

## APPENDIX 1

### **1. What does LDC believe are the timescales and process for Core Strategy finalisation and Neighbourhood Planning from now on in?**

The Core Strategy is due to be formally submitted to the Secretary of State in December this year. Hearing sessions for the Examination in Public would then be expected to commence in March 2014. We would anticipate the Core Strategy being adopted in Summer 2014 (the timings of adoption depend on how long the examination lasts). Timescales for progressing the neighbourhood plan are very much at the discretion of those who are progressing the plan (the Steering Group and Parish Council), although we are aware of the Project Plan that has been produced and is available to view on the Parish Council's website. Once the Parish Council has produced a finalised version of the plan and submitted it to us, we estimate that it should take around 6 months for it to come into force. This is as the District Council will have to undertake a statutory six week consultation on the plan, arrange and hold an examination on the plan, set up a referendum once the examination is completed and then formally adopt the document at a Council meeting. The 6 month period could be longer depending on how long the examination takes and whether the referendum is held at the same time as an election.

### **2. Once the Inspector makes his determination on the Core Strategy, how much time is there before LDC start implementation?**

The District Council and South Downs NPA will need to adopt and start implementing the plan as soon as possible after the Inspector has issued their final report. Adoption will be through full Council / full NPA meeting. If there is a delay in this adoption, the policies (as well as any modifications put forward by the Inspector) will still carry significant weight (probably as much as an adopted plan) as they will be at the most advanced stage in production and have been ruled 'sound' by an Inspector.

### **3. If immediate implementation and Newick's Neighbourhood Plan is only completed in draft form, waiting final numbers (and therefore not yet agreed by the Independent Examiner and Referendum), will LDC feel free to impose housing in Newick where it sees fit?**

There will be a reasonable period of time between the actual Core Strategy adoption and when allocations in Neighbourhood Plans, as well as the Council's own site allocations document, will need to be made. The Core Strategy allocates sites for housing in the early part of the plan period (e.g. North Street and Greenhill Way). Such sites will ensure that the District Council has a sufficient housing land supply (greater than 5 years) for a period of time once the Core Strategy has been adopted. Hence, the District Council should be in a position to resist speculative development that does not accord with the development plan and therefore maintain the plan-led approach to identifying and delivering new housing sites.

### **4. What happens if we complete the NP process (including referendum) before the Core Strategy is finalised, and the CS Inspector decides Newick should have more houses than the NP has allowed for? Will LDC decide where the extra houses should go (possibly making the NP exercise a waste of time) or will we be required and given time to draw up an addendum to our NP? Is this addendum then subject to Independent examination and a further referendum? Will LDC pay the extra costs involved?**

Firstly, it is the view of officers that an Inspector is more likely to retain the current housing delivery target for Newick if they can see that a Neighbourhood Plan has been significantly progressed and that it allocates the requisite number of houses on specific sites.

Should an Inspector decide to raise the housing delivery target for Newick (an outcome that we do not consider likely at this stage) and the Neighbourhood Plan has been adopted (or is at a significantly advanced stage that significant changes cannot be made) then the options available are;

- the District Council allocates the shortfall in provision (additional sites required) through the Site Allocations Development Plan Document it is currently preparing. Such an approach would involve a close working relationship with the Parish Council. In this scenario the Neighbourhood Plan would remain in place.
- the Neighbourhood Plan plans for 100 dwellings on allocated sites, but includes contingency/reserve allocations in the event that the Inspector increases the figure for planned housing growth at Newick.
- the full Neighbourhood Plan is reviewed in order to allocate the extra sites (unfortunately, the neighbourhood planning regulations do not allow for an addendum to be made to the plan, or for it to undergo a partial review, hence the need for a full review would be required). If this were to happen, Lewes DC would be statutorily required to cover the costs of the examination and referendum.
- delay the publication of the draft Neighbourhood Plan for consultation (under regulation 14) until the outcome of the Core Strategy examination is known.

Although it is for the Parish Council to decide which of the above options they would wish to pursue, the view of Lewes DC officers is that the first and second options are most feasible. We do not favour the third option due to the need to

do a full review of the plan so soon after the initial Neighbourhood Plan has been adopted. The reason for not favouring the final option is identified in the response to the question below.

**5. If LDC recognises the problems highlighted above and undertake not to impose housing on Newick until we have had an opportunity to finalise our NP once the numbers of allocated houses are known, are there any advantages of completing the NP process prematurely, bearing in mind that the Council is split on how many houses it should plan for?**

Early delivery of the Neighbourhood Plan will provide early planning certainty to all of those with an interest in Newick (this will be particularly the case in terms of knowing where and when development will take place). In addition, with the Lewes DC Community Infrastructure Levy (CIL) - Charging Schedule due to be adopted in Summer 2014 (and bearing in mind that town & parish councils will be eligible for a 25% cut of CIL receipts if they have a Neighbourhood Plan in place), early adoption of the plan should ensure that the Parish Council is able to take full advantage of CIL payments.

Delaying progress on the Neighbourhood Plan also runs the risk of the current high levels of public and stakeholder interest in the plan being lost, in addition to the general momentum that has been achieved in progressing the plan to date.

Despite the above, it is ultimately up to the Parish Council/Steering Group whether or not they would wish to delay production on the Neighbourhood Plan until after the outcome of the Core Strategy examination is known.

**6. What was the point of the consultation period for the "Joint Core Strategy" if we are subsequently told Newick must plan for a minimum of 100 houses before the Inspector has considered our arguments? In addition, what is the justification for this number when in para. 10.34 of LDC's own Sustainability Appraisal, it clearly shows Newick should only have 100 new homes during the life of the Plan (i.e. from 2010 to 2030) and 24 have already been accounted for?"**

In responding to the question it is important to recognise the issue of planning for new housing in the wider context. As with many other authorities in this region, Lewes District has a very high level of projected housing need over the next 20 years. It is recognised that the Core Strategy is not planning to meet the projected level of housing need (only approx. 225 dwellings per annum as opposed to approximately 450 dwellings per annum that will be required to meet the projected need). This is due to a lack of sufficient and suitable sites available to meet this housing need. Hence, where sustainable opportunities to deliver housing growth exist, every attempt needs to be made to plan for these. Failure to do this will result in the Core Strategy being declared 'unsound' as it will not plan positively for growth and be in accordance with the Government's National Planning Policy Framework (NPPF).

Against the context outlined in the previous paragraph, the District Council have not considered a figure of less than 100 additional planned houses to be a realistic figure to plan for. This is due to the relative sustainability merits of Newick. Those who have argued for a lower housing delivery target for Newick will still have their arguments heard by the Inspector for the Core Strategy. The District Council will be defending the housing targets. It is the view of officers that it is highly unlikely that the number will be reduced.

It is appreciated that development has occurred in Newick, as is true across the district, since the production of the Core Strategy has begun – which is why recent development is referenced in the Core Strategy. However, the Core Strategy identifies planned housing targets for settlements around the district. The sustainability appraisal assessed options for planned housing growth. The options considered for Newick are presented in para. 10.32. The options clearly state that it is for "a planned level of growth" – this is to say that it does not include windfall numbers in the assessment nor permissions and completions that have come forward since production of the Core Strategy commenced.