

# Peacehaven and Telscombe Neighbourhood Plan

Site Options and Assessment

Peacehaven and Telscombe Town Councils

November 2019

## Quality information

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## Abbreviations used in the report

### Abbreviation

Ha	Hectare
JCS	Joint Core Strategy
LDC	Lewes District Council
MHCLG	Ministry of Housing, Communities and Local Government
NPPF	National Planning Policy Framework
SDNPA	South Downs National Park Authority
SHELAA	Strategic Housing and Economic Land Availability Assessment
TPO	Tree Preservation Order

# 1. Executive Summary

The Peacehaven and Telscombe Neighbourhood Plan, which will cover the whole of Peacehaven and Telscombe Parishes, is being prepared in the context of the Lewes District Council's Development Plan and the South Downs National Park Development Plan.

Where a Town Council is developing a neighbourhood plan that will include site allocations for specific uses, the District Council is not proposing to allocate sites or identify site specific policies in the preparation of the Local Plan Part 2. Spatial Policy 2 of the Joint Core Strategy requires a planned housing growth of 255 net units at Peacehaven and Telscombe over the plan period, in addition to delivery of a strategic site allocation in the neighbourhood area (450 homes to the northeast of the Meridian Centre).

The built-up area of Peacehaven is located on the edge of the South Downs National Park, and in accordance with the National Planning Policy Framework great weight should be given to the scope of enhancing landscape and the natural and built character of the area when identifying sites for potential allocation. The Town Councils would like to allocate sites with a view to rebalancing growth through regeneration of the underutilised town centre (Meridian Centre) to reduce reliance on the car for transport to local services and facilities.

Until neighbourhood plans for designated neighbourhood areas have been approved at referendum, the saved policies in the Lewes District Local Plan 2003, that are specifically applicable to these designated areas, will continue to form part of the development plan for the area. Policies specific to sites within the neighbourhood plan area will be replaced upon publication of the plan. This gives scope for the neighbourhood plan to introduce new uses to areas where current land uses are underutilised. Over-reliance on the A259 for connectivity to the wider area should also be considered when allocating sites for residential and employment uses to create a more sustainable neighbourhood.

This site assessment has found that Sites PTNP1, PTNP3 (47PT), PTNP4, PTNP5, 19PT, and 62PT are appropriate for allocation; Site 45PT and part of Site PTNP2 (Sites 20PT and 06PT) are potentially appropriate for allocation, subject to constraints such as access, landscape and viability issues being addressed; and Site PTNP6 and the remainder of Site PTNP2 were found to not be appropriate for allocation due to overriding issues of landscape sensitivity, biodiversity and development within the countryside.

As the town centre is underutilised, PTNP1 (the Meridian Centre) is appropriate for allocation for town centre and residential uses. Allocation of the site should consider maximising density options in line with Core Policy 2 to deliver a significant proportion of the housing growth for Peacehaven and Telscombe for the plan period, in line with the suitable context of a town centre site and the wider landscape sensitivity of the area. Development of part of PTNP2 should be considered in a sequential approach in line with the SHELAA and as a contingency site should the growth requirement for the plan area not be fully met when considering growth options.

This assessment is the first step in the consideration of site allocations. From the shortlist of suitable sites identified in this report, the Town Councils should engage with Lewes District Council and the community to select sites for allocation in the Neighbourhood Plan which best meets the objectives of the Neighbourhood Plan and the housing need for the plan area.

## 2. Introduction

### Background

- 2.1 AECOM has been commissioned to undertake an independent site appraisal for the Peacehaven and Telscombe Neighbourhood Plan (NP) on behalf of Peacehaven and Telscombe Town Councils. The work undertaken was agreed with the Town Councils and the Ministry of Housing, Communities and Local Government (MHCLG) in June 2019 as part of the national Neighbourhood Planning Technical Support Programme led by Locality.
- 2.2 It is important that the site assessment process is carried out in a transparent, fair, robust and defensible method and that the same criteria and thorough process is applied to each potential site. Equally important is the way in which the work is recorded and communicated to interested parties.
- 2.3 The NP, which will cover the combined parishes of Peacehaven and Telscombe (see Figure 1), is being prepared in the context of the Lewes District Council (LDC) and the South Downs National Park Authority (SDNPA) development frameworks. Neighbourhood plans are required to be in conformity with the strategic policies of emerging Local Plan, as well as the adopted Local Plan. Neighbourhood Plans can add value to the development plan by developing policies and proposals to address local place-based issues. The intention, therefore, is for the respective Local Plans to provide a clear overall strategic direction for development in Peacehaven and Telscombe, whilst enabling finer detail to be determined through the neighbourhood planning process where appropriate.

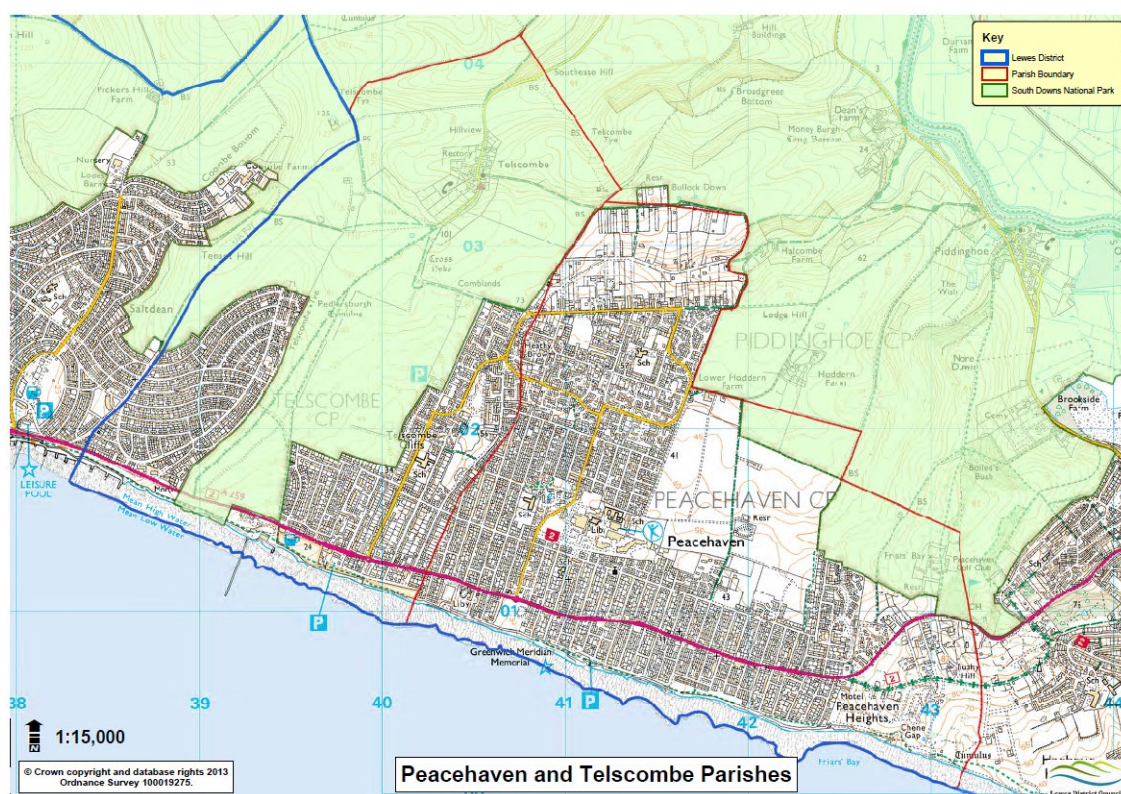


Figure 1 Peacehaven and Telscombe Neighbourhood Area

- 2.4 The Lewes District Local Plan Part 1: Joint Core Strategy (JCS), working in partnership with the SDNPA, was adopted by the Council in 2016 and provides the planning policy framework to guide strategic growth across the district to 2030. The Draft Lewes District Local Plan Part 2, which excludes the SDNPA area, builds upon the strategic policies of the JCS by allocating smaller-scale sites for development and providing the detailed development management policies to inform planning decisions. It will cover the period to 2030 and replace the majority of the 'saved' policies of the 2003 Lewes District Local Plan. The Local Plan Part 2 is currently undergoing independent examination, and while it includes development management policies pertinent to

development of the wider district it does not allocate housing and employment sites for those settlements where a Town or Parish Council is preparing a neighbourhood plan that will allocate sites for housing and employment development. It also will not include settlement specific development management policies. In July 2019, the South Downs Local Plan was formally adopted, replacing the 'saved' policies of the Lewes District Local Plan 2003 and the JCS.

- 2.5 It is the intention of the NP to include allocations for housing, employment and community uses to direct development to sustainable sites and meet identified local housing, economic and community needs over the current Local Plan period.
- 2.6 In addition to the delivery of the strategic site allocation at Hoddern Farm, Peacehaven, the JCS sets a planned level of growth of 255 homes to be delivered through the neighbourhood plan. While the Local Plan Part 2 will allocate land for housing and employment, where a town or parish council is developing a neighbourhood plan that will include site allocations for specific uses, the District Council is not proposing to allocate sites or identify site specific policies in the Local Plan Part 2. Planned housing growth for these areas is to be identified in the Neighbourhood Plan. Until neighbourhood plans for designated neighbourhood areas have been approved at referendum, the saved policies in the Lewes District Local Plan 2003, that are specifically applicable to these designated areas, will continue to form part of the development plan for the area. These site-specific policies, of which 8 are currently saved within the neighbourhood area, will be superseded upon approval of a Neighbourhood Plan
- 2.7 The vision and objective of the Peacehaven and Telscombe NP is to allocate sites for housing and employment, in sustainable locations that enhance town centre opportunities with regard to the sensitive landscape setting of Peacehaven and Telscombe. This is in line with the JCS, which looks to work in partnerships to deliver the regeneration of vacant, underused or poor quality sites and premises and improve accessibility before allocating new green field sites.
- 2.8 This report is an independent and objective assessment of sites identified by Peacehaven Town Council and in their Call for Sites consultation in October 2018. While some of these sites have also been identified in the Strategic Housing and Economic Land Availability Assessment (SHELAA) also in 2018, a number of sites identified in the Call for Sites consultation have not as yet been assessed to establish whether they are suitable, available and achievable for development.
- 2.9 The purpose of AECOM's site appraisal is to produce a clear assessment as to whether the identified sites are appropriate for allocation in the NP, in particular whether they comply with both National Planning Policy Framework and the strategic policies of the adopted Development Plan; and from this group of sites, identify which are the best sites to meet the objectives of the NP. The report is intended to help the group to ensure that the Basic Conditions considered by the Independent Examiner are met, as well as any potential legal challenges by developers and other interested parties.

## 3. Policy Context

### Planning Policy

- 3.1 NP policies and allocations must be in general conformity with the strategic policies of the Local Plan and have due regard to the strategic policies of any emerging development plan documents.
- 3.2 The key documents for LDC's planning framework include:
- Lewes District Local Plan Part 1 Joint Core Strategy 2010-2030 (May 2016)<sup>1</sup>;
  - Local Plan Policies Map, Inset Map 3: Peacehaven (2016)<sup>1</sup>;
  - Lewes District Local Plan 2003 saved policies<sup>2</sup>; and
  - The emerging Lewes Local Plan Part 2: Site allocations and development management policies<sup>3</sup>.
- 3.3 The following extract, Figure 2, taken from the LDC Local Plan Policies Map, shows the policy context of Peacehaven and Telscombe in relation to the surrounding area.



**Figure 2 The policy context of Peacehaven and Telscombe Neighbourhood Plan Area (Inset Map 3)<sup>4</sup>**

- 3.4 As viewed in Figure 1 and 2, part of the north-west and north-east of the NP Area is within the SDNPA Area. Although there are no identified sites for potential allocation in the Neighbourhood Plan within the National Park, development proposals would have to consider impacts on the sensitive landscape of the South Downs and its environs.

<sup>1</sup> Available at: <https://www.lewes-eastbourne.gov.uk/planning-policy/lewes-core-strategy-local-plan-part-1/>

<sup>2</sup> Available at: <https://www.lewes-eastbourne.gov.uk/planning-policy/lewes-local-plan-2003-saved-policies/>

<sup>3</sup> Available at: <https://www.lewes-eastbourne.gov.uk/planning-policy/lewes-local-plan-part-2-site-allocations-and-development-management-policies/>

<sup>4</sup> The policy map can be viewed in greater detail here:

<https://www.lewes-eastbourne.gov.uk/resources/assets/inline/full/0/257163.pdf>

## Lewes District Local Plan Part 1 Joint Core Strategy 2010-2030

3.5 The Core Strategy was adopted by Lewes District Council on 11 May 2016 and by the South Downs National Park Authority on 23 June 2016. The policies of relevance to development in the Peacehaven and Telscombe NP area include the following:

*Spatial Policy 1 - Provision of housing and employment land* sets provision for a minimum of 6,900 net additional dwellings be provided in the plan area in the period between 2010 and 2030.

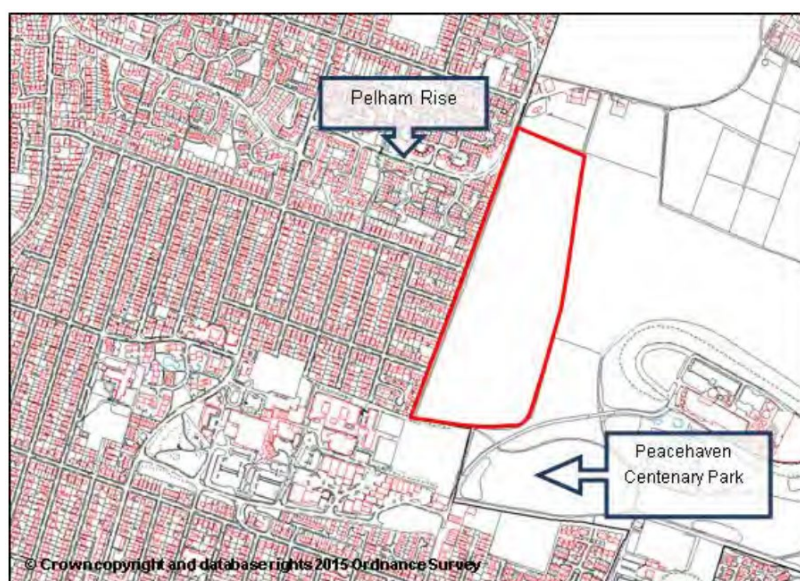
*Spatial Policy 2 – Distribution of Housing* sets a requirement to deliver 450 homes on the strategic site allocation *Land at Hoddern Farm, Peacehaven*, with planned housing growth of a minimum of 255 net additional units at Peacehaven and Telscombe. This planned growth is contingent upon developers identifying and demonstrating to the satisfaction of the local highway authority, and delivery of a co-ordinated package of multi-modal transport measures required to mitigate the impacts of development on the A259. A further 200 net additional homes are to be determined in other locations<sup>5</sup>.

The planned levels of housing growth for Peacehaven and Telscombe over the plan period is summarised in Table 2.1 below. This table however does not account for a windfall site allowance of 600 units.

**Table 3.1 Planned levels of housing growth for Peacehaven and Telscombe (Source: Joint Core Strategy)<sup>6</sup>**

Completions (April 2010 – April 2015)	Commitments (as at 1st April 2015)	Housing delivered on strategic sites	Housing to be delivered through subsequent allocations	Total
332	189	450	253	1224

*Spatial Policy 8 - Land at Lower Hoddern Farm, Peacehaven* allocates 11 hectares for residential development of approximately 450 dwellings, contingent on the delivery of a number of transport infrastructure improvements, including improvements to the operation of the A259/Telscombe Cliffs Way junction, the Sutton Avenue roundabout, and the Newhaven Ring Road.



<sup>5</sup> The emerging Local Plan Part 2 proposes that the 200 net additional homes will be accounted for through delivery of 183 homes at Newlands, Seaford.

<sup>6</sup> Table 2.1 is an extract of Table 5 of the Lewes District Local Plan Part 1 Joint Core Strategy, which states that 253 homes are to be delivered through subsequent allocations in Peacehaven & Telscombe. Spatial Policy 2 of the Local Plan Part 1 sets the requirement for a minimum of 255 net additional dwellings to be provided within the settlements of Peacehaven and Telscombe.

*Core Policy 2 – Housing Type, Mix and Density* expects housing developments to have regard for the existing character and housing mix of the vicinity and, where appropriate, the setting of the National Park. Housing developments are to achieve densities in the region of 47 to 57 dwellings per hectare for the towns, but higher or lower densities may be justified by the specific character and context of a site.

The supporting text sets out in paragraph 7.28 that ‘Neighbourhood Plans could provide more details on the appropriate housing type, mix and density for the relevant plan area, for instance where there is an identified need in the locality for a particular type or size of dwelling or there is a definable local character that may influence density requirements.’

*Core Policy 4 – Encouraging Economic Development and Regeneration* safeguards existing employment sites from other competing uses unless there are demonstrable economic viability or environmental amenity reasons for not doing so. In such circumstances, there will be a strong preference for a mixed-use alternative development in order to facilitate the retention or delivery of an appropriate element of employment use on the site. The policy supports proposals for re-use of suitable previously developed land and the planning of new development in highly sustainable locations without adversely affecting the character of the area.

*Core Policy 6 – Retail and town centres* seeks to support and retain a predominance of retail units in district retail centres such as the Meridian Centre. Where it can be demonstrated that retail is unviable alternative community uses will be sought in the first instance. Proposals for new small-scale rural retail and community facilities will be encouraged where they provide for local needs.

*Core Policy 7 – Infrastructure* protects, retains, and enhances existing community facilities and services, including facilities which serve older people. New community facilities should be located within the defined planning boundaries where they will be most accessible. Proposals involving the loss of sites or premises currently, or last, used for the provision of community facilities or services will be resisted unless:

- i) a viability appraisal, including a marketing exercise where appropriate, demonstrates that continued use as a community facility or service is no longer feasible; or
- ii) an alternative facility of equivalent or better quality to meet community needs is available or will be provided in an accessible location within the same locality; or
- iii) a significant enhancement to the nature and quality of an existing facility will result from the redevelopment of part of the site or premises for alternative uses.

*Core Policy 10 – Natural Environment and Landscape Character* seeks to conserve and enhance the natural environment of the district, including landscape assets, biodiversity, geodiversity, priority habitats and species and statutory and locally designated sites. Within and in the setting of the South Downs National Park, development will be resisted if it fails to conserve and appropriately enhance its rural, urban and historic landscape qualities, and its natural and scenic beauty, as informed by the South Downs Integrated Landscape Character Assessment.

*Core Policy 11 – Built and Historic Environment and High Quality Design* seeks to secure high quality design in all new development in order to assist in creating sustainable places and communities. This will be achieved by ensuring that the design of development respects and, where appropriate, positively contributes to the character and distinctiveness of the district’s unique built and natural heritage.

*Core Policy 13 – Sustainable Travel* promotes and support development that encourages travel by walking, cycling and public transport, and reduces the proportion of journeys made by car, in order to help achieve a rebalancing of transport in favour of sustainable modes by ensuring that new development is located in sustainable locations

## Lewes District Local Plan 2003 saved policies (2007)

3.6 The Lewes District Local Plan was adopted in March 2003. Some of its policies have now been replaced by the policies of the Lewes District Local Plan Part 1: Joint Core Strategy 2010-2030, adopted in 2016. Its remaining policies are currently under review and will eventually be replaced by the emerging Local Plan Part 2: Site Allocations and Development Management Policies and emerging Neighbourhood Plan Policies.

3.7 The policies of relevance to development and sites identified in the Peacehaven and Telscombe NP Call for Sites include the following:

*ST3 - Design, Form and Setting of Development* ensures that development respects the overall scale, height, massing, alignment, site coverage, density, landscaping, character, rhythm and layout of neighbouring buildings and the local area more generally.

*E4 - Town Centres* supports the Primary Shopping areas designated on the Proposals map. Proposals which would result in the loss of retail (Use Class A1) and food and drink uses (A3) at ground floor level will not be permitted unless they would demonstrably benefit the overall vitality and viability of town centres.

*CT1 - Planning Boundary and Key Countryside Policy* contains development within the Planning Boundaries as shown on the Proposals Map. Planning permission will not be granted for development outside the Planning Boundaries unless proposals are in compliance with affordable homes exceptions sites (Policy RES10), are minor development proposals which are essential to meet the needs of local communities and community services, and are policy compliant forms of sports, recreational and leisure development (Policy RE4).

*H2 – Listed Buildings* will not permit any proposals that would adversely affect the architectural or historic character of a listed building, its internal or external features of special architectural or historic interest, or its setting.

*PT9 Meridian Centre Town Centre Role* ensures that new uses are physically integrated with the existing and future uses in the Meridian Centre area.

*PT11 The Joff Youth Club* ensures that proposals for alternative uses for the strip of land between the school field and the Joff field, as shown on Inset Map No 3, will provide a main footpath/cycleway link to the school site.

*PT18 Allotments* safeguards land adjacent to allotments at Cornwall Avenue (as defined on Inset Map No 3) for an informal public open space.

*PT19 The Valley Area* ensures that development proposals do not detract from the immediate natural setting and character of routes (defined on Inset Map No 3) which are of value for walking and riding in the Valley Area.

*PT20 Private Recreational Purposes* encourages development proposals for horsekeeping activities and leisure and recreational uses subject to certain criteria in the area between the Planning Boundary at the Valley and the (former) Sussex Downs AONB. Proposals should not involve the building of new structures and have an adverse impact on the Downs, the character of the Valley, important wildlife habitats, the key landscape features and the existing informal recreational uses of the area.

*PT21 Valley Park* safeguards Land at Roderick Avenue (north) Valley Road (as identified on Inset Map No 3) as informal public open space.

## Draft Local Plan Part 2: Site allocations and development management policies

3.8 The Local Plan Part 2 will allocate land for housing, including Gypsy and traveller pitches, and employment. It will also set out detailed planning policies to guide development and change in the period to 2030. When adopted by the Council, these new policies will replace most of the remaining 'saved' policies of the Lewes District Local Plan 2003. Where a town or parish council

is developing a neighbourhood plan that will include site allocations for specific uses, the District Council is not proposing to allocate sites or identify site specific policies in the Local Plan Part 2. Planned housing growth for these areas is to be identified in the Neighbourhood Plan. Until neighbourhood plans for designated neighbourhood areas have been approved at referendum, the saved policies in the Lewes District Local Plan 2003, that are specifically applicable to these designated areas, will continue to form part of the development plan for the area.

3.9 The Draft Local Plan contains 2 employment allocations: Newhaven and Falmer. The 2003 Local Plan employment site allocations within the designated neighbourhood plan areas at Newhaven, Peacehaven/Telscombe and Seaford continue to be 'saved', and therefore form part of the development plan for the area until the respective neighbourhood plans for these towns are approved. The policies in the Lewes District Local Plan 2003 specific to the neighbourhood area will continue to be saved until the Peacehaven & Telscombe Neighbourhood Plan is approved.

3.10 The draft policies of relevance to development in the Peacehaven and Telscombe NP area include the following:

*Policy DM1: Planning Boundary* permits new development within planning boundaries, as defined on the Policies Map, in accordance with other policies and proposals in the development plan. Outside the planning boundaries, the distinctive character and quality of the countryside will be protected and new development will only be permitted where it is consistent with a specific development plan policy or where the need for a countryside location can be demonstrated.

*Policy DM6: Equestrian Development* permits proposals for equestrian development where the intrinsic and locally distinctive character and amenities of the countryside are maintained.

*Policy DM10: Employment Development in the Countryside* permits proposals for small-scale employment development, including tourist and leisure facilities outside the planning boundaries where it involves the conversion or re-use of an existing agricultural or other rural building, or it comprises the demolition and replacement of an existing agricultural or other rural building where this would result in a more sustainable development than could be achieved through converting the building.

*Policy DM19: Protection of Agricultural Land* ensures that development proposals that would result in the irreversible loss of the best and most versatile agricultural land (Grades 1, 2, 3a in the DEFRA Agricultural Land Classification System) will not be permitted unless it can be demonstrated that there are no suitable alternative locations and the proposal would have overriding sustainability benefits that outweigh the loss of land from agricultural use.

*Policy DM25: Design* permits development which contributes towards local character and distinctiveness through high quality design where the following criteria are met:

- (1) Its siting, layout, density, orientation and landscape treatment respond sympathetically to the characteristics of the development site, its relationship with its immediate surroundings and, where appropriate, views into, over or out of the site;
- (2) its scale, form, height, massing, and proportions are compatible with existing buildings, building lines, roofscapes and skylines; and
- (4) existing individual trees or tree groups that contribute positively to the area are retained.

*Policy DM30: Backland Development* permits development in rear domestic gardens and other backland sites, within the planning boundaries as defined on the Policies Map, where the following criteria are met:

1. the provision of safe and convenient vehicular access and parking which does not have an unacceptable adverse impact on the amenities of neighbouring properties in terms of noise, light or other disturbance;
2. the mass and scale of development will not have an overbearing impact on, or result in the loss of privacy to, existing homes and gardens;

3. the development does not cause the loss of trees, shrubs or other landscape features which make an important contribution to the character and appearance of the locality or its biodiversity.

3.11 The Submission Policies Map<sup>7</sup> for Peacehaven & Telscombe can be viewed in Figure 3.



**Figure 3 Lewes District Policies Map Inset Map 3: Peacehaven & Telscombe (December 2018)**

3.12 Following the Examination of the submitted Local Plan Part 2, the Planning Inspector has recommended a number of Main Modifications to the Plan. These have been published for consultation between 8 July and 19th August 2019.

<sup>7</sup> Available here in greater detail: <https://www.lewes-eastbourne.gov.uk/resources/assets/inline/full/0/276907.pdf>

## 4. Methodology

- 4.1 The approach to the site assessment is based on the Government's Planning Practice Guidance. The relevant sections are Housing and Economic Land Availability Assessment (March 2015)<sup>8</sup>, Neighbourhood Planning (updated February 2018)<sup>9</sup> and Locality's Neighbourhood Planning Site Assessment Toolkit<sup>10</sup>. These all encompass an approach to assessing whether a site is appropriate for allocation in a Neighbourhood Plan based on whether it is suitable, available and achievable. In this context, the methodology for identifying sites and carrying out the site appraisal is presented below

### Task 1: Identify Sites to be included in the Assessment

- 4.2 The first task is to identify which sites should be considered as part of the assessment.
- 4.3 For the Peacehaven and Telscombe NP, this included:
- Sites identified as part of the Call for Sites consultation undertaken by the Town Councils in October 2018; and
  - Sites identified within the neighbourhood area within the SHELAA (2018).
- 4.4 Sites identified through the Call for Sites consultation which have not already been assessed through the Strategic Housing and Economic Land Availability Assessment (SHELAA) were appraised using AECOMs site assessment pro-forma.

### Task 2: Site Pro-Forma

- 4.5 A site appraisal pro-forma has been developed by AECOM to assess potential sites for allocation in the Neighbourhood Plan. It is based on the Government's National Planning Guidance, the Site Assessment for Neighbourhood Plans: A Toolkit for Neighbourhood Planners (Locality, 2015) and the knowledge and experience gained through previous neighbourhood planning site assessments. The purpose of the pro-forma is to enable a consistent evaluation of each site against an objective set of criteria
- 4.6 The pro-forma used for the assessment enabled a range of information to be recorded, including the following:
- General information:
    - Site location and use; and
    - Site context and planning history.
  - Context:
    - Type of site (greenfield, brownfield etc.); and
    - Planning history.
  - Suitability:
    - Site characteristics;
    - Environmental considerations;
    - Heritage considerations;
    - Community facilities and services; and
    - Other key considerations (e.g. flood risk, agricultural land, tree preservation orders).

<sup>8</sup> Available at <https://www.gov.uk/guidance/housing-and-economic-land-availability-assessment>

<sup>9</sup> Available at <https://www.gov.uk/guidance/neighbourhood-planning--2>

<sup>10</sup> Available at <https://neighbourhoodplanning.org/toolkits-and-guidance/assess-allocate-sites-development/>

- Availability

## Task 3: Complete Site Pro-formas

The next task was to complete the site pro-formas. This was done through a combination of desk top assessment and site visits. The desk top assessment involved a review of the conclusions of the existing evidence and using other sources including Google Maps/ Streetview and MAGIC maps in order to judge whether a site is suitable for the use proposed. The site visits allowed the team to consider aspects of the site assessment that could only be done visually. It was also an opportunity to gain a better understanding of the context and nature of the neighbourhood area.

## Task 3: Consolidation of Results

- 4.7 Following a site visit, the desktop assessments were revisited to finalise the assessments and compare the sites to judge which were the most suitable to meet the housing requirement.
- 4.8 A 'traffic light' rating of all sites has been given based on whether the site is an appropriate candidate to be considered for allocation in the Neighbourhood Plan. The traffic light rating indicates 'green' for sites that show no constraints and are appropriate as site allocations, 'amber' for sites which are potentially suitable if issues can be resolved and 'red' for sites which are not currently suitable. The judgement on each site is based on the three 'tests' of whether a site is appropriate for allocation – i.e. the site is suitable, available and achievable.
- 4.9 The conclusions of the SHELAA were revisited to consider whether the conclusions would change as a result of more detailed assessment based on the most recent available information.

## Task 5: Indicative Housing Capacity

- 4.10 Where sites were previously included in the SHELAA, indicative housing capacity shown in this document has been used as a starting point.
- 4.11 If landowners/developers have put forward a housing figure, this has been used if appropriate. If a site has been granted planning permission but the site has not yet been started or completed, then this capacity figure has been used.

## 5. Site Assessment

5.1 The sites to be considered through this site appraisal have been identified through:

- Sites submitted in the Peacehaven and Telscombe Call for Sites consultation undertaken by the Town Councils from August to October 2018; and
- Strategic Housing and Economic Land Availability Assessment 2018 (SHELAA)

5.2 The sites identified are set out in Table 5.1 and Table 5.2 below.

### Identified Sites in the Call for Sites Consultation (October 2018)

5.3 Peacehaven and Telscombe Town Councils identified sites in a formal 'Call for Sites' in 2018, and assessments were undertaken by Peacehaven and Telscombe Town Councils for allocation consideration.

5.4 Criteria for suggested site submissions were to be a minimum size of 0.2ha with capacity to accommodate a minimum of 5 dwellings. Sites for potential employment or other land uses were also to be submitted, especially sites that can accommodate wider community benefits.

5.5 Table 5.1 presents those sites (mapped in Figure 5) identified in the Call for Sites consultation.

**Table 5.1 Sites identified in the Call for Sites consultation (2018) for Draft Plan allocation consideration**

Site Ref.	Site Name / Address	Site Size (ha)	Capacity estimate by site promoter (homes and other)	Planning Applications	Included in the SHELAA	Proposed Uses
PTNP1	Meridian Centre	4.11	100 based on half of the site being available and with the upper limit of the Local Plan policy on housing density being applied. With New Co-op supermarket and other main town centre uses	The scheme is currently subject to a pre-application enquiry with the Council to discuss the potential redevelopment options for the site.	No	<ul style="list-style-type: none"> <li>• Housing (C3 use)</li> <li>• Residential Institutions (C2 use)</li> <li>• Housing for Older People</li> <li>• A1 (shops)</li> <li>• A2 (Financial and Professional Services)</li> <li>• A3 (Restaurants and Cafes)</li> <li>• A4 (Drinking Establishments)</li> <li>• A5 (Hot Food Takeaways)</li> <li>• B1 (Business)</li> <li>• D1 (Non-Residential Institutions)</li> </ul>
PTNP2	Land North of Peacehaven	42.7	200+	Relevant applications to the proposed land uses: LW/94/0540 Outline application for the erection of 500 dwellings Deemed Refused	Multiple sites	<ul style="list-style-type: none"> <li>• Housing (C3 use)</li> </ul>

Site Ref.	Site Name / Address	Site Size (ha)	Capacity estimate by site promoter (homes and other)	Planning Applications	Included in the SHELAA	Proposed Uses
				Jul 1994; LW/96/1212 Outline application for residential development of houses and bungalows, associated infrastructure and open space Refused Oct 1996		
PTNP3	Land at Cornwall Avenue	0.38	15	LW/90/0561 Outline application for residential development Refused June 1990	47PT	<ul style="list-style-type: none"> <li>Housing (C3 use)</li> </ul>
PTNP4	Land adjacent to Pelham Rise, Lower Hoddern Farm	0.8	12-15	LW/86/0025 Erection of additional vegetable storage building with four glasshouses to replace existing. Approved 1986; LW/07/0798 New road junction with Pelham Rise, extended spur road, demolition of existing buildings & construction of eleven commercial units & cycle store Approved Feb 1986	No	<ul style="list-style-type: none"> <li>Housing (C3 use)</li> </ul>
PTNP5	Sports Pavilion/Hubb at Centenary Park	15m <sup>2</sup>	Addition of two floors on ground floor footprint	LW/13/0268 Creation of new recreational facilities to the north and north west of Piddinghoe Sports Park and to undertake landscape improvements and improvements to existing buildings within Piddinghoe Sports Park Approved Jul 2013; LW/84/1565 Sports pavilion including toilets, changing rooms, meeting room. Approved Oct 1984; LW/82/1935 Two storey building to provide changing rooms and social facilities Approved Feb 1983	No	<ul style="list-style-type: none"> <li>Assembly and leisure (D2 use)</li> </ul>

Site Ref.	Site Name / Address	Site Size (ha)	Capacity estimate by site promoter (homes and other)	Planning Applications	Included in the SHELAA	Proposed Uses
PTNP6	Land to the north east of Lower Hoddern Farm	2.3	-	None	No	<ul style="list-style-type: none"> <li>Business (B1)</li> <li>Storage and Distribution (B8 use)</li> </ul>

5.6 Sites PTNP2 and PTNP3 were assessed through the SHELAA, and so the SHELAA assessment was reviewed as part of the assessment. While Site PTNP2 was assessed previously as multiple sites in the SHELAA, it was assessed again as a whole site (as submitted by the land promoter) using AECOM’s site assessment pro-forma. All other sites in Table 5.1 have been taken forward for appraisal using site assessment pro formas.

## Strategic Housing and Economic Land Availability Assessment (2018)

5.7 Lewes District Council updated the SHELAA<sup>11</sup> in 2018. The SHELAA appraisals conclude whether sites are:

- Deliverable (Suitable, Available and Achievable); or
- Developable (Suitable but either the availability is specified for a future date or is currently unknown, or the achievability of the site is unknown/marginal).

5.8 A number of sites were identified and assessed in the SHELAA that are within the Peacehaven and Telscombe Neighbourhood Area and can be viewed in Figure 4. Within the Neighbourhood Area 69 sites were assessed, with 6 found to be deliverable (3 of which have extant planning permission) and 4 to be developable. 22 of the sites were found not to be deliverable and developable with the remainder discounted due to other reasons (summarised in the key in Figure 4). The 3 deliverable sites (without planning permission) have an estimated capacity of 46 homes, while the 4 developable sites have an estimated capacity of 217 homes.

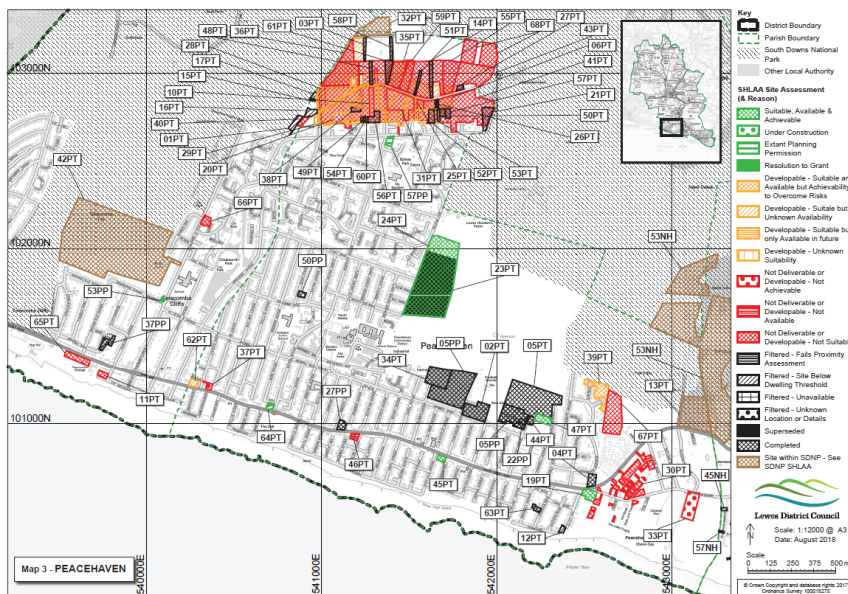


Figure 4 SHELAA Map 3 - Peacehaven<sup>12</sup>

<sup>11</sup> Available here: <https://www.lewes-eastbourne.gov.uk/planning-policy/strategic-housing-and-economic-land-availability-assessment/>

<sup>12</sup> Available here in greater detail: <https://www.lewes-eastbourne.gov.uk/resources/assets/inline/full/0/274103.pdf>

5.9 The SHELAA contains an updated housing trajectory for sites identified as Deliverable and Developable, complete with notional start date of sites and build out rates. These sites are presented in Table 5.2.

**Table 5.2 Housing trajectory for Peacehaven (Source: 2018 SHELAA Final Report, Lewes District Council)**

Site Ref.	Location	Potential Capacity	Build rate (per annum)	Notional start date	April 2018 – March 2023	April 2023 – March 2028	April 2028 – March 2030
57PP	35 Telscombe Road, Peacehaven	6	6	2018	6		
06PT	Valley Road, Peacehaven	113	40	2023		113	
19PT	Motel, 1 South Coast Road	26	26	2018	26		
20PT	Land north and south of Valley Road	158	40	2023		158	
24PT	Land at Lower Hoddern Farm, off Pelham Rise, East Peacehaven	450	60	2019	120	330	
39PT	Land adjacent to Cliff Park Close	10	10	2023		10	
45PT	Piddinghoe Avenue Car Park	6	6	2018	6		
47PT	Land at Cornwall Avenue	14	14	2018	14		
62PT	Land between 328 & 338 South Coast Road	6	6	2023		6	
64PT	Land at 264 South Coast Road	29	29	2023	29		

5.10 Removing duplications as a consequence of overlapping site boundaries, the total potential housing trajectory yield for Peacehaven is presented in Table 4.3.

**Table 5.3 Housing trajectory yield for Peacehaven (Source: 2018 SHELAA Final Report Lewes District Council)**

Parish/Town	April 2018 - March 2023	April 2023 - March 2028	April 2028 - March 2030
Peacehaven	201	547	0

5.11 Table 5.4 presents sites identified in the 2018 SHELAA as developable and deliverable in Peacehaven. Other sites within the Neighbourhood Area assessed in the SHELAA were found to be not deliverable or developable (or filtered from further assessment). These sites can be further viewed in Figure 4 and the Appendix of the SHELAA.

**Table 5.4 Sites identified in the 2018 SHELAA as developable and deliverable**

Site Ref.	Location	Size (ha)	Site Yield	Overall Assessment	Final Assessment Category	SHELAA Rationale
57PP	35 Telscombe Road, Peacehaven	-	6	Deliverable	Extant planning permission	LW/17/0786
06PT	Valley Road, Peacehaven	13.8 3	113	Developable	Developable – Suitable but Unknown Availability	Known to be within various ownerships, although a coordinated approach is seen as likely for the majority of the site – with some parcels being promoted through different sites. Unknown full ownership details. Due to scale of development higher developer costs are likely associated with necessary access works, strategic improvements to road network and local infrastructure works (e.g. Wastewater pumping) and gradients. Potential to overcome achievability in the future. Level of proposed development could be accommodated without adversely impacting on the surrounding landscape, subject to appropriate mitigation. Site largely covered by 20PT, see below.
19PT	Motel, 1 South Coast Road	0.42	26	Deliverable	Suitable, Available & Achievable	Brownfield site within the existing planning boundary. No environmental or historic designations. Former motel site, now vacant land. Within walking distance of bus stop with services to Brighton and Newhaven. Within walking distance of local shop (Ashington Gardens). Planning approval granted July 2012 for 25 units now lapsed, recent application submitted June 2015 (LW/15/0462) for 26 units – approved subject to S106. ESCC landscape architect raises no landscape concerns to development of site. ESCC highways state site has good access. This is consistent with their response to the 2012 planning application stated the requirement for pavement improvements, further information on parking and contributions towards improvements to A259 but otherwise no objection raised in principle.
20PT	Land north and south of Valley Road	11.26	158	Developable	Developable – Suitable but unknown availability / achievability	Site is being promoted on behalf on landowners in the Valley Road area as a coordinated approach is considered necessary to determine availability and bring the site forward. Delivery of site potentially complex due to large number of individual landowners. Proponent states that majority of site is confirmed to be available. TPO groups located on site. ESCC highways state that access is achievable with significant upgrading and locally the anticipated traffic can be accommodated, albeit subject to traffic modelling. Consideration of impacts of additional dwellings at Newhaven and

Site Ref.	Location	Size (ha)	Site Yield	Overall Assessment	Final Assessment Category	SHELAA Rationale
						Peacehaven will need to be given due to capacity concerns of A259. ESCC landscape architect suggests potential for development if concentrated in less sensitive areas, south of Valley Road. Downland to NW should be left undeveloped. Recognises area and buffer to SDNP and with potential to create Green Infrastructure area. The Landscape Capacity Study supports these comments indicating a low/negligible capacity in area north of Valley Road. Number of units reduced to reflect preliminary site survey work by proponents. Recent proposals seek wider development of Valley Road area over a three phased period and of up to approximately 600 units. Wider development has been previously considered (41PT) and excluded due to landscape concerns.
24PT	Land at Lower Hoddern Farm, off Pelham Rise, East Peacehaven	10	450	Deliverable	Suitable, Available & Achievable	Greenfield site adjacent to the existing settlement planning boundary but outside of the National Park. Within walking distance of the Meridian Centre, leisure centre, secondary school, primary school and local employment opportunities. Site is within single ownership with no abnormal build costs. ESCC highways state that there are access points to the site which are considered achievable. Site is an edge of settlement location. ESCC landscape architect raises concerns due to sites' potential impact on open downland and National Park. LCS concludes the landscape character area which the site falls within to have a low/ medium capacity for change with scope to improve the existing urban edge. Landscape sensitivities have informed a reduced capacity. Site is allocated within Joint Core Strategy (Spatial Policy 8: Lower Hoddern Farm) for 450 units. Planning application submitted (LW/17/0226) March 2017 – Approved.
39PT	Land adjacent to 22 & 30 Cliff Park Close	0.82	10	Developable	Developable – Suitable and Available but unknown/ marginal achievability	Combination of the requirement for major groundworks due to site topography and the identified surface drainage and severe flooding issues for the site mean that the achievability of a viable site for residential development is unknown/ marginal at this stage. Revised boundary to reflect additional available land. Dwelling yield increased to reflect this but limited due to irregular site shape. ESCC highways consider access is possible via Chichester Road. Northern strip is within National Park. ESCC landscape architect states that consideration will need to be given to

Site Ref.	Location	Size (ha)	Site Yield	Overall Assessment	Final Assessment Category	SHELAA Rationale
						buffering to the countryside. Otherwise no landscape concerns raised.
45PT	Piddinghoe Avenue Car Park	0.14	6	Deliverable	Suitable, Available & Achievable	Brownfield site within the planning boundary. Currently used as a car park. The 2015 Peacehaven Parking Study concludes that this car park is currently underused and suggests rationalisation and improvements should be considered in future. If rationalised, there may be potential for surplus land but likely to be at a reduced capacity (below 6 units). Bus stop and local shops available within walking distance of site. Nearest train station is in the adjacent town of Newhaven. Environmental Health requires further investigation into potential land contamination. Has existing access on to Piddinghoe Avenue. ESCC highways state no objection in principle however, loss of car park should be justified and not result in overspill parking on highway. Potential infill development. ESCC landscape architect states that development offers potential enhancement to streetscape.
47PT	Land at Cornwall Avenue	0.14	14	Deliverable	Suitable, Available & Achievable	Greenfield site within the planning boundary. Currently open green space allocated for extension to allotment site located to the south (PT18). Loss or amendment of existing allocation will be considered through Local Plan Part 2. Bus stop within walking distance, along South Coast Road with frequent bus services to Newhaven and Brighton. Not within walking distance of main shopping centre but local convenience shops approximately 350m (Ashington Gardens). ESCC highways state that access from Montreal Close would be only feasible option. Whilst the site is contained within an urban area ESCC landscape architect states that the loss of potential allotments would impact the provision of multi-functional green infrastructure. No historic or environmental constraints.
62PT	Land between 328 & 338 South Coast Road	0.18	6	Developable	Developable - Suitable but Unknown Availability	Brownfield site located within the planning boundary. Currently used as a car sales area. Intentions of landowner(s) unknown, hence unknown availability. Site is within an established residential area. No environmental or historical constraints identified on or adjacent to site. Within walking distance of bus stop with frequent services to Brighton and Newhaven. Approximately 800m to Infant School and 1km to Meridian Centre services. Has existing access

Site Ref.	Location	Size (ha)	Site Yield	Overall Assessment	Final Assessment Category	SHELAA Rationale
64PT	264 South Coast Road	0.12	29	Deliverable	Extant planning permission	from both South Coast Road and Second Road.  Brownfield site located within the planning boundary. Currently used as police station and associated car parking area. No environmental or historical constraints identified on or adjacent to site. Planning application (LW/13/0747) for new police station and 9 flats approved. Subsequent planning application submitted (LW/16/0841) for 31 gross sheltered apartments (now under construction). Approximately 500m from Meridian Centre shops and services. Within walking distance of bus stops with frequent services to Brighton and Newhaven. Within walking distance of schools.

5.12 Homes on Sites 57PP and 64PT have been built since publication of the SHELAA. Phase 1 of planning permission LW/17/0226 for Site 24 is currently being built, with the remainder of the site to be delivered through the Joint Core Strategy Site allocation (Spatial Policy 8: Lower Hoddern Farm) in subsequent phases.

5.13 Figure 5 identifies all sites<sup>13</sup> taken forward for assessment in the Peacehaven and Telcombe NP area.



**Figure 5 Sites identified for assessment in Peacehaven and Telscombe NP area (Map Source: 2019 Google)**

<sup>13</sup> Please note redline site boundaries are indicative.

## 6. Site Assessment Summary

- 6.1 10 sites were considered within this assessment by AECOM to assess whether they would be appropriate for allocation in the Peacehaven and Telscombe Neighbourhood Plan.
- 6.2 Table 5.1 sets out a summary of the site assessments, which should be read alongside the full assessments available in the pro formas in **Appendix A** and in the SHELAA.
- 6.3 The final column within the table is a 'traffic light' rating for each site, indicating whether the site is appropriate for allocation. Red indicates the site is not appropriate for allocation through the Neighbourhood Plan and Green indicates the site is appropriate for allocation. Amber indicates the site is less sustainable, or may be appropriate for allocation through the Neighbourhood Plan if certain issues can be resolved or constraints mitigated.
- 6.4 The summary table shows that sites PTNP1, PTNP3 (47PT), PTNP4, PTNP5, 19PT, and 62PT are appropriate for allocation; part of PTNP2 (20PT and 06PT) and 45PT are potentially appropriate for allocation, subject to constraints such as access, landscape and viability issues being addressed. Site PTNP6 and the remainder of Site PTNP2 were found to not be appropriate for allocation.
- 6.5 A plan showing all of the sites assessed and their traffic light rating is shown in Figure 6.

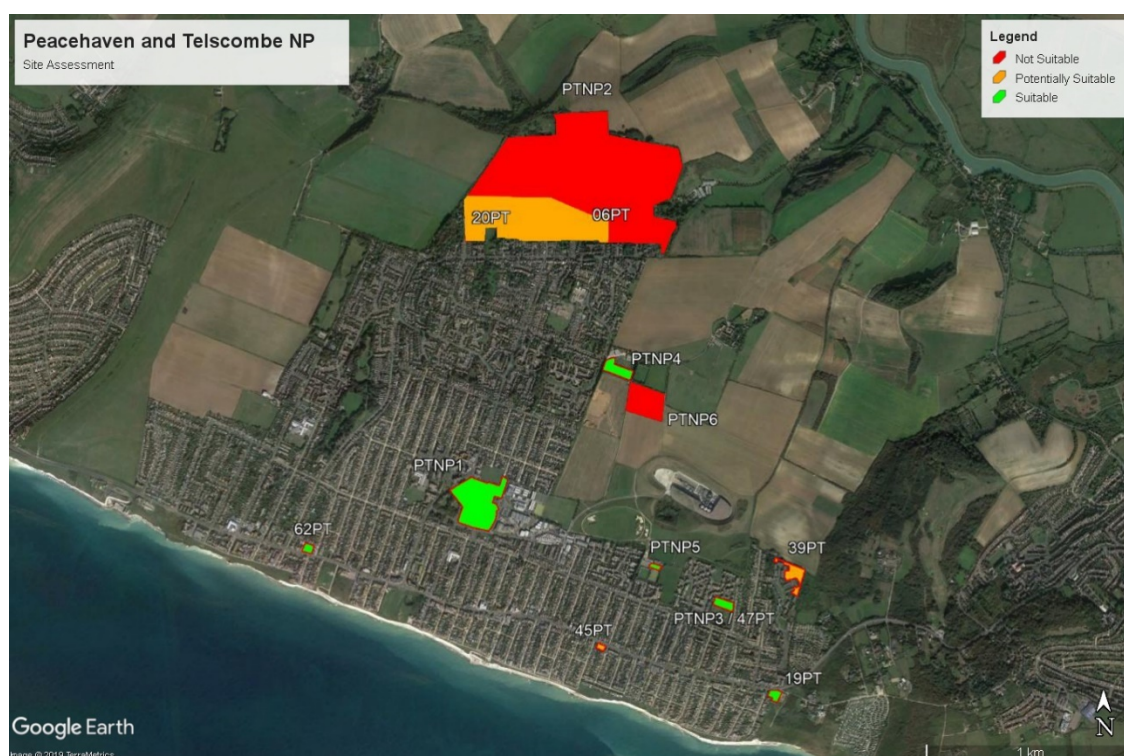


Figure 6 Red Amber Green rating for assessed sites (Map Source: 2019 Google)

**Table 5.1 Site Assessment Summary Table**

Site Ref.	Site Address	Site Source	Gross Site Area	Capacity (homes and other)	Site Type	Neighbourhood Plan Site Assessment summary	Traffic Light Rating
PTNP1	Meridian Centre	Town Councils Call for Sites	4.11 Ha	100 based on half of the site being available. With New Co-op supermarket and other main town centre uses (Source: The Co-operative Group Call for Sites submission)	Previously Developed Land	<p>The site is available;</p> <p>The site is previously developed land and contains the Meridian Centre and other town centre facilities and services;</p> <p>The site is favourably located in terms of services and facilities, access from adjacent residential and business areas and the strategic residential allocation of 450 homes currently being built;</p> <p>The site is largely within the ownership of the Coop Group, with other landowners promoting joint redevelopment of the site.</p> <p>The site is suitable for residential and commercial development subject to compliance with Core Policy 6 (Peacehaven District Retail Centre), and protection of the vitality and viability of the town centre; The scheme is currently subject to a pre-application enquiry with the Council to discuss the potential redevelopment options for the site.</p>	
PTNP2	Land north of Peacehaven	Town Councils Call for Sites; and Strategic Housing and Economic Land Availability Assessment (2018)	c. 42.7 Ha	Approx. 158 homes <sup>14</sup>	Mixture of Greenfield and Previously Developed Land	<p>This is a broad area made up of individual sites, adjacent to the urban edge and settlement boundary. It is surrounded to the north east and west by the South Downs National Park;</p> <p>The site is classified as Grade 3 quality agricultural land and designated locally for 'Private Recreational Purposes' (saved policy PT20), and contains pockets of trees protected by individual and group Tree Protection Orders;</p> <p>The site is part available. Phase 1 of the Call for Sites development proposals (SHELAA sites 06PT and 20PT) is available. The remainder of the site is not available;</p> <p>The 2018 SHELAA finds that sites 06PT and 20PT to the southwest of the site are 'found to be 'Developable – Suitable but unknown availability' and 'Developable – Suitable but unknown availability / achievability''. All other areas of the site are found to be not deliverable or developable;</p> <p>The north-eastern edge of the site is a protected Local Nature Reserve;</p> <p>The developable area of the site may be constrained due to trees, shrub land, priority habitats with potential to support primary species, and steep slopes;</p> <p>The site has a medium to high sensitivity in terms of visual impact on landscape. The site is within an undulating valley that is considered to have some development potential, in landscape capacity terms, although limited to the southern and western areas south of</p>	

<sup>14</sup> The potential capacity (site yield) in the 2018 SHELAA for Sites 06PT and 20PT is 113 and 158 homes respectively. As Site 06PT is largely covered by Site 20PT, the larger capacity estimate is used.

Site Ref.	Site Address	Site Source	Gross Site Area	Capacity (homes and other)	Site Type	Neighbourhood Plan Site Assessment summary	Traffic Light Rating
						<p>Valley Road; as areas outside of this become increasingly visually sensitive and have greater potential to impact on the surrounding character of the landscape and South Downs;</p> <p>With regard to viability the SHELAA states that the site would need considerable necessary access works, strategic improvements to road network and local infrastructure works (e.g. Wastewater pumping) and further costs associated gradients.</p> <p>Residential development of the site is contrary to current saved policies PT19 General Indoor Leisure and PT20 Private Recreational Purposes, these policies however are to be replaced upon publication of the neighbourhood plan;</p> <p>Development of the site is contrary to Lewes Draft Local Plan Countryside Policies (Policies DM2, DM3, DM4, DM5, DM6, DM7, DM9);</p> <p>On this basis, the area of the site south of Valley Road within SHELAA sites 06PT and 20PT is potentially suitable for residential development, subject to viability (access and infrastructure), ecology/biodiversity and landscape issues, and Local Plan policy constraints being addressed and other more sustainable sites sequentially coming forward for development.</p>	
PTNP3 (47PT)	Land at Cornwall Avenue	Town Councils Call for Sites; and Strategic Housing and Economic Land Availability Assessment (2018)	0.38 Ha	14 (Source: SHELAA 2018)	Greenfield	<p>SHELAA (2018) rationale:</p> <p>'Greenfield site within the planning boundary. Currently open green space allocated for extension to allotment site located to the south (PT18). Loss or amendment of existing allocation will be considered through Local Plan Part 2. Bus stop within walking distance, along South Coast Road with frequent bus services to Newhaven and Brighton. Not within walking distance of main shopping centre but local convenience shops approximately 350m (Ashington Gardens). ESCC highways state that access from Montreal Close would be only feasible option. Whilst the site is contained within an urban area ESCC landscape architect states that the loss of potential allotments would impact the provision of multi-functional green infrastructure. No historic or environmental constraints.'</p> <p>The SHELAA finds the site 'Suitable, Available &amp; Achievable'.</p> <p>As saved Policy PT18 can be replaced through the neighbourhood plan, the site is suitable for allocation consideration (for residential or allotment uses) with respect to allotment needs for the area and the landowners land use proposals.</p>	
PTNP4	Land adjacent to Pelham Rise, Lower Hoddern Farm	Town Councils Call for Sites	0.8 Ha	12-15 (Source: Landowner Call for Sites estimate)	Mixed	<p>The site is available.</p> <p>The site is outside but adjacent to the planning boundary;</p> <p>The site would require the creation of access onto Pelham Rise, however there is also potential for access through the shared boundary with the neighbouring site to the south;</p> <p>The site is adjacent to industrial uses, and would require a noise assessment to survey if potential noise impacts can be mitigated adjacent to potential residential uses;</p>	

Site Ref.	Site Address	Site Source	Gross Site Area	Capacity (homes and other)	Site Type	Neighbourhood Plan Site Assessment summary	Traffic Light Rating
						<p>The site is removed from the local centre (shops and services) but is in close proximity to schools and bus routes to the wider area. The site is moderately to poorly located on the edge of Peacehaven;</p> <p>The site is within the setting of the South Downs National Park; however views from the urban edge of Peacehaven towards the Downs show the site within the transitional urban-rural context of the eastern edge of Peacehaven. The eastern edge of Peacehaven is identified in the LCS as an area of high visual sensitivity, however as the site is bounded on three sides by built form, is screened by established hedgerow and trees, development of the site has potential to round off and create a defensible and coherent edge to the east of Peacehaven;</p> <p>The site is suitable subject to outlined constraints being addressed with the Local Planning Authority, Highways Authority and relevant statutory consultees.</p>	
PTNP5	Sports Pavilion/Hub at Centenary Park	Town Councils Call for Sites	15m <sup>2</sup>	Addition of two floors on ground floor footprint for community uses. (Source: Landowner Call for Sites estimate)	Greenfield	<p>The site is available;</p> <p>The site is outside but in close proximity to the planning boundary;</p> <p>The site is an indoor recreational facility (sports hub, changing rooms, meeting rooms) that is supported for retention by saved policy RE3, however a change of use could potentially be justified for proposed uses if justification of vacancy for its current use can be assessed;</p> <p>The site is removed from the local centre (Meridian Centre), and is in moderate to poor location for proximity to other services and facilities. Development proposals for the site would however deliver the following uses A3 (Restaurants and Cafes), B1 (Business), D1 (Non-residential Institutions), and D2 (Assembly and Leisure);</p> <p>The site is within the setting of the South Downs National Park and in an area of high visual sensitivity, however a new hub would be viewed against the urban contact of Peacehaven;</p> <p>The site is considered to be appropriate for allocation for the proposed use.</p>	
PTNP6	Land adjacent to Pelham Rise, Lower Hoddern Farm	Town Councils Call for Sites	2.3 Ha	Business (B1 and B8 uses)	Greenfield	<p>The site is available;</p> <p>The site is outside the settlement boundary and in open countryside, whereby development is contrary to saved policy CT1. The site is however adjacent to the built-up area;</p> <p>Access to the site is constrained, with proposed access through consented application LW/17/0226 having potential to be found to be inappropriate for business and distribution uses due to potential unacceptable impacts (noise, safety, environmental health) on the immediate residential area;</p> <p>There are several areas of archaeological interest within the urban area and surrounding landscape around Lower Hoddern Farm and along the urban edge east of Peacehaven;</p>	

Site Ref.	Site Address	Site Source	Gross Site Area	Capacity (homes and other)	Site Type	Neighbourhood Plan Site Assessment summary	Traffic Light Rating
						<p>Proposed development will protrude into open countryside and be incongruous with the defined urban edge of the town and the open countryside setting and character of Peacehaven and the South Downs and is contrary to draft agricultural policies DM9 and DM19; The site is within an area of high landscape sensitivity, that is currently undergoing transition to create a hard eastern edge to Peacehaven and mitigation of visual impact of the waste water treatment plant through landscaping;</p> <p>Proposed development is not in accordance with Core Policy 4 which encourages economic development in highly sustainable locations without adversely affecting the character and quality of the Peacehaven and the countryside;</p> <p>On this basis, the site is not suitable for development and allocation consideration, due to access issues, and development proposals conflicting with Local Plan policy and sensitive landscape and countryside character.</p>	
19PT	Motel, 1 South Coast Road	Strategic Housing and Economic Land Availability Assessment (2018)	0.42 Ha	26 (Source: Planning Permission for 26 homes approved subject to S106 agreement)	Greenfield	<p>SHELAA (2018) rationale: ‘Brownfield site within the existing planning boundary. No environmental or historic designations. Former motel site, now vacant land. Within walking distance of bus stop with services to Brighton and Newhaven. Within walking distance of local shop (Ashington Gardens). Planning approval granted July 2012 for 25 units now lapsed, recent application submitted June 2015 (LW/15/0462) for 26 units – approved subject to S106. ESCC landscape architect raises no landscape concerns to development of site. ESCC highways state site has good access. This is consistent with their response to the 2012 planning application stated the requirement for pavement improvements, further information on parking and contributions towards improvements to A259 but otherwise no objection raised in principle’.</p> <p>The SHELAA finds the site ‘Suitable, Available &amp; Achievable’.</p> <p>On this basis, the site is suitable for allocation consideration to ensure delivery of the site, however confirmation from the Council as to whether the 26 homes to be delivered on the site has already been included within the housing requirement is needed.</p>	
39PT	Land adjacent to 22 & 30 Cliff Park Close	Strategic Housing and Economic Land Availability Assessment (2018)	0.82 Ha	10 (Source: SHELAA 2018)	Greenfield	<p>SHELAA (2018) rationale: ‘Combination of the requirement for major groundworks due to site topography and the identified surface drainage and severe flooding issues for the site mean that the achievability of a viable site for residential development is unknown/ marginal at this stage. Revised boundary to reflect additional available land. Dwelling yield increased to reflect this but limited due to irregular site shape. ESCC highways consider access is possible via Chichester Road. Northern strip is within National Park. ESCC landscape architect states that consideration will need to be given to buffering to the countryside. Otherwise no landscape concerns raised.’</p>	

Site Ref.	Site Address	Site Source	Gross Site Area	Capacity (homes and other)	Site Type	Neighbourhood Plan Site Assessment summary	Traffic Light Rating
						<p>The SHELAA finds the site 'Developable – Suitable and Available but unknown/ marginal achievability'</p> <p>On this basis, the site is potentially suitable for development and allocation consideration, subject to infrastructure and flood risk achievability issues in the southern and western part of the site.</p>	
45PT	Piddinghoe Avenue Car Park	Strategic Housing and Economic Land Availability Assessment (2018)	0.14	6 (Source: SHELAA 2018)	Brownfield	<p>SHELAA (2018) rationale: 'Brownfield site within the planning boundary. Currently used as a car park. The 2015 Peacehaven Parking Study concludes that this car park is currently underused and suggests rationalisation and improvements should be considered in future. If rationalised, there may be potential for surplus land but likely to be at a reduced capacity (below 6 units). Bus stop and local shops available within walking distance of site. Nearest train station is in the adjacent town of Newhaven. Environmental Health requires further investigation into potential land contamination. Has existing access on to Piddinghoe Avenue. ESCC highways state no objection in principle however, loss of car park should be justified and not result in overspill parking on highway. Potential infill development. ESCC landscape architect states that development offers potential enhancement to streetscape.'</p> <p>The SHELAA finds the site 'Suitable, Available &amp; Achievable'. The site is currently listed as an Asset of Community Value (ACV) (ref no. ACV0034) until 21/12/2020 by Lewes District Council. On this basis, the site is potentially suitable for development and allocation consideration, subject to removal from the ACV list and rationalisation of underused car parks.</p>	
62PT	Land between 328 & 338 South Coast Road	Strategic Housing and Economic Land Availability Assessment (2018)	0.18	6 (Source: SHELAA 2018)	Greenfield	<p>SHELAA (2018) rationale: 'Brownfield site located within the planning boundary. Currently used as a car sales area. Intentions of landowner(s) unknown, hence unknown availability. Site is within an established residential area. No environmental or historical constraints identified on or adjacent to site. Within walking distance of bus stop with frequent services to Brighton and Newhaven. Approximately 800m to Infant School and 1km to Meridian Centre services. Has existing access from both South Coast Road and Second Road.'</p> <p>The SHELAA finds the site 'Developable - Suitable but Unknown Availability'. Planning permission has been applied (Ref. no. LW/19/0407) for 'Erection of 8 two-storey 3 bedroomed houses' for the site, and is awaiting decision. On this basis, the site is available and suitable for development and allocation consideration, subject to planning being received whereby allocation is not necessary.</p>	

## 7. Conclusions

- 7.1 The Lewes District Local Plan Part 2, which is currently at examination and awaiting the Inspectors Final Report, will plan for housing and employment growth through detailed planning policies to guide development and change in the period to 2030. Where a town council is developing a neighbourhood plan that will include site allocations for specific uses, the District Council is not proposing to allocate sites or identify site specific policies in the Local Plan Part 2. In addition to delivery of the strategic site allocation in the neighbourhood area, Spatial Policy 2 of the JCS requires a planned housing growth of 255 net units at Peacehaven and Telscombe over the plan period.
- 7.2 Until neighbourhood plans for designated neighbourhood areas have been approved at referendum, the saved policies in the Lewes District Local Plan 2003, that are specifically applicable to these designated areas, will continue to form part of the development plan for the area. Policies PT9, PT10, PT11, PT18 and PT19 are specific to sites within the plan area, and will be replaced upon publication of the plan. Peacehaven is located adjacent to the South Downs National Park, therefore in accordance with the National Planning Policy Framework great weight should be given to the scope of enhancing landscape and the natural and built character of the area when identifying sites for potential allocation. Over-reliance on the A259 for connectivity to the wider area should also be considered when allocating sites for residential and employment uses to create a more sustainable neighbourhood.
- 7.3 The assessment of sites in Peacehaven and Telscombe found that Sites PTNP1, PTNP3 (47PT), PTNP4, PTNP5, 19PT, and 62PT are suitable and appropriate for allocation; Sites 39PT, 45PT and part of Site PTNP2 (Sites 20PT and 06PT) are potentially appropriate for allocation, subject to constraints such as access, flood risk, landscape and viability issues being addressed; and Site PTNP6 and the remainder of Site PTNP2 were found to not be appropriate for allocation.
- 7.4 The total number of homes from landowner and SHELAA estimates that can be delivered on those sites assessed to be suitable and appropriate for allocation is approximately 160 homes<sup>15</sup>, which falls short of the growth requirement of 255 homes. Approximately 174 homes<sup>16</sup> can be accommodated on sites found to be potentially appropriate for allocation. There is however potential to increase the number of homes through more intensive redevelopment of the Meridian Centre site in line with Local Plan design and town centre policies.
- 7.5 As the town centre is underutilised and could be intensified, PTNP1 (the Meridian Centre) is appropriate for allocation for town centre and residential uses. Allocation of the site in the Neighbourhood Plan could include policies to maximise the density of development in line with Local Plan Core Policy 2 to deliver a significant quantum of the housing growth for Peacehaven and Telscombe for the plan period while respecting the wider landscape sensitivity of the area. Development of part of PTNP2 should be considered in a sequential approach in line with the SHELAA and as a contingency site should the growth requirement for the plan area not be fully met when considering growth options.

## Next Steps

- 7.6 From the shortlist of suitable sites, the Town Councils should engage with LDC and the community to select sites for allocation in the NP which best meets the housing, commercial and community needs and objectives of the NP.
- 7.7 The site selection process should be based on the following:
- The findings of this site assessment;
  - Discussions with the planning authority;

<sup>15</sup> Approximate capacity total from the following sites: PTNP1, PTNP3 (47PT), PTNP4, 62PT, 19PT. Lewes District Council has confirmed that the 26 dwellings of 19PT were already counted as a commitment, as at 1st April 2015, and therefore cannot contribute towards the housing requirement of 255. As the site remains unbuilt, it is suitable for allocation consideration.

<sup>16</sup> Approximate capacity total from the following sites: Sites 39PT, 45PT and part of Site PTNP2 (Sites 20PT and 06PT).

- The extent to which the sites support the vision and objectives for the NP;
- How the number of homes required is proportionate and well-related to the existing settlement and infrastructure; and
- The potential for the sites to meet identified infrastructure needs of the community.

7.8 Discussions with the LDC should consider:

- Appropriate densities for masterplanning for town centre sites such as on PTNP1 (the Meridian Centre site);<sup>17</sup>
- Whether sites that have received planning or are awaiting decision (Sites 19PT and 62PT) since April 2015, when the housing growth of 255 additional units was set, can be counted towards the housing requirement.<sup>18</sup>

7.9 Apply to undertake the Locality and AECOM Masterplanning & Design Guidelines for the preferred sites.

## Viability

7.10 The Town Councils should be able to demonstrate that the sites are viable for development, i.e. that they are financially profitable for the developer. It is recommended that the Town Councils discuss site viability with LDC. It is suggested that any landowner or developer promoting a site for development should be contacted to request evidence of viability, e.g. a site financial viability appraisal.

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<sup>17</sup> Lewes District Council have indicated in correspondence to the Town Councils that there is scope for the Peacehaven & Telscombe Neighbourhood Plan to include evidenced policy regarding increased density on a potential Meridian Centre housing allocation. The policy should be informed by appropriate work, such as design, and have regard to Core Policy 2 and paragraph 7.28 of the Local Plan as a starting point for density requirements for policies in Neighbourhood Plans.

<sup>18</sup> Lewes District Council have indicated in correspondence to the Town Councils that Site 19PT was already counted as a commitment, as at 1st April 2015, and therefore cannot contribute towards the 255. Lewes District Council accept that unidentified large sites (6 or more dwellings) that have been delivered since 1st April 2015 can contribute towards the housing requirement of 255. This amounts to 40 dwellings, with a further potential 18 dwellings with planning permission, with an estimated shortfall of 79 dwellings when the sites found suitable in this report are accounted for.

# Appendix A Site Appraisal Pro Formas

# Appendix B Land North of Peacehaven



-  Site Boundary
  -  Infrastructure
  -  Phase 1 - 14.9ha  
(338 Dwellings @35DPH)
  -  Phase 2 - 3.1ha  
(70 Dwellings @35DPH)
  -  Phase 3 - 16.3ha  
(370 Dwellings @35DPH)
  -  Retained Tree Groups
  -  TPO Areas
- 778 Deliverable Dwellings

Development Area Plan

