

Additional housing targets for Lewes District Council (LDC) – Q&A

Plumpton Parish Council (PPC) recently informed you that we had become aware of a potentially large development in Plumpton Green. That has naturally attracted some questions and requests for more information.

Given PPC is still trying to understand all the implications, and as the limitations of the current pandemic preclude any public meetings, attached is a list of some of the questions asked or anticipated to try and help you understand the situation. PPC, together with your District Councillor Rob Banks, met via Zoom with the developers, Fairfax Acquisitions Ltd., and their planning consultants Parker Dann, on Thursday 21st January.

| | |
|--------------------------------------|---|
| What is the proposed development? | 89 dwellings at the Nolands Farm site to the north east of Riddens Lane and the Village Shop. See a map giving the site footprint here. |
| Hasn't that been turned down before? | Yes, in February 2019 under planning application LW/17/08. In fact, that application was much smaller, covering 45 dwellings over a smaller portion of the land. |
| Why was it turned down? | The three main refusal reasons were that it: <ul style="list-style-type: none">• was not part of our neighbourhood plan• represented an unacceptable incursion of development and urbanisation of open countryside, resulting in harm to the rural and natural character of the landscape around Plumpton village• had access issues at Station Road. |
| Who is involved this time? | It is the same developer, Fairfax Acquisitions Ltd, assisted by the planning consultants Parker Dann, who are well known locally (they are generally involved in finding land for LDC, and for instance they represented the Plumpton Action Group in objections to the proposed Travellers site south of the Plough). |

| | |
|---|--|
| What stage is the process at? | Fairfax Acquisitions Ltd and Parker Dann have been working with East Sussex County Council (ESCC) and Lewes District Council (LDC) for some time now, and those parties signed a Planning Performance Agreement (PPA) in early October 2020. We have been informed that a pre-application is imminent. |
| When will we have any certainty? | Hopefully when the pre-application is made the developer will share that with us and we will know some level of detail about what is being proposed, and why the developer considers the application has validity. However, a pre-application will not answer all our questions, and we may have to wait for an outline or detailed planning application for confirmation. In the meantime, PPC will engage constructively with the developer whilst maintaining our objection to the proposal. |
| Has PPC got more details it can share on the proposal? | No – we have only seen a one-page indicative site plan that the developer does not wish us to share with residents at this stage. |
| Does the fact that LDC has signed a Planning Performance Agreement with the developer mean that they support the development this time? | Not necessarily. As the best practice advice on PPAs states “Although pre-application engagement and PPAs are a means of encouraging a collaborative approach to considering and resolving issues about a development, these agreements do not imply any obligation on the part of the council to approve the planning application for the proposal.” |
| If a smaller version of this development was turned as recently as February 2019, why is LDC even discussing it again now? | We are not completely sure on this and our district councillor is trying to find out, but LDC generally has a duty to work with developers. |
| Is this a consequence of the LDC plan approaching 5 years old? | Possibly, but again planning law and policy is not clear cut and we cannot state definitively why this is happening now. Rather than speculate we are working to find the facts. |

| | |
|--|--|
| <p>What could this mean for housing in Lewes District?</p> | <p>As we have said already, from May 2021 it appears that, unless LDC can argue otherwise, the housing target for LDC will be based on the ‘Standard Method’ which is a national statistical model. The impact of this is that LDC would receive a new annual target that increases the number of new dwellings required across the district by 227%.</p> <p>It also means that something called the ‘presumption in favour of sustainable development’ kicks in – some regard this as a relaxation of local planning controls but that is not what we understand it was intended for.</p> |
| <p>When will LDC have an up to date plan?</p> | <p>We don’t know yet, but back in July 2020 LDC indicated that it would be ‘Winter 2023’ before a new plan (Local Plan Part 1) would be adopted.</p> |
| <p>Are we at greater risk whilst LDC revises its strategic policies?</p> | <p>Hopefully not – the underlying principle of the changes to national planning policy were understood to be aimed at planning authorities that had been negligent by not creating strategic plans. LDC does not fit that category. The minister concerned was on record as stating the objective was to reduce speculative development and in particular to ensure “<i>that communities are not disadvantaged by unplanned growth</i>”. The opposite seems to be true in this case, but there has been a lot of recent press coverage of government attempts to change the planning system.</p> |
| <p>What are the implications for Plumpton from a new LDC local plan?</p> | <p>It is too early to say. Clearly, if LDC works out that it does in fact need more new housing than the current plan contains, then they will have to put them somewhere, and that might include an extra target for Plumpton. Unless and until that is the case, it would seem premature to discuss such a large development within Plumpton Green, which clearly does not match what the large majority of residents voted for in adopting the neighbourhood plan.</p> |

| | |
|---|---|
| <p>Isn't Plumpton already on course to deliver more new dwellings than LDC requested?</p> | <p>Yes. Whilst they may not have been 'built out' yet, the 4 sites in our neighbourhood plan will deliver 70 new dwellings over the plan period (it was 68, but LDC has approved 4 more at the 'Riddens' site, and the developer has reduced the 'Strawlands' site by 2).</p> |
| <p>What do our elected Parish, District and County representatives think of this?</p> | <p>Sarah Osborne as County Councillor, Rob Banks as District Councillor, and PPC have only just learned of this, and have not been consulted by the developer to date. We are working to establish the facts – none of us are planning professionals and so we need to understand the implications. We all share the view that this application has no merit at the current time but need to understand what obligations LDC has.</p> |
| <p>Weren't we supposed to have certainty on new housing for many years?</p> | <p>Yes – our neighbourhood plan covers the same period as the LDC local plan, out to 2030. Clearly LDC expected its local plan to be robust for that period.</p> |
| <p>Does this mean our Neighbourhood Plan is dead?</p> | <p>No, even under the 'presumption in favour of sustainable development' both the LDC local plan and our neighbourhood plan must be given weight in any decision making. Looking ahead, as the Neighbourhood Plan must align to the LDC local plan, so any significant change in that LDC local plan (such as an increase in housing target) may require our neighbourhood plan to be revised in due course.</p> |
| <p>Doesn't LDC know how poor the infrastructure is in Plumpton Green?</p> | <p>It should do, and certainly our district councillor is very well aware on our behalf. We will have to cater for 70 more homes shortly, which in itself will create significant demand on capacity. We will take this opportunity to remind LDC of the perennial problems with sewage, flooding, electricity and water supplies, broadband, poor roads and pavements etc. We can't forget that issues like capacity at our school must be confirmed also.</p> |
| <p>Are we losing out on anything if we object to this development?</p> | <p>All new developments are now accompanied by a variety of mechanisms like Community Infrastructure Levy which provides money for PPC to spend on the priorities identified in the neighbourhood plan. We will receive such monies from the neighbourhood plan sites as developers 'build out' on those sites. This new proposal would clearly bring significantly more money, but that alone is not a reason to support it.</p> |

| | |
|---|---|
| <p>Would this development bring more affordable homes to Plumpton?</p> | <p>Yes, as all developments over a minimum size must bring an element of affordable housing. All the sites already in the adopted neighbourhood plan are intended to include a minimum of 40% affordable homes (though one site is specifically allocated for one and two bed units specifically designed for older people).</p> <p>We just need LDC to enforce this condition at the detailed planning permission stage and then the developers to start building them.</p> <p>Unfortunately, 'affordable' does not always mean 'low cost'.</p> |
| <p>If we accept these 159 new houses (70 in the Neighbourhood Plan + the 89 at Nolands) will Lewes expect Plumpton to take any more new development?</p> | <p>It is a very real possibility. If LDC is really struggling to deliver housing in those areas that it chose within its own strategic plan, then there is every possibility that this might just be the beginning.</p> <p>To put this in perspective, the LDC strategic plan that our Neighbourhood Plan was based on required a minimum of 50 new dwellings in Plumpton out of a total of 6900 across the whole LDC district up until 2030. We don't know how far short of the original target LDC is, even before the new 'Standard Method' calculation more than doubles the annual target.</p> <p>That is why we support the desire of LDC to properly re-assess its strategy before it starts considering schemes that have previously been refused on the grounds that they don't meet democratically adopted strategy.</p> <p>The developers have indicated they are not prepared to wait for that.</p> |
| <p>Will the council bring more services to the village as a result of more houses - like a GP Surgery?</p> | <p>That is for LDC (and the NHS) to decide, but Plumpton Green is classified as a 'Service Village' which means LDC expects us to enjoy a basic level of service and facilities that meet some day to day needs, although travel to bigger settlements is needed to fulfil all needs.</p> <p>Realistically, to get more new facilities in walking distance we might have to take a lot more than 159 houses.</p> |
| <p>Are the houses going to be rented as "affordable" like Sun Close or available to be purchased 100% as part buy part rent schemes like some other new build developments.</p> | <p>It is too early to say, but that may be the case.</p> <p>Whilst our understanding is that Fairfax Acquisitions Ltd is a commercial developer rather than an affordable housing association or similar, we do not yet have any details on the proposed development beyond the fact that it is 89 units. We will learn more when the pre-application is made, but even that may not fully address this point.</p> |

| | |
|--|--|
| <p>Is Plumpton the only parish that is being targeted by development that is outside of the approved district plans and neighbourhood plans?</p> | <p>No, we are certainly not alone. We are communicating with our neighbouring parishes and the wider Lewes parishes. We already know that East Chiltington, Wivelsfield Green and Newick are all facing the same issue.</p> |
| <p>Does this have any connection to the proposed traveller site in Plumpton?</p> | <p>No, it is unrelated. To the best of our knowledge, there has been no progress on submitting any planning application to progress that site.</p> |
| <p>What can we do as residents?</p> | <p>At the moment, there is no formal planning application to officially comment on. You are always welcome to voice concerns through the normal democratic channels – Sarah, Rob, PPC especially. PPC will keep you informally regularly – at least monthly and more frequently if anything changes significantly.</p> |
| <p>I would like to help PPC – what can I do?</p> | <p>In the first instance, if we have any residents that have relevant professional knowledge on planning law and planning policy, PPC would welcome assistance.</p> |