDP will set out the strategic infrastructure that is required to support the growth that is planned for in the Core Strategy.

Details will be provided on who will supply that infrastructure, when it will be provided, how it will be funded and why it is required. The District Council has begun the process of preparing an IDP. At present, an audit of the current levels of infrastructure provision in the District is being undertaken. In addition, any existing investment/provision plans that have been prepared by infrastructure providers are being established.

In undertaking the IDP and eventually establishing a strategic policy approach on infrastructure, the Council will undertake a review of strategic infrastructure schemes set out in the Preferred Options document. This will be to determine

if these schemes are still likely to proceed (some may have already been completed).

Another element of the Council's evidence base on infrastructure will involve producing a Green Infrastructure Plan, which is in the early stages of production.

#### POI 2: How can we protect existing, and provide new leisure facilities in the District?

The comments received on this policy area can be summarised as follows;

This policy was generally supported in principle although it was suggested that amenity space should not be protected where this would compromise the ability of schools to expand.

Some respondents considered that developers should only make provision for leisure facilities required as a result of their own developments and not to compensate for existing shortfalls.

A suggestion was made that specific reference should be made to the protection of cultural facilities, footpaths and cycleways.

It was suggested that existing allocations in the Local Plan should be reassessed for any potential contribution to leisure facilities.

#### What has happened in this policy area since 2006 and how will issues raised by the respondents to this policy be addressed in the emerging Core Strategy?

The position that applies to the over-arching infrastructure policy (POI1) is also the same with this policy area, in terms of CIL and the IDP.

In addition further work is proposed to be undertaken on the Lewes District Outdoor Play Space Review 2004 and the Lewes District Informal Recreational Space Study 2005 to provide up to date evidence and recommendations.

#### POI 3: How can we move around the District in an effective and sustainable manner?

The comments received on this policy area can be summarised as follows;

It was commented that there are no suggestions as to how this policy will be implemented and that the Core Strategy needs a policy that covers the breadth of transport issues and lays the foundation for more detailed policies in other Development Plan Documents.

It was suggested that the policy should fully reflect the transport policy in the South East Plan in relation to car and cycle parking. With reference to cycling it was considered that the network of cycle paths is inadequate to encourage safe travel over distances.

It was considered that the provision of public transport (buses) to give access to the Downs would give further opportunities for access in this part of the District. In addition, it was considered that an enhanced bus service provision should be provided to and from the existing railway stations within the District.

Some respondents queried what this preferred option added to national policy and how it could be considered to be locally distinctive.

Some respondents felt that full regard had not been paid to PPG13 in selecting broad locations for development.

What has happened in this policy area since 2006 and how will issues raised by the respondents to this policy be addressed in the emerging Core Strategy?

Topic Paper 4 states at Objective 3 that the Council will work jointly with the agencies responsible for provision of physical, social and green infrastructure. This will include the programming, funding and delivery of all infrastructure required to support new development. Where appropriate, the provision of new infrastructure should also benefit the wider community and redress current inequalities in provision.

In addition Objective 7 seeks to reduce the need for travel and to promote a sustainable system of transport and land use for people who live in, work in, and visit the District. The Council proposes to work with the relevant transportation agencies to promote alternative modes of transport to the private car, improving the provision of facilities that enable safe walking and cycling, and to improve the connectivity, capacity and frequency of public transport facilities in the district.

As part of the Southern Coastal Towns Accessibility Strategy Local Assessment (ASLA), East Sussex County Council have carried out a survey in August and September 2009 to find out about how people get to places in their area. The purpose of the study was to understand more about any problems people may encounter when going on regular journeys to the shops, school, work and the GP or hospital. The outcomes from this study, along with a Strategic Transport Study that the Council will undertake, will be used for considering the transportation impacts of any strategic development proposals for the Core Strategy, along with any over-arching policy/strategy for this subject area.

At present, the County Council are preparing the Local Transport Plan 3 (LTP3). The content of this Plan will be a key consideration in formulating any transport policy.

POI 4: How important is Newhaven Port to the District?

The comments received on this policy area can be summarised as follows;

A query was raised as to why Newhaven Port is separated from the rest of the Town and other issues relating to Newhaven.

One comment considered that development in the town needs to have regard to the historic environment in the vicinity.

In respect of the rail infrastructure, it was considered that the harbour station is not in regular use and should be merged with the town station.

A suggestion was made that diversification of the Port use could include a marina, which should be acknowledged in the Policy.

What has happened in this policy area since 2006 and how will issues raised by the respondents to this policy be addressed in the emerging Core Strategy?

Topic Paper 8 relates to the Eastside area of Newhaven, which includes the port of Newhaven. The purpose of this Topic Paper at this stage is simply to identify the current position with regards to developing and considering options for this potential strategic development site.

A number of considerations need to be taken into account in considering the future role for this area of Newhaven, this includes evidence base work. One such piece of evidence has been commissioned by Newhaven Strategic Network (NSN), and funded by the South East England Development Agency (SEEDA), and is in the process of being completed by the consultants BBP Regeneration. This is entitled 'Physical Development Vision for Newhaven' and it will contain a 20 year vision for the town, which will include options for achieving that vision. The role that the Eastside area of the town could play in achieving the vision is going to form a key component of this study.

The study being prepared by BBP Regeneration is due to be consulted upon in late Summer/early Autumn 2010. This consultation will be co-ordinated by NSN. As part of this consultation the Council expects some strategic planning options for the Eastside area to be identified, with comments sought on them. These options will be based on the outcomes from the BBP study as well as the evidence base work identified previously in this paper.

Another key influence on any strategic policy options for the Eastside area is going to be the future role of the Port. Newhaven Port and Properties (NPP) have commissioned specialist consultants, Royal Haskoning and DMH Stallard, to prepare a Masterplan for the Port. The Masterplan will look at the future prospects for the port and what it needs to do to sustain both cross-channel ferry and commercial shipping traffic. It will also examine what other opportunities may arise for development of port business, such as, for example, supporting offshore wind farm development. This work also includes community and stakeholder engagement. The Council hope that by the time consultation on the BBP

study, along with options for the Eastside area, is undertaken the future role of the port and its importance for the District will be clearer and this can be reflected in the consultation material.

POH1: How are we going to provide adequate land for housing the population of our District?

The comments received on this policy area can be summarised as follows;

One of the main concerns raised was that the housing delivery targets should be flexible in the event that targets are revised in the South East Plan (which had not been adopted at the time the Preferred Options document was consulted upon), also, that the document should show the broad locations for strategic housing development and other strategic needs.

Support was given to the focus of development on the edges of the District's major settlements.

The provision of development till 2011 is considered to be overly ambitious and the proposed rate of development is not sufficiently substantiated or clearly enough explained. The pace of development should be phased to match the provision or availability of employment.

Concern was raised about the use of the ranking matrix in the Sustainability of Settlements document and suggested that it needs to be re-examined as the existing approach is unjustified and ill-defined. Other comments considered that the viability of local services should be key in determining where development should be sited. It was considered that too much emphasis has been given to the principal settlements and that the list of suitable settlements should be revised.

It was also commented that there is no reference in the plan as to how the housing allocations will be distributed between the Sussex Coast and the rest of Lewes (as identified in the South East Plan).

It was suggested that the rural areas should take a modest amount of development to ensure communities remain viable.

Objection was raised as to the identification of the edge of Burgess Hill as having the potential for accommodating new development. It was suggested that the edge of Haywards Heath should be included in the consideration of development options.

It was suggested that the existing allocations within the Local Plan should be subject to Sustainability Appraisal and public consultation.

The Highways Agency commented that they would require improvements to be in place to match the phasing of development. Comments were also made in respect of the provision of other key infrastructure being available and in place at the time of development.

A number of comments received were concerned with the deliverability of the housing numbers as required by the South East Plan.

What has happened in this policy area since 2006 and how will issues raised by the respondents to this policy be addressed in the emerging Core Strategy?

A key element of any Core Strategy document is going to be the strategy that sets out how, when and where housing will be delivered over the plan period. Since the publication of the 2006 Preferred Options document, there has been significant change at both a national and regional level with regards to planning policy on housing delivery. Hence, the housing delivery element of the new Core Strategy for Lewes District is being prepared against the backdrop of the adopted South East Plan and Planning Policy Statement 3 (Housing), both of which have been issued since the Preferred Options document.

Topic Paper 5 sets out how the Council will develop a strategy for housing delivery, and this will address many of the concerns that were raised on this policy area in the 2006 document. This includes identifying the key evidence base work that either has, is or is going to be prepared to help inform the strategy for distributing housing growth. One of these documents will be the Rural Settlement Study, which will help inform the Core Strategy by defining villages in terms of their service role and need/suitability for development.

Compared with the 2006 Preferred Options document, the Core Strategy that the Council is currently progressing will need to contain a lot more detail on how the Council's housing requirements are to be met over the next 5 years and up to 15 years from the date of adoption.

POH2 - What are the housing needs of the District?

The comments received on this policy area can be summarised as follows;

There were a number of comments received suggesting that there should be a range of accommodation provided that meets the needs required by a community and that this requirement should relate to smaller rural communities as well as larger ones.

Delivery of appropriate housing for the elderly was suggested. It was suggested that such housing should be located so that it is convenient to local services and facilities. Along the same lines, comments were made that in view of the demographics of the District support should be given for the provision of sheltered housing with extra care.

Concern was raised as to what would be the 'appropriate mix' of residential sizes required. It was suggested that more evidence is needed to ensure that the mix of dwellings is relevant to each location.

What has happened in this policy area since 2006 and how will issues raised by the respondents to this policy be addressed in the emerging Core Strategy?

The delivery of the right type of housing that is responsive to the market is a key issue that has been recognised in Topic Paper 2. In turn, the vision in Topic Paper 3 and the strategic objectives in Topic Paper 4 identify the delivery of the right type of housing to meet the needs of the District as a key achievement for the Core Strategy. Topic Paper 6 identifies a number of subject areas that are to be addressed in the emerging Core Strategy document. One such area is affordable and appropriate housing.

To ensure that the right type of housing is provided in the District, the Council commissioned consultants to undertake a Strategic Housing Market Assessment (2008). Although this study is likely to be updated during the next year, it will (along with the updates) form the basis for determining the appropriate type/mix of housing that will need to be planned for through the Core Strategy.

Policy POH2 recognised the need to provide housing that is appropriate to meet the needs of an ageing population. Any policy approach that the emerging Core Strategy takes, with regards to housing type/mix, will also need to plan for the changing demographics of the District, including an ageing population.

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?

The comments received on this policy area can be summarised as follows;

A number of developers raised concern over the deliverability of 40% affordable housing on viability grounds with the consequence that sites will not come forward so development will be stifled. Equally, a number of representations were received in support of the proposed requirement of 40% affordable housing on sites of 6 or more dwellings. Some respondents even suggested a higher percentage.

One suggested change to the policy was to seek the provision of affordable housing specifically for the elderly, or sites specifically for elderly care, in order to free up family type accommodation.

Some comments received felt that the 70/30 split in favour of rented accommodation, over shared ownership, did not reflect the ideals and needs of the population. Other permutations for the proportion of rented and shared ownership affordable housing were suggested.

A suggestion was made that the uniform requirement for affordable housing across the District, may need to be flexible and that a higher or lower requirement may be more appropriate in differing locations. Similarly, a suggestion was made that the amount of affordable housing sought is identified on a site by site basis.

It was commented that there is currently an incomplete evidence base to assess an appropriate percentage of affordable housing and set this out in a Core Strategy policy.

What has happened in this policy area since 2006 and how will issues raised by the respondents to this policy be addressed in the emerging Core Strategy?

Since the Preferred Options document was published in 2006, the District Council commissioned consultants to undertake a Strategic Housing Market Assessment (SHMA). This Assessment, in part, provides an evidence base for determining an appropriate proportion and type of affordable housing that should be sought in new housing developments.

In light of the recent economic downturn this SHMA will need to be updated, which will include a viability assessment of affordable housing policy approaches. This updated SHMA will inform the proposed policy area 'affordable and appropriate housing' that will be contained within the emerging Core Strategy. Such an approach to developing a strategy for affordable housing will ensure that many of the concerns that were raised on this policy area, in the 2006 Preferred Options document, will be addressed this time around. The Council will also be undertaking an update to its Housing Needs Survey, which will also inform this policy area.

POH4 - How can we ensure that we provide accommodation for Gypsy and Travellers?

The comments received on this policy area can be summarised as follows;

A comment made that the provision of sites should be in response to 'need' as well as working pattern.

Some considered that the illustrative criteria have been drawn too tightly and that the 'no adverse impact' requirement would deny any planning permission being given. It was also stated that the criteria should include mention of flood risk, the townscape and AONB/National Park.

It was suggested that the Council should allow for temporary permissions to be issued for gypsy and traveller sites in advance of a Site Allocations DPD to expedite the provision of pitches.

What has happened in this policy area since 2006 and how will issues raised by the respondents to this policy be addressed in the emerging Core Strategy?

Topic Paper 6 (Other Key Elements of the Emerging Strategy) recognises that any strategy concerning affordable and appropriate housing will need to ensure the provision of appropriate sites to meet the accommodation needs of Gypsies, Travellers and Travelling Showpeople. This will involve the identification of appropriate sites (probably identified in an Allocations

Development Plan Document) and ensuring that a policy framework is in place for considering proposals for sites/pitches for gypsies and travellers.

The South East England Partnership Board has submitted a review of for the South East Plan policy approach relating to the provision of new pitches that each local authority should provide for Gypsies, Travellers and Travelling Showpeople in the South East (for Lewes District it proposes 11 net additional pitches by 2016). Following an Examination held for the review of this policy, a Panel Report is expected in summer 2010. This will provide a clearer indication on the proposed number of pitches that will need to be found within the District.

Lewes District Council is currently carrying out site assessments for potential pitches for Gypsy and Travellers. This work, along with the reviewed and adopted South East Plan policy and the East Sussex Traveller Strategy 2010 – 2013, will inform the Council's policy approach to this subject area.

#### POE1 – How can we encourage development of the Economic Growth sectors?

The comments received on this policy area can be summarised as follows;

It was commented that it is not reasonable to retain employment land for such purposes when there are no studies and therefore evidence to back up this approach in the strategy.

A comment was made that the role of Newhaven Port, the need for medium sized business units and additional visitor accommodation should be recognised. This comment was repeated for policies POE3, POE4 and POE5.

It was suggested that simplified planning zones should be established to encourage new business to the District.

A request was made for clarification in broad terms as to where adequate and suitable employment sites are.

#### What has happened in this policy area since 2006 and how will issues raised by the respondents to this policy be addressed in the emerging Core Strategy?

One of the key objectives for the District, set out in Topic Paper 4, is to 'stimulate and maintain a buoyant and balanced local economy through regeneration of the coastal towns, support for the rural economy and ensuring that the economy does not become reliant on one or two sectors'. This could be initiated by the regeneration of Newhaven associated with the existing port, creating a sustainable tourism economy at Seaford taking advantage of its seaside location and proximity to the South Downs National Park, and diversifying the economy of Lewes town so that it is less reliant on the public sector and tourism. This will require the creation of more modern and varied

commercial premises to meet the needs of new and expanding local businesses.

A key part of the Council's evidence base for the emerging Core Strategy will be the Employment Land Review (ELR). This piece of work is currently being undertaken and is due to be published by July 2010.

The ELR will initially assess the future demand for and supply of employment land and sites for employment (i.e. identifying the future needs). An assessment of the suitability of current and planned employment sites will then be undertaken, which will identify those sites that are unlikely to be needed by the market or are not 'fit for purpose'. If it is determined through this work that there is the need for further employment land or premises to be delivered during the plan period for the Core Strategy then the ELR will need to consider the suitability of potential new sites to meet the projected requirements. This work will provide the evidence for the strategy/policy area on Economic Development and Regeneration. By taking this approach for this policy area will ensure that a number of the concerns that were raised on the 2006 policy will be addressed as the new Core Strategy progresses.

POE 2 - How can we reduce the gap between poorly paid work and high living costs?

The comments received on this policy area can be summarised as follows;

Concern was raised as to the wording in the preferred option relating to growth at Plumpton College.

It was suggested that growth points may need widening to better reflect local employment forecasts.

It was suggested that further information should be given as to how the preferred option will be achieved.

What has happened in this policy area since 2006 and how will issues raised by the respondents to this policy be addressed in the emerging Core Strategy?

The response to POE 1 is relevant in terms of the provision of employment and the health of the economy.

In addition Draft strategic objective 1 in Topic Paper 4 seeks 'To deliver the homes and accommodation for the needs of the District and ensure the housing growth requirements of the South East Plan to 2026 are accommodated in the most sustainable way'. Meeting the accommodation needs of the District will involve planning for housing that meets the needs of those in low-paid occupations, thereby enabling them to stay within the local area.

POE3 – How can we adapt to the changing needs of the economy.

The comments received on this policy area can be summarised as follows;

It was commented that it is unclear as to how much priority is to be given in land allocation and other actions to promote economic development. It was also suggested that the identification of sectors may need widening to reflect local employment forecasts. The comment was repeated for policies POE2, POE4 and POE5.

It was suggested that reference to a sustainable tourism economy could be further strengthened with reference to other Core Strategy Policies.

An issue raised was that the economic priorities of the District are at odds with those regarding housing land supply as there are a number of employment sites identified as having potential for residential development.

A suggestion was made that further information should be given as to how the preferred policy option will be achieved.

What has happened in this policy area since 2006 and how will issues raised by the respondents to this policy be addressed in the emerging Core Strategy?

The response to POE1 is relevant in this case. In addition the Vision for the District, as outlined in Topic Paper 3, refers to parts of the District performing an important sustainable tourism role within the region. Such a role has taken on increased prominence with the designation of the South Downs National Park confirmed in 2009. It will be important that the emerging Core Strategy plans for such a change in the local economy to ensure that the economic benefits of such changes can be maximised, but also ensuring that some of the side issues (i.e. an increase in tourism resulting in an increase in tourism) can be mitigated in a sustainable manner.

POE 4 – How can we capitalise on high quality local small scale business?

The comments received on this policy area can be summarised as follows;

It was suggested that smaller better equipped units are required to suit modern day enterprises.

A suggestion was made that further information should be given as to how the preferred option will be achieved.

What has happened in this policy area since 2006 and how will issues raised by the respondents to this policy be addressed in the emerging Core Strategy?

The response to POE1 is relevant in this case. It is also worth noting that Objective 9 in Topic Paper 4, states that ‘the creation of more modern and varied commercial premises will be required to meet the needs of new and expanding local businesses.’

POE 5 – How can we ensure that the District has a successful retail sector?  
The comments received on this policy area can be summarised as follows;

It was suggested that reference should be made to resisting the loss of shops in Seaford Town Centre.

A suggestion was made that the preferred option should promote edge of centre locations for retail development in Lewes due to the lack of suitable sites within the town centre. However, contrary to this point it was suggested that the provision of more modern units, to meet retailer requirements, would draw trade from and have an adverse impact upon the traditional historic core of Lewes.

In respect of Newhaven it was suggested that consideration be given to providing and maintaining local shopping facilities.

A number of respondents commented that additional housing would increase the need for local retail floorspace, and that convenient shopping facilities to serve poorer parts of communities was important.

It was commented that further information should be given as to how the preferred option will be achieved.

What has happened in this policy area since 2006 and how will issues raised by the respondents to this policy be addressed in the emerging Core Strategy?

Appropriate retail provision in appropriate locations, along with addressing the role of town centres in the District, is one of the issues that will need to be addressed in the emerging Core Strategy as it is inherent in achieving many of the strategic objectives, as set out in Topic Paper 4.

The Retail Study of Lewes District entitled, 'A comprehensive assessment of retail activity and town centres' was published in 2005. Due to significant changes in the economic climate having taken place, this Retail Study needs to be reviewed in due course to inform a strategy for retail and the town centres for inclusion in the LDF Core Strategy. This updated study, along with any policy approach to retail, will need to be in accordance with the recently published Planning Policy Statement 4 – Planning for Prosperous Economies.

POG1 –What role should Lewes have in the future?

The comments received on this policy area can be summarised as follows;

It was commented that affordable housing should not be provided at the expense of the environment.

The policy should mention the need for flood defences and parking provision.

Support was given to the position of Lewes as a principle service provider and that a sequential test will be applied in order to determine the sustainability of the settlements. Support was also given to the recognition of small businesses which are the character of the town (Lewes).

Some respondents considered that the preferred option document underplays the role of Lewes Town as a service centre for a wider area.

In respect of employment, support was given for the need of Lewes to diversify away from dependency on public sector employment.

One of the most fundamental comments raised was to query how much development Lewes will accommodate as the policy as worded, gave no indication of this.

What has happened in this policy area since 2006 and how will issues raised by the respondents to this policy be addressed in the emerging Core Strategy?

In undertaking the work on the emerging Core Strategy to date (as identified in the Topic Papers), consideration has been given as to how the individual towns and rural areas of the District could evolve over the plan period. As part of the visioning process (see Topic Paper 3) a vision has been proposed for each of the towns in the District, including the town of Lewes. In formulating the draft vision for the town of Lewes, the comments that were made on this policy area in 2006 have been taken into account and, where possible, reflected in the vision.

At this stage in the process of preparing the Core Strategy the Council has yet to identify a preferred strategy for the town of Lewes – this will be set out in the next stage of the Core Strategy, which will be the Preferred Strategy. Key to determining this strategy will be the outcomes from the evidence base work and ensuring that the strategy is compatible with achieving the vision for the town. In setting out a strategy for the town, the level of development that is being planned for over the plan period, along with a broad indication of where this will be, will be identified.

Within the town of Lewes is the North Street area, which has a long and complex history relating to potential development proposals. A Topic Paper has been prepared for this part of Lewes (Topic Paper 7), which details the site history and identifies a number of potential development proposals. Any strategy for this site will form an integral part of any strategy for the whole town.

POG 2 – What role should Newhaven have in the future?

The comments received on this policy area can be summarised as follows;

It was considered that the preferred option should indicate positive action that would enhance the appearance of historic sites.

It was considered that reference should be made to the proposed incinerator and the impact that this would have on Newhaven.

In view of the aim to develop employment, tourism and housing within the District, it was suggested that work should be carried out to explore the effects that this development will have on the A26 trunk road.

Support was given to the policy mentioning an increase in tourist accommodation, but the ferry link to France, the port access road, the proposed transport interchange and the existing business allocation should also be mentioned.

It was suggested that waterfront development would act as a stimulus for economic and urban renaissance of the town and where housing needs cannot be met in this location or on brownfield sites, then greenfield sites to the edge of the town should be considered.

One of the most fundamental comments raised was to query how much development Newhaven will accommodate as the policy as worded, gave no indication of this.

What has happened in this policy area since 2006 and how will issues raised by the respondents to this policy be addressed in the emerging Core Strategy?

In undertaking the work on the emerging Core Strategy to date (as identified in the Topic Papers), consideration has been given as to how the individual towns and rural areas of the District could evolve over the plan period. As part of the visioning process (see Topic Paper 3) a vision has been proposed for each of the towns in the District, including the town of Newhaven. In formulating the draft vision for the town of Newhaven, the comments that were made on this policy area in 2006 have been taken into account and, where possible, reflected in the vision.

At this stage in the process of preparing the Core Strategy the Council has yet to identify a preferred strategy for the town of Newhaven – this will be set out in the next stage of the Core Strategy, which will be the Preferred Strategy. Key to determining this strategy will be the outcomes from the evidence base work and ensuring that the strategy is compatible with achieving the vision for the town. In setting out a strategy for the town, the level of development that is being planned for over the plan period, along with a broad indication of where this will be, will be identified. One possible large-scale and strategically important site where development could take place over the plan period is the Eastside area. A Topic Paper has been prepared on this part of Newhaven and comments have been invited on future roles for this area.

POG 3 – What role should Peacehaven and Telscombe have in the future?

The comments received on this policy area can be summarised as follows;

It was commented that the policy was unclear as to what priority will be given to employment land allocations in Peacehaven and the promotion of economic activity to redress current levels of out-commuting from the town.

It was suggested that it should be made explicit in the policy, that the Meridian Centre and its environs be a key focus for future growth and development. Contrary to the previous comment one respondent felt that undue emphasis should not be placed on the Meridian Centre as it is remote for some residents.

A suggestion was made that a simplified planning zone should cover the existing industrial and business allocations.

One of the most fundamental comments raised was to query how much development Peacehaven and Telscombe will accommodate as the policy gave no indication of this.

What has happened in this policy area since 2006 and how will issues raised by the respondents to this policy be addressed in the emerging Core Strategy?

In undertaking the work on the emerging Core Strategy to date (as identified in the Topic Papers), consideration has been given as to how the individual towns and rural areas of the District could evolve over the plan period. As part of the visioning process (see Topic Paper 3) a vision has been proposed for each town in the District, including the towns of Peacehaven and Telscombe. In formulating the draft vision for the towns of Peacehaven and Telscombe, the comments that were made on this policy area in 2006 have been taken into account and, where possible, reflected in the vision.

At this stage in the process of preparing the Core Strategy the Council has yet to identify a preferred strategy for the towns of Peacehaven and Telscombe – this will be set out in the next stage of the Core Strategy, which will be the Preferred Strategy. Key to determining this strategy will be the outcomes from the evidence base work and ensuring that the strategy is compatible with achieving the vision for both towns. In setting out a strategy for the towns, the level of development that is being planned for over the plan period, along with a broad indication of where this will be, will be identified.

POG 4 – What role should Seaford have in the future?

The comments received on this policy area can be summarised as follows;

It was suggested that reference should be made in this part of the document to health problems in Seaford North, the two golf courses and the Cuckmere Estuary.

It was suggested that the hotels and tourist accommodation within the town should be protected and encouraged to maximise the tourist potential. In addition it was also suggested that new tourist facilities generally should be promoted in the policy.

It was commented that it is unclear what priority will be given to employment land allocations in Seaford and promoting economic activity to help redress the significant levels of out-commuting.

One of the most fundamental comments raised was to query how much development Seaford will accommodate, as the policy gave no indication of this.

What has happened in this policy area since 2006 and how will issues raised by the respondents to this policy be addressed in the emerging Core Strategy?

In undertaking the work on the emerging Core Strategy to date (as identified in the Topic Papers), consideration has been given as to how the individual towns and rural areas of the District could evolve over the plan period. As part of the visioning process (see Topic Paper 3) a vision has been proposed for each of the towns in the District, including the town of Seaford. In formulating the draft vision for the town of Seaford, the comments that were made on this policy area in 2006 have been taken into account and, where possible, reflected in the vision.

At this stage in the process of preparing the Core Strategy the Council has yet to identify a preferred strategy for the town of Seaford – this will be set out in the next stage of the Core Strategy, which will be the Preferred Strategy. Key to determining this strategy will be the outcomes from the evidence base work and ensuring that the strategy is compatible with achieving the vision for both towns. In setting out a strategy for the town, the level of development that is being planned for over the plan period, along with a broad indication of where this will be, will be identified.

POG 5 – What role should the rural area have in the future

The comments received on this policy area can be summarised as follows;

A general comment stated that the approach for the rural areas needs to be further developed in order to understand how the objectives will be achieved. Also the strategy fails to take into account the role played by smaller settlements within the District in the potential to deliver additional housing.

In respect of the countryside, it was stated that the concept of a 'working countryside' be supported with agriculture being a key factor in its land management.

It was commented that there is no indication on how the provision of employment, facilities and services will be strengthened in the rural areas and that there is a need to support tourism in view of the National Park.

One respondent considered that there is too much emphasis on the provision of affordable housing without sufficient regard being had for what the needs of the local community are. It was suggested that small open market units and

affordable housing for first time buyers and the elderly are particularly needed in rural areas. In the case of the latter, it was considered that this would free up family size accommodation and provide liquidity to the housing market. Also in respect of affordable housing it should be made clear that 'exception' sites will also be supported in appropriate cases.

In respect of employment in rural areas, there was support for general employment uses and innovative uses such as live work units.

It was suggested that other uses should be supported in the policy, which would help retain rural services, facilities, vitality and community.

The provision of cultural facilities within rural areas was raised and it was suggested that such facilities are supported in the policy. The examples that were given, included arts centres and amateur theatres.

What has happened in this policy area since 2006 and how will issues raised by the respondents to this policy be addressed in the emerging Core Strategy?

In undertaking the work on the emerging Core Strategy to date (as identified in the Topic Papers), consideration has been given as to how the individual towns and rural areas of the District could evolve over the plan period. As part of the visioning process (see Topic Paper 3) a vision has been proposed for the rural areas of the district. Two different character areas have been identified for the rural area of the District, the South Downs and the Low Weald, and a draft vision has been prepared for both areas. In formulating the draft visions for the rural areas, the comments that were made on this policy area in 2006 have been taken into account and, where possible, reflected in the visions.

At this stage in the process of preparing the Core Strategy the Council has yet to identify a preferred strategy for the rural areas – this will be set out in the next stage of the Core Strategy, which will be the Preferred Strategy. Key to determining this strategy will be the outcomes from the evidence base work (particularly the Rural Settlement Study) and ensuring that the strategy is compatible with achieving the vision for both character areas in the rural area. In setting out a strategy for the rural areas in the district, the level of development that is being planned for over the plan period, along with a broad indication of where this will be, will be identified. This is likely to include identifying the level of development that is planned to be accommodated within the part of the District covered by the National Park.