

**Report to:** Full Council

**Date:** 26 November 2018

**Title:** Submission of the Lewes District Local Plan Part 2: Site Allocations and Development Management Policies

**Report of:** Director of Regeneration & Planning

**Ward(s):** All wards that lie wholly or partially outside of the South Downs National Park

**Purpose of report:** To report to Members the representations received to the Pre-Submission Local Plan Part 2 and seek Council approval to formally submit the Local Plan Part 2 to the Secretary of State for examination.

**Officer recommendation(s):**

- (1) to approve the submission of the Local Plan Part 2 to the Secretary of State under Regulation 22 of the Town & Country Planning (Local Planning) (England) Regulations for examination, along with the other submission documents required by the regulations as referred to in Paragraphs 7.2 and 7.3 of this report;
- (2) to authorise the Director of Regeneration & Planning, in consultation with the Cabinet Member for Planning, to make minor editorial changes to the Local Plan Part 2 prior to submission to the Secretary of State;
- (3) to authorise the Director of Regeneration & Planning, in consultation with the Cabinet Member for Planning, to prepare a schedule of minor modifications to the Local Plan Part 2 prior to submission to the Secretary of State;
- (4) to authorise the Director of Regeneration and Planning, in consultation with the Cabinet Member for Planning, to respond to issues arising during the examination and to agree any further or revised minor modifications to the Local Plan Part 2 during the examination process;
- (5) to approve and publish a revised Local Development Scheme with effect from 26 November 2018.

**Reasons for recommendations:** To ensure that the Local Pan Part 2 is progressed towards adoption in a timely manner, thereby supporting the implementation and delivery of the Local Plan Part 1: Joint Core Strategy through the allocation of additional development sites and up-to-date planning policies to assist in the determination of planning applications.

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## 1 Introduction

- 1.1 The development plan is at the heart of the planning system with a requirement set in law that planning decisions must be taken in accordance with the development plan unless material considerations indicate otherwise. It is essential that plans are in place and kept up-to-date.
- 1.2 The Lewes District Local Plan Part 1: Joint Core Strategy (JCS) was adopted by the Council in 2016 and provides the planning policy framework to guide strategic growth across the district to 2030.
- 1.3 The Draft Lewes District Local Plan Part 2 (LPP2) builds upon the strategic policies of the JCS. It allocates smaller-scale sites for development and provides the detailed development management policies to inform planning decisions. When adopted, the LPP2 will also cover the period to 2030 and replace the majority of the 'saved' policies of the 2003 Local Plan.
- 1.4 The LPP2 only applies to the area covered by the Lewes District Planning Authority (i.e. Lewes District *excluding* the area within South Downs National Park). The South Downs National Park Authority is preparing its own Local Plan, which on adoption will supersede all existing local plan policies within the National Park.
- 1.5 The LPP2 is procedurally and legally compliant because it has been prepared in line with the Duty to Cooperate, the Local Development Scheme and the Statement of Community Involvement; it has been prepared in accordance with the Habitat Regulations and has been subject to a robust Sustainability Appraisal incorporating Strategic Environmental Assessment and in line with our Public Sector Equality Duty as detailed below.

## 2 Background

- 2.1 Work began on the LPP2 in 2013. A simple overview of the previous stages of preparation and future timetable for producing the LLP2 is set out below. The stages in italics have already been completed.

<b>Stage of Local Plan Preparation</b>	<b>Date</b>
<i>Issues &amp; Options Consultation (Reg.18)</i>	<i>Nov 2013 - Jan 2014</i>
<i>Consultation Draft Plan (Reg.18)</i>	<i>Nov 2017- Jan 2018</i>
<i>Pre-Submission Plan Consultation (Reg.19)</i>	<i>Sept/Nov 2018</i>
Formal submission to the Secretary of State (Reg.22)	January 2019
Examination in Public	Spring/Summer 2019
Adoption	Autumn 2019

- 2.2 Public consultation first took place in 2013/14 through the publication of 'Topic Papers' seeking views on options for consideration in the preparation of the LPP2. This was followed by the publication of the Consultation Draft LPP2 in 2017/18. The views expressed in response to these consultations helped shape the Pre-Submission LPP2, which was presented in a report by the Director of Regeneration & Planning to Cabinet at its meeting on 17 September 2018.
- 2.3 Prior to Cabinet, an all-Member presentation and briefing was held on 12 September 2018 when officers highlighted the main issues raised by the comments received on the Consultation Draft LPP2 and the principal changes that had been made to the draft document in response to those comments.
- 2.4 On 17 September, Cabinet resolved to approve the draft LPP2 for public consultation under Regulation 19 of the Town & Country Planning (Local Planning) (England) Regulations and to seek the approval of full Council to submit the LPP2 to the Secretary of State under Regulation 22 of the Town & Country Planning (Local Planning) (England) Regulations for examination (See Minute 28 attached as Appendix 1 to this report).

### **3 Regulation 19 Consultation**

- 3.1 The Council published the Pre-Submission LPP2 under Regulation 19 on the basis that the document is 'sound' and ready for submission to the Secretary of State for examination. The tests of 'soundness', as set out in the National Planning Policy Framework, are whether the LPP2 is:
- Positively prepared
  - Justified
  - Effective
  - Consistent with national policy

The Pre-Submission LPP2 as published is attached as Appendix 2 to this report.

- 3.2 Representations on the Pre-Submission LPP2 were invited over a 6 week period between 24 September and 5 November. All statutory bodies, together with individuals or organisations that previously commented on the Consultation Draft document, were directly notified. The consultation was also publicised on the Council's web site, through a press release, and working in partnership with town and parish councils. Paper copies of the document were made available in local libraries and at Southover House.
- 3.3 It should be noted that the Regulation 19 consultation is very different to the earlier consultations undertaken at the draft plan (Regulation 18) stages. The purpose of publishing the LPP2 under Regulation 19 is to provide an opportunity for people dissatisfied (or satisfied) with the LPP2 to make formal representations to enable them to participate in the examination in public; it is not a consultation exercise to help inform the Council's preparation of the draft plan, rather is it a consultation exercise to inform an Inspector's examination of the draft plan and informs any modifications the Inspector may propose.

- 3.4 This means that objectors to the LPP2 must state clearly why the draft plan is not 'sound' and what changes need to be made to address the matter. If the Council decides that no issues are raised that would affect the 'soundness' of the LPP2, all the representations received by the Council within the formal consultation period will be sent to the Secretary of State for subsequent consideration at the examination in public.
- 3.5 The crucial aspect is that the Council has no power at this stage to make substantive changes to the draft LPP2 before submitting it to the Secretary of State for examination. Any significant amendments to the document (i.e. by deleting or inserting policies) would have to be published for a further six week consultation period if they are to form part of the plan to be examined.
- 3.6 However, the Council can propose *minor* modifications to the LPP2 in order to update information, correct drafting errors, or improve the clarity and application of its policies. The inspector appointed to conduct the examination of the submitted plan will then be invited to consider these modifications and make recommendations as to whether such modifications, together with any other modifications as s/he may consider appropriate, are necessary to make the document sound.

#### **4 Key issues raised by the representations**

- 4.1 All the representations received by the Council between 24 September and 5 November have been logged and carefully considered by officers to ensure that no issues have been raised that could result in the draft LPP2 being found 'unsound' at examination. 701 representations have been received, submitted by 496 representors. The breakdown of representations in relation to draft policies is included as Appendix 3 to this report. It will be noted that the vast majority of representations relate to Draft Policy GT01(Land south the Plough, Plumpton) and Draft Policy E1 (Land at East Quay, Newhaven Port).
- 4.2 Draft Policy GT01 was not included in the earlier Consultation Draft LPP2 because a concurrent 'call for sites' was undertaken to broaden the search for suitable sites. Draft Policy E1 was also proposed subsequent to the Consultation Draft LPP2, as a result of comments received from East Sussex County Council, Newhaven Port & Properties, and Newhaven Town Council. Consequently the publication of the Pre-submission LPP2 was the first opportunity for people to make their views known on these draft site allocations.
- 4.3 It is not correct, as suggested in some representations, that interested parties objecting to these policies have been effectively excluded from full participation in the consultation process. Representations made at this stage will be considered by the Inspector and anyone making representations at this stage has secured the right to be heard by the independent inspector appointed to carry out the examination of the LPP2.
- 4.4 The planning issues raised by the objections to Draft Policies GT01 and E1 are:
- 4.5 Policy GT01
- No need for Gypsy and Traveller accommodation

- Loss of greenfield land
- Road/ pedestrian access/ safety
- Local infrastructure capacity
- Impact on local amenity
- Impact on character of village
- Flood risk
- Site management
- Inconsistent with Plumpton Neighbourhood Plan

#### 4.6 Policy E1

- Loss of biodiversity
- Adverse landscape impact
- Impact on local heritage assets
- Air pollution
- Traffic congestion
- Flood risk
- No need for employment development
- Impact on public access and amenity
- Inconsistent with the JCS vision and objectives

4.7 It is not considered that any of the above planning issues affect the ‘soundness’ of the draft LPP2. The background to the inclusion of Draft Policies GT01 and E1 is set out below.

### 5 **Policy GT01**

5.1 Draft Policy GT01 allocates land south of The Plough pub and north of the Old Brickworks light industrial estate in Plumpton Parish for five permanent Gypsy and Traveller pitches. The site is shown in Figure 11 (page 54) of the Pre-Submission LPP2. The allocation has been proposed in order to deliver the requirement for permanent Gypsy and Traveller pitches set out in Core Policy 3 (*Gypsy and Traveller Accommodation*) of the adopted JCS.

5.2 Core Policy 3 requires the provision of 13 additional permanent pitches for Gypsies and Travellers over the period 2014 - 2030. This requirement is based on the [Gypsy, Traveller and Travelling Showpeople Accommodation Assessment](#) (GTAA)<sup>1</sup> commissioned by the South Downs National Park Authority (SDNPA) and East Sussex local planning authorities. The GTAA proportioned the total 13 pitch requirement for Lewes District to 8 pitches within the National Park and 5 pitches outside of the National Park.

5.3 Core Policy 3 clearly states that *“The local planning authority will allocate specific, deliverable sites through Local Plan Part 2 and the SDNPA Local Plan, unless allocated through Neighbourhood Plans.”* No sites for permanent Gypsy and Traveller pitches are identified in made (i.e. adopted) or emerging neighbourhood plans. Consequently, a site or sites must be allocated in the LPP2. The SDNPA has identified sites in the parishes of Hamsey and Kingston for permanent pitches within its Local Plan, which is currently at examination.

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<sup>1</sup> Undertaken by the Sustainable Housing & Urban Studies Unit and University of Salford.

- 5.4 The site identified in Draft Policy GT01 is the result of a number of site searches and call-for-sites exercises undertaken by the Council over the previous seven years. Approximately 30 alternative sites, located across 16 other parishes and towns, were initially assessed. However, the majority were dismissed due to conflict with national policy and guidance, objections from statutory bodies, and/or lack of availability for Gypsy and Traveller use. Two of the sites that scored well in the assessment are now proposed allocations within the SDNPA's Local Plan.
- 5.5 The Draft Policy GT01 site meets all the criteria set out in Core Policy 3 to guide the allocation of permanent Gypsy and Traveller sites in the district. It is part of a much larger site that was previously assessed in 2012, as set out in the Lewes District Council and South Downs National Park Authority Gypsy and Traveller Site Assessment Addendum (December 2012). Whilst this larger site scored comparatively well overall, East Sussex County Council (ESCC) raised concerns in relation to vehicular access. However, ESCC has no such concerns with the alternative access proposed to the smaller GT01 site. The Gypsy and Traveller Background Paper sets out how officers, with input from ESCC, have assessed the proposed allocation in relation to the criteria set out in Core Policy 3.
- 5.6 It should be noted that the proposed allocation identifies a site for five *permanent* pitches, rather than a transit site. A permanent pitch provides the security of a home base from which an individual or family live but can still travel. A transit site provides formal *short term stay* accommodation, usually limited to three months, for those actively travelling through the area. Consequently, a lower level of vehicle movements, and possible disturbance, would be expected from a permanent sites compared with a transit site. Vehicle movements and on-site activity at a permanent site are generally more akin to other residential developments.
- 5.7 In relation to the day-to-day management and accountability of future residents of the site, this will be set out within a strict licence agreement between the householder and management body. Breaches of the licence can ultimately lead to eviction of that licensee. Such licence agreements have been successful in the management of other local permanent sites. Officers are therefore confident that many of the public concerns regarding this issue will be properly addressed.
- 5.8 Future planning applications submitted in accordance with Draft Policy GT01 will also be determined against relevant policies including, but not limited to, JCS Core Policies 7 (*Infrastructure*), 10 (*Natural Environment & Landscape Character*), 12 (*Flood Risk*) and 13 (*Sustainable Travel*), relevant policies within the Plumpton Parish Neighbourhood Plan, and Policies DM1 (*Planning Boundary*), DM23 (*Noise*), DM25 (*Design*), and DM27 (*Landscape Design*) of the LPP2 when adopted.

## **6 Policy E1**

- 6.1 Draft Policy E1 allocates land at East Quay for employment uses associated with Newhaven Port. The site is shown in Figure 12 (page 60) of the Pre-

Submission LPP2. It comprises mainly undeveloped land that is wholly within the ownership of Newhaven Port & Properties (NPP). Much of the site is located within the Tide Mills Local Wildlife Site, a non-statutory designation made by the Council in 1993 in recognition of the value of its mixed salt/fresh water habitat. A small portion of the site is also included within the Tide Mills Archaeological Notification Area.

- 6.2 Draft Policy E1 essentially carries forward Policy NH20 from the Lewes District Local Plan 2003, which was retained when the JCS was adopted. However, Policy E1 covers a significantly reduced area in comparison with Policy NH20. This is because Policy E1 *excludes* the land which now has planning permission for new port facilities - currently under construction - and the creation of a nature reserve (Application Ref: LW/15/0034).
- 6.3 Adopted Policy NH20 allocates land within the planning boundary at East Quay for the upgrading and expansion of Newhaven Port, but also permits the encroachment of development beyond the planning boundary if a need can be demonstrated. Policy NH20 is shown on the JCS Proposals Map and currently forms part of the approved development plan for the area (see the Proposals Map Extract at Appendix 4).
- 6.4 The justification for Policy NH20 was reviewed as part of the work on the preparation of the LPP2, having due regard to the presumption in favour of retaining existing, unimplemented employment site allocations in Core Policy 4 of the JCS and stakeholder responses received during earlier consultations during the plan process, in particular comments received from ESCC, NPP and Newhaven Town Council.
- 6.5 As part of this review, officers concluded that there has not been a material change of circumstances sufficient to warrant de-allocating that part of the allocated NH20 land located within the Newhaven planning boundary. In fact, it is considered that the justification for an employment allocation at East Quay has strengthened since Policy NH20 was first adopted, for the reasons set out below.
- 6.6 In 2012, the **Newhaven Port Masterplan** was published by NPP. It provides the strategic framework for the development of the port over the next 20-25 years and was developed in accordance with Government guidelines and through extensive stakeholder and community consultation.
- 6.7 The Port Masterplan identifies East Quay, including the site allocated by Draft Policy E1, as the primary focus of NPP's proposals to attract new manufacturing, storage and distribution uses to deliver the long term economic growth and new jobs required to secure a sustainable future for Newhaven.
- 6.8 The District Council, ESCC and Newhaven Town Council have all agreed to work with NPP to achieve the implementation of the Port Masterplan. In the case of the District Council, this commitment is formally set out in Core Policy 4 of the adopted JCS, which states that the local planning authority will support "*plans for expansion and modernisation of the port as identified in the port authority's Port Masterplan*".

- 6.9 In 2014, the **Brighton City Deal** and the **Strategic Economic Plan of the South East Local Economic Partnership** both prioritised Newhaven as a growth location. These initiatives were developed in partnership with and have been endorsed by the District Council. The Strategic Economic Plan specifically identifies East Quay as a key opportunity for attracting manufacturing and service activities associated with the Off Shore Wind sector.
- 6.10 In 2019, the **Newhaven Flood Defence Scheme** funded by the Environment Agency and the South East and Coast to Capital Local Enterprise Partnerships will be completed, providing a 1-in-200-year standard of protection for the town, further enhancing the viability of employment development in this location.
- 6.11 In 2020, the **Newhaven Port Access Road** is due for completion, terminating at a new roundabout within the Policy E1 allocation. One of the primary objectives of the Port Access Road, which is costing £23m, is to improve connectivity to the East Quay area and unlock capacity for the development of new employment space in this location.
- 6.12 Notwithstanding the above considerations, officers acknowledge many of the concerns raised by representors in respect of the impact of employment development in this location. In the determination of future planning applications on the site, such concerns be would addressed through JCS Core Policies 7 (*Infrastructure*), 8 (*Green Infrastructure*), 9 (*Air Quality*), 11 (*Natural Environment & Landscape*), 12 (*Flood Risk & Coastal Erosion*) and 13 (*Sustainable Travel*), together with Policies DM14 (*Multi-functional Green Infrastructure*), DM20 (*Pollution Management*), DM24 (*Protection of Biodiversity and Geodiversity*), DM33 (*Heritage Assets*) and DM35 (*Footpath, Cycle and Bridleway Network*) of the LPP2 once adopted.
- 6.13 Nevertheless, officers consider that the clarity and application of Draft Policy E1 could be improved by some minor modifications in order to highlight the issues above, in particular the need to mitigate for any potentially adverse impacts of development on biodiversity, archaeology and flood risk. Such minor modifications can be made prior to the submission of the draft LPP2 to the Secretary of State and recommended to the examination inspector in accordance with Recommendation 3 of this report.

## **7 Submission and next steps**

- 7.1 Officers do not consider that any of the issues raised in the representations would result in the draft plan being found 'unsound' at examination. Accordingly, subject to approval by Council, the draft LPP2 can be formally submitted to the Secretary of State for examination in accordance with the recommendation from Cabinet on 17 September 2018.
- 7.2 Legislation requires that copies of all the representations received during the formal consultation period are submitted to the Secretary of State alongside the draft plan and made available to the public. It should be noted that, in accordance with the Council's Public Sector Equality Duty, it will be necessary to redact certain words or phrases from some representations prior to publishing



them.

- 7.3 Certain other documents must also be submitted to the Secretary of State alongside the draft plan, including the Council's Statement of Community Involvement, summaries of the issues raised during consultation, the Sustainability Appraisal, the Habitat Regulations Assessment, and any other supporting documents relevant to the preparation of the draft plan.
- 7.4 It is also intended to submit a schedule of minor modifications to the LPP2 in order to update information, correct drafting errors, or improve the clarity and application of its policies.
- 7.5 The examination in public will commence following submission of the LPP2 to the Secretary of State. The examination will include public hearings but the majority of issues are likely to be addressed through written representations. If the document is found 'sound' by the inspector, it will be presented to full Council for formal adoption. The LPP 2 will then comprise part of the approved development plan, alongside the JCS, the Waste & Minerals Plan, and any 'made' neighbourhood plans.

## **8 Revised Local Development Scheme**

- 8.1 It is important that local communities and interested parties can keep track of the progress of documents which, when adopted, will comprise the development plan for the area. The key stages in preparing the LPP2 are therefore required to follow the timetable set out in the Council's Local Development Scheme (LDS), which is published on its website. If the LPP2 is not prepared in accordance with the LDS, it will not meet the necessary legal and procedural requirements and fail at examination.
- 8.2 The Council approved its most recent LDS in November 2017. However, the programme for preparing the LPP2 has slipped in the meantime due to the challenge of finding a suitable site for the provision of permanent Gypsy and Traveller pitches. The LDS has therefore been revised to reflect the up-to-date timetable and is attached at Appendix 5. The Cabinet Member for Planning endorsed the revised LDS on 26 September and recommends to full Council that the document is approved and published with effect from 26 November 2018 (Recommendation 5 of this report).

## **9 Financial appraisal**

- 9.1 The costs associated with submitting the document and the subsequent Examination in Public will be substantial. The cost of the Planning Inspector alone will be over £1,000 per day and further costs will be incurred through the hire of a venue, the appointment of a Programme Officer, administrative expenses, etc. The exact costs cannot be predicted until it is clear which issues the Inspector will wish to examine and the length of the Examination in Public. The Council has included £40,000 in its 2018/19 General Fund Budget to cover these costs.

## **10 Legal implications**

- 10.1 The legal power to submit a Local Plan to the Secretary of State for Independent Examination is contained in section 20 of the Planning Compulsory Purchase Act 2004 (as amended) ("the 2004 Act"), and the manner in which this must be done is prescribed by Regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012 ("the 2012 Regulations").
- 10.2 The Inspector is required to consider first whether the Plan's preparation has complied with the duty to co-operate. S/he will then consider whether the Plan is sound and whether it is compliant with legal requirements. The National Planning Policy Framework (paragraph 182) makes it clear that in order to be sound, a Local Plan should be 'positively prepared, justified, effective and consistent with national policy'.
- 10.3 Section 149 of the Equality Act 2010 sets out the council's public sector equality duties which includes the duty to have due regard to the need to eliminate discrimination, harassment, victimisation and any other conduct prohibited under the 2010 Act .
- 10.4 The 2010 Act defines harassment as any unwanted conduct related to a protected characteristic that violates that person's dignity or makes them feel intimidated, degraded, humiliated or offended. In order to comply with the council's public sector equality, representations that could potentially amount to harassment, will be redacted prior to publication and those redactions will not be considered by the Inspector.
- 10.5 The local planning authority is required to prepare and maintain a scheme to be known as their local development scheme. To avoid challenge, upon the revision of the scheme, it is important for the Council to comply with S.15(8) Planning and Compulsory Purchase Act 2004 which provides that a local planning authority must revise their local development scheme at such time as they consider appropriate.
- 10.6 Subsection (9) sets out that the same statutory provisions apply to the revision of a scheme as they apply to the preparation of the scheme. Upon the revision of a scheme, the local planning authority must make the following available to the public –
- a) The up-to-date text of the scheme
  - b) A copy of any amendments made to the scheme
  - c) Up-to-date information showing the state of the authority's compliance (or non-compliance with the timetable

Legal Implications Provided 12.11.18 LDC-JCS

## **11 Risk management implications**

- 11.1 The following risks will arise if the recommendations are not implemented:

- A delay in progressing the draft LPP2 to adoption will mean that the Council is unable to meet its strategic requirements for new homes, including permanent Gypsy & Traveller pitches, and that planning applications will continue to be determined in accordance with broad national policies, together with the strategic policies of the JCS and 'saved' policies of the 2003 Local Plan, rather than more detailed, up-to-date and locally derived planning policies.
- A delay in submitting the draft LPP2 to the Secretary of State may risk the draft LPP2 being found not 'sound' at examination. This is because the LPP2 policies were drafted on the basis of the National Planning Policy Framework (NPPF) published in 2012, rather than on the basis of the revised NPPF published on 24 July 2018. If the LPP2 is submitted within six months of this date (i.e. by 24 January 2019) then it will be examined for 'soundness' under the previous NPPF. However, if Council resolves to consult on further changes to the LPP2, it would be impossible to meet this deadline. As a consequence, the draft plan would be examined under the newly published NPPF, with which the plan policies may not be wholly consistent. Consistency with national policy is a key test of 'soundness' (see para.3.1 of this report). Further technical work would therefore be required to ensure consistency with the new NPPF, which could result in additional costs and delay.

## **12 Equality analysis**

An Equality and Fairness Analysis has been undertaken and is included as a background paper to this report.

## **13 Appendices**

- Appendix 1 - Cabinet Minute 28
- Appendix 2 - Pre-Submission LPP2
- Appendix 3 - Number of representations received
- Appendix 4 - Extract from the JCS Proposals Map
- Appendix 5 - Local Development Scheme (revised version for approval)

## **14 Background papers**

The background papers used in compiling this report were as follows:

- Lewes District Local Plan Part 2: Pre-Submission Document - Report of the Director of Regeneration & Planning to Cabinet 17 September 2018
- Gypsy & Traveller Background Paper
- Neighbourhood Plans Background Paper
- Lewes District Local Plan Part 1: Joint Core Strategy
- Sustainability Appraisal: Pre-Submission Document
- Habitat Regulations Assessment: Pre-Submission Document
- Equality & Fairness Analysis: Pre-Submission Document
- Summary of Consultation on the Consultation Draft Local Plan Part 2
- Consultation Draft Local Plan Part 2

- Summary of Consultation on the Local Plan Part 2 Topic Papers
- Local Plan Part 2 Topic Paper 1: Introduction
- Local Plan Part 2 Topic Paper 2: Housing
- Local Plan Part 2 Topic Paper 3: Employment
- Local Plan Part 2 Topic Paper 4: Infrastructure
- Local Plan Part 2 Topic Paper 5: Development Management Policies

All the background papers are available at: <https://www.lewes-eastbourne.gov.uk/planning-policy/lewes-local-plan-part-2-site-allocations-and-development-management-policies/>