



**MATTER 2 EXAMINATION STATEMENT**

**EUROPEAN PROPERTY VENTURES**  
**(EAST SUSSEX)**

**REPRESENTOR REP/37**

**STRATEGY**  
***POLICY SD25***



**This Statement for Matter 2 will seek to address the Inspector's Questions identified below:**

Is the Development Strategy for the SDNP and its Town and Village Centres, put forward by Policy SD25 of the Plan, appropriate and justified by robust evidence, with respect in particular to:

- a. the choice which has been made between alternative approaches to development distribution,
- b. the functional relationships between communities inside and outside the SDNP boundary,
- c. the identified settlements,
- d. the identified town centres,
- e. the redevelopment of previously developed land outside settlements?



## **Matter 2 – Strategy Policy SD25**

### **Introduction**

1. Claremont Planning Consultancy Ltd previously provided responses to the Council's emerging Local Plan on behalf of European Property East Sussex (EPV) to seek to boost housing requirements and recognise the need to ensure appropriate housing delivery within South Downs National Park. Specific to this is the possibility of meeting cross boundary needs arising from neighbouring settlements via provision of housing sites within the park area to address housing deficiencies within Lewes District and how this relates to the provision of infrastructure improvements in and around towns such as Peacehaven.
2. The Development Strategy of the South Downs National Park Authority (SDNPA) must take careful consideration of the value of the Park, especially to its special landscape, visual and environmental value which is attributed significant weight through the National Planning Policy Framework. Whilst the Authority must be commended in approaching the strategy in such a way, it remains ineffective in identifying appropriate areas of land that could contribute towards the identified need without resulting in unacceptable and detrimental impacts this recognised intrinsic value.
3. Effective identification of sites is crucial in underpinning a sound Local Plan and is a requirement that all Planning Authorities must meet to ensure that they are able to instigate the growth to meet the identified need in the Plan. Whilst the SDNPA is not statutorily bound to achieve an OAN, the Authority nonetheless is required to stimulate the growth to meet the needs of its residents. To do so, the SNPA should ensure that it has thoroughly exercised its requirement to seek suitable sites to foster this growth and meet this need. However, the Development Strategy does not go far enough in finding sufficient, deliverable sites and does not acknowledge, or take appropriate consideration, of cross-boundary capacity.

### **Alternative Strategic Means and Options**

4. The Development Strategy identifies a number of settlements within the National Park that are regarded as being a suitable size in accommodating some growth that is only of the extent that respects and conserves the National Park and its setting. It is acknowledged that this approach ensures that sufficient development is directed towards these existing settlements in the vein of achieving sustainable development and supporting the services bases of these towns. But, the Strategy does not acknowledge the presence of those suitable settlements at the margins of the National Park area and therefore fails to adequately take account of cross boundary pressures and opportunities.
5. Setting precedent for development at the margins of the National Park, such as edges of settlements that directly abut, but not fall into the Park area, can provide options for growth to meet the identified need of the Park Authority, but provide opportunities to explore sites that can provide substantial numbers without causing undue harm to the Park itself. Policy SD25 does not state as to whether this alternative approach has been identified or explored as a possible option and as such does not demonstrate effectiveness insofar as recognising the deliverability of such sites. Whilst it is recognised that growth should be directed towards existing settlements in reflection of existing pattern of development within the Park, it should be recognised that there are other suitable mechanisms of growth that will not result in detriment



to the Park and still deliver sustainable development. The opportunity of locating development toward the edges of larger settlements that are directly adjacent to the Park is such a strategic approach that has not been adequately considered through the proposed strategy.

6. Without clear justification as to the reasoning behind the selected approach taken in the emerging Local Plan over above alternative such as set out above, Policy SD25 cannot be regarded as effective in terms of seeking appropriate sites to realise development and to meet the identified need in the National Park or meet the Duty to Cooperate and satisfying cross-boundary need.

#### **Functional Relationships with Settlements Beyond the Park**

7. The predominant characteristic of the Park is that of dispersed development, with concentrations of activity towards its larger settlements such as Lewes and Petersfield. However, these settlements alone cannot be regarded as supporting all of the service requirements and needs of the residents of the Park and as such, there is a strong functional relationship between the Park and the settlements and cities at its fringes.
8. These settlements provide a supportive function to those living within the Park, as bases of employment, education and everyday convenience, especially for those living in rural areas within the Park away from the main settlements of it. This functional relationship should be taken into fuller account and should contribute towards the development strategy as key a component underpinning the reasoning behind the distribution of development within the National Park. As such, it is advanced that the margins of Peacehaven have the potential to accommodate growth without detriment to the setting of the Park, specifically the site at Lower Hoddern Farm provides an option to maximise this functional relationship between Peacehaven as a settlement outside the National Park but having a strong influence on the Park it in its immediate vicinity.
9. Sites such as the identified Lower Hoddern Farm site, provide a suitable opportunity to exploit the close relationship settlements such as Peacehaven have with the surrounding National Park, given that the town serves as a major service base for the surrounding villages including Piddinghoe, Rodmell and Beddingham. The importance of neighbouring towns should not be undermined, Peacehaven performs as a centre for services and employment that should inform the strategy that the LPA has taken, given that development at its fringes will provide an appropriate extent of development within the National Park. The landscape around the fringes of the town do not reflect those highly valuable assets which national policy identifies and will not cause unacceptably detrimental harm to the National Park in general.
10. Peacehaven, whilst not falling within the jurisdiction of the South Downs National Park Authority, should be a settlement recognised in the Local Plan as a strongly influential settlement on the Park itself. Its physical relationship, with the designated Park area surrounding the town on all sides, is undeniable and as such will have an inevitably close economic and social relationship with the smaller settlements within the Park that are within a functional distance of the town.
11. Policy SD25 fails to identify Peacehaven or other neighbouring towns on this basis. This has resulted in the absence of sites which the strategy has not been able to identify, given that these sites, such as at Lower Hoddern Farm, have the potential to deliver residential development without causing undue harm to the intrinsic value of the National Park. Consequently, the Policy is not effective in fully realising the development opportunities that the



edges of settlements can provide and to abundantly exploit the functional relationships between them and the National Park.

### **Network of Centres**

12. The Plan appropriately recognises a network and hierarchy of settlement and town centres within the National Park. This a strategy which establishes a strong economic framework to ensure that development is sustainably directed towards the most suitable settlements within a particular area. The development strategy of Policy SD25 provides this network and recognises the existing capacities of settlements within the Park to accommodate further development to meet the identified need. In turn, this ensures that settlements can grow sustainably and support their existing service bases, which is especially pertinent in more rural settlements, but also to support the local economies and employment markets of the larger service settlements and towns of the Park.
13. Whilst the Plan makes adequate and appropriate strategic provision in identifying this network, there is a significant issue in terms of the network that sits above that within the Park itself. Given the dispersed nature of the Park, which is predominantly rural, the reliance on those centres beyond the Park's boundaries is substantial. As such, the Policy which sets out the basis of centres within the Park does not make effective acknowledgement of the impact of centres beyond the Park and how this could inform the development strategy. Therefore, the effect of cross-boundary considerations are not attributed appropriate weight in justifying the development strategy and fails to be sound.
14. Addressing cross boundary issues is central to an effective Local Plan and also forms part of the statutory requirement of Local Planning Authority's Duty to Co-operate so that need can be addressed across local authority boundaries. In the case of Lewes and Peacehaven, the unmet need of the area and the SDNPA, is pertinent to the emerging Plan and how it is able to engage and accommodate this need. In so doing, the Plan must therefore make appropriate provision to deliver sufficient housing allocations and improvements to infrastructure that go above and beyond the recognised need in the SDNPA.
15. The network of centres identified in the development strategy therefore must take into account the wider context of the network and the role it plays in the relationships beyond the boundaries of the national park. If it did so, the strategy and therefore, the Plan, will have identified areas of growth at the margins of the National Park, such as at Peacehaven, which relate directly to centres beyond the Park, but have a close relationship with it. The practicalities of facilitating the growth of these neighbouring settlements to the Park, should be allowed for in the proposed Strategy to address infrastructure, housing and employment requirements. Without recognising these established directions of growth, the Plan fails to identify the potential to deliver sustainable growth that can materially contribute towards the need recognised in the Plan.

### **Delivery and Previously Developed Land**

16. Previously developed land is sequentially preferable through the planning assessment and balance, given that its nature is of land that has been undergone transformation insofar as it hosts built form or other structures which has diminished its natural state. Annex 2 of the Framework makes that very clear, however in regard to the delivery of such land, there are issues which previously development land sites in comparison to those which are undeveloped and/or greenfield.



17. It is acknowledged that the SDNPA should place significant weight in its preference to the development of previously developed land within the National Park, given the generally high sensitivity of the landscape and its lack of capacity to accommodate growth. However, Policy SD25 needs to take into account that development of such land, which is often regarded as brownfield, can encounter more constraints limiting the deliverability of such sites.
18. Dependent on previous uses, delivery of PDL sites can be constrained through policy designation, for example if the site was previously used as employment, industrial or commercial purposes and as such designated to remain in that use through Policy. Any proposed change of its use would be direct noncompliance with Policy and so not deemed as deliverable in that sense. Or, if the site was previously used for heavy industry or chemicals, contamination considerations will certainly impact on the delivery of such sites given the remediation that would be required. Delivery would therefore be limited due to viability concerns in this case.
19. It is advanced that the site at Lower Hoddern Fam, Peacehaven, as a greenfield site, falls under single ownership and as an open, unused space, is not limited by such constraints as a brownfield, previously developed site would be. Therefore, whilst the Policy SD25 makes preference for the development of PDL sites given that they would result in less harm to the landscape, there is no acknowledgement that greenfield sites can provide a more deliverable route in realising required residential development. Inappropriate weight attributed to PDL sites coming forward over and above unconstrained greenfield sites is an unjustified and ineffective strategy that does not take into account sites such as at Peacehaven which could form part of the strategy as important and deliverable components.

**Word Count : 1985**