

LEWES DISTRICT LOCAL PLAN RESPONSE TO ISSUES AND OPTIONS CONSULTATION EAST CHILTINGTON PARISH COUNCIL

1st September 2021

East Chiltington Parish Council (ECPC) is pleased to respond to the above consultation exercise. We have set out our response to the Issues and Options Consultation according to the strategic options and questions that are identified by LDC, focusing on those that are of particular salience to us, and drawing on the NPPF (MHCLG 2021).

Has the council identified the right issues?

We consider the Issues and Options document to be somewhat unbalanced. The document points to the need to balance the existing spatial strategy with targets generated under the standard methodology. However, it is thin in its analysis of the nature of housing need and how this links to considerations such as employment and transportation. In many ways the issues around environmental protection and climate collectively form the “other side of the coin” to any housing requirement. One is left with the impression that far from addressing the real “issues and options”, these are being downplayed.

We are also concerned by the assumption of 782 new housing units being needed every year and elaborate the basis for our concern below. It is possible that LDC may come to a determination that a different target figure is appropriate in the local context, as it is entitled to do. We note that a number lower than the assessed OAHN was finally adopted as part of the last Local Plan. Yet the public is being asked to consult on the basis only of the 782 figure, which will skew the consultation in a certain direction given the centrality of the figure to the draft policies. For example, the option of a new settlement as raised in 3.2 may not even be relevant if a lower annual housing figure is set.

In respect of the creation of a new settlement within the Low Weald the council is correct to identify some specific constraints (see Issues and Options p23/24 and Topic Paper 3, p.19), these being:

- The delivery timescale would mean that this option would not contribute towards meeting our housing needs until the back end of the plan period
- Such a settlement would require a greenfield site and the loss of a significant area of open countryside
- Such a settlement may be prove unable to achieve an affordable and frequent public transport service that links the new settlement with neighbouring towns
- The vehicular movements arising from such a large development in a single location may be difficult to accommodate on the local highway network
- Depending upon location, there could be a harmful impact upon the special qualities of the South Downs National Park and/or the Low Weald landscape

However, there are a number of constraints that the current consultation documents do not address which are particularly relevant to the creation of a large settlement of between 2,000 and 5,000 homes, including both the full transport and employment issues relating to a large new settlement.

It is unlikely that a town even at the upper end of this range would be large enough to generate an employment base that would be able to provide jobs for more than a small proportion of its population. In the recent past the MHCLG has suggested that to be self-sustainable, new settlements would need to be larger than 10,000 homes – significantly bigger than suggested here. At the size suggested, transport movements would therefore not be internalised to any significant extent, which would undermine the sustainability of this option.

Has the Council missed anything?

The consultation document is surprisingly silent on existing Neighbourhood Plans and LPP1 and 2. The public who will be responding to this consultation are thus presented with an incomplete basis on which to make informed comments, including existing planned but unbuilt development. Indeed, we are surprised that LDC appears to scarcely reference the existing plan, which had previously been found sound at examination. With reference to this, the inspector's report is illuminating and of relevance. The inspector found that:

"I am entirely satisfied that this is the most suitable and appropriate strategy for the district up to 2030 and that no reasonable alternatives exist that would be more so. For example, the suggestion that with the NP covering 56% of the district and the sea to the south the majority of new development needed to meet the full OAN of the district should instead be concentrated in the villages of the Low Weald is neither reasonable nor realistic. It would lead to an unsustainable pattern of development as well as unnecessary and unacceptable impacts on local services, facilities and infrastructure, including the largely small scale road network of that area." (Payne, 2016: para. 15).

In our view, the grounds for this conclusion have not significantly altered.

As noted, there are also serious gaps in commentary on housing numbers and transportation.

1. Housing numbers

The standard methodology produces a housing need figure for the whole of Lewes District of 782 new homes per year, or 15,640 new homes up to 2040. These figures are based on the ONS's 2014 based population and household formation projections (<https://www.gov.uk/government/statistical-data-sets/live-tables-on-household-projections#based-live-tables>) It is now accepted that there were methodological problems with the 2014 projections and the subsequent projections, 2016 and 2018 based, show substantially lower growth in household numbers (<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationprojections/datasets/householdprojectionsforengland>). For Lewes over the period 2018 – 2039 the 2014 based projection shows an increase of 11,249 households in the Lewes district, the 2018 based projection shows an increase of 7,138 households (a reduction of almost 40%). The next set of national household projections (due in November 2021) are almost certain to show a further reduction in growth, due to smaller increases in life expectancy, falls in the birth rate and also the impact of Brexit on net migration. The NPPF makes the point on several occasions that plans must be based on the most up to date information and data. To ignore these important trends seems inconsistent with the stated need, for example, in the Council's Climate Change and Sustainability Strategy) to reduce emissions and improve climate change resilience.

To put these numbers in context, according to the ONS 2018 based household projections, in 2020 there were 45,105 homes in the Lewes district. An additional 15,640 home would represent an increase of almost 35%. The infrastructure that would have to be provided for such an increase in

houses would be virtually impossible to provide. In the 30 years from 1990 to 2020 only a little over 8,000 new homes were built. This is not made clear in the discussion document. It is also the case that the initial housing need numbers given to local authorities across England generally end up at a lower level. While we appreciate that 'no stone must be left unturned', in order to identify deliverable options for new houses the failure to properly discuss housing targets and the possibility that the Plan adopts a lower target is an extremely serious omission, implying that the Council has no leeway in setting its Local Plan target, and could well undermine the results of the consultation process, with inappropriate options having been put forward for consideration.

With increasing pressure for a change in the household formation projections used in the standard methodology calculations it seems likely that the housing need figures will be changed prior to the submission of the Local Plan. In addition, the Government has confirmed that the figures produced by the Standard Method are not 'cast in stone'. In a letter to one of our residents on behalf of the Secretary of State Robert Jenrick he stated that 'The Standard Method is only the starting point for local authorities in identifying the housing need for a local area', and he also said that '..... it does not set a target and it is for the local authorities to determine whether this figure can be delivered, when taking into account their particular circumstances, including land availability and environmental constraints such as the presence of a National Park'.

2. Transportation

Very little is said about transportation. This suggests that the Council wishes to side-step it as a planning issue, whereas it is fundamental to the principles of planning and sustainability. Paras 85, and 104 of the NPPF are particularly relevant here. Para 85 states that in rural areas: 'it will be important to ensure that development is sensitive to its surroundings, does not have an unacceptable impact on local roads and exploits any opportunities to make a location more sustainable (for example by improving the scope for access on foot, by cycling or by public transport). The use of previously developed land, and sites that are physically well-related to existing settlements, should be encouraged where suitable opportunities exist'. Para 104 notes that 'Transport issues should be considered from the earliest stages of plan-making and development proposals'.

One sensible premise for a transportation strategy might be to focus on introducing improvements to the *existing* transport infrastructure that serves the majority of existing District residents (rather than, for example, serving just a new settlement). This might lead to a focus on (for example) guided bus/tram infrastructure connecting east/west along the coast and inland through to Lewes. Topic Paper 6 ignores this potential, focusing instead on incorporating such design features into new development allocations.

The Local Plan should thus consider the implications of the potential development strategies for existing transportation networks and any potential/required improvements. This point is developed below in relation to the specific options suggested for accommodating growth.

What are your views on the Council's current strategic planning policies and the decisions they lead to?

It is difficult to distinguish between the effects of local policy and national policy in planning decisions. However, the existing settlement hierarchy accurately reflects the structure of settlements within the District and the allocations identified in SP2 accord with that. This has been a sound basis for decision-making, and we would continue to support this approach.

What do you feel needs changing and what shouldn't change?

The Settlement structure of the District should be maintained. This means Seaford, Lewes, Newhaven, Peacehaven & Telscombe remaining as District Centres, Newick and Ringmer as Rural Service Centres and Barcombe Cross, Ditchling, Firle, Glynde, Plumpton Green and Wivelsfield Green as Service Villages, and East Chiltington, Barcombe, Plumpton, Chailey Green, Hamsey (etc) as Hamlets. No planned new settlements should disrupt this.

Issue 1: Tackling Climate Change

The NPPF emphasises policies to tackle climate change. At para 153 it is stated that: 'Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures'. We agree that this is essential and that the LDC local plan needs to show how it is doing this with regards to any preferred options selected.

1.1 Energy efficiency and net zero carbon. The Plan should concentrate on ways to retrofit energy efficient technologies within existing communities and developments. The overwhelming majority of district residents live in properties already constructed over many different periods. The key to promoting energy efficiency is to use the planning system to require upgrades whenever that can be achieved.

1.2 Circular economy and use of materials. We agree that there should be a focus on making best use of existing physical built infrastructure, adapting it were possible to allow flexible use. Ways of using existing buildings for alternative use, particularly in town centres where changes in the way in which office and retail space may be used can provide an opportunity for more residential uses to be introduced.

1.7 Land for tree planting and/or woodland expansion. Yes, we agree that allocation of land for tree planting and woodland expansion is important, but not simply as part of planning requirements to justify new developments.

1.8 Critical wildlife corridors, rewilding and biodiversity. Yes. However, the Council must resist the temptation to achieve this simply by putting these elements as requirements on housing and commercial development projects. They are valid projects in their own right.

1.9 Should the new Local Plan introduce a policy supporting food growing? Should the Local Plan require all major housing developments to provide food growing space? Yes to the first proposition; no to the second. The plan should not distinguish between the scale of projects when considering the potential benefits of local food growing projects. There is no reason why this cannot be achieved on the smallest of developments, for example by insisting on gardens which are large enough to include an area for vegetable and fruit growing. Furthermore, the Plan should not simply introduce a policy requirement on development proposals but should also include a standalone policy for new allotment provision.

Food growing space allocated? Yes. However, as above, these should not simply be an adjunct to development proposals but rather standalone policies.

1.13 Sustainable modes of travel. The majority of the District's residents live in the larger settlements and will continue to do so, meaning that the proper focus for sustainable transport

should be ensuring that these residents are able to access sustainable transport provision. For example, exploring ways to introduce dedicated and priority infrastructure that works for mass-transit in existing settlements, rather than focusing on systems that serve just new development projects. Whilst proposals for large new housing allocations (including new settlements) may focus on cycling and walking transportation, the majority of people rely on cars to get to work, shopping, leisure etc., which challenges the idea of such developments offering sustainable modes of travel.

Issue 2: Protecting and Enhancing the Quality of the Environment

This is an important principle, as set out in the NPPF at para 174: 'Planning policies and decisions should contribute to and enhance the natural and local environment by:

- a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);
- b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;
- c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate;
- d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;
- e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and
- f) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.

2.1 20% biodiversity net gain as a requirement in all major developments? Although we broadly agree with setting challenging targets for biodiversity gain, 'major developments' is not defined. Also, there is growing scepticism about the biodiversity offsetting agenda, as it has been used by developers to justify schemes which have wider negative environmental effects.

2.8 Are there additional areas that should be investigated for potential conservation areas? We would recommend that the importance of the current soft boundaries of the SDNP are recognised and protected, for example by creating an exclusion zone that would serve to defend against inappropriate development close to the boundaries of the SDNP.

Issue 3: Options for Delivering the Growth We Need

3.1 Are there any options that the Council has missed?

We find it surprising that the Council has not asked for opinions on different potential apportionments of the 782 units between the SDNPA area and the remainder of the District, rather than taking the apportionment of 602 outside the Park area as “fixed”. The SDNPA area differs from many other National Parks in the sense that it is linear and therefore not “remote”. As a result, the National Park is not really a housing market area in its own right, but one which forms part of a number of adjacent housing market areas.

The logic therefore of determining the requirement of the District outside the Park in relation to the size of the existing housing stock merits further consideration. Spatial growth options generally do not simply look to allocate proportionate growth to every settlement so why should that approach be contemplated unquestionably as between the Park authority area and its hinterland? The largest settlement in Lewes District is Seaford. Development there is intrinsically sustainable yet the National Park boundaries to the north may be conceived as an absolute constraint. Similarly, Lewes town is subsumed within the National Park yet remains an important service and cultural centre. It would not be inconceivable to look to adjust the development requirement positively in the SDNP to reflect these facts.

The Council should consider both the duty to cooperate and the potential ability of adjacent and potentially less constrained areas (in particular Mid Sussex and Wealden) to deliver housing in locations which effectively serve the same market areas in determining whether the Lewes Local Plan should be seeking to address 100% of its assessed housing need, or some lesser proportion of it.

3.2 What is your preferred option, or combination of options?

The most equitable and effective combination of options should be 1 to 4. Option 5 risks an unsustainable pattern of growth and limits the opportunities to improve the innate sustainability of the larger settlements.

Relying on Option 6 in any form would be a very high-risk strategy. There are no available sites that are brownfield in nature, and which would benefit from existing infrastructure. Similarly, there are no sites which could come forward in an acceptable way in transportation terms, nor provide the levels of local employment needed not to increase car use, nor contribute in any effective way to housing need within the plan period. Indeed, when SDNPA/LDC carried out a scoping study in 2012 to assess the potential for accommodating a new settlement within the Lewes District, it concluded that ‘there is no scope to develop a new settlement within Lewes District and thus such an option for accommodating new housing will not be considered any further in the development of the Core Strategy’ (SDNPA/LDC 2012: 17).

There is a particular risk around larger development sites that the cost of providing new infrastructure is so high that the ability of that size to deliver policy compliant affordable housing is diminished. Such sites should not be allocated in the first place. We again emphasise here the ‘soundness principles’ of the NPPF (para 35) with which all plan-making must be compliant, emphasising the significance of principle c), associated with deliverability. Plans must be:

- a) **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- b) **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;

- c) **Effective**—deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground;
- d) **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.

In addition, para 69 of the NPPF emphasises the significance of small and medium sized sites, which can often be built out relatively quickly. In order to identify these, it is suggested that local authorities ‘identify, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare; unless it can be shown, through the preparation of relevant plan policies, that there are strong reasons why this 10% target cannot be achieved’. The use of brownfield sites is also emphasised at para 121: ‘Local planning authorities, and other plan-making bodies, should take a proactive role in identifying and helping to bring forward land that may be suitable for meeting development needs, including suitable sites on brownfield registers or held in public ownership, using the full range of powers available to them’. It is clear then that the NPPF requires that Councils look at all options for delivering new housing, rather than defaulting to a new settlement simply because some of the decisions around growing existing settlements may be difficult.

With regard to transportation, there are different implications for each of the six options put forward for accommodating the very high housing numbers currently being considered, but we concentrate on those relating to the option of a new settlement in the Low Weald. Given the size of any new settlement, it should also be recognised that the impact to the highway network will extend outside of the local area. Even with an optimistic target of high levels of internalisation it is highly likely that longer scale commutes (and other travel reasons) will be common (see below re traffic movements) and will affect the wider highway network in, not only the District, but also across the whole of Sussex.

Within the Low Weald area of the District, there are just two A roads, with the rest of the area served by small single lane rural roads (many of which rely on passing places). It is quite evident that the road networks in the Low Weald are unsuitable for any significant level of additional traffic. Wherever a new settlement were to be located, many villages across a large area of the Low Weald area would be affected, along with the larger towns of Lewes, Burgess Hill, Hassocks, Haywards Heath and even Brighton. On the basis of using the TRICS database, a settlement in this area of 3,000 residential units would generate c12,000 trips per day, with approximately 1,500 two-way trips (one every 2.5 seconds) between each of 8 - 9 and 5 - 6.

The area does contain two train stations (Plumpton and Cooksbridge), but both are small rural stations, and in both cases any expansion of facilities would be extremely difficult and increased frequencies of services is also unlikely to be possible given the limitations in capacity of the rail network. In addition, currently trains obstruct the junction when parked at the platforms. Increased frequency would therefore mean extended delays, particularly on the A275 at Cooksbridge, where there are already serious problems of tailbacks and congestion.

Bus provision over the whole area is virtually non-existent and unless credible evidence were provided, it is highly likely that a very high proportion of trips outside the new settlement would be made by car. The NPPF at paragraph 105 is clear that “significant development should be focussed on locations which are or can be made sustainable...opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in plan-making.”

If option 6 were to be included in the Local Plan, then on transport grounds alone, it is likely that it would be found to be unsound.

As a statutory consultee, East Chiltington Parish Council argues emphatically that a single site settlement anywhere in the Low Weald should not go forward as an option in the District Council's strategy on the spatial development of the area. The arguments put forward by various parties on previous occasions have not substantially changed and in some instances have become even more salient. The development of any greenfield site in LDC for 2000-5000 dwellings would be unsustainable, undeliverable, contrary to core principles of the NPPF, and should be ruled out. It would have an entirely unacceptable impact in terms of environment, transport, landscape, and the effects on rural roads and historic villages.

Issue 4: Improving Access to Housing

4.1 Should the new Local Plan seek the maximum viable affordable housing target on sites of 10 or more dwellings? Yes. Delivering affordable housing should be a priority. In particular, it should not be compromised on larger sites. It is the bigger sites that are likely to deliver the majority of affordable provision and it is essential that this is not undermined. We would suggest that, providing it is supported by a neighbourhood plan, higher levels of affordable and social housing should be provided in rural areas, where there is a particularly pronounced need.

4.3 Should the new Local Plan have a locally specific approach to supporting the development of 'First Home exception sites' (as it currently has for rural exception sites) or should the Council rely on national planning policy? Yes. This will improve the supply of such housing and contribute positively to meeting overall housing needs. Such policy will allow for a more generous windfall allowance.

4.4 Are there any other issues that the new Local Plan should be considering?

The Local Plan should embrace the concept of "land value capture". Lewes District is an area of relatively high house prices, where the land value component of the housing price is disproportionately high when compared to many other parts of the country. This is a land value created to no small degree by public policy in restricting supply. It is less a reflection of market failure and more a function of the environmental attractiveness of the District and its geographic location. The Council should only consider allocating greenfield sites of any size for development where (a) planning policies support a maximum level of land value capture and (b) where firm undertakings have been provided to ensure that the majority of land value increment arising is secured for the benefit of existing and future communities.

4.6 How can the new Local Plan be more responsive to the needs of younger households, older people and custom/self-builders? The widest range of needs are best met by supporting the spread of development sites in different geographical locations and in contrasting housing market areas, avoiding any major concentration of development in one location. A new settlement within a housing market area that is already characterised by high house prices is unlikely to result in more accessible housing across the District but rather more expensive properties. This will not help to improve access to housing, acknowledged in Topic Paper 4 as an important issue for the Local Plan to address. The better way to meet a range of housing needs is to ensure that new housing developments are spread across a range of market areas, including, but not exclusively, in locations such as Peacehaven, Newhaven and Seaford where market conditions allow a wider range of those in need to access housing.

4.9 Should the Council be applying minimum density standards across the whole plan area, or only applying them in specific locations such as town centres, train stations, and routes with reliable and frequent bus services, e.g. A259? Land with development potential is a scarce resource and suitable greenfield land, all the more so. The most efficient use must be made of any new greenfield site, which means delivering appropriate minimum densities.

Issue 5: Promoting a Prosperous Economy and building Community Wealth

5.1 How much employment development is required to support a sustainable economy? The document provides no context against which an answer can be provided (i.e. by providing a range of potential floorspace or acreage options). However, it is important that the Plan recognises that employment development is very much market-driven and an employment allocation cannot be converted into jobs in a location in which the market does not want to deliver. Another way to address this question is to specify that if a new development is to be environmentally sustainable with little or no new car use, then it needs to provide enough employment for each household.

In terms of the options suggested above, options 1 – 4 are more straightforward as the housing would be centred on existing areas where there is likely to be an established labour market. Options 5 and 6 are much more problematic as there is currently either limited employment opportunities (Option 5) or no existing employment (Option 6). An area with a well-established labour market provides the catalyst for further growth in jobs and if such a market currently doesn't exist then the vast majority of people living in such areas will simply travel to work in surrounding settlements, where there are employment opportunities. In the case of the Low Weald then unless the housing is located in already sustainable villages (Option 4) then household creation in other areas will result in jobs being taken in both surrounding towns and larger villages and also, given the likely socio-economic composition of the population, in places further afield maintaining inefficient patterns of commuting.

5.2 What type of employment space should the new Local Plan prioritise? Given changing ways of working, no single form of employment space should be targeted. However, the location rather than the type of employment space is critical. Unrealistic employment allocations that are aspirational rather than reflective of established demand and needs of existing local businesses should not be progressed, particularly where they give lip service to otherwise unsustainable development projects. The Local Plan should not seek to support employment allocations within locations where there is likely to be little market demand. Planning proposals that include proposed employment areas should be tested to ensure that they are credible, likely to deliver the number of jobs stated, and importantly, within a timeframe likely to be effective in relation to transportation use. Too often, employment provision lags behind housing growth, meaning that travel patterns become established on an unsustainable basis and are then much more difficult to reverse, even if the employment opportunities do subsequently emerge.

5.5 How much additional retail and space for town centre uses is required to support a sustainable economy? The document provides no context against which an answer can be provided (i.e. by providing a range of potential floorspace or acreage options)

5.6 What type of space should the new Local Plan prioritise? Provision to support established centres that have established transport infrastructure.

5.7 How should the new Local Plan address the provision of small-scale retail uses, for example convenience shops, outside of designated town centres? Such provision is likely to undermine the

vitality and viability of existing centres, already under significant threat following recent changes in working practices and should therefore be firmly resisted. Existing local centres are highly vulnerable at present and the Local Plan should not make matters worse by proposing a new settlement that will mean that existing local centres will not benefit from the potential growth in trade that a growing population would normally bring, with that spend potentially captured within the new community.

5.8 How can the new Local Plan help enhance the visitor offer? The Local Plan must preserve the things that visitors value, which includes protecting the character of the setting of the National Park and generally open character of land within the low Weald. The Low Weald provides the setting for the downland landscape. Many of the most spectacular views are northwards from the scarp slope over the Low Weald, where the pattern of villages at the foot of the Downs is fragile. The foreground and middle ground views across the Low Weald are fundamental to sustaining the character of the downland and to the settlements on its fringes. A new settlement in the Low Weald could thus only undermine the visitor offer.

We note the NPPF states at para 176, in relation to development within and adjacent to National Parks, that ‘The scale and extent of development within all these designated areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas’ (our emphasis). Similarly, at para 185, there is an emphasis planning policies taking into account ‘health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development’ This includes identifying and protecting ‘tranquil areas which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason’ and limiting the impact of light pollution on local amenity, intrinsically dark landscapes and nature conservation’.

5.11 What else can the new Local Plan specifically do to support the rural economy? By supporting landowners and farmers to help them maintain the attractiveness of the land economy such as to ensure the incentive to release greenfield development is properly balanced by appropriate commercial opportunities in retaining the countryside in undeveloped form.

5.12 How can the new Local Plan help support Newhaven as a key strategic asset for the local economy and help promote the regeneration of the town? Newhaven is gradually being transformed into a desirable place in which to live and work. Identifying new development opportunities within and around the town will help attract further inward investment.

5.13 Should the new Local Plan focus provision for new employment space within the towns or the countryside? Within established commercial market locations. As with 5.7 above, new settlements should be self-sustaining and in theory that means delivering employment within the development. The Local Plan should look to protect existing employment centres under threat following Covid19 rather than encouraging entirely new, effectively competing, commercial provision.

Issue 6: Creating Healthy Sustainable Communities with Infrastructure

6.1 On what types of infrastructure should the Council prioritise developer contributions? Should the Council require:

- a) A greater proportion of affordable housing but lower overall design and other infrastructure requirements; or
- b) A lower proportion of affordable housing but higher overall design standards and other infrastructure requirements?

The priority must be improving the accessibility of housing. Infrastructure is there to serve communities, but the priority is delivering housing that is affordable. In terms of design, we do not understand why these options should be seen as mutually exclusive. Why should affordable housing have lower overall design requirements?

6.2 Whether you prefer Option (a) or (b), what do you think is more important out of the following:

- Enhanced carbon reduction design/renewable energy infrastructure?
- Accessible, adaptable or fully wheelchair accessible homes?
- Strategic infrastructure (school places, transport improvements, sports facilities, etc.)?

We do not think that it is appropriate to prioritise these, all of which are essential, but which will have highly varied costs and benefits.

6.6 Should the 10-20 minute neighbourhood concept be adopted by the new Local Plan? The most relevant metric is, for most people, travel to work. Any proposal that has the potential to reverse the present advantageous trend toward a reduction in commuting over long distances should be specifically resisted in devising the local plan. Where new development proposals promote new employment opportunities as part of a scheme, proper scrutiny should be used to understand the nature and plausibility of the proposed employment.

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