

Lewes DC Issues & Options consultation: Plumpton Parish Council response Tackling Climate Change

1.1

How can the new Local Plan best promote energy efficiency in new development and the Council's ambition of net zero carbon? Should the new Local Plan work towards setting lower carbon emissions targets for new homes/buildings than those set out in Building Regulations?

Development must be directed to sustainable urban locations, including significant urban redevelopment to modern environmental standards, rather than destruction of the very green fields that are required to achieve carbon targets. In terms of lower carbon emissions, while this is supported there is the concern that it would be unenforceable in practice as developers may regard this as reducing profit and therefore refuse to comply. A voluntary approach is still beneficial. This also overlooks the impact of existing buildings on climate change - there needs to be policies that address bringing older buildings up to standard.

1.2

Should the New Local Plan require all development proposals to:

-

Provide evidence of circular economy principles and waste reduction - requiring retention of existing buildings unless evidence of need to demolish?

This objective is laudable but likely to be conflicted by the net zero carbon agenda in practice. The carbon cost of retention (and modification) versus demolition over the lifetime of the building seems a sensible minimum requirement in planning.

-

Evidence reductions in carbon by prioritising the use of materials and construction techniques that have smaller ecological and carbon footprints?

Yes, provided that this is enforceable.

-

Consider the lifecycle of the building and whether it can be easily adapted to meet changing needs?

Yes, but within what parameters would that evaluation be made?

1.3

Should the new Local Plan require all new development to include small-scale renewable energy generation on site?

Yes, within national policy frameworks for coherency and operability, but within local design preferences (not all locations want solar arrays and wind turbines by default).

1.4

Should the new Local Plan require all large-scale developments to consider community scale renewable energy generation?

Yes, subject to the definition of 'large scale' which is not specified in the paper.

1.5

Should the new Local Plan allocate land for large scale renewable energy generation, such as wind and solar? If so what types? Or should the Council rely on Neighbourhood Plans to identify suitable sites for renewables to reflect local community aspirations?

These two options are not mutually exclusive. Both have benefits, but again the net carbon figure needs to be assessed such that it does not encourage the unnecessary loss of greenfield and rural sites. Furthermore, large scale renewable energy generation technologies need to have the carbon footprint of the build and construction also factored into any clean energy proposal to ensure feasibility.

1.6

Should the new Local Plan set out more specific requirements for tree planting in new development?

Is this a priority for the Local Plan? Perhaps better left to national planning policy and Neighbourhood Plans. If input is necessary, then yes, given our current situation and the UKs alarmingly bad record of ancient woodland and forest destruction. Whilst we recognise that planting trees in new developments does not alleviate this, tree planting should be encouraged wherever possible as should rewilding of areas and creating rewilding corridors within the District and linking to other districts.

1.7

Should the new Local Plan allocate land for tree planting and/or woodland expansion?

Yes, such that it is not left to the whims of developers. It should be science-led, and balance biodiversity and food-bearing trees. It should be based on a range of minimum options with local residents able to influence developments in their parish.

1.8

Should the new Local Plan identify critical corridors, perhaps based upon water courses, for potential planting of trees and/or other types of rewilding such as heritage grassland, which would enable storage of water, carbon storage and improved wildlife movement and biodiversity resilience?

Yes, but again needs to be properly assessed as a whole. Currently rural villages with flooding issues are targeted for new development in the existing plans and despite all the evidence of flooding the narrow definition used by LDC allows developers to successfully argue that there is no problem. Policy must reflect the fact that rural areas frequently suffer very old infrastructure developed at a time when surface water and foul discharge were not separated, and under-maintained to the point that ground water enters the sewage system causing issues.

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?

Supported in principle subject to the practice being appropriate (e.g. vertical planting in communal sites). However, the implication is that garden space is compromised in major developments (term not defined), which should not necessarily be the case. Certainly, for the multi storey buildings proposed then allotment style facilities should be included.

1.10

Should the new Local Plan support the Council's Climate Change and Sustainability Strategy more stringent (100l) target for water consumption in new buildings or go further?

Would it be enforceable if it went further? Also, consumption issues conflict with recycling policies (where material is to be presented washed). This policy needs balancing with infrastructure supply so that demand is not the only consideration.

1.11

To encourage modal shift, should the new Local Plan require EVCP at all new development and should that be at the level in the Councils EVCP TAN?

Yes, and no. Given the accelerating national policy electric vehicles the TAN is regarded as unambitious. Whilst accepting that there are variations in charger types, flats should aim for one EVCP per parking space. Commercial property should be at much higher than 2%, dependent on whether the parking is for staff or public use.

1.12

In order to encourage the use of more sustainable modes of transport should the new Local Plan set higher cycle parking requirements for new residential development than current East Sussex County Council standards?

The issue is less one of cycle parking at the residential end (except for communal dwellings) and more at the destination end. Whilst sound in practice, LDC also needs to consider that many development proposals currently being brought forth are in rural areas and by their very nature, would increase traffic use on country roads, so whilst encouraging cycling, it is also good to remember that there is a safety element to consider along with and the impact that increased development creates on country roads. e.g. the proposed new settlement in point 3.2 increased car usage (as an estimate an additional 4.5k cars on rural roads) would have a major impact on our rural roads and safety for cyclists. More cycling less building!

1.13

What else can be done through the new Local Plan to encourage a modal shift towards more sustainable modes of travel?

Prioritise development in urban areas where the majority of the population live and public transport is economically viable, rather than rural areas where car dependency is obvious. Also do not conflate the pollutant effect of the internal combustion engine in vehicles with the sustainability of cars in general as the move to electric vehicles accelerates.

1.14

Should a Coastal Change Management Area(s) be defined where the SMP has already identified physical changes to the shoreline?

1.15

Are there any other issues that should be considered?

Protecting and Enhancing the Quality of the Environment

2.1

Should we require a 20% biodiversity net gain in all major developments?

The term 'major developments' is not defined, but generally there is scepticism about the biodiversity agenda in practice since developers can argue that small amounts of selective planting can compensate for the removal of significant areas of greenfield sites.

2.2

Should the new Local Plan seek to identify/allocate sites to provide off-site biodiversity net gain?

This requires very careful consideration and cannot allow greenfield development on rural sites by offsetting it elsewhere.

2.3

How can the new Local Plan best achieve an effective policy for a Nature Recovery Network?

Identify brownfield and redevelopment sites over green field sites to start with. Develop more areas for rewilding within local communities/district. Look at rewilding our pathways and corridors and even scrap land, it would also save the local council money on mowing!

2.4

In the context of the new Local Plan what would enhance your town / village?

Respecting the Neighbourhood Plan in terms of development sites, and putting residents views ahead of speculative developers. Providing local input to District policies with ability to tailor to local preferences.

2.5

What would you consider to be 'beautiful' in terms of development?

This is entirely subjective but should be based on the design sections of Neighbourhood Plans! In general terms, avoiding developments that are filled with box identikit housing that maximise developer profits would be a start. Creating developments that are in harmony within the landscape and rural nature. e.g., Norfolk, all local building takes into consideration the character of the area this is clearly reflected as you drive through the villages and preserves the local character of the area. Perhaps we need to create a local minimum design standard.

2.6

Should the Council prepare specific design codes that cover the whole plan area, specific parts of the plan area, or for individual sites?

This is best approached by localism and should be influenced within Neighbourhood Plans.

2.7

How can communities have a greater say in the design standards set for their area?

Via Neighbourhood Plans that are respected by LDC.

2.8

Are there additional areas that should be investigated for potential Conservation Areas?

The currently soft boundaries of the SDNP that are under real threat by speculative development should be considered for some treatment, though an exclusion zone approach may be better.

Accommodating and Delivering Growth

3.1

Are there any options for accommodating development growth that the Council has missed?

The use of the Standard Method guide number for consultation is regarded as fundamentally flawed. The consultation should be based on an objectively assessed housing need, and then residents can direct the delivery of that need to sites knowing what it means in practice. If LDC is following a prescribed practice, then that practice is flawed. If LDC has elected to go to consultation without first doing the necessary groundwork to determine the appropriate need number, then the consultation is premature and will result in challenges.

There are urban areas of the SDNP with brownfield sites in more sustainable locations than the rural settings and these should be prioritised (e.g. Lewes within the plan area, but others outside LDC). The LDC housing target split between itself and SDNP is arbitrary based on historic development and should be informed by objectively assessed need and prioritise the exploitation of sustainable brownfield sites with appropriate densities. The duty to cooperate responsibility applies equally to SDNP, and LDC should not take such a high percentage of the load where the SDNP could reasonably do so in its sustainable urban locations. The existing Settlement Hierarchy should inform this as it is a good indication of underlying 'sustainability'.

There is no analysis of existing brownfield sites and empty properties (commercial and residential) that would usefully inform this consultation.

3.2

What is your preferred option, or combination of options?

-

Intensification of development within the coastal towns

-

Further outward expansion of Newhaven and Peacehaven

-

Urban extensions to Burgess Hill and Haywards Heath

-

Focussing growth on the most sustainable villages in the Low Weald

-

Dispersing growth across all villages in the Low Weald

-

A new settlement within the Low Weald

Please explain why this is your preferred option

This question should really be supported by a known housing need (rather than the unsustainable Standard Method figure). Generally, 1 and 2 should be the focus as the only practical options that align to the NPPF and meet the climate emergency agenda, but superficial analysis would suggest that option 2 offers little available scope to contribute significantly. Option 3 may also support this agenda but appears less expansion of Burgess Hill and Haywards Heath, and more greenfield development close to Low Weald villages that already suffer infrastructure (especially road) issues for which no solutions appear viable. Much development is already planned and underway so there is a concern on what scope there is in practice for the option to contribute. Options 4 and 5 can contribute within the existing settlement hierarchy, but with an emphasis on local need exception sites for small dwellings, rather than simply large-scale car dependent estates developed primarily for profit not need. Option 6 whilst in theory could be regarded as a potentially attractive option, in practice, developing green field sites would be unsustainable, undeliverable and contrary to core principles of the NPPF. Even if a suitably well connected site were available in the district, it would have an entirely unacceptable impact in terms of environment, transport, landscape, and the effects on rural roads and historic villages. Sites like the Eton one are regarded as totally unsuitable and would be a last resort on climate policy and infrastructure grounds (especially transportation as it will inevitably fall short of the provisions in the mature urban locations, and car dependency is unlikely to be a viable option for new large scale towns given the state of the East Sussex road network). Options 4, 5 and 6 are all effectively large-scale development of the Low Weald which would mean expansion of 100%+ which cannot be regarded as sustainable in infrastructure and climate terms.

Regardless of the above, it is considered that even focussing on 1 and 2, with some contribution from 4 and 5, the guide number will not be achieved.

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 for urban areas. If supported by Neighbourhood Plans the policy should allow for up to 100% affordable in rural areas.

4.2

Should the new Local Plan maintain the Council's preference for an affordable housing tenure split of 75% affordable rented homes and 25% intermediate homes, or should it pursue a different approach?

The approach should prioritise local need and be tilted towards allowing local people, especially the young, to remain local should they wish to do so.

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, directed within Neighbourhood Plans, and with the clear objective of allowing local people to stay local, rather than creating housing supply for which the demand will be filled by influx.

4.4

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

There is insufficient content on infrastructure. Government policy is driving an unsustainable increase in development much of which is being directed to rural communities who already suffer from poor infrastructure relative to the urban population centres. Government policy claims 'infrastructure first' before development, but that is not enforced in practice. Current growth in Plumpton is against a backdrop of poor sewage, electricity and broadband service, but more developments are being considered without regard for real capacity and planned growth.

4.5

Should the new Local Plan go beyond the mandatory building regulations to ensure that a proportion of new homes are accessible and adaptable? In what circumstances should this be applied?

Only if local objective needs assessment identifies this as an issue.

4.6

How can the new Local Plan be more responsive to the needs of younger households, older people and custom/self-builders?

By setting strategic policies that support these and then enforcing them with developers. All new schemes should be based on an analysis of local need for those groups.

4.7

Should the new Local Plan ensure that a proportion of new homes are one or two bedroom dwellings that are more affordable for first time buyers? In what circumstances should this be applied?

Yes, within Neighbourhood Plans.

4.8

Should the new Local Plan require all new homes to meet the nationally described space standard?

As a minimum.

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?

Yes, provided there are suitable figures for urban (high density) and rural (low density) sites. Rural sites require garden space, and tower blocks have no place in the countryside.

4.10

Are there any other issues that the Council should be considering?

Conversion of redundant commercial and office space for residential use with the rise of internet shopping and home working. The Council should also be carrying out an empty buildings review and looking at how this can be used to support local housing need.

Promoting a Prosperous Economy and Building Community Wealth

5.1

How much employment development is required to support a sustainable economy?

This perhaps requires professional input rather than public opinion, but clearly to be sustainable it has to reduce dependency on car travel.

5.2

What type of employment space should the new Local Plan prioritise?

That which is required - see 5.1

5.3

How can policies made flexible enough to accommodate needs not anticipated, particularly as economic implications of the Covid-19 pandemic are unknown?

5.4

How can the new Local Plan best meet the needs of Small and Medium Sized Enterprises?

5.5

How much additional retail and space for town centre uses is required to support a sustainable economy?

5.6

What type of space should the new Local Plan prioritise?

The local plan should be seeking to have more communal areas that encourage a sense of community.

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?

This requires careful consideration within the Settlement Hierarchy as it impacts on transportation and sustainability. Generally, convenience shops cannot address full shopping needs and so concentration of retail in urban sites theoretically requires one and only one journey. However, local convenience stores are vital to rural communities and should not be lost unnecessarily.

5.8

How can the new Local Plan help enhance the visitor offer?

By maintaining what people visit the area for. Changing rural villages into commuter towns impacts the character of the area and contributes to loss of the soft boundary to the SDNP. The reason the area around the SDNP is beautiful and attractive to visitors is because it is green and a natural landscape. Destroying these landscapes with housing developments would undermine the attractiveness of such areas.

5.9

Should the new Local Plan identify new development to facilitate tourism growth, and if so what and where?

5.10

Should the new Local Plan seek to protect facilities and attractions that could be critical to sustaining the visitor economy?

Yes, including the landscapes that frame those attractions (e.g. Plumpton racecourse) and the SDNP. The SDNP is a wonderful way to engage people, support local business, rural economy, and tourism in the national park. 2019 brought in huge revenue in terms of tourism £££'s. SDNP and the dark sky biosphere is a big draw for visitors and needs to be protected. If development on the soft boundaries of the park continues this will hardly support an attractive visitor economy, 2019 figures show that tourism figures are not to be sniffed at:

April-Sept - £251,000,000

Oct-March - £181,000,000

5.11

What else can the new Local Plan specifically do to support the rural economy?

Remove the incentive for farmers to sell of huge tracts of land for development by allowing profitable agricultural and secondary usages (such as camping etc) - it seems odd that alternative agricultural uses such as planting vines is frowned upon but developing fields for housing is not.

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?

Have a holistic development plan that transforms the town into what it is capable of being.

5.13

Should the new Local Plan focus provision for new employment space within the towns or the countryside?

The local plan should look at current trends and how the very nature of how we work and live has changed and seek to develop spaces that work for the community - looking at shared working spaces and more communal areas.

5.14

How can the new Local Plan support the vitality and viability of town and village centres in light of changes to permitted development rights?

By ensuring that strong design policies exist for permitted development in away that promote the rural identity of villages and opposes identikit box housing.

5.15

How can the new Local Plan protect the employment space, and where should the focus of that protection be?

The way we work has changed, LDC needs to do a proper assessment on current trends and supporting wellbeing in the workplace.

5.16

Should the approach to local labour be a blanket approach for the plan area, or should it focus on specific locations? We welcome comments from developers as to how.

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?

b) a lower proportion of affordable housing but higher overall design standards and other infrastructure requirements?

Please enter any additional comments

This question conflates affordability and design - affordable does not need to mean bad design, nor should beauty be sacrificed, these homes are part of our landscape and as such should be attractive. Infrastructure is a pre-requisite of development and not an option; why should affordable housing have lesser infrastructure?

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.)?

Please enter any additional comments

This question is regarded as not well structured. These options are in no way mutually exclusive, and all should be included. The first option should be mandatory. Wheelchair access should be based on need, as should infrastructure.

6.3

Should the new Local Plan introduce specific benchmark standards for the provision of other open spaces, in addition to the existing standards for outdoor playing space? If so, which types of open space should be addressed?

6.4

Should the new Local Plan require Health Impact Assessments for larger development proposals? How should the threshold be determined?

6.5

Should strategic housing site allocations (100+ dwellings) incorporate Active Design principles?

6.6

Should the 10-20 minute neighbourhood concept be adopted by the new Local Plan?

It would appear to be one methodology for sustainability, so yes.

6.7

If so, should the 10-20 minute neighbourhood principles be applied differently in towns compared to villages within the plan area?

That would seem to be inevitable. In particular a single village convenience store with very limited parking (as is typical for Low Weald service villages) should not be regarded as capable of sustaining a typical weekly shop. For that a supermarket is a minimum requirement.

6.8

Should the 10-20 minute neighbourhood principles be a requirement of all major new developments, or only on strategic housing site allocations?

The term 'major' is not defined but would appear to be below the 100+ of 'strategic' sites, in which case the principles would be hard to apply in practice.

6.9

Should new development be required make provision for a superfast broadband connection, or an equivalent alternative technology, installed on an open access basis?

Yes - this is regarded as basic infrastructure and there is already a 'postcode lottery' in its provision meaning rural locations have inferior infrastructure.

6.10

If so, should this policy apply to only residential, or to both residential and non-residential, development?

Both.

General Questions

You may also like to consider the following general questions:

Has the Council identified the right issues?

PPC accepts that LDC must, however inappropriate it is, start from the output of the Standard Method resulting in an unsustainable 782 annual housing target, which must be challenged under NPPF exceptional circumstances provisions in due course. As an unconstrained number, this is manifestly unsustainable as it is higher than the accepted figure from LPP1 which was defined by the inspector based on available sites and represented a significant reduction on the national guide number at the time. However, a fundamental issue is that the disaggregation between LDC and SDNP of the Standard Method calculation is based on historic development (being simply the ratio of existing dwellings in the two areas) rather than any analysis of sustainability and/or future need. The resulting 602 target per year is therefore unsound as a starting point and LDC should not rely on that figure in this consultation but instead undertake a robust needs analysis with the SDNPA, even if that is based on the 782 guide number.

Has the Council missed anything?

The consultation seemingly starts from a blank sheet of paper and is silent on the implications of the sites included in LPP1/2 and various Neighbourhood Plans. LPP1 had allocations running to 2030 and so much of the true underlying need is catered for. The consultation should clearly identify in the options that many of the proposed locations have unbuilt but planned development already, and make it clear what the delta is between current plans and the new government arbitrary Standard Method guide number. The lack of build out of existing sites is a good indicator of commercial demand. The consultation is very light on transportation issues which are fundamental to sustainability and especially the climate emergency declared by LDC. In particular, it is widely accepted that the evidence confirms rural locations are significantly more car dependent than urban areas, and also far more significant in carbon capture and biodiversity. The consultation identifies that the rural road network is inadequate for the levels of development proposed, and that there is no significant planned investment even if that inadequacy could be properly addressed. For LDC to be serious about the climate issues it cannot in all conscience put forward options for growth that direct housing to greenfield sites in blatant contradiction to climate policy. Sustainability is not really defined in practice, particularly in regard to the very tangible transportation issues, but also the less tangible community and well being aspects. LDC should set out clearly what it regards as sustainable, as recent experience suggests that in practice very little of what matters to residents in terms of sustainability is regarded as significant in decision-taking. To achieve the Council's net zero carbon goals it should be prioritising brown field sites, empty buildings and looking at the regeneration of retail and office space.

Whilst the Council talks about net zero carbon, planting trees and food production there is no mention about protecting the bio-diversity of our soils and the primordial importance of soil within our ecosystem. If the local government is dictating as to what measures should be put in place for new developments in terms of energy then it should also encourage practices that protect our soils and are environments for the sake of our health and well-being and for our future generations.

Will the information the Council is collecting tell us what we need to know?

It is difficult to assess given the very open nature of questions and wide range covered, and also because the Standard Method guide number is so undeliverable, but LDC is obliged to consult on that number rather than objectively assessed need. However, a major concern is that even if all the proposed options for delivering the unsustainable growth were combined, they cannot realistically meet a guide of 12,040 new homes up to 2040. This consultation should really be clearer on page 22 where it is stated that it is based on the unconstrained guide number, rather than the constrained objective needs assessment but is then ambiguous as what number applies to the duty to cooperate statement. It is understood that duty to cooperate will apply to the constrained number that is real need, and that is the number that the public need to make informed choices. The quoted figure will require two new towns of the size proposed. Care needs to be taken that decisions support objectively assessed need and are therefore effective, rather than simply a popularity contest under which the rural areas will suffer as there are less 'votes' to take into account.

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

These policies were found to be sound at plan inspection and had been applied previously to good effect. Now LDC appears to accept that government changes to planning policy mean that they should not carry even substantial weight on decision-making in the interim period until the new plan emerges. This does little to install faith in LDC's planning processes, what is to stop there being another U-turn in 5 years? LDC should defend the current plans more rigorously but it would appear that LDC has abandoned them and so there is currently no confidence on what that means in terms of the decisions they lead to. In particular SP2 set out the settlement hierarchy and directed development on a clear basis that made sense. The impact of national policy distorts numbers but should not distort the settlement hierarchy as there is no good reason to change that in the absence of any significant transportation and other infrastructure developments in the interim.

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

The new plan should be very clear on the type of houses to meet local need, rather than simply the number. To put it bluntly, the plan should dictate the type of housing delivered, rather than leaving it to developers who will be commercially driven. In particular there should be robust policies not just for affordability, but also for the smaller houses required by young local first time buyers who wish to stay local, and similar for 'empty nesters' to downsize to. However contradictory it might sound, 'exception' policies should be the norm. The current settlement hierarchy should be maintained, with an emphasis on new development in truly sustainable urban locations, rather than in the rural hamlets, villages and service villages which form much of the character of the county. The SDNP was intended to be protected by a soft boundary. The Ashdown Forest gets a 7km zone, but LDC is currently indicating policy support to unplanned development within 0.5km of the SDNP, impacting not just on biodiversity considerations but also the world-renowned dark skies biosphere. This does not appear consistent or fair.