It is suggested that this document is read alongside the Emerging Core Strategy. The document can be found online:

http://www.lewes.gov.uk/Files/plan_Emerging_Core_Strategy_Final.pdf
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1. **Introduction**

1.1 Lewes District Council, in partnership with the South Downs National Park Authority, is preparing a Local Plan that will guide development and change in Lewes District over the period to 2030.

1.2 The Core Strategy will form ‘Part 1’ of the Local Plan and will set out a vision and a strategy for meeting development requirements across the whole district. A Site Allocations and Development Management Policies Development Plan Document (DPD) will form ‘Part 2’ of the Local Plan.

1.3 The Core Strategy, as the strategic level planning document for the district, is being produced in advance of the Site Allocations and Development Management Policies DPD, which will follow at a later stage of the process. The main stages in preparing the Core Strategy are identified in the table below, showing the stages where formal public consultation has been, or will be, undertaken in *italics*.

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<td>30 September – 2 December 2011</td>
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<td>Late Summer 2013</td>
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1.4 A report summarising the comments received is produced by the District Council after each stage of formal public consultation. A summary of the earlier public consultation undertaken on the ‘Issues and Emerging Options Topic Papers’ in 2010 can be read at:


1.5 This report presents a summary of the formal public consultation undertaken on the ‘Emerging Core Strategy’ document, and the accompanying Sustainability Appraisal, between 30th September and 2nd December 2011. **Section 2** of the report describes how people were notified and consulted on the Emerging Core Strategy. **Section 3** outlines the main points raised at the meetings held with, or hosted by, Town and Parish Councils. **Section 4** summarises the representations received and indicates how these have been used to inform the Proposed Submission Core Strategy document.
2. **Summary of the Consultation Process**

**Notification of Consultation**

2.1 On 27\textsuperscript{th} July a letter was sent to all Town and Parish Councils/Meetings notifying them that consultation on the Emerging Core Strategy was likely to commence in late September, subject to approval by both Lewes District Council’s Cabinet and the Planning Committee of the South Downs National Park Authority.

2.2 On 19\textsuperscript{th} September, after the document was approved for public consultation, an email alert was sent to every consultee on our LDF database who had provided an email address (approximately 270 individuals and organisations). This explained that the consultation would officially begin on 30\textsuperscript{th} September, but that the Emerging Core Strategy, the Sustainability Appraisal and other background documents could already be found online.

2.3 On 28\textsuperscript{th} September letters and emails were sent to every consultee we had on the LDF database (approximately 500 individuals and organisations) to notify them that consultation on the Emerging Core Strategy and Sustainability Appraisal would commence on 30\textsuperscript{th} September and last until 12\textsuperscript{th} November. These explained where the documents could be found and how people could submit comments. At the same time, the District Council’s website displayed front page information about the consultation.

2.4 Letters and emails were sent to all consultees on 7\textsuperscript{th} November notifying them of the decision to extend the consultation until 2\textsuperscript{nd} December. The front page of the website also clearly stated that the consultation deadline had been changed.

2.5 Copies of these letters and emails can be found in the [Appendix](#).

**Availability of the Emerging Core Strategy**

2.6 The Emerging Core Strategy was published on the Council’s website at [www.lewes.gov.uk/corestrategy](http://www.lewes.gov.uk/corestrategy) and hard copies of the document were placed in the Council’s Planning Offices in Lewes and the South Downs National Park Authority’s offices in Midhurst.

2.7 As well as making the document available electronically, hard copies of the document were placed in district’s libraries at Lewes, Newhaven, Peacehaven, Ringmer and Seaford and in libraries outside of the district at Burgess Hill, Haywards Heath, Saltdean and Uckfield. Copies of the document were also placed in the mobile libraries that cover the district.

**Meetings with Town/Parish Councils**

2.8 The letter sent to Town/Parish Councils on the 27\textsuperscript{th} July (see paragraph 2.1) indicated that District Council and, where appropriate, National Park officers were available to attend meetings held by Town and Parish Councils to discuss the Emerging Core Strategy if invited to do so.
As a result of this letter, a number of Town/Parish Councils invited us to attend one or more meetings. Details of these meetings can be found in section 3 of this report.

Publicity

Summary leaflets and posters provided information about the document and how people could submit their views. These were distributed to Town and Parish Councils alongside the letter referred to in paragraph 2.3 for advertising within their respective areas. Leaflets and posters were also placed in the libraries alongside hard copies of the Emerging Core Strategy document. In addition planning officers handed out the leaflet at Lewes Railway Station, at Sainsbury’s Supermarket, Newhaven, and at the Meridian Centre, Peacehaven.

Within District Link, the Council’s quarterly publication produced for every household in Lewes District, the centre pages were devoted to the Emerging Core Strategy and provided a summary of the document. It also explained where the document could be found and how people could submit comments upon it.

Press releases were produced, resulting in two articles in the Sussex Express, a weekly newspaper that covers the whole district, on 28th October and 11th November. The latter article notified people of the extension to the consultation period.

Use of Social Media

The Council’s Facebook and Twitter accounts were used to advertise the consultation. Weekly tweets and updates to the facebook status included links to the location of copies of the Emerging Core Strategy document and methods of submitting comments.

Representations Received

Representations on the Emerging Core Strategy were received from over 800 individuals and organisations.

While most of these were submitted via email or letter, 68¹ were submitted via an online survey set up specifically for the consultation process, which allowed people to make representations on the key policy areas of the Emerging Core Strategy without having to read the document or its supporting information.

Some people responded through both the on-line survey and emails/letters, while others submitted more than one written response and as a result the number of different representations approached 900.

¹ There were actually 163 submitted surveys but the majority filled in only their contact details and did not respond to any questions. Furthermore, some people posted fake details (for example, submissions were received from ‘Your Name’, ‘kajiskaJSLia’ and ‘dsdasdas’), whilst some completed surveys more than once. As a result only 68 of the surveys were taken into account.
3. Meetings with Town and Parish Councils

3.1 Prior to the start of the Emerging Core Strategy consultation, the District Council asked Town and Parish Councils if they would like officers to attend meetings with them to discuss the Emerging Core Strategy. Meetings were subsequently held with Burgess Hill, Haywards Heath, Lewes, Newhaven, Peacehaven, and Seaford Town Councils and Chailey, Ditchling, Firle, Newick, Plumpton and Ringmer Parish Councils.

3.2 The following part of the report outlines the main topics discussed at the meetings and the issues raised by the Town/Parish Councillors and members of the public who attended.

Plumpton Parish Council – 19 September, Plumpton Village Hall

3.3 A summary of the Emerging Core Strategy was provided as was an explanation of how the consultation responses have influenced the document. A run through of the work done up to the publication of the document was given, after which a discussion on certain issues followed in further detail.

Main issues raised
- The Parish Council made the District Council aware of their plans for the delivery of affordable housing in the village (as identified in their Village Action Plan) and it was discussed how this ties in with the housing figures being consulted upon for the village.
- The contribution that places such as Plumpton and Plumpton Green make to employment figures/policies in the Core Strategy.
- The Council needs to maintain a preference for new development to be on brownfield land, preferably indicating what proportion of new development is expected to be delivered on such sites.
- There were queries raised on how the figure for housing commitments has been established, as well as where the classifications used in the settlement hierarchy had come from.
- The definition of ‘affordable’ housing needs to be made clear and clarification was sought on what is termed as ‘green infrastructure’.
- Concern that developers could use the SHLAA to bring forward development that is shown as green or orange.
- Queries were raised on the issue of when the non-strategic sites will be allocated, the role of neighbourhood plans and how the Community Infrastructure Levy will operate.
- A number of questions were raised on the consultation process and how the documents can be viewed.
- They stated that they found the document very clear and easy to read.

Newhaven Town Council (Planning Committee meeting) – 20 September, Meeching Hall.

3.4 An introduction was given which touched upon the Core Strategy and its importance in the Local Development Framework. The introduction also outlined the background work completed to feed into the Emerging Core Strategy and how the previous consultation responses have translated into the current version of the CS.
Main issues raised

- Conversions and subdivisions of properties need to be counted as part of the housing target.
- Agree that options need to be considered for Eastside as nothing has happened since allocation in 1981, “something needs to happen there”. Pleased to see alternatives being explored – but wonder if the current application is appropriate.
- Suggested that in some circumstances a target percentage range, rather than a set target for affordable housing is employed to ensure that developers do not stop at the lowest target when they are able to deliver more.
- Support the aim to increase footfall in the town centre but in reality, it is thought that, encouraging alternative uses will not create the desired outcome and the town centre will become dead, like Bridge Street, where there has been recent residential development.
- Concerns were also expressed with regards to moving the town centre as many people, especially the elderly population of Newhaven, rely on being able to walk to the shops within the town centre. If this option is taken forward some forward thinking is needed on how transport links can be improved to ensure accessibility to shops and services isn’t lost to those on the west side of Newhaven.
- Would like to see a lower target percentage for social housing for Newhaven and instead improve the amount and quality of open market housing.
- There’s a worry that a large increase in new housing/subdivisions would further exacerbate the problem at Newhaven of parking.

Seaford Town Council (Planning Committee Meeting) – 22 September, 37 Church Street

3.5 Officers provided a basic introduction to the Emerging Core Strategy, touching upon the evidence base, background studies and pointing out misconceptions about what the Core Strategy will include/do.

Main issues raised

- Questioned the term ‘affordable housing’ – stating that what is affordable to one, is not for another and asked could the term social housing be used instead.
- Comments were made that indicated an interest in producing a Neighbourhood plan for Seaford.
- Members of the Planning Committee were worried about the SHLAA. It was explained to them that there were no sites identified that could accommodate 100 dwellings in Seaford and thus there were no strategic sites in the Emerging Core Strategy located in Seaford. They were made clear that allocations in Seaford would follow after adoption of the Core Strategy.
- The Town Council had concerns that their response to the Issues and Emerging Options Topic Papers consultation had not been taken into account when working on the Emerging Core Strategy – this was especially with regards to the vision and the characteristics of Seaford. The following day, the Council were sent an email notifying them of the whereabouts of the consultation summary document for the Issues and Emerging Options Topic Papers where they could see how the Emerging Core Strategy had reflected comments received at the previous stage.
Peacehaven Town Council – 29 September, Peacehaven Town Council Offices, Meridian Centre

3.6 A special meeting to discuss the emerging Core Strategy was attended by Town Councillors. An introduction to the document was given, covering the evidence base and relationship with other documents.

**Main issues raised**

- The A259 was a concern. Councillors considered that the road in its current condition is unable to accommodate any more traffic and thus, in their view, development of potential strategic sites/broad locations for growth would not be acceptable. It was explained that LDC had to accept the view of ESCC, detailed in their Transport Position Statement, as they are the transport authority.
- The findings of the transport study and views of ESCC were questioned.
- The availability of the Valley Road area for development was questioned by some. It was made clear that all maps in the Emerging Core Strategy were indicative and that the site was included due to the outcomes of the SHLAA.
- There were concerns that the town was unable to meet the future needs for both education and health provision even without additional development.
- There were concerns that increased congestion on the A259 would impact on the ability of the emergency services to travel to accidents/hospitals during peak times.
- Enquiries were made on the cost of preparing a neighbourhood plan.

Chailey Parish Council – 4 October, Reading Room, Chailey Green

3.7 Planning officers attended a regular meeting of the Planning & Environments Committee. An introduction to the LDF and Core Strategy was provided, including the background work completed to feed into the Emerging Core Strategy and how the previous consultation responses have translated into the Emerging Core Strategy and implications for Chailey parish.

**Main issues raised**

- Queries were raised and an explanation was provided on how the proposed housing figures for Chailey had been derived.
- The view was that South Chailey is more sustainable than North Chailey.
- Questions were raised on the policy stance on the brickworks site and farm diversification.
- It was felt that housing delivered on windfall sites should be taken into account in setting the housing target.
- It was felt that the Core Strategy should address the continued loss of small dwellings due to extensions and larger replacement dwellings.
- Concern that the northern half of the District is being allocated more housing due to the designation of the South Downs National Park.
- Improved broadband in the rural areas was seen as essential.
- Concern about retrospective planning applications always being granted permission.

Plumpton Parish Council Public Meeting – 5 October, Plumpton Village Hall
3.8 Arranged by the Parish Council, this special meeting was attended by approximately 250 members of public. A presentation was provided to explain what the Core Strategy is, the status of the Emerging Core Strategy and the issues of relevance to Plumpton. Attendees were then invited to ask questions of the Parish Council and District Council and provide views on some of the policy options being considered.

Main issues raised

- Could the eventual figure for the amount of housing to be delivered at Plumpton include the 42 affordable homes identified by the Parish Council in their Housing Needs Survey?
- The term ‘affordable housing’ needs to be made clear and it should include starter homes for local people.
- In deciding how much housing development goes to Plumpton Green there is a need to take into consideration the impact on the local highways, particularly the problematic junctions at either end of the village, and the existing parking problems.
- The views of the Parish Council on the consultation document were sought. The Parish Council explained how they will reflect the views of the village in their response.
- How can LDC be confident that whatever figure for new housing is eventually given to Plumpton can be delivered on suitable sites?
- It was queried why some settlements in the District have little, or no development proposed for them (i.e. Ditchling).
- More housing will require more policing, sewerage, water, electricity, etc.
- What will be the timescales for the development, will it be in line with the SHLAA?
- Number of children attending the Primary School is dropping and therefore further development is needed to sustain such services in the villages.
- There was no obvious consensus over what level of housing should be planned for in Plumpton Green. Some attendees, who spoke, were opposed to any increase in the amount of housing in the village, others would welcome some (although towards the lower end of the range that the Emerging Core Strategy was consulting upon) and some felt a higher amount is appropriate providing that it can be proven that the infrastructure required to service this amount of additional housing would be forthcoming.

Ditchling Parish Council – 11 October, Old Meeting House, Ditchling

3.9 This was a meeting of the Parish Council’s Planning Committee, which was open to members of the public to attend. An introduction to the LDF and the Emerging Core Strategy provided, including the background work completed to feed into the CS and how the previous consultation responses have translated into the Emerging Core Strategy and particular policy areas included of relevance to Ditchling parish area.

Main issues raised

- Further clarification on the proposed affordable housing policy was sought (i.e. thresholds), and also whether the Core Strategy will be supportive of the provision of more visitor accommodation.
• Ditchling PC is particularly concerned about traffic getting worse through the village, especially from developments in Mid Sussex. In this regard, it was queried whether the removal of the South East Plan would remove these development pressures.

• Will the design policy be changing much? Ditchling PC doesn’t want modern buildings which they consider out of keeping but are currently getting approved against their wishes under existing policy.

• Permission has been granted for an extension to Ditchling museum but bus parking needs to be planned for it.

• Ditchling is very congested, not just at rush hours but also at weekends. Roads need to be closed (Ditchling Beacon and the Clayton Road) and traffic sent through West Sussex Stonepound crossroads instead. Cheap and easy to do – just notices and sandbags needed (this was the view of a member of the public in attendance).

• The PC expressed support for policy to improve public transport for villages like other National Parks have done which would benefit both tourists and local residents.

• The PC consider transport to be Ditchling’s biggest issue.

• Shouldn’t the district’s housing target be lower as a result of the National Park as otherwise areas around the periphery have to take too much development?

• Affordable housing should be required on a 50/50 basis.

• Ditchling generally has only small developments of maybe 2 or 3 units and such developments still wouldn’t be caught for affordable housing with the threshold only lowered to 5.

Ringmer Parish Council – 13 October at Ringmer Village Hall

3.10 Approximately 100 members of the public were present for a presentation on the consultation document and a subsequent discussion, particularly focussing on the policy options of relevance to Ringmer.

Main issues raised

• Core Strategy is a developer led plan relying on the SHLAA to identify sites and this is not considered to be a fair approach.

• The view of many was that the character of Ringmer will change beyond recognition if the larger number of houses, identified in the Emerging Core Strategy, are built. Additional concerns were raised on infrastructure provision, particularly highways and healthcare.

• A new site for a primary school will be required if any more housing is built in the village.

• Additional impact on earwig corner junction – if not improved will this prevent development occurring?

• It was considered by some that the lower housing number could be incorporated into village.

• A number of queries were raised on the Ringmer Neighbourhood Plan process. Concern was expressed that the Core Strategy may undermine the delivery of this plan.
The issue was raised of developers selling on land once planning permission has been granted therefore not getting the standard and type of development local people would like to see.

**Newick Parish Council – 17 October at Newick Village Hall**

3.11 Approximately 150 members of the public were present for a presentation on the consultation document and a subsequent discussion, particularly focusing on the policy options of relevance to Newick. The discussion revolved largely around the SHLAA and the options for housing growth.

**Main issues raised**
- Suitability of Cooksbridge to accommodate development instead of Newick
- Lack of smaller homes for the young and elderly - planning policy should control this.
- Need for employment sites in the village
- Newick has already accommodated significant development.
- Concerns about whether the infrastructure will cope, specifically nursery provision, the village primary school and water, sewerage and electricity.
- Local need for allotments cannot been met, with continued difficulties in finding a site
- Interest was shown by some people for making a neighbourhood plan.
- Concern was raised about the SHLAA with a general misunderstanding that it allocates sites for development.
- Difficulty in identifying any benefits to Newick if the Core Strategy allows more housing in the village.

**Lewes Town Council – 18 October at Lewes Town Hall**

3.12 The meeting was held with the Town Council’s Planning Committee and it was open for members of the public to attend. A brief introduction was provided on what the Core Strategy is, how it is prepared, how the Town Council can get involved and some of the key elements of the current consultation that are of relevance to Lewes town.

**Main issues raised**
- There was concern about raising the affordable housing percentage requirement as a number of developments in the town have failed to meet the current Local Plan requirement of 25%. Whatever percentage requirement is chosen, it needs to be enforced.
- A general discussion was had on the provision of affordable housing, which included; whether LDC should plan to deliver Council housing; what proportion of affordable houses that should have been delivered actually have been over recent years; could the Old Malling Farm site include the provision of affordable housing, and; the Core Strategy needs to contain further information on the definition of affordable housing.
- It was queried why the Core Strategy needs to plan for further industrial floorspace in Lewes town when a number of recently built large retail units (Aldi, Carpet Right, etc) at Brooks Road have resulted in the loss of industrial units.
• There is a need to consider North Street in the wider context of the town, particularly if it is to include retail units (consideration will need to be given as to what impact such units could have on the existing shopping areas).
• The North Street site should be considered alongside the Waitrose site and improvements to the connectivity of the two areas need to be sought.
• A discussion was had on neighbourhood planning, which included what funding was available to help support Town and Parish Councils who wish to prepare a neighbourhood plan for their area.

Firle Parish Council – 1 November at The Ram PH

3.13  The meeting was held with the full Parish Council and it was open for members of the public to attend. A brief introduction was provided on what the Core Strategy is, how it is prepared, the role of the South Downs NPA and some of the key elements of the current consultation that are of relevance to Firle.

Main issues raised
• Clarity was sought over the role of the National Park Authority – would they produce their own park-wide plan and could they decide on a different policy approach to what the Lewes District Core Strategy eventually sets out?
• There was interest in delivering an exceptions site for a limited amount of affordable homes for local people.
• The Parish Council expressed concerns over the A27 to the east of Lewes and queried whether there was a need to make improvements to it in order to accommodate the planned growth in the District.
• Support for small-scale and decentralised renewable and low carbon energy.

Peacehaven Town Council – 1 November 2011 at Peacehaven Town Council Offices

3.14  A special meeting of the Town Council was held to discuss the conclusions of East Sussex County Council (ESCC), as the local transport authority, on the Peacehaven options for strategic housing allocations/broad locations for growth in the Emerging Core Strategy. The meeting was attended by officers from ESCC, as well as the District Council.

3.15  The Town Council was concerned about the sentence in the Emerging Core Strategy which states “Based on the transport evidence that has been collected and the opinion of the Highway Authority (East Sussex County Council), the Lower Hoddern Farm option could be accommodated by the local transport network”.

3.16  ESCC had previously circulated a paper, ‘Traffic Associated with New Housing in Peacehaven’, which set out the assumptions and methodology behind the transport authority’s conclusion that the capacity of the local network transport was sufficient to accommodate up to 652 new dwellings in Peacehaven. A run through of the paper was provided at the meeting.

3.17  Councillors were not in agreement with the content of this paper. In their opinion, the A259 between Newhaven and Brighton suffers from severe congestion particularly at peak times. It is the main route for people from
Eastbourne, Seaford, Newhaven and Peacehaven to commute to work in Brighton & Hove and it is their view that this road cannot take much more traffic.

3.18 Councillors also feel that the condition of many of the roads within Peacehaven are in such a bad condition that they cannot, without major refurbishment and re-surfacing, take any more traffic from the existing houses let alone additional housing.

3.19 Councillors did not consider that the high quality sustainable transport corridor described in the Emerging Core Strategy ‘vision’ for Peacehaven was achievable, because ESCC has no proposals for Phase 2 of the A259 bus corridor between Telscombe Cliffs and Newhaven. They felt that it was impossible to create a new bus lane without the loss of on-street parking, which would destroy the shops and businesses along the A259. If buses were travelling at the same speed as the rest of the traffic, how will residents be persuaded to use public transport instead of private cars?

3.20 Councillors felt that any housing proposals in Peacehaven should be matched by new employment opportunities in the town in order to reduce the need to commute to work along the A259.

Ditchling Parish Council Public Meeting – 7 November, Ditchling Village Hall

3.21 The meeting was attended by about 65 members of the public. A presentation was provided discussing what the Core Strategy is, the status of the Emerging Core Strategy and the issues of relevance to Ditchling. Attendees were then invited to ask questions of the Parish Council, District Council and National Park Authority (NPA) and provide views on some of the policy options being considered.

**Main issues raised**

- How will the well documented parking problems in Ditchling be addressed by the National Park?
- Traffic is also a problem on Spatham Lane. Speed limits need to be lowered and roads need to be better maintained.
- Development proposed in Burgess Hill and Haywards Heath is likely to have the most significant impact on traffic in Ditchling. Attendees were made aware of the Mid Sussex District Plan that is currently out for consultation.
- Closing of the Beacon Road could rectify many of the traffic problems.
- East Sussex County Council are due to meet with the South Downs NPA to discuss ‘honeypot’ areas and the problems that traffic create.
- There is a need for housing for the elderly (i.e. smaller purpose built properties) and the Core Strategy should recognise this.
- Heavy traffic through the village is impacting upon the structural integrity of some of the buildings.
- What does the NPA consider ‘enhancement’ means and how will this be achieved in the National Park?
- A glossary of key terms such as ‘sustainable’ and ‘delivery’ needs to be prepared.
- Concern by some that the NPA are being slow to determine how they will go about fulfilling the National Park purposes.
• Concern was expressed over a recent refused application being overturned by the Planning Inspectorate at appeal and a flint wall being demolished that should not have been. This led to a discussion on the NPAs role in the consideration of planning applications.

• It was queried how the proposed affordable housing policy had been arrived at. There was some concern that the policy may discourage developers from building in Lewes District.

• The prospect of preparing a neighbourhood plan was raised by the Parish Council. Some attendees queried whether the Ditchling community would be able to have a say on this plan.

Meeting with Burgess Hill Town Council and Haywards Heath Town Council – 8 November, Burgess Hill Town Council offices

3.22 The meeting was held with representatives of the two Town Councils but was not open to the public. Attending from Burgess Hill Town Council were David Carden (Clerk), Cllr Andrew Barrett-Miles, Cllr Dennis Jones and Cllr Ian Simpson. Steven Trice (Clerk) and Cllr Tim Farmer were the representatives from Haywards Heath Town Council. A brief introduction was provided that included explaining how we had arrived at the Emerging Core Strategy, the plan for taking the document forward to adoption (including any further evidence work to be undertaken) and some further detail relating to the two options for broad locations for housing at Burgess Hill and Haywards Heath (both within Wivelsfield Parish).

Questions/comments
• Concern expressed by both Town Councils that should either of the two (or both) housing options at Burgess Hill and Haywards Heath be taken forward the infrastructure requirements will be in the towns and not within Lewes District.

• Due to the above, both Town Councils consider that it is essential that any s.106 or CIL monies associated with these proposals (should they come forward) is spent in the respective towns. The way the s.106 money from the Theobalds development was spent is considered to have set an unwelcome precedent by Burgess Hill Town Council.

• Haywards Heath Town Council are of the opinion that should the Greenhill Way option come forward then it should make a financial contribution to the cost of the Haywards Heath Relief Road.

• Both options could lead to coalescence of the two settlements, particularly the Valebridge Road option.

• A number of queries and questions were raised on the District Councils overall approach to its housing target and strategy for distribution (particularly in relation to employment development).

• Both Town Councils stated that they will be preparing their own Neighbourhood Plan.
4. Summary of Representations on Emerging Core Strategy

4.1 The tables below summarise the representations made on particular sections of the Emerging Core Strategy or its background documents, and indicate how the comments received have influenced the Proposed Submission Core Strategy.

Comments on Section 1 (Introduction)

Topic Area: Comments on the Introduction to the Emerging Core Strategy

<table>
<thead>
<tr>
<th>Number of respondents</th>
<th>8</th>
</tr>
</thead>
<tbody>
<tr>
<td>Summary of the comments received</td>
<td></td>
</tr>
<tr>
<td>Very few consultees made detailed representations on the Introduction. Some suggested that documents which could influence the production of the Core Strategy should be referenced in this section, including:</td>
<td></td>
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<tr>
<td>• The Emerging River Ouse to Seaford Head Coastal Management Plan.</td>
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<tr>
<td>• The East Sussex and Brighton &amp; Hove Waste and Minerals Local Plan and its forthcoming replacements.</td>
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<tr>
<td>• The Water Resources Management Plan produced by South East Water.</td>
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<tr>
<td>East Sussex County Council suggested that mention should be made the current provision of libraries and future plans for expansion. Newhaven Port and Properties felt that the introduction should refer to Newhaven Port Authority as a partner in the production of the Core Strategy, alongside Lewes District Council and the South Downs National Park Authority.</td>
<td></td>
</tr>
<tr>
<td>How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy.</td>
<td></td>
</tr>
<tr>
<td>The Sustainability Appraisal identifies a comprehensive list of documents that have influenced the Core Strategy, including all those suggested by respondents. Library provision and future investment plans are addressed in the Infrastructure Position Statement, published in association with the Emerging Core Strategy. It is acknowledged that Newhaven Port Authority is a key stakeholder in the future planning of the district, but it is not the local planning authority and is therefore unable to have the same partnership role as the District Council and the National Park Authority in terms of the producing the local development plan for the area. Accordingly, no changes have been made to the Core Strategy in response to the comments submitted.</td>
<td></td>
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</tbody>
</table>

Topic Area: Publicity and Consultation on the Emerging Core Strategy

<table>
<thead>
<tr>
<th>Number of respondents</th>
<th>29</th>
</tr>
</thead>
<tbody>
<tr>
<td>Summary of the comments received</td>
<td></td>
</tr>
<tr>
<td>The majority of comments were negative, with many respondents feeling that publicity was deliberately kept to a minimum and that the level of consultation was unacceptable. Others felt that residents living adjacent to potential strategic development sites/Gypsy and Traveller sites should have been directly consulted, and/or that the timescale for submitting responses was too short. A typical quote is:</td>
<td></td>
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<tr>
<td>“We are concerned that the Council has not written directly to the residents whose properties will be affected by any development of this site. The only notification we have received was yesterday when we read our copy of the LDC newsletter ‘district link’ and...”</td>
<td></td>
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</tbody>
</table>
Some respondents considered that the Council has not taken into account views from consultation events undertaken in 2010, and one thought that the questionnaire was difficult to answer. Mid-Sussex District Council considered that, in light of the new ‘duty to cooperate’, we should have consulted with them and respective town councils on the two potential strategic development sites located adjacent to its boundary before commencing public consultation on the Emerging Core Strategy.

How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy.

The public consultation on the Emerging Core Strategy was undertaken wholly in accordance with the Council’s Statement of Community Involvement, which itself was widely consulted upon prior to adoption. It is not considered reasonable, nor is it a requirement, to write directly to all those individuals whose properties may be affected by potential development options. In terms of the concerns expressed by Mid Sussex District Council (MSDC), LDC officers met with MSDC officers on a number of occasions prior to the publication of the Emerging Core Strategy to discuss the development options under consideration. Nevertheless, the Council will review the consultation on the Emerging Core Strategy to see if the process can be improved in an effective and cost efficient way.

Topic Area: Content and Design of the Emerging Core Strategy

| Number of respondents | 23 |

Summary of the comments received

There was generally positive feedback on the content and design of the document, with most respondents considering the topics appropriate and the presentation both clear and informative. One respondent felt that the document featured too much jargon and over-used the word ‘sustainable’ without giving a clear definition of the term. Another suggested that a better definition of infrastructure should be provided in the glossary. Several respondents suggested that the document was overly focused on the needs of future residents rather than existing residents.

East Sussex County Council felt that definitions were required for the terms ‘Community Infrastructure Levy (CIL)’, ‘Charging Schedule’, ‘Infrastructure Delivery Plan’, ‘Section 106 Planning Obligations’ and ‘Developer Contributions’. The National Farmers Union and others considered that more prominence should be given to food production and farming, whilst another suggested that transport and highways issues should feature more prominently. One respondent said that whilst they were pleased that mention was made to the importance of the National Park’s purposes, “it would be helpful to have a reference to the Sandford Principle whereby, in National Parks, if irreconcilable conflicts exist between conservation and public enjoyment, then conservation interest should take priority.”

One Lewes District Councillor considered that we should only plan for the area outside the South Downs National Park, citing other authorities who have adopted such an approach. Another Lewes District Councillor felt that the document bore little resemblance to the Issues and Emerging Options Topic Papers of 2010.

How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy.

It is acknowledged that the Core Strategy would benefit from clear definitions of the
planning terms used in the text of the Core Strategy and this has been addressed in the
glossary where necessary. The text of the Core Strategy has also been amended in
recognition of the importance of farming to both the economy of the district and its valued
landscapes, and to make reference to the importance of the ‘Sandford Principle’ in
determining planning applications within the South Downs National Park. However,
transport is considered to be adequately addressed in policy terms and East Sussex
County Council, the local transport authority, supports the approach taken in the
Emerging Core Strategy.

The geographical area covered by the Core Strategy in the district has been approved by
the District Council and the National Park Authority and also accords with the
‘duty to co-operate’ and need to plan strategically across local boundaries, as advocated
in the National Planning Policy Framework. It is therefore considered unreasonable to
exclude the National Park from the plan area and no amendment has been made in this
respect.

Similarly, the argument that the Emerging Core Strategy is unrelated to the ‘Issues and
Emerging Options Topic Papers’ is not accepted. The Emerging Core Strategy has
clearly evolved from the Topic Papers and the comments received upon them (cf. the
Summary of Consultation on the Issues and Emerging Options Topic Papers). Whilst it is
acknowledged that the Topic Papers identified only two strategic site options (North
Street, Lewes and Eastside, Newhaven), a number of broad location options for
distributing housing growth were also identified, many of which are consistent with the
broad location options set out in the Emerging Core Strategy.

**Topic Area: Evidence Base/Background Documents to the Core Strategy**

<table>
<thead>
<tr>
<th>General Comments on the Evidence Base</th>
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<tbody>
<tr>
<td><strong>Number of respondents</strong></td>
</tr>
<tr>
<td><strong>Summary of the comments received</strong></td>
</tr>
</tbody>
</table>
| The Environment Agency pointed out the need to take into account PPG25’s requirement
  for undertaking the sequential test on potential development sites. Another respondent
  believed that the Strategic Flood Risk Assessment had not been correctly taken into
  account when considering the amount of development to be distributed in Plumpton
  Green. |
| Sport England expressed concern over the lack of an up-to-date PPG17 assessment to
  provide a robust and credible evidence base for the provision of open space and
  recreation. |
| Another respondent commented on what they considered to be flaws in the whole range
  of background documents produced, including the SHLAA, Local Housing Needs
  Assessment and Transport Study, and thus indirectly questioning the robustness of the
  Emerging Core Strategy. These comments are addressed below under the respective
  section for each individual document. |

| **How these comments have influenced the Proposed Submission Document and
  further information relating to this part of the Core Strategy.** |
|---------------------------------------------------------------|
| The need to undertake the sequential test on potential development sites is
  acknowledged and will be done prior to the formal submission of the Core Strategy. It
  should be noted that the Environment Agency, East Sussex County Council (the local
  flood authority) and the District Council’s Environmental Health Team (who deal with land
  contamination and flooding) support these views. |

17
drainage issues within the district) have been consulted on all the sites assessed in the SHLAA and/or the Emerging Core Strategy. None of these bodies have submitted an objection on flood risk grounds.

The need to carry out an assessment of recreational open space to inform planning policies is also recognised. As a part of the evidence base for the Core Strategy, the Council commissioned two separate assessments of recreational and other open space within the district, as detailed in the Infrastructure Position Statement. It is acknowledged that both assessments were produced some time ago, but it is considered unlikely that there have been significant changes in the level of provision sufficient to negate their value for plan making purposes. Nevertheless, the Council is examining the possibility of undertaking a review of these studies in order to inform the detailed development management policies in the Site Allocations & Development Management Policies DPD.

General Comments on the Strategic Housing Land Availability Assessment (SHLAA)

<table>
<thead>
<tr>
<th>Number of respondents</th>
<th>100</th>
</tr>
</thead>
<tbody>
<tr>
<td>Summary of the comments received</td>
<td></td>
</tr>
<tr>
<td>Many representations commented on the SHLAA sites that were not specifically identified in the Emerging Core Strategy. Most comments disagreed with the SHLAA conclusions, highlighting issues including surface water flooding, traffic congestion and road safety, loss of countryside/ views, overdevelopment, impact on the National Park, and access to local services.</td>
<td></td>
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<tr>
<td>Comments related to specific sites/ parishes are identified below:</td>
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**Plumpton Green**
- The development of 04PL (East of Station Road, rear of The Rectory) would result in a shortfall of burial ground in Plumpton Green in the next 20 years.
- Section 106 agreement on 08PL land should be maintained as agreed. Development of this land would result in the loss of views of existing residents and roads in village will become more dangerous.
- Potential increased flooding from development of 05PL land.
- Plumpton’s exception sites have not been considered as part of SHLAA.
- Sites 04PL and 05PL together would provide Plumpton Green with an appropriate scale of development.
- 05PL should be identified as amber, rather than green, due to access issues. Also note that other comments state sites currently with constraints identified as green (deliverable) should be amber (Developable).

**Ringmer**
- 24RG should be reassessed in light of the broad location identified in Emerging Core Strategy.

**Newick**
- Objection to 11NW, eastern edge of the village, due to its location adjacent to the Conservation Area and potential increased pressure for further development along Goldbridge Lane.

**Chailey**
- Development in the Lower Station Road area will impact on the area’s unique ‘unspoilt’ feel and the countryside ‘gap’ and result in ribbon development. Area is not within easy access of services or facilities. Increased traffic movement resulting from development will cause further congestion along the A272.
Seaford

- Chyngton Way site should not be developed due to its role as an entrance and gateway to the National Park, its status as a site of archaeological interest, current use as agricultural land, green space and area of transition between the town and countryside.
- Objection to any development off Bishopstone Road.

General comments state that the majority of sites identified through the SHLAA are greenfield and edge of town/village locations, which also tend to be outside of planning boundaries. It is suggested that the SHLAA is more proactive in seeking willing and available brownfield sites to assess. Further comments suggest that sites should only be found suitable if development does not adversely impact on community’s views of countryside and general happiness.

Some respondents suggested further sites to be assessed in the SHLAA and these will be picked up in the next SHLAA update in April 2012.

How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy.

Comments submitted are responded to in turn below. General objections to sites are acknowledged. Where specific concerns were raised, not already covered by the SHLAA Assessment methodology, responses are provided below.

Plumpton
This cemetery is not one that is run by LDC. Advice from the legal team states that section 106 agreements for keeping land undeveloped should not impede a site’s assessment. Therefore it will be a consideration at the site allocations stage.

General concerns such as local flooding and access have been fed into the SHLAA to ensure that the issues are considered in the site’s assessment of suitability. Clarification of issues with service providers has changed some conclusions.

Ringmer
SHLAA site 24RG’s conclusion remains unchanged, initial concerns of illogical extension of village and impact on landscape remain.

Newick, Chailey and Seaford comments – all issues already covered by SHLAA assessment of sites.

Available land within settlements, particularly in rural settlements, that meets SHLAA criteria is limited. Also, there are only a limited number of available brownfield sites within urban areas, which means land adjacent to planning boundaries has to be considered in order to meet housing requirement. Continue rolling call for sites and including known vacant/ potentially available sites to ensure that potential sites are identified and assessed in SHLAA.

Impact of development on the landscape is considered as part of a site’s suitability, supported by the Landscape Capacity Study.

Comments on Landscape Capacity Study (LCS)

| Number of respondents | 10 |

Summary of the comments received

Representations on the LCS tended to disagree with either the observations or the
conclusions on specific landscape character areas, specifically in Plumpton and Ringmer Parishes. East Sussex County Council supported the methodology of the LCS, along with how the conclusions were reflected in the policy options put forward in the Emerging Core Strategy. However, they did suggest some inconsistencies between the main text of the report and the appendices.

How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy.

Several sources of guidance and existing landscape assessments were used as background information in the landscape assessment and appraisal. Guidance in the landscape character assessment methodology, including judging sensitivity, was primarily sourced from *Landscape Character Assessment Guidance for England and Scotland* and further supported by the East Sussex County Landscape Architect.

However, it is acknowledged that the LCS needs to clarify references to fields on the south east edge of Plumpton Green and the text has been amended accordingly. Changes have also been made to remove the inconsistencies between the main text and the appendices. However, no other amendments have been made to the document in the light of the representations received.

<table>
<thead>
<tr>
<th>Comments on the Rural Settlement Study (RSS)</th>
</tr>
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<tbody>
<tr>
<td>Number of respondents</td>
</tr>
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</table>

Summary of the comments received

The majority of comments on the RSS were related to the proposed Settlement Hierarchy. These are addressed in the section on the Settlement Hierarchy. A few minor errors or changes to the RSS Study were also put forward.

How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy.

The RSS has been updated or amended to correct any errors.

<table>
<thead>
<tr>
<th>Comments on Transport Studies &amp; Position Statement</th>
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<tbody>
<tr>
<td>Number of respondents</td>
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</table>

Summary of the comments received:

The Highways Agency made a number of detailed technical observations and recommended that further work is undertaken to assess the impact of the development options on the Southerham, Beddingham and Ashcombe roundabouts. Peacehaven Town Council challenged the findings in respect of the A259 coast road, arguing that the Newhaven Transport Study does not provide proof that the A259 is not at capacity already. A number of individual respondents also challenged the conclusions of East Sussex County Council, as the local transport authority, that any significant development in Wivelsfield would result in an unacceptable increase in traffic in Ditchling village.

How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy.

The technical queries raised by the Highways Agency have been addressed and discussions are continuing on the implications for the A27 trunk road junctions. East
Sussex County Council, the local transport authority, does not consider that these junctions will be a constraint on the proposed spatial strategy for the district.

Since the publication of the ‘Newhaven Transport Study’ and the ‘County Council Position Statement in relation to Transport’ in September 2011, further transport modelling work has been carried out on the potential impact of development on the A259 coast road. As a result of this additional work, the County Council has changed its view on the acceptable level of development that can be accommodated in Peacehaven and Newhaven, and in September 2012 issued a further statement titled ‘New housing in Peacehaven and Newhaven: Impacts on A259 west of Peacehaven and on Newhaven ring road, and the consequences for housing numbers’.

This new statement replaces the conclusions for Peacehaven and Newhaven at paragraphs 2.18, 2.19 and 2.20 of the previously published County Council ‘Transport Position Statement ’ and has been a determining factor in the distribution of development set out in the Proposed Submission Core Strategy. However, the County Council has not changed its view on the unacceptability of significant development in Wivelsfield and this is reflected in the proposed spatial strategy for the district.

### Comments on Gypsy and Traveller Site Assessment (GTSA)

<table>
<thead>
<tr>
<th>Number of respondents</th>
<th>20</th>
</tr>
</thead>
</table>

**Summary of the comments received**

Most representations made on the GTSA were directed at the criteria used in the assessment of potential sites. The main points considered that either some of the criteria were illogical and could rule out otherwise suitable sites or that insufficient weight was given to criteria, such as National Park designation.

Several objections were made towards the inclusion of potential sites in Newhaven due to their value as open space, proximity to the incinerator, experience of theft and criminal damage to property of previous illegal encampments, intimidation, damage to environment, and the failure of Travellers to contribute to the local community.

Comments relating to sites that were assessed in the GTSA and referenced in the Emerging Core Strategy are addressed in the section on Core Policy 3 – Gypsy and Traveller Accommodation.

**How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy.**

The criteria used in the site assessments are considered to generally accord with Government guidance provided in a number of publications. No change is therefore considered necessary. However, the National Planning Policy Framework has been published since the GTSA was carried out, together with the supporting ‘Planning Policy for Traveller Sites’ document, and will also be taken into account in future assessments. The Council now intends to identify sites in the Site Allocations and development Management Policies Development Plan Document rather than in the Core Strategy itself.

### Comments on the Infrastructure Position Statement

<table>
<thead>
<tr>
<th>Number of respondents</th>
<th>6</th>
</tr>
</thead>
</table>
Only a few infrastructure providers and stakeholders submitted comments in relation to the Infrastructure Position Statement, and there were no common issues or concerns.

East Sussex County Council stated that the requirement for County Council infrastructure and services is unknown at this stage and will need to be established as development options are refined. The water companies serving the District (Southern Water and South East Water) considered that the absence of an Infrastructure Delivery Plan at this stage is a significant weakness.

Southern Water pointed out that utility infrastructure provision should be planned in parallel to the development of the Core Strategy in recognition that the delivery of key infrastructure often has long lead times and cannot be provided on demand. It urged the District Council and the South Downs National Park Authority to consult utility providers and progress the development of the Infrastructure Delivery Plan without further delay.

South East Water commented that the emerging Infrastructure Delivery Plan should identify and make provision for the development of new water resources and identify the need to safeguard or allocate specific sites for the Clay Hill reservoir and Newhaven desalination sites or other alternatives that South East Water has demonstrated are necessary to meet water demand. It considers that the emerging policies cannot be considered sound in the absence of a draft Infrastructure Delivery Plan.

The Environment Agency commented that the section on flood defences identifies the Environment Agency and the District Council as sources of funding, but in fact the Environment Agency also expects new development to contribute towards necessary flood defence measures.

The other respondents were concerned that the District Council has not carried out a comprehensive study of infrastructure requirements to determine whether or not Ringmer village could support a large number of additional dwellings.

How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy.

It is acknowledged that the Core Strategy needs to be underpinned by robust evidence about the key critical infrastructure that is required to support the new development proposed and the mechanisms which will be put in place to secure this infrastructure at the appropriate time. The importance of ensuring that infrastructure providers can plan and align their own strategies and budgets to support the developments proposed in the emerging spatial strategy for the District is also recognised. The District Council and the South Downs National Park Authority are therefore seeking to build a partnership approach with the relevant agencies and organisations, including the Water Companies, to ensure that infrastructure provision is properly planned, funded and delivered as necessary and in a timely fashion alongside planned development in the District. The information agreed will feed into the Infrastructure Delivery Plan.

Similarly, the importance of developing new water resources is recognised, as detailed in the Infrastructure Position Statement. However, the extent to which the provision of new strategic water resources is required must take into account environmental, social and economic costs and benefits, and South East Water is currently undertaking an extensive appraisal of the options for new infrastructure provision across the whole of its area. The Council acknowledges its role in assisting with the timely delivery of strategic new water resource schemes but will need to see the strategic need for any such schemes in the District confirmed by the Secretary of State’s endorsement of the SE Water’s Water Resources Management Plan 2014 before it incorporates specific policy support in the Lewes District Core Strategy. If a need for a new strategic water resource (or resources) within the District is eventually identified in the WRMP 2014, a specific allocation (or
allocations) can be made within the Site Allocations and Development Management Policies DPD that will follow the adoption of the Core Strategy.

The comments of the Environment Agency are acknowledged and the Infrastructure Position Statement has been amended accordingly.

In respect of the concerns about Ringmer, all the relevant infrastructure agencies were approached and all, or a combination of, the following questions asked:

- What measures or standards do you use to determine the level of service provided?
- Is the existing infrastructure capacity for your particular service adequate to serve existing development in Lewes District when assessed against these standards?
- If yes, is there any spare capacity to absorb further development, and if so, can you estimate how much in broad terms?
- If no, what is the nature and extent of the shortfall in provision, and how serious or decisive is that in preventing further development?
- Are there any plans for infrastructure improvements and/or capital projects already in your programme?
- What would need to be done to accommodate the levels of additional development outlined above, and is this realistically achievable?
- Are there any overriding constraints that would prevent the provision of such infrastructure taking place?

The responses received, in addition to responses received during the Core Strategy Issues and Emerging Options consultation period (Summer 2010) and information from nationally published sources, have informed the thematic tables of the Infrastructure Position Statement. This process will be further developed and will continue to inform the infrastructure planning work associated with the Local Development Framework.

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**Comments on the Employment and Economic Land Assessment (EELA)**

<table>
<thead>
<tr>
<th>Number of respondents</th>
<th>1</th>
</tr>
</thead>
</table>

**Summary of the comments received**

Although certain respondents referenced this study in their representation, only one respondent suggested a change/addition to it. This was to say that land at Southerham (Grey) Pit should have been assessed through the study and subsequently included within the Core Strategy.

**How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy.**

The Southerham (Grey) Pit site has in fact been considered by officers of the District Council and the SDNPA using the EELA site assessment criteria. The site did not score highly, with particular concerns in relation to the poor proximity to Lewes town, its location within the National Park landscape and SSSI status. A site of this nature is not required to support the Core Strategy, nor is it considered appropriate. Consequently, it has not been recommended for inclusion for as an allocation for employment purposes.

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**General Comments on the Local Housing Needs Assessment**
Although a few comments were made on this background report, they were done so when commenting upon the housing target in the Emerging Core Strategy (either agreeing or disagreeing with it). Accordingly, those comments are documented in topic papers which discuss the housing target.

**General Comments on the Renewable Energy and Low Carbon Development Study**

A few respondents referenced this study in the comments they made. This was done when commenting upon the core policy on renewable and low carbon energy and sustainable use of resources (Core Policy 14). Accordingly, those comments are documented in the topic papers on Core Policy 14.
Comments on Section 2 (Portrait)

<table>
<thead>
<tr>
<th>Agree with whole or part of Portrait section</th>
</tr>
</thead>
<tbody>
<tr>
<td>Number of respondents</td>
</tr>
</tbody>
</table>

Summary of the comments received

Respondents stated either that they broadly supported the portrait section or expressed support for particular aspects in the portrait. Many of these respondents, whilst supporting the aspects noted in the portrait, suggested that the section could be expanded to include additional information. These suggestions are addressed in the ‘Changes/additions’ section below.

How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy.

Support welcomed.

<table>
<thead>
<tr>
<th>Disagree with whole or part of Portrait section</th>
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<tbody>
<tr>
<td>Number of respondents</td>
</tr>
</tbody>
</table>

Summary of the comments received

Some consultees disagreed with some points mentioned in the portrait or did not agree with interpretations of some statistics. The points raised included:

- the road network cannot be described as good
- predicting household numbers is not an exact science
- it should not be assumed that the social mix and vitality of all villages is being undermined by a shortage of affordable housing, limited public transport and high levels of out-commuting
- there has been a decline in the number and range of local services
- Peacehaven is given a short description as a settlement rather than a town
- only part of Peacehaven is built on a grid street layout
- the A259 is busy at all times, not just peak periods
- house prices in the rural Low Weald villages around Lewes are very significantly lower than prices in Lewes town (and in the villages in the north-west of the District prices are lower than in Haywards Heath)
- demand for market housing and affordable housing is higher in Lewes than anywhere else in the District
- train services from Lewes to Ebbsfleet International require at least one change and therefore are not direct
- the portraits do not allow for comparison between each other as each settlement/area feature different statistics.

Some respondents from Plumpton Green felt that the village had a thriving community with a number of well supported local groups and therefore that the third bullet point above was a misinterpretation.

Seaford Town Council made the following points:

- the last sentence of point 1 should read ‘it is located between the sea and the Downs between the Ouse and Cuckmere valleys’
- the seafront should not be described as modern
- the town centre is adequate rather than thriving
- ‘The town also incorporates the village of Bishopstone within which are the historically significant Saxon built St Andrews Church and flint wall designs that are unique to the village’ should be added to the end.
Newhaven Town Council made these points:
- additional reference to the location, history, rail links, retail and development changes and opportunities in Newhaven should be made for a truer portrait of the town
- concerned that reference to 37% of jobs in the town being in manufacturing does not reflect the recent closure of Parker Pen, Artex and other firms and should be updated
- there is no reference to the higher levels of socio-economic deprivation factors that affect significant elements of the town’s population

How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy.

This section aims to highlight the qualities and distinguishing features of the District and its different communities. It is intended to help everyone understand how these qualities have shaped the Core Strategy and the Council’s priorities for future development and investment. As such, the section needs to distil the available knowledge and evidence about the District and focus on the key issues and opportunities that are relevant to a particular places or locations. However, it is acknowledged that many of the suggested changes either help to explain the important history, context, and physical or social characteristics of the area, or correct inaccurate information, and these have been incorporated in the text where appropriate.

Changes/additions suggested to the section

<table>
<thead>
<tr>
<th>Number of respondents</th>
<th>20</th>
</tr>
</thead>
</table>

Summary of the comments received

A number of comments received thought that we had omitted certain important aspects. These are listed in the sections below.

**Lewes**
- reference to the two conservation areas
- the distortion in current policy leading to shops in the High Street and Western Road being categorised as secondary
- consultation has been undertaken into extending the controlled parking zone
- there is a station travel plan
- the town is well connected to Brighton, Tunbridge Wells and settlements in between by bus
- huge success by OVESCO in community investment in solar at Harvey’s depot shows community spirit and commitment to a more sustainable future
- Lewes Little Theatre is a cultural asset
- good educational and recreational facilities and a wide range of cultural activities
- concentration of antique shops and auction houses.

**Newhaven**
- the ferry is a strategic asset, providing the shortest route from London to Paris
- the Port provides about 500 direct and indirect jobs
- Newhaven Town is the main station
- potential for rail freight - the Energy from Waste facility will use rail freight for bottom ash, potentially opening up further opportunities for rail freight.
- the position of the town and its relationship with its quality environs
- Newhaven Fort, a Scheduled Ancient Monument and other heritage assets
- the potential for improved walking and cycling links to the town centre
- the town’s harbour and sea-faring heritage and modern role and fishing and marina facilities
- the significant regeneration and waterfront opportunities on derelict and underused sites
- the concentration of waste-management related businesses (and the associated risk for contaminated sites)
- successful economic development on Denton Island
- two railway stations offering services to Seaford, Brighton and Lewes and on to Gatwick and London
- the declining town centre within the ring road.

Seaford
- Eastbourne exerts as much influence on the south eastern edge of the district as Brighton elsewhere in the district
- Poynings Town and important archaeological findings in the Cuckmere Pathfinder Project.

Peacehaven/Telscombe
- mention the Meridian monument and line
- the new waste water treatment works
- proposed new sports park
- proximity to the national park

Other/General
- the chalk aquifers that are important reserves of fresh water should be mentioned in the Environmental Characteristics
- the town centres have large town centre residential populations that should be protected
- ESCC has more up-to-date (2011) data on A27 traffic flows
- Southern is the train operator
- there is no mention of transport in the rural Low Weald, which is important for recreational purposes
- the contribution of the universities to the local economy
- Chailey is a dispersed settlement where a high proportion of the area comprises Chailey Common SSSI/LNR and arable or grazing land
- addition of a bullet point to identify the real benefits to recreation that the Downs provide
- landscape and historic environment should be expanded to include ‘townscape’
- should set out the number of 0-14 year olds to tie in with the later reference to lack of play space for children
- this area is designated as an area of serious water stress and recognise that South East Water has a legal duty to plan for secure water supply in the long term, maintain supply to customers and service new development
- the Ouse and tributaries are a source of flood risk but also provide many social, amenity, environmental, green infrastructure and groundwater resources and is tidal to Barcombe Mills
- more should be made of agricultural activity in the district
- important flora, fauna and birdlife should be mentioned
- tranquility needs caveat about noise from the A27 and aircraft
- high commuting levels are a threat but also a resource – it brings in wealth that helps local businesses.

How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy.

This section aims is to highlight the qualities and distinguishing features of the District
and its different communities. It is intended to help everyone understand how these qualities have shaped the Core Strategy and the Council’s priorities for future development and investment. As such, the section needs to distil the available knowledge and evidence about the District and focus on the key issues and opportunities that are relevant to a particular places or locations. However, it is acknowledged that many of the suggested changes help to explain the important history, context, and physical or social characteristics of the area and these have been incorporated in the text where appropriate.
Comments on Section 3 (Issues and Challenges)

<table>
<thead>
<tr>
<th>Comments on the Issues and Challenges identified</th>
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<tbody>
<tr>
<td>Number of respondents</td>
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</tbody>
</table>

Summary of the comments received:

The majority of respondents agreed with the issues and challenges identified in the Emerging Core Strategy, although a number of additional issues or detailed modifications to the text were suggested by some respondents.

East Sussex County Council sought the inclusion of an additional issue relating to air quality in the section titled ‘Protecting and enhancing the distinctive quality of the environment’. It also suggested a number of detailed changes to the text, none of which would alter the overall thrust and direction of the issues and challenges identified.

The Environment Agency recommended that the Catchment Flood Management Plan should be used in conjunction with the Strategic Flood Risk Assessment and the East Sussex Preliminary Flood Risk Assessment in order to address flood risk in the District.

Newhaven Town Council considered that the section should address additional issues and challenges specific to Newhaven, as follows:

- Supporting vulnerable households existing and “imported” to Newhaven.
- Access to housing, even with lower house prices in Newhaven compared to other parts of the District.
- Maximising the benefits of the port for Newhaven.
- Making up shortfalls in Newhaven’s green infrastructure.

In the section titled ‘Accommodating and delivering growth’, Newhaven Town Council also sought the inclusion of cross-boundary working within Lewes District as part of the challenge of cross-boundary working with adjoining local planning authorities. The Town Council also suggested a number of detailed changes to the wording of the text, none of which would alter the overall thrust and direction of the issues and challenges identified.

Other individual respondents suggested the inclusion of the following issues and challenges:

- protecting new inhabitants from existing sources of noise
- preventing the deterioration of the existing sound environment
- protecting new inhabitants from existing land pollution
- protecting the quality of the soil and land
- the continuing uncertainty and potential loss of employment at County Hall
- the need to recognise the future needs of Sussex University to ensure consistency with the emerging policy approach of Brighton and Hove City Council
- the lack of protection from residential conversion of essential shops outside the primary retail frontage and this impact on an ageing population
- the need for an analysis of townscape - materials, form and scale
- the decline in incomes and economic opportunities
- the adequate separation of development sensitive to odour from wastewater treatment works to protect amenity
- the need to supplement the tourist accommodation in Lewes town and upgrade some of the existing facilities
- the need to give priority to landscape conservation over recreation and economic considerations in those parts of the District within the South Downs National Park where the Sandford principle applies
- the need to recognise the role of Lewes and the coastal towns as access points
for tourists visiting the National Park
- the need for allotments and meeting rooms
- the need to promote efficiency in infrastructure such as street lighting
- the need to continue and build on the approach established by the Integrated Urban Drainage Project

Seven respondents disagreed with the identified issues and challenges for a variety of reasons, as follows:

Lewes District Green Party does not support the assumption that growth should be accommodated and delivered. It believes that the Core Strategy should be built around the following principles of “Smart Growth”:
- Mix land uses
- Take advantage of compact building design
- Create a range of housing opportunities and choices
- Create walkable neighbourhoods
- Foster distinctive, attractive communities with a strong sense of place
- Preserve open space, farmland, natural beauty, and critical environmental areas
- Strengthen and direct development towards existing communities
- Provide a variety of transportation choices
- Make development decisions predictable, fair, and cost effective
- Encourage community and stakeholder collaboration in development decisions

A number of respondents commented that allocating greenfield sites at Ringmer contradicts the two identified challenges of, firstly, working in partnership to deliver the regeneration of vacant, underused or poor quality sites and premises and, secondly, supporting the quality of community life through partnership working to promote social inclusion, tackle deprivation, encourage community cohesion, and reduce the fear of crime.

One respondent commented that the section ‘Accommodating and delivering growth’ should recognise the restraints created by topography, soil type and run-off, which is particularly important in the Low Weald and should therefore influence the location of future development.

How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy.

It is important that the Core Strategy is clear and concise so that developers, local communities and other stakeholders can understand how the area will be changing in the future. This means identifying and prioritising the key strategic issues and challenges that need to be addressed by the Core Strategy. It is considered that the Emerging Core Strategy achieves this in a succinct and coherent way, reflecting both the Lewes District Sustainable Community Strategy and the feedback from the earlier stages of public consultation and engagement.

Many of the more detailed issues that have been raised by respondents are capable of being dealt with under the scope of issues and challenges identified by the Emerging Core Strategy, whilst others relate to very specific locations within the District and, as such, are considered inappropriate for a strategic document. Ignoring the need to accommodate and deliver housing and economic growth, as suggested by the Lewes District Green Party, would conflict both with the national planning policies set out in the NPPF and with regional policies contained in the South East Plan. Nevertheless, most of the ‘Smart Growth’ principles identified in the Green Party’s representation are incorporated or reflected in the emerging Core Strategy.
It is acknowledged that where a list of individual documents is identified in the text as part of the methodology for addressing a particular issue or challenge, then this list should be comprehensive. The text of the section titled ‘Tackling Climate Change’ has therefore been amended to include the Environment Agency’s Catchment Flood Management Plan. However, no other changes have been made to the ‘Issues and Challenges’ section in response to the comments submitted.
## Comments on Section 4 (The Vision)

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<tr>
<th>Comments on the District-wide vision</th>
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<tbody>
<tr>
<td>Number of respondents</td>
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**Summary of the comments received**

Overall there was agreement with the Vision set out for the District. A number of minor amendments were suggested, as follows:

- Superfast broadband should be suggested rather than e-communications
- Supporting the growth of the local economy and value of education should be more explicit in the vision
- Should include specific improvements for walkers and cyclists
- Should state that flood defences will be provided in all areas where there is housing.
- Identify that town centres within Lewes District should remain vital and viable and recognise the role that they have in achieving sustainable economic growth and delivering more sustainable patterns of development.
- More realistic to say that residents have endeavoured to respond to challenges of climate change
- The examples of alternative travel options should include off-road cycleways.
- Tranquillity, including reducing noise and light pollution, should also be mentioned.
- Reference should be made to the fact that housing need is created by significant increases in the number of households (rather than simply by population), and by the changing profile of that population. Hence the relevant part of the vision should read, “Appropriate new housing will have been delivered that has contributed to meeting the significant housing need that has resulted from an increase in households in the district and changes to the demographic profile of the population.”

One respondent considered that the special environmental qualities of Lewes District had not been made clear enough, whilst another was of the view that the District-wide vision was not locally focussed. A couple of respondents queried whether the vision would be achievable, particularly in light of the current economic difficulties being experienced.

### How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy.

The points made in relation to broadband, housing need, town centres, climate change and economic regeneration are supported and the vision has been amended accordingly.

However, the vision already refers to “alternative travel options” and “sustainable transport options” and it is not considered appropriate to highlight certain specific facilities that would be in accordance with this policy approach (e.g. off-road cycleways). The suggested changes are therefore not supported in this instance.

It is also considered inappropriate to make reference to the provision of flood defences in all housing areas due to the fact that most locations that are currently, or could become, developed for housing are not actually at risk from flooding and therefore do not require flood defences.

The special environmental qualities of Lewes District are considered to have been sufficiently addressed – these qualities are apparent in the District-wide vision and the visions for the individual sub-areas. In addition, none of the environmental bodies, including the Environment Agency and Natural England, consider this to be an issue and
the suggested change is therefore considered unnecessary.

It is acknowledged that certain elements of the vision may not be seen as achievable in the short-term, principally due to the current economic situation. However, this is a long-term plan and it would not be unreasonable to expect the wider economic climate to significantly improve over time and create the circumstances to help achieve the wider vision.

<table>
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<tr>
<th>Comment on Vision for Newhaven</th>
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<tr>
<td><strong>Number of respondents</strong></td>
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<tr>
<td><strong>Summary of the comments received</strong></td>
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</table>

The vision for the economic regeneration of Newhaven was supported although two respondents considered that the location of the town adjacent to the National Park should be highlighted.

Newhaven Town Council believes that the vision for the town needs to be amended to better reflect its character and suggests a number of elements that could more appropriately be incorporated to reflect the local community’s needs and aspirations. The Town Council also suggests an alternative vision for Newhaven, incorporating much of the Emerging Core Strategy vision but also including issues such as maximising the potential of the waterfront, developing tourism opportunities in the town and ensuring that all communities have access to appropriate facilities to meet their needs.

Newhaven Port and Properties supports the strategic vision for Newhaven but consider that the emphasis of the town’s regeneration should be achieved around port-related and port hosted activities, with a focus on commodities, low carbon energy and manufacturing industries, and tourism and leisure. They also envisage that regeneration of these areas would have resulted in a more accessible Town centre, actively renovated waterside access, an improved public realm, a dynamic leisure marine and fishing industry, an enhanced and better used ferry service, providing a tourism gateway to both the National Park and Northern France, and a wider range of uses and activities.

East Sussex County Council suggests that the vision should include reference to a better integration between bus and rail facilities by means of a transport interchange at Newhaven Town station, which will also improve accessibility and facilities for pedestrians and cyclists.

The District Council’s Environmental Health Team suggests that the vision should contain the aspiration to achieve air quality levels within permitted values by 2030.

| How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy. |

The need to make reference to the town’s location adjacent to the National Park is not considered appropriate in the vision as it is an existing feature of the town. This point has therefore been reflected in the changes made to the Newhaven section in the ‘Portrait of Lewes District’ chapter of the Core Strategy.

However, amendments to the vision have been made wherever possible to reflect the comments submitted by the Town Council and Newhaven Port and Properties, whilst at the same time maintaining a strategic and succinct vision appropriate to a Core Strategy document. Notwithstanding these amendments, it is considered that a number of the elements of the vision suggested by the Town Council and Newhaven Port and Properties would be more appropriate for a town-wide plan, which could potentially be brought forward as a Neighbourhood Plan.
The Council’s aspiration to achieve good air quality applies across the District’s town centres, and indeed other locations, and the District vision has therefore been amended accordingly to incorporate this point. However, the comment from ESCC about a possible transport interchange at Newhaven Town station is considered to be already addressed through the reference to achieving “greater connectivity to the town’s railway stations” and therefore no change has been made in response to this suggestion.

Comments on Peacehaven and Telscombe Vision
Number of respondents | 4

Summary of the comments received

Respondents were of the opinion that a more positive approach to the town needs to be taken, although no examples were suggested for such an approach. Comments included the need for an Enterprise Centre to serve the settlement and a specific reference to coastal management, particularly the need to protect the A259 from coastal erosion.

How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy.

The need to deliver more employment floorspace to help establish a greater presence of local businesses and enhance local job opportunities is acknowledged and the vision has been amended accordingly. The improvement of the local retail offer has also been included as part of the vision.

Comments on Seaford Vision
Number of respondents | 4

Summary of the comments received

The Friends of Seaford Head considered that the vision should refer to securing and sustaining access routes into the National Park that are impressive, sympathetic and memorable. Another comment considered that the economic vision for Seaford (the largest town in the District) was vague and optimistic. It was suggested that it include a new image for Seaford as an attractive place for small business start-ups, high tech skills and professional services in an environment which offers a good quality of life.

How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy.

The suggested change concerning the access routes into the National Park is a very detailed comment for a high-level and strategic document and although a laudable aim, it is considered that this is encapsulated within the wording “advantage will have been taken of the opportunities presented by the National Park.”

In relation to the suggested change to the economic vision, evidence suggests that the demand for such uses is likely to be limited in the future. However, in line with the Council’s Regeneration Strategy, it is acknowledged that every effort should be made to attract businesses and investment to the District’s towns, including Seaford, and the District-wide vision has been amended accordingly.

Comments on Lewes Vision
Number of respondents | 13

Summary of the comments received
The vision, or elements of it, was supported by the majority of respondents. However, a number of suggested additions and amendments were made including:

- The vision should state that by 2030 the air quality standards of the town are within permitted values and that ground water supplies beneath the town remain protected from contamination and over extraction.
- Lewes Conservation Area Advisory Group suggested that the aspiration to improve employment opportunities and reduce out-commuting is contradicted by the proposal to decant employment to Ringmer village.
- It also stated that the vision should also provide for the protection of the streets of the Conservation Areas which create the setting for the 'plum' attractions.
- Opportunities should be highlighted for the town to develop as a new media centre delivering software and services in business starter units.
- A local councillor suggested adding the flooding issue in the vision, including the emerging threat from increased rainfall and sea level rise due to climate change, which will have been addressed by flood defences, flood mitigation measures and a comprehensive Flood Plan.
- It was suggested that, in view of the ‘fine grain’ of the town’s built form, the vision should refer to new development being small in scale, mixed in use and incremental in both design and timeframe.
- The vision should include reference to improvements to existing facilities for tourists, including an improved footpath from Malling Fields to the river and Hamsey, and riverside walkways by the Ouse.

A couple of representations queried the reference to Lewes having its role as a County town strengthened, given that the relocation of East Sussex County Council to an alternative location outside of Lewes would not achieve this.

How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy.

As with many of the other comments on the vision, most of the suggested changes would result in the creation of an overly detailed vision for Lewes town that would be inappropriate in a high level and strategic document (but would hence be more suited to a town-wide plan). It is also considered that some of the suggested changes are already addressed in the District-wide vision. However, it is acknowledged that future opportunities should be taken to capitalise upon the potential amenity benefits of the River Ouse and the vision has therefore been amended accordingly.

<table>
<thead>
<tr>
<th>Comments on Low Weald vision</th>
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<tr>
<td>Number of respondents</td>
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<tr>
<td>Summary of the comments received</td>
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The majority of comments concerned a perceived disparity between the vision and the spatial strategy for the Low Weald area. This was particularly mentioned by individuals and organisations in the Plumpton and Wivelsfield areas (including, Wivelsfield Parish Council and Plumpton Residents Opposed to Unnecessary Development) as they felt that the housing options being considered for these areas do not accord with the vision (particularly the part that relates to development being sensitively accommodated in this part of the District).

The vision to achieve improved linkages to the stations at Plumpton and Cooksbridge was questioned by some respondents who consider that there is good access to this part.
of the District already, or who are not sure how such improvements would be realised. In relation to the existing rail network, a few respondents suggested that greater emphasis should be given to its strategic importance in providing future opportunities for sustainable travel.

The recognition of the Low Weald as a distinct area was appreciated by some respondents, including Plumpton Parish Council. However, the Parish Council did raise concerns that the train service, even if enhanced, does not represent a sustainable means of transport for the majority of residents. Hence, they felt that heavy reliance on the private car needs to be emphasised further in the vision.

Barcombe Parish Council did not support the reinstatement of the Lewes to Uckfield railway line. They pointed out that the question of reinstatement had been examined at great length and it was considered to be economically unviable.

One detailed comment on the vision concerned the importance of meeting community based housing needs. It was argued that changes in demographic profiles means that such housing needs are more complex than simply providing 'affordable housing'. It was therefore suggested that the vision should state "development that meets the community's needs for housing, including affordable housing, and supports the rural economy...".

One respondent felt that the Low Weald should be recognised in the Emerging Plan as needing, and having the capacity, to meet a significant proportion of the District's housing needs.

**How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy.**

Comments about how the vision has been translated into the spatial strategy are for consideration in the formulation of the strategy itself. However, it is worth noting that none of the comments disputed the vision itself.

The vision has been amended to clarify the emphasis on seeking further opportunities for sustainable travel to and from stations of Plumpton and Cooksbridge. The comment about the reliance on the private car in the rural areas of the district is noted but it is not considered necessary to make any change in this respect as the vision already acknowledges that "travel by the private car will still, in many instances, be the only practical way of accessing and travelling around this part of the district".

The comment made by Barcombe Parish Council about reinstatement of the Lewes to Uckfield line is noted, but the Council still supports the reinstatement of this crucial transport link in the event that a change in Government funding arrangements result in a more positive outlook in the future. A change is therefore not considered appropriate.

In terms of meeting housing need as well as affordable housing, the overall vision identifies the need to provide both within the District. Section on the Low Weald has identified the need to provide housing development that meets the needs of the community including affordable housing.

Overall vision on employment has been further detailed and identifies support for employment to serve communities.

Meeting the majority of the housing target in the Low Weald would be in direct conflict with sustainability principles. Sustainable locations for development are based on a wide range of considerations not least on access and landscape issues. Distribution of development in the Core Strategy has been based on Sustainability Appraisal as well as
other evidence such as Landscape Capacity Study and Infrastructure Position Statement.

<table>
<thead>
<tr>
<th>Comments on the Vision for the rural part of the National Park</th>
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<tbody>
<tr>
<td><strong>Summary of the comments received</strong></td>
</tr>
<tr>
<td>One respondent supported the vision and the other suggested a change. The suggested change was as follows, &quot;Development to meet the social and economic needs of the existing communities', including the provision of affordable housing and community facilities, will have been met sensitively, acknowledging and responding to the special qualities of the National Park.&quot;</td>
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<thead>
<tr>
<th>How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy.</th>
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<tbody>
<tr>
<td>The suggested change is supported and the vision has been amended accordingly.</td>
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<table>
<thead>
<tr>
<th>General comments on the vision</th>
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<tbody>
<tr>
<td><strong>Number of respondents</strong></td>
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<tr>
<td><strong>Summary of the comments received</strong></td>
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<tr>
<td>In addition to those who stated that they supported the vision as a whole, the only other general comments were as follows:</td>
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<tr>
<td>- The vision is unrealistic as for many years no change has occurred and there had been a consistent problem of lack of facilities, congested roads and poor planning.</td>
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<tr>
<td>- The vision has not been reflected in the subsequent strategy.</td>
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<table>
<thead>
<tr>
<th>How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy.</th>
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<tbody>
<tr>
<td>Characteristic of the vision is that it describes aspirations that are achievable. The vision is useful in that it provides the context for the objectives and in turn the policy direction. Policies in the Core Strategy will be one of the means that the vision can be made manifest.</td>
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## Comments on Section 5 (Strategic Objectives)

### Agree with Objectives

<table>
<thead>
<tr>
<th>Number of respondents</th>
<th>30</th>
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**Summary of the comments received**

Most respondents supported the objectives as a whole but particularly Objectives 1 and 6. Specific support was also given to Objectives 3, 4 and 5.

**How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy.**

Support welcomed.

### Disagree with Objectives

<table>
<thead>
<tr>
<th>Number of respondents</th>
<th>7</th>
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**Summary of the comments received**

Some representations said that they disagreed with certain objectives and sought revisions to the wording of them to highlight additional points. Sports England considered that there is a lack of robust evidence, to support open space and recreation provision, potentially making the strategic objectives unsound. A further representation suggested that Objective 10 (local economy) should appear higher in the list of objectives to reflect the importance of the issue of the local economy.

**How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy.**

As a part of the evidence base for the Core Strategy, the Council commissioned two separate assessments of recreational and other open space within the District, as detailed in the Infrastructure Position Statement. It is acknowledged that both assessments are now out-of-date, but it is considered unlikely that there have been significant changes in the level of provision sufficient to negate their value for plan making purposes. Nevertheless, the Council is examining the possibility of undertaking a review of these studies in order to inform the detailed development management policies in the Site Allocations & Development Management Policies DPD.

As stated in the Emerging Core Strategy document, the strategic objectives are not listed in any order of importance. However, Objective 10 has been positioned towards the top of the list in recognition of the Government’s commitment to ensuring that the planning system does everything it can to support sustainable economic growth, as expressed in the recently published National Planning Policy Framework.

### Amendments to/new objectives suggested

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<tr>
<th>Number of respondents</th>
<th>13</th>
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**Summary of the comments received**

The majority of comments proposed additional wording to the existing objectives, rather than new objectives. The suggested amendments/ additions were:

**Strategic Objective 1**

- Inclusion of live/work units to support self employed sector.
- Emphasise the delivery of housing through sustainable means such as: housing mix, tenure, size, type and affordability, adjusted to reflect the different needs of
the District.
 Should also be seeking to improve the quality of life through better and more accessible facilities and infrastructure rather than just deliver homes.

Strategic Objective 3
 Flood defences should be mentioned specifically with regards to infrastructure provision.
 Support to those with limited mobility.
 South East Water stated that reference to utility infrastructure should be mentioned in the supporting text.

Strategic Objective 4
 Protection of key views and historic buildings.
 Preservation of historic townscapes.
 Maintenance and enhancement of existing buildings, including modernisation of commercial premises before new build.

Strategic Objective 6
 Within the objective highlight the opportunity to remediate contaminated land which in turn can help water quality.
 Mention the protection of green spaces.
 The objective should reflect the constraints of developing brownfield land and that development on such land is likely to only be possible if the land is available and the development is viable and deliverable.

Strategic Objective 7
 Reference should be made to traffic management on rural lanes through regulation of satnav routes for heavy vehicles;
 The addition of the words ‘study in’ to reflect the educational opportunities in the District;
 East Sussex County Council suggested that mention should be given to the high speed rail link, super-fast broadband (instead of e-communications) and add wording “comply with the Climate Change Agenda”.

Strategic Objective 8
 Mention protection and management of natural resources.
 Housing layout should be considered in the delivery of sustainable housing.
 ESCC suggested reference to possibilities of low emission vehicles and charging points.

Strategic Objective 9
 Run off from the Downs is excluded as a cause of flooding.

Objective 10
 Lack of reference given to agriculture in the District – this needs to be referenced in this objective and elsewhere in the plan.
 Reference should be made to resisting the creation of retail parks through changes of use of business premises.
 The proponents of a business park at Southerham Pit suggested that the following wording is included within the objective “attracting new businesses and the provision of high quality premises and create a new high quality employment village.”
 It was also stated that objective 10 focuses on existing businesses and meeting local needs only and lacks the recognition for investment attract new businesses and to reduce out-commuting.
 There is a lack of emphasis on regeneration across the District, instead the emphasis is just for the coastal towns.
Newhaven Town Council specifically suggested that potential constraints to regeneration experienced in some urban areas should be highlighted in the objectives.

How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy.

Strategic Objective 1: The supporting text has been amended to ensure that consideration is given to the particular housing needs, in terms of mix and tenure, of individual settlements. However, the objectives of creating more varied commercial premises, which would include live/work units, and providing improved or more accessible services and infrastructure is addressed by the text associated with Strategic Objectives 10 and 3 respectively.

Strategic Objective 3: A full definition of infrastructure is included in the Glossary but it is acknowledged that it would be beneficial to mention utilities in the wording of the objective and an amendment has been made accordingly.

Strategic Objective 4: It is not considered necessary to list all the environmental features that contribute to the distinctive character or ‘sense of place’ of individual settlements. The Council’s Conservation Area Appraisals will be used to inform the design of new development in areas of historic interest and further design guidance will be published in future. However, the wording of the objective will be amended to refer to all forms of new development in order to include conversions as well as new build.

Strategic Objective 6: The difficulties and constraints to developing urban brownfield sites are acknowledged and the text has therefore been amended to include the words “recognising the benefits and challenges”.

Strategic Objective 7: The text has been amended to include the words “study in” to reflect the benefits of the knowledge at local universities, colleges and schools identified in Strategic Objective 10 and the priority given to ‘Inspiring Learning’ actions in the Council’s Regeneration Strategy. The term e-communications has also been replaced with “broadband” to be consistent with changes in section 4: ‘A Vision for Lewes District’.

Strategic Objective 10: The Sussex Coast is a priority for economic growth and regeneration in the South East Plan, with which the Core Strategy is required to generally comply, and Newhaven is the Council’s main focus for its regeneration activity. A change to the objective is therefore not considered appropriate in this respect. However, the contribution of agriculture to the rural economy and the need to attract new businesses to the District is acknowledged and the text of Objective 10 has been amended accordingly.

Comments on achievability of Objectives

<table>
<thead>
<tr>
<th>Number of respondents</th>
<th>26</th>
</tr>
</thead>
</table>

Summary of the comments received

Whilst the majority of representations support the objectives, there were concerns about the achievability of particular objectives. A number of respondents felt that the proposed housing options would not meet the requirements of Strategic Objective 1, in particular the delivery of homes in the most sustainable way. Many also considered that the options selected for housing growth were not consistent with Strategic Objective 6, which seeks to maximise opportunities for re-using suitable previously developed land in urban areas.
Other representations claimed either that some of the Strategic Objectives were too ambitious and the achievability was dependant on significant financial resources, or that they were weak and would only be achieved if other issues, such as the effects of climate change, were given due consideration.

**How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy.**

The concerns are noted, but no additional wording is considered to be necessary. Meeting the Core Strategy objectives will mean balancing the needs of existing and future communities with the District. Whilst it is the aim to maximise the use of previously developed land there will not necessarily be sufficient, available and suitable sites to meet the housing and employment need. In the absence of previously developed sites to deliver sustainable development, the development of greenfield sites adjacent to existing settlements is an option that needs to be considered. Objectives and Policy outcomes will be monitored and reviewed as needed in order to ensure that the both the objectives and policies remain achievable and effective.

**Comments on whether the Objectives will help deliver the Sustainable Community Strategy?**

<table>
<thead>
<tr>
<th>Number of respondents</th>
<th>6</th>
</tr>
</thead>
</table>

**Summary of the comments received**

There was a mixed opinion as to whether the objectives will help deliver the Sustainable Community Strategy (SCS). Financial constraints are considered a hindrance to the achievability of delivering the SCS by 2030. Other more general comments state that the objectives are weak, unenforceable and lack detail to deliver the SCS. One respondent considered that the potential housing sites do not accord with the SCS. Other respondents considered that there is conflict between the level of housing provision and the SCS priorities, with questions about how an increase in housing will achieve accessibility to local facilities where there is already a lack of facilities, or benefit the economy and environment, or create stronger safer communities.
Comments on Section 6 (The Spatial Strategy)

Comments on the Settlement Hierarchy

Agree with settlement hierarchy

| Number of respondents | 12 |

Summary of the comments received

Those who supported the settlement hierarchy either did so in general terms, or by making reference to a particular settlement that they felt had been correctly classified. This support came from a number of the proponents of sites being considered as housing options, as well as certain town and parish council’s, including Seaford, Plumpton and South Heighton.

How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy.

Support for the settlement hierarchy is welcomed

Disagree with settlement hierarchy and suggested changes

| Number of respondents | 39 |

Summary of the comments received

Those representations that disagreed with the settlement hierarchy (Table 2 of the Emerging Core Strategy) generally did so when putting forward the case for a change to be made (e.g. moving a settlement into a different category), rather than the hierarchy as a whole, or its concept. The few respondents who did comment about the concept of a settlement hierarchy generally had the view that having the hierarchy will not allow for flexibility in deciding how development is distributed.

The areas of disagreement with the hierarchy, along with the changes being sought, were as follows:

- A significant number of representations disagreed with Lewes town being categorised as a ‘District Centre’ and felt that this underplayed its function, particularly in light of the towns transport links, employment opportunities and services it has to offer. It was considered it should be reclassified as a ‘Secondary Regional Centre’. Those who put over such a view included Lewes Town Council and the Friends of Lewes.
- Mid Sussex District Council objected to settlements outside of Lewes District being included within the hierarchy.
- Newhaven Town Council raised the concern that the settlements on the periphery of Newhaven do not readily fit within the defined categories, particularly in terms of access to higher order settlements.
- Barcombe Parish Council objected that Barcombe and Barcombe Cross are referred to separately in the hierarchy, as all areas of housing in the parish are one entity. Likewise Wivelsfield Parish Council objected to the way Wivelsfield and Wivelsfield Green have been separated in the hierarchy as they consider that this appears to ease the way for justifying development in each of the two areas, rather than looking at overall development within the parish as a whole.
- It was suggested by a couple of respondents that Plumpton Green has the characteristics of a ‘Rural Service Centre’, particularly as it has a frequent rail service and that it functions in a similar way to Newick. Conversely the view was

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2 Page 34 of the Emerging Core Strategy
held by a couple of people that Plumpton Green is reclassified as a 'Local Village' or a large hamlet (due to the poor highway network in and around Plumpton).

- Plumpton Parish Council suggested that Falmer, Kingston and Cooksbridge should also be categorised as "Service Villages". This view was shared by a few other respondents. In respect to Falmer and Cooksbridge the reasoning given for placing these settlements in a higher category was that they both have train stations and ease of access to A roads.
- With regards to Ringmer, comments were made that even though it is a Rural Service Centre it has a poor bus service especially at the weekend and evenings.
- There was some disagreement over Newick being classed as a 'Rural Service Centre', particularly by respondents from Newick. Their view was that it is very different to Ringmer and should be in a lower category (Service Village).
- It was suggested that there is an inconsistency in the classification of Firle between the Rural Settlement Study and the Settlement Hierarchy proposed in table 2 of the Emerging Core Strategy.

A number of comments were made on the theoretical levels of growth identified in the settlement hierarchy. Such comments are summarised as follows:

- The hamlets would benefit from some housing growth and therefore should be assigned a figure.
- The arbitrarily allocated tranches of houses identified across the District are without any consideration of a cohesive plan, particularly regarding infrastructure and employment effect and needs.
- The range of potential units for "Service Villages" is too broad and needs to be more specific in the final document. The top end of the range is also too high, and is inappropriate when most communities in the category have very limited services with constrained transport and utilities infrastructure.
- It was suggested that it is not appropriate to seek to impose an upper end of additional units that could take place for each settlement. It is preferable for general areas to be identified and for specific sites to be promoted through both the Core Strategy as Strategic Sites and as other sites through the Housing Allocations Development Plan Document.

How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy.

The classification of the villages in the district in the settlement hierarchy has very much been influenced by the Rural Settlement Study, which set out and implemented a methodology for assessing each rural settlement in the district. Based on the findings of this work, the villages were assigned to one of the pre-determined categories that were set in the Rural Settlement Study, based on how they had scored against a set of criteria that were related to issues such as access to key services and facilities.

As a plan for the district needs to have regard to the wider regional area that has a strong influence on the district, it is considered appropriate to mention settlements outside of the district within the hierarchy. This also helps provide some context for determining the role that the settlements within the district perform.

It is not considered appropriate to alter the position of Lewes town in the hierarchy, as although it offers a range of services and facilities these are not of a scale comparable to other Secondary Regional Centres. Limited retail on offer especially comparison goods creates leakage to larger towns with a greater range.

In respect of the anomaly in categorising Firle in the Core Strategy and in the Rural Settlement Study, this has been corrected in the Core Strategy.
Concern that development range for Service Villages at 30 – 100 is too large and that it should be reduced. This is a wide range but in view of the capacity of such villages to provide day to day services, this is considered viable and provides leeway for housing number to reflect need and capacity.

No need to change position of Cooksbridge and Falmer as although they have comparatively good transport connections, including railway stations and A roads, they are villages that have very few key services such as a convenience store and doctors surgery, something that the Service Villages do have.

Suggestion that Newick should not be in same category as Ringmer. In view of Sustainability Matrix scoring in RSS based on wide range of services that Newick has, no change suggested to ranking.

Suggestion that Hamlets should receive some housing would be in conflict with sustainability criteria. Opportunities will exist though for exception housing where there is an identified need.

General identified areas for housing and specific site allocation is not the role of the Core Strategy and these will be identified in the Site Allocations Development Plan Document scheduled to be adopted in 2014. The Rural Settlement Study and the Landscape Capacity Study are background evidence documents for the Core Strategy and these will identify a preferred area for housing based on environmental considerations.

Topic Area: Housing Target

Agree with Housing Target

| Number of respondents | 37 |

Summary of the comments received

Those who supported the preferred housing target (4,150 net additional dwellings between 2010 and 2030) included a number of the town and parish councils (including Lewes and Seaford Town Councils), East Sussex County Council, Natural England, the Lewes District Association of Local Councils and a number of individual members of the public. Reasons for supporting the housing target included:

- Given the environmental sensitivities of the planning area, the planned level of housing growth appears appropriate.
- The target seems achievable.
- The housing will help to meet a significant level of housing need.
- The other options suggested would result in over-development in the District.

A number of respondents provided caveats when supporting the proposed housing target. These caveats were as follows:

- That the housing is sensibly distributed and focused on those towns with the greatest need for housing.
- The housing should be delivered as small and evenly distributed units throughout the district. Any large-scale village development would not be appropriate.
- Appropriate infrastructure is delivered alongside the planned housing in a timely manner.
- All brownfield sites are used for new housing before any greenfield sites are released.

How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy.
The support for the preferred housing target is welcomed and points noted.

**Disagree with the preferred housing target**

<table>
<thead>
<tr>
<th>Number of respondents</th>
<th>9</th>
</tr>
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</table>

**Summary of the comments received**

A number of respondents disagreed with the proposed housing target, without specifying whether the target was too high, or too low. The reasons given for disagreeing with the housing target were as follows:

- Potential windfall developments have not been taken into account in formulating the target.
- The target should consider infrastructure as well as housing need.
- The level of housing planned for the district should only be established once a full picture of infrastructure provision and needs of those in the district have been established.
- The proposed strategy fails to take into account that the South East Plan (SEP) remains current adopted policy and that account should be taken of the requirements to adhere to this policy until such time that the SEP is abolished.
- No account is made for bringing empty homes back into use.
- The housing target is based on long-term projections. Given current economic uncertainties and recent changes in the birth rate this is not appropriate. Flexibility should therefore be provided in the Core Strategy to review the housing target at various times during the plan period.
- The housing target should be expressed as a set number of dwellings to be delivered per annum, which can be reviewed.

**How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy.**

In formulating the revised housing target in the Proposed Submission document (4,500 between 2010 and 2030) an allowance for 190 homes on unidentified ‘windfall’ sites during the first 5 years of the plan has been made. The NPPF only allows for including windfalls in a five year supply, not the entire plan target period.

Infrastructure limitations are one of the key constraints on the housing target, meaning that the proposed housing target is less than the objectively identified housing need.

The plan has been prepared in full recognition that the South East Plan is still part of the development plan. The housing target in the Proposed Submission document is considered to be in general conformity with the district’s South East Plan housing requirements.

Empty homes are only a very small proportion of the district’s housing stock. The Council’s Housing Strategy supports bringing empty homes back into use but this would not result in significant numbers of habitable homes being generated annually and there we cannot demonstrate how many homes might be delivered in this way annually. Empty homes brought back into use would not amount to net additional dwellings in the district’s housing stock and so would not count against the strategic housing target.

The target is based on numbers that can be reasonably expected to be delivered based on a number of factors, including historic delivery rates, land availability and land owners/developers intentions. The Core Strategy has been developed through a period of ongoing economic uncertainty and recessions and this has been factored into supporting evidence.
The housing target of 4,500 is broken down to approximately 225 net additional dwellings per annum. The local planning authority monitors housing delivery and will continue to do so and thus will be able to monitor the effectiveness of the Core Strategy in delivering homes against the target.

### Disagree with the housing target - think it is too high

<table>
<thead>
<tr>
<th>Number of respondents</th>
<th>18</th>
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#### Summary of the comments received

Although many respondents commented that proposed levels of housing growth were too high for individual settlements, comparatively few representations considered that the overall level of housing planned for the district was too high. Of those, the following reasons were given for 4,150 net additional dwellings being too high a level of housing growth to plan for (with reference often being made to the Local Housing Needs Assessment and/or the Housing Background Paper):

- The future growth of household numbers, based on the forward projection of past trends from more prosperous times, is very likely to be over-estimated as a result.
- Further significant housing in the district should not be at the expense of community cohesion and the countryside in order to meet unrealistic and unnecessary targets set by central government for more needless housing development.
- The strategy refers to the fact there will be limited overall increase in population in the region, so why is there a need to further develop?
- There should be no new housing planned for unless it is on brownfield sites and/or is agreed by the parish council who represent the local people.
- Further housing development could further degrade the river systems and the aim must be for improvement, particularly in light of the Water Framework Directive.
- The majority of respondents who opposed the proposed housing target, as they considered it to be too high, cited concerns over infrastructure provision. Particular mention was made to water provision (in light of concerns being expressed over prospective water shortages), capacity in existing schools, leisure facilities and transport infrastructure.

It is worth noting that no alternative housing delivery targets, which fell below the proposed target, were suggested by respondents.

### How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy.

The district is very constrained in planning terms (including infrastructure and environmental constraints) and hence we are only able to plan for a housing target which falls some way below the assessed level of housing need. While housing need is based on projections, and is not an exact science, we are comfortable that the housing target will not represent an oversupply of housing.

Housing needs have been objectively assessed at the local level and are not longer directly prescribed from above. However, the South East Plan, which imposed housing requirements for the district, is currently still in place (although its revocation is expected in the future). The locally derived housing target is considered to be in general conformity with the South East Plan with local justification.

While the overall population numbers are not expected to increase significantly, the number of households is. This is as a result of an ageing population and changing household structures, with growing numbers of single person and smaller households.
There is also an existing backlog of unmet housing needs.

Brownfield sites have been sought wherever possible. However, there are insufficient suitable and available brownfield sites to meet all the district’s requirements. Town and Parish Council’s have been consulted on sites in their areas. In some cases they are preparing or considering preparing Neighbourhood Plans to identify housing sites for their areas. However, the Core Strategy must also identify at least sufficient sites to demonstrate housing supply for the first 5 years from the point of adoption.

The Council and NPA work closely with partners such as the Environment Agency to ensure that environmental impacts of new development are minimised and appropriately mitigated. This would include any potential impacts on river systems.

The Proposed Submission document, together with the housing target, has been prepared with infrastructure constraints as a key consideration. Infrastructure providers have been consulted throughout the development of the Core Strategy, which includes information on infrastructure that will need to be provided in order to support new development. This will be set out in the Infrastructure Delivery Plan that accompanies the Core Strategy. Where, for example, a development will generate a need for additional school places in an area where schools are at capacity, the developer would be required to make financial contributions to support the creation of the relevant school places.

<table>
<thead>
<tr>
<th>Disagree with the housing target - think it is too low</th>
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<tbody>
<tr>
<td><strong>Number of respondents</strong></td>
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<tr>
<td><strong>Summary of the comments received</strong></td>
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<tr>
<td>Those who considered the housing target to be too low included Newhaven Town Council, developers and a number of landowners/proponents of potential development sites, as well as a few individual members of the public. Reasons for seeking a higher target included, along with what that target should be, were:</td>
</tr>
<tr>
<td>• Long term under provision of housing will exacerbate the demand for affordable housing.</td>
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<tr>
<td>• The Local Housing Needs Assessment considers that in order to promote economic growth and allow for demographic trends in dwelling requirements a figure between 250 and 300 dwellings per annum would be more sustainable.</td>
</tr>
<tr>
<td>• As the Emerging Core Strategy is not proposing to meet the identified level of housing need, it will fail to fulfill the first strategic objective.</td>
</tr>
<tr>
<td>• At the very least the South East Plan figure should be maintained and if possible raised. This will allow for economic growth and choice in the housing market, both for developers and households, whilst protecting the environmental capital of the district. This is more likely to meet the objectives and vision of the Core Strategy.</td>
</tr>
<tr>
<td>• We would be willing to see a higher level adopted if it could be ring-fenced as only for truly affordable homes, such as council houses or homes more suitable for elderly people.</td>
</tr>
<tr>
<td>• With affordable housing needs having reached 2,142 by 2010 there is no prospect of delivering the necessary affordable housing with the housing target as currently set out.</td>
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<tr>
<td>• The evidence base points to a need to plan for a materially higher number of dwellings than currently proposed in order to meet the full requirements for market and affordable housing.</td>
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<tr>
<td>• Paragraph 109 of the draft National Planning Policy Framework says that local planning authorities should ensure that their Local Plan meets the full requirements for market and affordable housing. In addition it points towards</td>
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</table>
local planning authorities needing to maintain a five year supply of housing, with an additional allowance of 20% to ensure choice and competition. Because of this, the housing target for the Core Strategy needs to be increased and regard will need to be had towards the 20% additional allowance.

Eleven of the respondents who disagreed with the housing target did so by making representations through the online survey and supporting the option that was strictly in accordance with the South East Plan requirements. This option was for 206 net additional dwellings per annum in the period 2010 to 2026 and then 220 net additional dwellings per annum for 2026 – 2030. In total this equates to 4,176 dwellings, which is just slightly more than the preferred target of 4,150.

How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy.

The Proposed Submission document seeks to provide the optimum level of housing delivery, including affordable housing, in a sustainable way within the recognised constraints. The constraints mean that the total level of housing to meet need cannot be achieved in the district.

The housing target proposed is a little higher, on an annualised basis, than the South East Plan target (225 per annum proposed compared to 206 per annum in the SEP).

The entire housing target cannot be ring-fenced for affordable homes as this is not financially viable. Unfortunately the affordability gap issue in the district is already a significant problem. Even if all the housing target was delivered as affordable housing, the level of need would be unlikely to be met in full. The constrained nature of the district makes this impossible.

The NPPF (March 2012) requires a 5 year housing land supply plus a 5% buffer. Regards has been has to this in deriving the housing target and demonstrating a 5 year supply in the Proposed Submission document.

### Topic Area: Office Floorspace Target

<table>
<thead>
<tr>
<th>Agree with the planned level of provision of office floorspace</th>
<th>34</th>
</tr>
</thead>
<tbody>
<tr>
<td>Number of respondents</td>
<td>34</td>
</tr>
<tr>
<td>Summary of the comments received</td>
<td></td>
</tr>
<tr>
<td>The majority of respondents that supported the preferred office floorspace provision did not specify their reasons for doing so. One respondent commented that it would be useful to know how many extra jobs the extra floorspace envisaged would be likely to generate. Others noted that the key issue is the generally low quality of many existing employment premises in the district and therefore considered that the Core Strategy should look at how to upgrade some of the existing stock, as well as ways in which new employment development could be stimulated on long-standing undeveloped employment sites and support regeneration.</td>
<td></td>
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</table>

How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy.

The support for the preferred level of office floorspace provision is welcomed and the points noted.

<table>
<thead>
<tr>
<th>Disagree with the planned level of provision of office floorspace</th>
<th>28</th>
</tr>
</thead>
<tbody>
<tr>
<td>Number of respondents</td>
<td>28</td>
</tr>
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</table>
Summary of the comments received

Nineteen respondents felt that the preferred target was too high, whilst two felt that it was too low. These responses were mainly submitted as survey responses and so the specific reasons for taking that viewpoint have generally not been expressed. However, other general comments provided by others respondents were:

- a higher level of employment growth should be proposed to try to address high levels of out-commuting
- a more proactive approach should be taken to attracting businesses to locate in the district
- a more proactive approach should be taken to facilitating a transition to higher value business sectors and providing appropriate modern premises
- employment needs and distribution should be set out in neighbourhood plans

Newhaven Town Council was concerned that the proposed employment floorspace requirements being based principally on existing commitments should not stifle opportunities for regeneration or enhancing the local economy. The Town Council also called for greater flexibility in terms of delivering long-standing employment commitments and considering how to upgrade existing employment sites, and also for the Core Strategy to recognise that there are special circumstances in which opportunities for employment creation arise that could be acceptable, subject to meeting sustainability requirements.

How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy.

The 2010 EELA acknowledged that an issue faced in the district is the relatively low quality of much of the existing employment stock. Therefore there is a need to ensure that the policy supports, and does not present a barrier to, improvement and appropriate intensification of existing stock. The EELA also recognised that, in some instances, the lower quality stock is serving a local need at a relatively low cost. However, if we are to actively encourage a transition to higher value, more high tech uses and more modern facilities the policy framework needs to support appropriate alterations to existing stock.

Neighbourhood plans could set out a local employment strategy for a given plan area.

Reducing out commuting is desirable but this will be through improving job opportunities and the quality of jobs through improved better quality premises, more homeworking, encouraging small businesses, maintaining our existing employment land supply etc.

Setting unrealistically high floorspace allocations will result in undeliverable and unimplemented sites as the EELA update continues to show that the district has ample employment land (job forecasts have been revised downwards in light of ongoing economic uncertainties and job/floorspace ratios have increased since 2010). The issue is more about the type of buildings/uses currently on that land. Mixed use redevelopments may help deliver modern employment units where the employment market alone is unable to deliver 100% employment development.

Taking a more proactive approach to business development and marketing the district to attract business to locate here is more a role for Economic Development colleagues. The Core Strategy cannot really do this directly, but it can set an appropriately supportive planning policy context.

This data follows the completion of the ELR Update June 2012 and assumes Eastside is removed from supply following the committee resolution to grant for the Asda/Barrett Homes retail/residential scheme. These figures relate to provision from 2012 to 2031.
In the period from 2012 to 2031 in the region of 74,000 sq. metres of employment floorspace (B1, B2 and B8) will be provided in the plan area. About 60,000 sq. metres of this floorspace will be industrial space (B1c, B2 and B8), and about 14,000 sq. metres will be office space (B1a).

For office space there is reasonable consistency for a requirement in the 12,000 – 14,000 sq. metres range, which is lower than the 11,400 – 24,000 sq. metres range found in the 2010 EELA for a shorter period. This is not surprising given that much denser office occupancy is now assumed compared to 2010 (12.5 sqm per job compared to 20 sqm per job previously assumed). The 2012 ELR Update still advocates planning towards the higher end of the forecast range for office space to ensure appropriate opportunity to realise the District’s potential for office employment is provided. Around 14,000 sq. metres of office space is therefore considered to be required to 2031.

Qualitative factors also remain important in the district, where there is an identified lack of supply of good quality office and industrial sites that are fit for modern purposes. The 2010 EELA suggested that if a good new site was to be provided, free from significant constraints, it may stimulate development and attract occupiers able to design and build premises.

While redeveloping some industrial sites for office use offers a potential solution to the office space requirements, including better quality and fit for modern purposes premises, in practice very few sites were identified where this might realistically occur. The choice of office sites remains limited and therefore a potential need for a new site in or near Lewes town for qualitative reasons remains.

No need has been identified for new employment land allocations elsewhere in the district (other than those above in or around Lewes town). However the provision of small scale, flexible business units also remains appropriate in all the larger towns in the district.

In comparison with the 2010 EELA, the 2012 ELR Update indicates lower quantitative requirements based on predicted employment growth and higher quantitative requirements based on the actual recent development trends in the district. However in terms of the need to allocate additional employment land, the 2012 Update concludes that the position is broadly unchanged from the 2010 position set out in the Emerging Core Strategy.

As set out in the Emerging Core Strategy, the need for 1 - 1.25 ha for office space within or near Lewes town is reiterated in the 2012 Update. The North Street redevelopment area offers an opportunity to include modern office development.

**Topic Area: Industrial Floorspace Target**

<table>
<thead>
<tr>
<th>Agree with the target</th>
<th>29</th>
</tr>
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</table>

**Summary of the comments received**

Most respondents in support of the preferred level of industrial floorspace did not provide reasons for their opinion on this point. However, one respondent identified that there was no residual requirement for additional industrial floorspace because the existing potential supply of industrial land could meet the level of need. Another felt that it was important to plan for this level of floorspace in order to provide manufacturers with good sized premises.

**How these comments have influenced the Proposed Submission Document and**
further information relating to this part of the Core Strategy.

Support welcomed and comments noted.

<table>
<thead>
<tr>
<th>Disagree with the target</th>
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</thead>
<tbody>
<tr>
<td><strong>Number of respondents</strong></td>
</tr>
<tr>
<td><strong>Summary of the comments received</strong></td>
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</tbody>
</table>
| Of the respondents that disagreed with the proposed level of industrial floorspace, the majority felt that the target was too high, although reasons were not given for why, except that the district’s existing industrial land would suffice.

Three respondents considered the target to be too low, saying that manufacturing should be supported and that its decline is not as significant as often stated. Newhaven Port and Properties considered the level to be low, stating that it has 20,000 sqm of existing industrial buildings that could be upgraded and made available. They also consider that there are hectares of under-utilised commercial land in Newhaven with potential (Eastside area, East Quay and North Quay) and so planning for increased industrial and commercial facilities in the district should be focused on Newhaven Port.

<table>
<thead>
<tr>
<th>How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy.</th>
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</thead>
<tbody>
<tr>
<td>The update to the EELA is now complete – see comments below.</td>
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</tbody>
</table>
| The 2010 EELA acknowledges that an issue faced in the district is the relatively low quality of much of the existing stock, we therefore need to ensure the policy is supportive of improvement and appropriate intensification of existing stock and does not present a barrier. It is also recognised that in some instances the lower quality stock is serving a local need at a relatively low cost. However, if we are to actively encourage a transition to higher value, more high tech uses and more modern facilities we need to encourage these alterations.

Setting unrealistically floorspace allocations will result in undeliverable and unimplemented sites if the EELA update continues to show that the district has ample employment land. The issue is more about the type of buildings/uses currently on that land. Mixed use redevelopments may help deliver modern employment units where the employment market alone as not and is unlikely to deliver 100% employment development. There are already significant land and premises available for industrial uses in the district, including at the Port, which would be retained for employment unless there were overriding reasons not to (subject to EELA update findings). Encouraging intensification and modernisation is what’s required, building on existing economic strengths and fostering new ones, rather than large additional land areas, especially given the local economy is largely based on small enterprises.

This data follows the completion of the ELR Update June 2012 and assumes Eastside is removed from supply following the committee resolution to grant for the Asda/Barrett Homes scheme. These figures relate to provision from 2012 to 2031.

In the period from 2012 to 2031 in the region of 74,000 sq. metres of employment floorspace (B1, B2 and B8) will be provided in the plan area. About 60,000 sq. metres of this floorspace will be industrial space (B1c, B2 and B8), and about 14,000 sq. metres will be office space (B1a).

For industrial space the range of requirements is quite wide and higher than found in 2010, which may partly reflect the less dense occupancy figures now used for industrial
space. Employment forecasts are less reliable for small rural economies, and given that past completions reflect actual development trends to a greater extent, the ELR Update suggests that an industrial requirement of around 60,000 sq. metres would be a more appropriate basis for planning to 2031 than the higher or lower ends of the range.

The forecast surplus of industrial floorspace is considerably reduced over that anticipated in 2010 and indicates a potential modest shortfall if recent trends continue. This change is in large part explained by the loss of Eastside from the potential supply and to the less dense occupancy now applied to industrial. For offices, the surplus is much tighter than in 2010, although a shortfall is also looking unlikely unless future office growth is much greater than in the past and some sites fail to come forward for development.

Qualitative factors also remain important in the district, where there is an identified lack of supply of good quality office and industrial sites that are fit for modern purposes. The 2010 EELA suggested that if a good new site was to be provided, free from significant constraints, it may stimulate development and attract occupiers able to design and build premises. It also suggested that an additional industrial development site in or adjacent to Lewes town would improve choice and could provide some good quality, immediately available industrial land to meet future needs. As there may be a shortfall of industrial floor space if past development trends continue, the 2012 Update considers this to remain a reasonable way forward.

No need has been identified for new employment land allocations elsewhere in the district (other than those above in or around Lewes town). However the provision of small scale, flexible business units also remains appropriate in all the larger towns in the district.

In comparison with the 2010 EELA, the 2012 ELR Update indicates lower quantitative requirements based on predicted employment growth and higher quantitative requirements based on the actual recent development trends in the district. However in terms of the need to allocate additional employment land, the 2012 Update concludes that the position is broadly unchanged from the 2010 position set out in the Emerging Core Strategy.

As set out in the Emerging Core Strategy, the need for 1 – 1.5 ha for industrial space within or near Lewes town.

Land at Newhaven Port will be required for the Port Masterplan, including onshore support for the Rampion Windfarm.

### Topic Area: Housing - Haywards Heath Distribution/ Burgess Hill Distribution

<table>
<thead>
<tr>
<th>Number of respondents</th>
<th>6</th>
</tr>
</thead>
</table>

**Summary of the comments received**

Very few respondents made general comments on the distribution of housing on the edge of Haywards Heath and Burgess Hill. As can be seen in later sections, many did however discuss potential development at specific sites (Valebridge Road and Greenhill Way).

One respondent, whilst supporting the approach to apportion development at Haywards Heath and Burgess Hill, believed that such sites could be allocated higher numbers, taking into account other pieces of land on the settlements’ boundaries.

Haywards Heath and Burgess Hill Town Council, in a joint submission on the Emerging Core Strategy, felt that the levels of distribution in the Core Strategy did not reflect the goals of the South East Plan to concentrate development in the Sussex Coast sub-
One respondent also pointed out that development at Haywards Heath and/or Burgess Hill should be recognised as development within Wivelsfield parish.

How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy.

In the Emerging Core Strategy up to 180 houses were identified for the area within Wivelsfield Parish at the edge of Haywards Heath and 70 – 220 at the edge of Burgess Hill. The numbers at Haywards Heath have been reduced in the Proposed Submission document, following consultation and further site assessments, to 140 on the edge of Haywards Heath (to be delivered on the Greenhill Way strategic site) and 70 on the edge or Burgess Hill (33 existing completions since April 2010 and 37 commitments). The Valebridge Road site is not included in the document due to uncertainties over deliverability as a strategic level site.

Topic Area: Housing - Seaford Distribution

<table>
<thead>
<tr>
<th>Number of respondents</th>
<th>42</th>
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</thead>
<tbody>
<tr>
<td>Summary of the comments received</td>
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</table>

The vast majority of respondents submitted comments on the land to the south of Chyngton Way that was one of a number of potential housing sites assessed and identified in the Strategic Housing Land Availability Assessment (SHLAA). A summary of the comments made on this site is included within the section of this document that covers the SHLAA.

Several of the comments made on the Chyngton Way site referred to Table 5 of the Emerging Core Strategy, which proposes that 125 houses are delivered on identified small-scale sites. Such comments expressed concern that this figure would of necessity have to include a contribution from the Chyngton Way site.

A few objections were made to any additional planned housing development at Seaford, due to concerns over infrastructure. Contrary to this, a few respondents considered that the proposed level of housing growth for Seaford was too low and that the Core Strategy should consider some growth on the edge of the town and into the South Downs National Park, provided it does not prejudice the National Park purposes.

How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy.

It is acknowledged that the figure of 125 units to be delivered at Seaford on identified small-scale sites reflected the total capacity of the sites in the town that were deemed deliverable or developable in the SHLAA. This included land at Chyngton Way. This is not to say that such sites will be allocated for development. Instead, the total capacity figure from the SHLAA provides the latest indication of the potential for Seaford to accommodate additional housing growth (excluding small-scale windfall sites).

The work undertaken on the Infrastructure Position Paper and Delivery Plan has demonstrated that there are no insurmountable constraints on the towns infrastructure that would prevent a level of housing growth in the region of that identified in the Emerging Core Strategy being delivered in the town.

Whilst it is recognised that the level of planned housing growth is low for Seaford in comparison to the size and needs of the town, it needs to be recognised that the possibilities for outward expansion of the town are almost non-existent. This is
evidenced by the findings of the SHLAA and is predominantly due to the National Park boundary running up to the immediate edge of three sides of the town with the sea on the fourth. Consequently, housing development will generally be limited to redevelopment and intensification opportunities that arise within the existing urban area (comparatively few such opportunities are available within the town due to a lack of derelict and vacant sites/precisities).

Accordingly, no change has been made to the Core Strategy in response to the comments submitted.

Topic Area: Housing - Lewes Town Distribution

<table>
<thead>
<tr>
<th>Number of respondents</th>
<th>13</th>
</tr>
</thead>
</table>

Summary of the comments received

Although many comments related to particular sites in the town (as addressed in the respective sections of this document), only a small number of comments touched upon the overall distribution of housing in Lewes town.

The comments were divided between those advocating that Lewes town should accommodate a higher number of homes than that suggested in the Emerging Core Strategy and those that suggested a lower number was more appropriate.

The reasons for suggesting a higher target included:

- A high housing target is necessary to ensure economic vitality
- The housing target takes no account of what may come forward at North Street
- District Centres, such as Lewes town, should have the highest housing figures
- A low target in Lewes town puts pressures on other parts of the district/South Downs National Park
- There are a large number of brownfield sites in the town that could be developed

The reasons for suggesting a lower target included:

- The number fails to reflect the environmental constraints such as flooding and the South Downs National Park designation
- The 'medieval infrastructure' of the town would not be able to cope with much additional housing, especially the road network
- Existing sites should be used for the local economy and services rather than housing

How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy.

Comments relating to the North Street and Old Malling Farm sites are addressed within specific sections of this document. If either, or both, of these sites are allocated/identified in the Core Strategy, then they will contribute to the overall housing target for the town.

Although some of the arguments advocating a higher housing target for Lewes town are considered reasonable, it should be accepted that the location of the town within a nationally protected landscape does limit the level of housing growth that could be delivered, due to the landscape constraints to developing green field sites.

One respondent advocated a higher housing number due to the number of brownfield sites in the town that could be delivered. The SHLAA, which has undertaken a thorough assessment to identify such sites, has identified some capacity for housing to be
delivered on brownfield sites and this has been incorporated into the proposed housing delivery figure for the town.

**Topic Area: Housing - Newhaven Distribution**

| Number of respondents | 8 |

**Summary of the comments received**

The comments categorised under this section relate to the proposed level of housing growth at Newhaven, without specifically mentioning the options for the Eastside area, or suggesting alternative strategic sites/locations for development. They can be summarised as follows:

- Housing should only be brought forward in association with the provision of adequate highway access and community and green infrastructure requirements.
- Broad opportunities and constraints, as well as infrastructure requirements, should be identified in the supporting text for any strategic sites in Newhaven.
- Any housing delivered on the edge of Newhaven should improve the interface between the existing urban edge and the National Park and prevent coalescence with Peacehaven.
- A proportion of the houses to be delivered on identified small-scale sites at Newhaven should be located within the National Park (where it borders the town) to help meet the National Park objectives.
- Newhaven Town Council considers that there are additional sites, apart from Eastside, that could deliver in the region of 100 dwellings and therefore be identified as strategic sites in Newhaven. These sites were not identified. The Town Council also considered that reference should be made to the significant redevelopment opportunities that could deliver housing in the town, including the Old Shipyard at Robinson Road, various areas in and around the town centre, and land adjacent to Tideway School.

None of the comments on the proposed housing distribution at Newhaven considered the level of growth proposed to be too high. Instead, most of them considered that additional housing growth should be planned for at Newhaven to aid in the regeneration of the town. However, such comments were generally made by respondents objecting to additional housing in another area of the district.

**How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy.**

It is not clear how the delivery of housing on identified small-scale sites within the South Downs National Park would help to meet the National Park objectives, as suggested by some respondents. National Park purposes would clearly not support such an approach to housing delivery in Newhaven, particularly when there are development opportunities elsewhere within the town, outside of the National Park, that could help deliver the housing need for the area. Furthermore, the SHLAA has not demonstrated any potential for small-scale housing sites within the National Park area that borders Newhaven (generally around Denton), with most of the submitted sites being sites assessed as unsuitable on the grounds of negative landscape impact.

It is acknowledged that the sites identified by Newhaven Town Council could deliver housing over the plan period. However, these sites are not considered strategic in nature and are therefore not under consideration for allocation within the Core Strategy. It is also considered inappropriate to refer to them in the supporting text, as this may pre-empt decisions that should be taken through either a Newhaven Neighbourhood Plan, or the Site Allocations DPD.
All strategic site allocations will identify, either in the policy itself or in the supporting text, the opportunities and constraints to development (including how these can be taken advantage of/overcome), together with the key infrastructure requirements that will be required to service the planned development.

In response to the comments advocating a higher housing target for Newhaven, it should be recognised that Newhaven already benefits from a significant number of committed housing schemes that have yet to be built (including Phase 3 of the Marina and Eastside). This large number of commitments is partially due to the relatively suppressed housing market in Newhaven, which is currently preventing such developments coming forward.

The SHLAA Technical Advisory Panel consider that the housing market in Newhaven is incapable of delivering a large amount of housing over a short period of time, even during more buoyant wider market conditions. Hence, it is necessary to identify and phase a housing target that is deliverable and will aid in delivering the wider regeneration needs for the town. It is considered that the proposed housing target achieves this and the phasing of the strategic sites should allow for a steady deliverable rate of new housing throughout the plan period. Irrespective of the above, it is worth noting that the SHLAA has not identified a potential level of housing capacity for the town (based on deliverable and developable sites) that exceeds the level of growth that is being planned for.

Topic Area: Housing - Peacehaven and Telscombe Distribution

<table>
<thead>
<tr>
<th>Number of respondents</th>
<th>13</th>
</tr>
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<tbody>
<tr>
<td>Summary of the comments received</td>
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</table>

There was some support for development in the ranges proposed by the Emerging Core Strategy for Peacehaven and Telscombe. However, most respondents felt that the range of potential housing numbers in the Emerging Core Strategy document were too high, with some feeling that the area should not accommodate any additional housing development, for the following reasons:

- New development would add to the traffic problems on the A259, causing problems to residents and emergency services.
- New development would take away recreational space.
- Peacehaven does not have the shops, employment and services to support additional population.
- The town has had a lot of recent development and ‘has done its bit’, whereas other parts of the district have not.
- Newhaven and Peacehaven could amalgamate as additional development would result in urban sprawl.

How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy.

In the Emerging Core Strategy the housing figure for Peacehaven and Telscombe was 455 – 1018. This has been revised in the Proposed Submission document to 517 (189 completions, 108 commitments, 0 on strategic sites, and 220 to be delivered through subsequent allocations (Neighbourhood Plans or Site Alllocations DPD)).

Evidence has been undertaken to assess the impact of additional housing growth on the highway network and in particular the A259. Although this evidence shows an increase in traffic flows on certain routes, including the A259, it is not seen by the highways authority (ESCC) as a ‘showstopper’ to any further housing development in the town, however this has been a significant constraint on potential development numbers in
Peacehaven and Telscombe.

The settlement hierarchy places Peacehaven and Telscombe as a District Centre. This means that it has a reasonable level of services and facilities and is seen as one of the more appropriate and sustainable areas for growth in the district, in accordance with the National Planning Policy Framework.

It is recognised that the gap between Peacehaven and Newhaven, and the separate identity of the two towns, is highly valued. The housing figures identified for Peacehaven and Telscombe are seen as deliverable whilst maintaining the gap.

All residential development in the district is required to directly provide or contribute towards an adequate level of recreation facilities for the development type and scale, not to take recreation facilities away. Proposed Submission Core Policy 7 (Infrastructure) seeks to resist the loss of sites or premises currently, or last, used for the provision of community facilities, unless there are overriding reasons to do so.

Topic Area: Housing - Ringmer and Broyle Side Distribution

<table>
<thead>
<tr>
<th>Number of respondents</th>
<th>208</th>
</tr>
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</table>

Summary of the comments received

The vast majority of respondents raised concerns over future housing development in the village, often without specifying an alternative housing delivery target. Some either objected to any additional housing in Ringmer at all, or objected to the targets at the upper end of the range in the Emerging Core Strategy. Others supported a housing delivery target that was at the lower end of the range consulted upon.

Comments on the wider housing distribution are set out below (N.B. Comments made on the options for broad locations for housing are addressed in the relevant section of this report).

Housing Number

Objections to the higher housing development option for Ringmer (between 176 & 647 new houses), including Ringmer Parish Council, included the following reasons:

- The range is above the scale required to meet village needs
- Ringmer should not meet District needs but local needs
- The numbers represent the desire of developers rather than the community
- Development at such a scale does not accord with the vision for the area
- Would not deliver homes in areas of need, contrary to Strategic Objective 1
- Would turn Ringmer into a town, contrary to Strategic Objective 4
- Would impact on natural beauty and wildlife as growth would occur on greenfield land, contrary to Strategic Objective 5
- Brownfield land in the rest of the district should be developed before land in the countryside, as encouraged by Strategic Objective 6
- Would increase out-commuting – not aiding the ambition to reduce carbon dioxide emissions seen in Strategic Objective 8
- Development should be focused on the most deprived parts of the district rather than in Ringmer, in accordance with Strategic Objective 10 and the South East Plan.
- Ringmer is being treated unfairly when compared to the other settlement within the same category in the Settlement Hierarchy, i.e. Newick.

The few respondents who supported the higher housing development option providing
the following reasons:

- Ringmer is a great place to live and more housing needs to be provided.
- Due to limited options for growth elsewhere in the district, the most should be made of the identified capacity for housing at Ringmer.
- Only large-scale housing development will rectify existing infrastructure deficiencies, particularly on the highway network.

Some respondents who objected to the higher housing delivery option went on to support a housing delivery target that was at the lower end of the range consulted upon for the following reasons:

- 150-200 houses will deliver the required housing to meet local needs, thereby enabling people to stay in the village if they wish to do so.
- The additional housing would help sustain local shops, pubs, schools, etc.
- Ringmer has an unusually high proportion of elderly residents and therefore more development is needed to help accommodate new, younger families.
- There is a need for more housing that is suitable for the elderly.

**Infrastructure**

Southern Water (SW) advised that new development in Ringmer would drain to Neaves Lane Wastewater Treatment Works, where there is limited headroom in the existing Environment Agency (EA) discharge permit to handle new development. They also stated that, if the maximum amount of development were brought forward, the resulting 20% increase in the permitted flow discharge would need a new permit from the EA and investment by SW in additional wastewater treatment capacity.

SW further added that they are not aware of any environmental constraint which would prevent the increase in effluent flow associated with new development. However, the investment required needs to be planned and its delivery recognised and supported via the Infrastructure Delivery Plan. They add that the timing of development will need to be phased and coordinated with the delivery of additional wastewater treatment capacity.

Ringmer Parish Council commented that there were already problems with infrastructure for the current community. This view was held by a number of respondents who also considered that infrastructure relating to water, schools, broadband, etc. were not adequate for a larger community. As a result, many felt that development at Ringmer should be conditional on infrastructure being provided.

**Village Character**

East Sussex County Council and other respondents felt that there could be an impact on the character of the settlements if the upper level figure was taken forward, although this would be dependant on phasing and integration of buildings into its surroundings. Others suggested that development principles would need to be established to make development appropriate and some argued that new development needs to be designed sympathetically with the rest of the settlement.

Ringmer Parish Council commented that any large scale development would destroy the ‘village feel’ of Ringmer. This view was echoed by others who stated that expanding Ringmer disproportionately would impact on the community significantly.

Some suggested that ribbon development should not continue as it was causing urban sprawl and thus the gap between Ringmer and Broyle Side should be kept. Others disagreed, stating gaps should be filled rather than developing upon substantial open areas.

**Transport**
Ringmer Parish Council stated development in Ringmer would be contrary to Strategic Objective 7, as it would increase the need to travel (to employment and higher order services) and such travel would be predominantly by private car. A number of consultees felt that significant improvement to transport infrastructure and services were needed for additional development to come forward.

Many comments stated that Earwig Corner was beset by problems and if it could not be dramatically improved, development at Ringmer should not be considered. It was suggested by others however that the reopening of the Lewes to Uckfield railway line may solve the traffic problems.

One respondent commented that the cycle path part constructed between Ringmer and Lewes was little used and completing it would not noticeably improve traffic. A number of comments focused on current parking problems and potential parking problems caused by new development.

**Ringmer Neighbourhood Development Plan**

Ringmer Parish Council stated that the Ringmer Neighbourhood Development Plan should consider the nature and location of any additional housing. They felt that not doing so undermines their plans. This position was reiterated by Parish Councillors and members of the public who felt that numbers should be developed through local community consultation rather than top-down imposition by the District Council.

There were also a number of other comments, as follows:

- There should be no strategic-level sites (100+ homes) but small scale development, with a mix of tenures, may be acceptable
- Lessons should be learnt from previous ‘bad’ development in Ringmer (a number of different sites were referenced)
- Development is being considered in Ringmer due to the bus service and shopping precinct
- Ringmer has quadrupled in size in the last 45 years and thus Rushey Green has been lost as a separate settlement
- Developer contributions should be used to enhance the quality of life in the village rather than spent at Earwig Corner.
- Development should bring a 20mph speed limit in Ringmer
- Development at Ringmer should consider energy conservation and be built to high standards to reduce consumption.

**How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy.**

Regarding infrastructure constraints, it is accepted that any significant level of housing growth will require improvements made to the existing levels of provision. In particular, ESCC Education Services have indicated that there a potential additional 0.5 form entry at primary school level may be required in the medium to long term and there is currently sufficient capacity at secondary school level, Southern Water have indicated that improvements will be required to the sewage treatment infrastructure and ESCC Highways require improvements to be made to the highway infrastructure (particularly Earwig Corner) if significant development is to be delivered at Ringmer. Through the work undertaken on the Infrastructure Position Statement and Delivery Plan there is nothing to suggest that such improvements cannot be delivered.

Ringmer is classified as a Rural Service Centre in the settlement hierarchy. As such is it a more sustainable location for development than most other villages in the district (Newick is also a Rural Service Centre) and the most sustainable locations after District Centres and Secondary Regional Centre (Haywards Heath in Mid Sussex).
Housing numbers for Ringmer and Broyle Side in the Emerging Core Strategy were indicated to be in the range of 176 – 647 dwellings. Further to the consultation and additional assessment work, this figure has been reduced in the Proposed Submission document to 224 (1 completion, 3 commitments and 220 on subsequently allocated sites (Neighbourhood Plan or Site Allocations DPD).

A reduction in the speed limit cannot be delivered by the Core Strategy; this is a matter for the local highway authority and police.

Proposed Core Policies 11 (Built and Historic Environment and High Quality Design) and 14 (Renewable and Low Carbon Energy and Sustainable Use of Resources) will require energy conservation, high design standards and resource consumption considerations in new development district wide.

**Topic Area: Housing - Newick Distribution**

<table>
<thead>
<tr>
<th>Number of respondents:</th>
<th>78</th>
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**Summary of the comments received**

The vast majority of representations were from residents of the village who submitted individual letters. Most of these representations supported the approach put forward by the Newick Village Society, which is opposed to a large expansion of the village but supports some new housing development (perhaps 30 houses) to meet the local needs of Newick residents. Newick Parish Council itself considers that the village needs a limited number of low cost and affordable houses, probably about 30-40% of the potential number of dwellings indicated in Table 5 of the Emerging Core Strategy document.

A summary of the general issues raised is set out below:

- There is already insufficient parking at the existing shops and other facilities in the village and virtually all the planned homes both in Newick and the immediate vicinity will necessitate driving into the village centre to use the facilities
- The breadwinner in all the new homes will likely have to commute out of Newick, causing additional traffic and pollution
- Access to the A272 at peak times is already a nightmare
- Newick wants to retain its village community spirit
- The District Council has failed to explore what level of housing would actually bring benefits to the village and make it a more sustainable community
- The construction of more ‘executive style’ homes must be prevented
- How will local schools and health facilities cope with an influx of new people to the area?
- How will sufficient water supplies be made available when there have already been chronic water shortages in recent years?
- A rapid growth in social housing will inevitably be allocated to people with no connections to Newick or village life
- The spatial strategy covers a period of 20 years so it is unacceptable that Newick is identified in the SHLAA as being capable of taking all the proposed new homes in only 5 years
- Strategic Objectives 1 and 7 of the Emerging Core Strategy have not been met and any attempt to extend the development boundary of Newick will be contrary to Objective 5

Three respondents opposed any additional housing growth in Newick on the grounds that:
the village has done more than its fair share to contribute to the housing needs of the County
local schools, health facilities, roads and parking facilities are already at capacity
further expansion would add to sprawling development and turn the village into a town
it would have an adverse impact on the designated Conservation Area.

Four respondents supported a level of housing growth within the range suggested in the Emerging Core Strategy on the grounds that the steady development of new homes for rent and purchase in the village is necessary both to provide houses for existing families and local school staff and to support existing local shops, public houses and bus services.

One respondent argued that the SHLAA sites located between Newick and Chailey should be identified in the Core Strategy as a broad location for development (with a notional capacity of circa 70 units) and be included as an option in Table 5.

Other specific comments made in relation to individual sites assessed in the SHLAA are identified SHLAA topic paper.

How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy.

The Council is not aware of any particular ‘showstoppers’ when it comes to potential infrastructure constraints impacting upon the delivery of further development at the village. However, this is not to say that there is sufficient spare capacity in the infrastructure to support new development and it will be expected that improvements to the level of provision will be required alongside the delivery of new housing. Through liaison with the highways authority (ESCC) no concerns have been raised over the principal of a level of housing development, within the range consulted upon, in terms of potential impact upon the highway network.

Any new housing at Newick will need to be conditional on contributions being made to the delivery of SANGS (Suitable Alternative Natural Green Space) to mitigate the impact of recreational disturbance on the Ashdown Forest and deflect potential visitors to an alternative site.

In the Emerging Core Strategy 120 – 174 homes were proposed for Newick. Following consultation and further site assessments, this has been revised to 124 (21 completions, 3 commitments and 100 on sites to be allocated subsequent to the Core Strategy (Neighbourhood Plan or Site Allocations DPD). All net additional housing in Newick is contingent on appropriate SANGS provision.

Topic Area: Housing - Barcombe Cross Distribution

<table>
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<tr>
<th>Comments on Barcombe Cross Distribution</th>
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<tbody>
<tr>
<td>Number of respondents</td>
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</table>

Summary of the comments received

All the respondents considered that the figure in the Emerging Core Strategy was too low. Barcombe Parish Council felt that the village could accommodate additional housing at the rate of 6-7 per year, while one parish resident agreed stating that such a rate would sustain the village better. The latter did however feel that Barcombe was a single village encompassing Barcombe Cross and other settlements and that this should be reflected in the distribution table. A number of Plumpton Green residents expressed a view that Barcombe Cross had been provisionally allocated less than its fair share of
additional housing because it was less than the range consulted on for Plumpton Green, both of which are classified as a Service Village.

How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy.

Work undertaken on the Rural Settlement Study and the Settlement Hierarchy suggests that Barcombe Cross could accommodate between 30 and 100 additional dwellings during the plan period. Despite this, the Emerging Core Strategy only identified a figure of 30 dwellings to be delivered on identified sites during the plan period. This is because the Strategic Housing Land Availability Assessment (SHLAA) 2011 did not identify a potential capacity for housing growth above 30 dwellings. The update to the SHLAA for 2012 has not identified any significant capacity at Barcombe Cross and as such 11 units to be delivered on sites to be allocated subsequently to the Core Strategy has been identified for the village.

Whilst recognising the desire of the Parish Council and others to deliver housing in excess of the figure provided in the Core Strategy, it should be recognised that there is no evidence to support this. If the figure was set at 100, it could be argued that this level of growth would not be achievable.

Despite the above, it is worth noting that the figure of 11 should be seen as a minimum level of growth to be planned for in the village. In addition, should the Parish Council produce a Neighbourhood Plan, it is possible to plan for a higher level of housing growth, provided appropriate sites can be identified.

Topic Area: Housing - Plumpton Green Distribution

<table>
<thead>
<tr>
<th>General comments</th>
<th>39</th>
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<tbody>
<tr>
<td><strong>Number of respondents</strong></td>
<td></td>
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<tr>
<td><strong>Summary of the comments received</strong></td>
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<tr>
<td>The vast majority of representations were from Plumpton Green residents who submitted individual letters to the District Council. Some of these representations provided reasoned opinions on what level of housing growth should be planned for in the village and these are summarised in the subsequent sections of this document. Other representations also raised a number of comments regarding future housing in Plumpton Green, without specifically relating these to a preference for what level of growth should be planned for. Comments relating to individual sites assessed in the SHLAA are identified in the SHLAA topic paper. A summary of the general issues raised is set out below:</td>
<td></td>
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<tr>
<td>• Support for good quality retirement homes and smaller properties, rather than larger properties. This will allow for some people to downsize and still remain in the village.</td>
<td></td>
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<tr>
<td>• Any new housing should be designed so that it is sympathetic to the existing houses and preserves the sense of living in a village in the countryside.</td>
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<tr>
<td>• Priority should be given to infill housing.</td>
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<tr>
<td>• There has been considerable building in the vicinity of the village and indeed the village itself has seen its fair share of new houses.</td>
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<tr>
<td>• Results of the Village Action Plan show the desire for starter/smaller housing units and for some local control over who takes up residence in such new homes.</td>
<td></td>
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<tr>
<td>• Concern about the focus of significant development being built quickly over the next few years. Instead the housing should be phased more slowly over the</td>
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lifetime of the plan.

- Traffic concerns were cited in many representations, with particular focus being on parking and increased levels of traffic on Station Road, safety of the two junctions at either end of Plumpton Lane, accident black spots (particularly the bridge on Plumpton Lane to the south of the racecourse) and the inadequate pavement (too narrow and only on one side of the road) along Station Road.
- Concern over whether the infrastructure of the village could cope with further housing was mentioned in a number of representations. Such concerns particularly focused on electricity, water supply and mains sewerage.
- Concerns were expressed over land drainage problems and flood risk and the high quality landscape and biodiversity in and around the village.
- Development could change the linear nature of the village and encroach into the surrounding countryside, all of which is visible from the Downs.
- Any new housing should also result in high speed broadband being introduced into the village.
- Increasing housing will bring increased demand for street lighting.

One respondent considered that the area to the east of Station Road should be described more clearly in the development strategy for Plumpton Green.

Comments received from Plumpton Parish Council
Plumpton Parish Council invited comments from Parishioners on the Emerging Core Strategy and consolidated these comments in order to draw out the points where there was a strong consensus of opinion. 102 individuals submitted comments to the Parish Council and these are summarised below:

- 21% expressed a preference of no development.
- 34% for up to 30 units
- 28% for 30-60 units
- 3% for over 60 units
- A further 13% did not indicate specific numbers and of these 9% appeared to favour a minimal amount of development and 4% a significant amount of development.
- Of those who gave a view on the type and mix of housing preferred, the preference was almost exclusively for affordable homes with some expressing a preference for any market housing to be units of 2-3 bedrooms.
- Of specific points raised additional traffic volumes was cited most frequently and the impact on the utilities infrastructure was a key concern.

The Parish Council also made their own comments and these are summarised within the relevant topic papers. Comments that specifically related to the options for housing growth in the village are summarised as follows:

- The housing target for Plumpton Green should be a single figure at the lower end of the range (30 – 100). This would reflect the majority of Parishioners views and help in achieving the vision and objectives.
- Allocating up to 100 dwellings conflicts with the objective of improving air quality.
- Concern that any development will drive a greater dependence on oil and gas deliveries to the village.

The Parish Council also enclosed a report undertaken by the Plumpton Wildlife and Habitat Group. This was concerned with the biodiversity issues relating to development proposals for Plumpton in the Emerging Core Strategy, as well as the SHLAA.

Comments received from Plumpton Residents Opposed to Unnecessary Development (PROUD)
PROUD is a collective of Plumpton and Plumpton Green residents who have the common aim of protecting the unique countryside and rural character of the Parish. A
representation was submitted on behalf of PROUD and a number of the main issues raised in relation to the options for housing growth are summarised below. It is worth noting that comments that were made on background documents such as the Rural Settlement Study and the Strategic Housing Land Availability Assessment (SHLAA) are identified within the topic papers that cover these reports. This representation was supported by 381 individuals, representing 197 households.

- The concerns of PROUD relate solely to the excessive level of housing for Plumpton Green, namely; lack of justification for the proposed housing, no consideration of the Parish Council's strategy for delivering affordable housing, constraints to development, conflicts with national policy and other parts of the Emerging Core Strategy, no consideration of settlements' historic building rates and no consideration of scale of development compared to existing settlement.
- The Parish Council has set out a coherent plan to deliver the required amount of affordable housing to meet local needs and in a manner that will respect the rural character of the settlement. This community derived objective appears to have not been acknowledged within the Emerging Core Strategy with the emphasis instead placed on the potential for excessive levels of market housing from sites identified in the SHLAA to deliver the local affordable housing.
- The amount of traffic that would be generated is the most significant constraint. PROUD have produced a professional assessment of the impacts associated with the development of 110 additional houses at Plumpton Green on top of other expected traffic growth in and around the village.
- It is too simplistic to assert that because a settlement has land that is potentially suitable to accommodate 100 dwellings, then that settlement should be required to deliver 100 dwellings; no explanation has been offered within the Core Strategy as to why development at Plumpton is higher than that proposed for the other service villages.

In summary PROUD are seeking the identification of 30 units to be delivered on identified small-scale sites in the Proposed Submission version of the Core Strategy.

How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy.

A number of comments expressed a preference for new housing at Plumpton Green to comprise smaller properties. The findings of the Strategic Housing Market Assessment and Local Housing Needs Assessment both support this argument and this has been reflected in Core Policy 2.

Regarding the comments on transport, ESCC (as the local highway authority) has advised that a level of development anywhere within the range consulted upon (30 – 100 dwellings) can be accommodated by the local highway network. The sites that are eventually selected to accommodate the chosen level of growth will need to consider local transport issues through their Transport Assessments that are submitted at the planning application stage. The District Council has also consulted ESCC on the sites assessed in the SHLAA to gain a view as to whether they are suitable in highways terms (particularly in terms of whether access can be achieved).

Through consultation with the infrastructure providers, the District Council is not aware of any constraints that will preclude additional development at Plumpton Green that falls within the range of 30 – 100 new dwellings. This is not to say that infrastructure improvements to service this new development will not be required.

A number of comments were related to particular sites that had been assessed in the SHLAA. These comments are addressed under the topic area concerning the SHLAA.
1980’s – 35 houses at Woodgate Meadow
1990’s – 32 houses at Westgate
Since 1983, some 150 houses have been built

In terms of the comment from PROUD that no regard has been had to historic housing delivery rates and the scale of development relating to the size of the existing development, the following is worth noting. 59 net additional residential units were completed within the parish over a 20 year period up until the 1st April 2011. 53 additional units are proposed in the proposed Submission document (to be identified in a Neighbourhood Plan or Site Allocations DPD). There are an estimated 599 households in Plumpton Parish. 30 additional households over a 20 year period would equate to a 5% increase in the number of households. 53 additional households over a 20 year period would equate to a 9% increase in the number of households.

Support the lower end figure (30 - 50 dwellings)

| Number of respondents | 31 |

Summary of the comments received

Some representations clearly gave a preference for the eventual housing target for Plumpton Green to be at the lower end of the range consulted upon (including the Parish Council and PROUD). Many of these views were expressed in opposing a housing target at the higher end of the range. However, there were also a considerable number of respondents who supported the Parish Council’s proposals for 42 new affordable houses and therefore supported such a figure to be the eventual housing target for the village.

Many of the reasons for opposing a housing target at the higher end of the range are the same general issues identified in the previous topic paper and are not repeated here. Those who gave positive support to a housing target to the lower end of the range gave the following reasons and caveats to this level of housing growth:

- Feel that a small rise of say 30-40 extra units for ‘affordable’ and market properties would be helpful for the sustainability of the parish.
- 50 homes seem sensible given the time span of 20 years.
- The housing should be developed by the Homes and Communities Agency’s Rural Exception Scheme and not as a by-product of developers building more executive homes.
- The housing should be spread over a number of small sites, with a focus on affordable homes for local people. Ideally, these would be on brownfield sites and within the existing planning boundary.

How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy.

Addressed under the general comments above.

Support the upper end figure (60 - 100 dwellings)

| Number of respondents | 7 |

Summary of the comments received

A small number of respondents supported a housing target that was at the higher end of the range consulted upon (this included two respondents who considered that 100 dwellings should be the minimum target). The reasons given were:

- The problem with little or no development is the rapidly advancing age demographic of the village, which, in the foreseeable future, will put schooling in
the village under threat. This village desperately needs a sizeable mixed
development, on one or multiple sites.
- Significant new development will help support the continued viability of the
  school, post office, station and pubs.
- There is a difficulty in employing people in the jobs available in the village.
  Hence, further housing is needed that will enable young people to stay in the
  village and aid the local businesses.

How these comments have influenced the Proposed Submission Document and
further information relating to this part of the Core Strategy.

Addressed under the general comments above.

Oppose additional housing in general

<table>
<thead>
<tr>
<th>Number of respondents</th>
<th>14</th>
</tr>
</thead>
</table>

Summary of the comments received

Many of the reasons for opposing any additional housing were the same as the reasons
given for opposing the upper end of the range for housing growth consulted upon, i.e.
issues over transport, infrastructure provision, flood risk and environmental quality. It
was also argued by a number of respondents that any new housing will not be for locals
but will instead attract people who commute to other areas, such as London.

How these comments have influenced the Proposed Submission Document and
further information relating to this part of the Core Strategy.

Addressed under the general comments above.

Topic Area: Housing - Wivelsfield Green Distribution

<table>
<thead>
<tr>
<th>Number of respondents</th>
<th>11</th>
</tr>
</thead>
</table>

Summary of the comments received

The majority of representations that made reference to the level of housing proposed in
Wivelsfield Green (47 units) did so when making comments on the two strategic housing
options in Wivelsfield Parish that border Haywards Heath and Burgess Hill (comments on
these two sites are dealt in subsequent topic papers). They generally pointed out that the
figure of 47 was misleading as the 330 units being considered on the two aforementioned
sites should also be added to this figure.

There were a few comments received that said that Wivelsfield Green was able to
accommodate levels of development above that suggested in the Emerging Core
Strategy. The reasons given for this included the following:
- The settlement has the necessary services and facilities to accommodate
development
- There are limited locations for growth elsewhere in the district
- That development would bring forward community open space to help meet the
  identified shortfall in such provision
- That additional development would help meet the identified need for affordable
  housing.
- That the Transport Statement, which led to the ruling out of further development
  at the village, is flawed.

It was suggested that a strategic housing option should be considered at Wivelsfield
Green, which would encompass some of the sites assessed in the SHLAA.

**How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy.**

It is acknowledged that the Emerging Core Strategy identified options for development in Wivelsfield Parish in excess of the 30 units proposed for Wivelsfield Green. However, the approach to distributing housing was/is taking an approach to distribute housing on a settlement basis, rather than a strict parish basis. In addition, if either, or both, of the strategic site options be delivered in Wivelsfield Parish then they would be seen as part of the settlements of Burgess Hill/Haywards Heath, rather than part of the village of Wivelsfield Green.

Based on the advice received from the highways authority (ESCC), a higher level of growth beyond the 30 additional units identified (a total of 47 units over the plan period is proposed in the Proposed Submission document, including commitments and completions) is not seen as appropriate due to the potential impact upon the highway network, particularly the B2112 through Ditchling (where ESCC are keen to resist any increase in traffic flows).

**Topic Area: Housing - Cooksbridge Distribution**

**Number of respondents** 25

**Summary of the comments received**

The majority of representations suggested that Cooksbridge could, or should, have a higher level of housing allocated to it and that potential growth should not be limited to 10-30 dwellings over the plan period. Some argued that further growth would assist in creating a more self sufficient village and that the existing transport links were advantageous in terms of supporting additional development. Such comments were generally from those objecting to housing growth in Newick and Plumpton Green.

Objections to further development at Cooksbridge were given for the following reasons:

- Current housing commitments are adequate to meet medium term housing needs;
- No demonstrable need for housing for the elderly in Cooksbridge and lack of associated infrastructure to support it;

Hamsey Parish Council did not object to the figure of 36 dwellings at Cooksbridge but had concerns regarding the potential sites identified in the Strategic Housing Land Availability Assessment (SHLAA) on the grounds of poor vehicular and pedestrian access.

**How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy.**

Growth beyond the figure identified for Cooksbridge is not considered appropriate on the findings of the evidence base. The SHLAA has not identified capacity for significant growth beyond the figure identified in the Emerging Core Strategy and the Rural Settlement Study does not identify the village as a suitable location for a large amount of housing growth based on its relatively low level of services and facilities (whilst recognising it does have a mainline train station).

Certain representations advocated planning for significant growth at Cooksbridge as this could help sustain and deliver further services and facilities. To deliver such services and facilities (i.e. village shop, doctor’s surgery, etc) would require a level of growth that
is far in excess of any potential capacity identified through the SHLAA at Cooksbridge. It should also be appreciated that the outward expansion of the village is restricted to the south by the National Park designation and, in part, to the north by the open nature of the landscape leading towards the floodplain of the River Ouse.

**Topic Area: Housing - Chailey Distribution**

<table>
<thead>
<tr>
<th>Number of respondents</th>
<th>2</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Summary of the comments received</strong></td>
<td></td>
</tr>
<tr>
<td>Chailey Parish Council recognised the need for a sustainable level of growth in housing in South Chailey/ South Street, supported by the necessary infrastructure. However, they consider that only very small scale, infill type, development would be achievable at North Chailey and Chailey Green. The other respondent objected to the potential housing sites identified in the Strategic Housing Land Availability Assessment (SHLAA) on the grounds of conflict with current Local Plan policies.</td>
<td></td>
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</tbody>
</table>

**How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy.**

The Core Strategy does not address the specifics of non-strategic sites. No particular concerns were raised over the potential level of growth identified for Chailey.

The SHLAA update supports continuing the level of growth for Chailey as set out in the Emerging Core Strategy.

**Topic Area: Other Settlements’ Distribution**

<table>
<thead>
<tr>
<th>Number of respondents</th>
<th>18</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Summary of the comments received</strong></td>
<td></td>
</tr>
<tr>
<td>A number of respondents considered that housing targets should be given to settlements such as Glynde, Firle and Ditchling rather than including them in the ‘other settlements’ category as the Emerging Core Strategy did not plan for any growth in such locations. It was suggested by some that these settlements, classified as service villages, should be allocated between 30-100 homes in the Core Strategy to be consistent with Plumpton Green. A District Councillor went further stating that every village should have a housing allocation – “even if it is only 5 houses over 20 years” - a view which was shared by some others. Another respondent suggested that the housing should be more fairly distributed with the unclassified smaller settlements taking an increased amount of development, thus taking the pressure off some of the settlements with the potentially the largest allocations.</td>
<td></td>
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</table>

**How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy.**

‘Other settlements’ have not been allocated a level of housing because they do not have a planning boundary and/or have no deliverable capacity identified in the SHLAA and so have been deemed unsuitable for an allocated number of homes in the Proposed Submission Document.
### Topic Area: General comments on housing distribution to settlements

<table>
<thead>
<tr>
<th>Number of respondents</th>
<th>63</th>
</tr>
</thead>
</table>

### Summary of the comments received

The majority of comments showed strong consensus on the prioritising of brownfield sites in and adjacent to urban areas rather than greenfield sites, as well as allowing the smaller settlements to bring forward an element of housing over the plan period to ensure the vitality of villages continued. One representation suggested that rural brownfield sites should be identified separately within table 5. Another suggested that where allocating and developing greenfield sites was unavoidable these sites should be required to provide all CIL and affordable housing contributions otherwise they would be de-allocated.

Some representations stated that villages should prioritise the provision of affordable housing, as well as jobs and services through an exceptions policy, which contribute towards a village’s allocation. In turn, it was also suggested that distributing the housing evenly to the smaller settlements would reduce the potential gap between the larger and smaller communities, as well as strengthening social cohesion and economic status across the District (between 350 and 400 houses was suggested as an amount of housing that should be allocated to such settlements by one respondent). In contrast, another representation felt that no growth should be assumed for the rural areas and that any starting assumption of provision should be ‘zero’. Other concerns related to the loss of tourism to rural areas if elements of the Emerging Core Strategy were brought forward and the loss of a village’s ‘quaint’ identity once areas were developed.

Several comments were made in relation to the South Downs National Park (SDNP) and settlement distribution, including:
- The SDNP designation seems to have pushed the housing requirement to the peripheries of the Park which is unfair on those towns and villages on the boundaries;
- The SDNP should not be an embargo on development

Other more general comments include:
- Make better use of empty properties,
- Housing options should be replaced by a housing statement,
- An approach to the inclusion of windfall sites should be produced,
- Agree to the approach of not continuing the sub-regional split, as set out in the South East Plan, as this would be obsolete once the South East Plan is revoked;
- Disproportionate distribution as settlement hierarchy and strategic objectives have not been followed, specifically villages such as Ditchling, Barcombe, Kingston and Falmer did not carry a fair share of housing compared to villages such as Plumpton Green.
- Sites such as Newhaven Eastside and Lewes Phoenix must be included as sites that will include housing in the plan period.
- More affordable housing should be provided in Newhaven, Lewes and villages where the employment is located, deprivation is greatest and where housing is less affordable.

Southern Water stated that with the current housing distribution investment will be required to both the water supply and sewerage infrastructure in order to bring forward the development options.

### How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy.

Brownfield sites have been prioritised wherever possible. However, there are insufficient
brownfield sites available to deliver all housing for the district.

A balance has been struck between the capacity of settlements for housing delivery, supporting the ongoing sustainability of settlements, settlement hierarchy and directing most development to the most sustainable locations.

It is agreed that the NPA status should not mean an embargo on development, however by the nature of much of the NP area, large scale development will often not be appropriate. Much of the area was formerly designated AONB, which had the same degree of landscape protection.

Empty properties are tackled through the Council’s Housing Strategy. They do not account for a significant proportion of the district’s total housing stock.

In line with the NPPF, an allowance for windfalls has now been included in the district’s housing target.

Lewes Phoenix (the North Street area) has been included with housing included in the mixed use proposals. Newhaven Eastside is not included as an allocation due to a planning committee resolution to grant planning permission for a scheme for retail and housing, subject to a S.106 legal agreement.

Infrastructure matters are covered in the draft Infrastructure Delivery Plan that accompanies the Proposed Submission document.

Topic Area: Eastside, Newhaven

<table>
<thead>
<tr>
<th>General comments on Eastside</th>
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<tbody>
<tr>
<td><strong>Number of respondents</strong></td>
</tr>
<tr>
<td><strong>Summary of the comments received</strong></td>
</tr>
<tr>
<td>A number of respondents gave a description of the site, and several mentioned that it had been an unimplemented allocation for employment land for a long time. Newhaven Town Council expressed a view that whatever development is brought forward on the site, it should help meet the shortfall of green infrastructure in the town. Southern Water advised that, due to unpleasant odours arise from the adjacent Wastewater Treatment Works, sensitive development such as housing on the site would require mitigation measures.</td>
</tr>
</tbody>
</table>

How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy.

Since the consultation on the Emerging Core Strategy, the Council has granted planning permission for up to 190 dwellings, 1,860 sq m of B1 employment floorspace (ref. LW/11/0634) and 6,780 sq m of retail floorspace (ref. LW/11/0635) on the Eastside site.

<table>
<thead>
<tr>
<th>Support Preferred Eastside Option</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Number of respondents</strong></td>
</tr>
<tr>
<td><strong>Summary of the comments received</strong></td>
</tr>
<tr>
<td>The majority of respondents supporting the option did so via the online survey and thus generally did not explain their reasoning.</td>
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</tbody>
</table>

East Sussex County Council commented that the option would help to deliver the Port

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Access Road, an objective of the Local Transport Plan.

One respondent agreed that the site would need ‘enabling development’ to bring forward employment land due to the weak commercial property market. Ringmer Parish Council shared similar sentiments and commented that the development of the site should be a priority given its sustainable location.

Another respondent queried the term ‘enabling development’. They felt that the policy should be framed in such a way that any high value non-B class uses which are deemed necessary to enable a viable development do not have significant adverse consequences for other areas, including Newhaven and other designated centres, or for the overall delivery of the various wide policy objectives set out in the Core Strategy.

**How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy.**

Since the consultation on the Emerging Core Strategy, the Council has granted planning permission for up to 190 dwellings, 1,860 sq m of B1 employment floorspace (ref. LW/11/0634) and 6,780 sq m of retail floorspace (ref. LW/11/0635) on the Eastside site.

**Disagree with preferred approach/ prefer one of the other options considered**

| Number of respondents | 8 |

**Summary of the comments received**

Four respondents supported the retention of the existing Local Plan employment allocation, whilst others favoured the de-allocation of the site for employment uses, either because they considered that employment uses were unlikely to come forward but housing would be inappropriate in this location or because they believed that the site should not be developed at all due to its high environmental quality. One respondent suggested that the preferred approach would not be in keeping with some of the objectives of the Core Strategy, especially those relating to the environment.

**How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy.**

Since the consultation on the Emerging Core Strategy, the Council has granted planning permission for up to 190 dwellings, 1,860 sq m of B1 employment floorspace (ref. LW/11/0634) and 6,780 sq m of retail floorspace (ref. LW/11/0635) on the Eastside site.

**Proposed Other Options for Eastside**

| Number of respondents | 4 |

**Summary of the comments received**

One respondent felt that the site should have a higher proportion of housing as this location could become a very desirable place to live. Another respondent had a similar view, but felt that the site should be extended to the Tide Mills area. Another felt that the site should be developed to help improve the operation of the Port and a link with Newhaven’s Train stations. Another felt that the redevelopment of long derelict employment sites should be dealt with in the Core Strategy rather than this land being developed.

**How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy.**

Since the consultation on the Emerging Core Strategy, the Council has granted planning permission for up to 190 dwellings, 1,860 sq m of B1 employment floorspace (ref.
LW/11/0634) and 6,780 sq m of retail floorspace (ref. LW/11/0635) on the Eastside site.

### Topic Area: Lower Hoddern Farm, Peacehaven

<table>
<thead>
<tr>
<th>General Comments on Lower Hoddern Farm</th>
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<tbody>
<tr>
<td><strong>Number of respondents</strong></td>
</tr>
<tr>
<td><strong>Summary of the comments received</strong></td>
</tr>
<tr>
<td>Both respondents noted the close proximity of the Wastewater Treatment Works (WTW) to the site and that careful design would be needed to ensure that residential amenity is not adversely affected. Southern Water advised that in order to protect the amenity of new residents, that &quot;the landowner/developer should therefore commission an assessment to determine how far housing development should be separated from the works and any landscape required.&quot;</td>
</tr>
</tbody>
</table>

### How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy.

The assessment recommended by Southern Water has been carried out by the promoters of the Lower Hoddern Farm site. However, since the publication of the Emerging Core Strategy, East Sussex County Council (the local transport authority) has changed its view on the acceptable level of traffic growth that can be accommodated on the A259 west of Peacehaven. The County Council’s new transport advice is set out in the document ‘New housing in Peacehaven and Newhaven: Impacts on the A259 west of Peacehaven and on Newhaven Ring Road and the consequences for housing numbers’. As a result of this more recent transport advice, which concludes that in the morning peak on the A259 west of Peacehaven the headroom for additional westbound traffic in is only 70 vehicles per hour, no strategic housing allocation is proposed in Peacehaven and Telscombe at this stage. Housing allocations to meet the planned level of housing growth of 220 dwellings in Peacehaven and Telscombe will be allocated through either a Neighbourhood Plan or the Site Allocations and Development Management Policies Development Plan Document.

<table>
<thead>
<tr>
<th>Support development at Lower Hoddern Farm</th>
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</thead>
<tbody>
<tr>
<td><strong>Number of respondents</strong></td>
</tr>
<tr>
<td><strong>Summary of the comments received</strong></td>
</tr>
<tr>
<td>The majority of representations supporting development of the site were received via the online survey. Generally, such respondents did not explain how they had come to such an opinion. Those advocating development of the site commented that:</td>
</tr>
<tr>
<td><strong>It would help meet identified housing need within coastal towns</strong></td>
</tr>
<tr>
<td><strong>It would strengthen the urban edge</strong></td>
</tr>
<tr>
<td><strong>It could provide employment as well as housing, in order to reduce out-commuting</strong></td>
</tr>
<tr>
<td><strong>It is located in highly sustainable part of Peacehaven, close to existing shops and services.</strong></td>
</tr>
</tbody>
</table>

### How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy.

Support noted. However, since the publication of the Emerging Core Strategy, East Sussex County Council (the local transport authority) has changed its view on the

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acceptable level of traffic growth that can be accommodated on the A259 west of Peacehaven. The County Council’s new transport advice is set out in the document ‘New housing in Peacehaven and Newhaven: Impacts on the A259 west of Peacehaven and on Newhaven Ring Road, and the consequences for housing numbers’. As a result of this more recent transport advice, which concludes that in the morning peak on the A259 west of Peacehaven the headroom for additional westbound traffic in is only 70 vehicles per hour, no strategic housing allocation is proposed in Peacehaven and Telscombe at this stage. Housing allocations to meet the planned level of housing growth of 220 dwellings in Peacehaven and Telscombe will be allocated through either a Neighbourhood Plan or the Site Allocations and Development Management Policies Development Plan Document.

Object to development at Lower Hoddern Farm

Number of respondents | 13

Summary of the comments received

The objections, including one from Peacehaven Town Council, were on the following grounds:

- Development at the site would destroy valuable high quality farmland, vital for food production
- Development should not occur on green field land when brownfield sites are available elsewhere in the district.
- Development at the site would increase traffic problems on the A259.

How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy.

Since the publication of the Emerging Core Strategy, East Sussex County Council (the local transport authority) has changed its view on the acceptable level of traffic growth that can be accommodated on the A259 west of Peacehaven. The County Council’s new transport advice is set out in the document ‘New housing in Peacehaven and Newhaven: Impacts on the A259 west of Peacehaven and on Newhaven Ring Road, and the consequences for housing numbers’. As a result of this more recent transport advice, which concludes that in the morning peak on the A259 west of Peacehaven the headroom for additional westbound traffic in is only 70 vehicles per hour, no strategic housing allocation is proposed in Peacehaven and Telscombe at this stage. Housing allocations to meet the planned level of housing growth of 220 dwellings in Peacehaven and Telscombe will be allocated through either a Neighbourhood Plan or the Site Allocations and Development Management Policies Development Plan Document.

Other Suggestions for Lower Hoddern Farm

Number of respondents | 3

Summary of the comments received

Peacehaven Town Council felt that a previous idea for developing part of the site for an elderly care village should be revived given the ageing population of the town. Burgess Hill and Haywards Heath Town Councils suggested, in a joint representation on the Emerging Core Strategy, that the site should be expanded “to provide more housing and include a range of additional uses so as to create a mixed use site.”

How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy.

Since the publication of the Emerging Core Strategy, East Sussex County Council (the
local transport authority) has changed its view on the acceptable level of traffic growth that can be accommodated on the A259 west of Peacehaven. The County Council’s new transport advice is set out in the document ‘New housing in Peacehaven and Newhaven. Impacts on the A259 west of Peacehaven; on Newhaven Ring Road; and consequences for housing numbers’. As a result of this more recent transport advice, which concludes that in the morning peak on the A259 west of Peacehaven the headroom for additional westbound traffic in is only 70 vehicles per hour, no strategic housing allocation is proposed in Peacehaven and Telscombe at this stage. Housing allocations to meet the planned level of housing growth of 220 dwellings in Peacehaven and Telscombe will be allocated through either a Neighbourhood Plan or the Site Allocations and Development Management Policies Development Plan Document.

Topic Area: Old Malling Farm, Lewes

<table>
<thead>
<tr>
<th>General Comments on Old Malling Farm</th>
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</thead>
<tbody>
<tr>
<td>Number of respondents</td>
</tr>
<tr>
<td>Summary of the comments received</td>
</tr>
</tbody>
</table>

East Sussex County Council felt that reference to traffic calming along the Church Lane/ Mayhew Way/ Brooks Road route needs to be included.

Natural England felt that there did not appear to be any ‘showstoppers’ preventing development of the site, although there are many issues that need consideration, including the impact on Offham Marshes SSSI and the impact on the setting of the National Park.

One respondent felt that if the site were to be allocated it should be for meeting the local need for affordable housing, whilst another felt that brownfield sites in Lewes should be considered before considering a green field site such as this.

<table>
<thead>
<tr>
<th>How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Comments noted. Further consideration is given to the above issues in the ‘Oppose development on Old Malling Farm’ section.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Support development on Old Malling Farm</th>
</tr>
</thead>
<tbody>
<tr>
<td>Number of respondents</td>
</tr>
<tr>
<td>Summary of the comments received</td>
</tr>
</tbody>
</table>

Most supporting representations used the online survey and did not provide a reason for their support. One respondent considered that as Old Malling Farm is the biggest and most accessible site in Lewes, it should be developed. Another supported the development of the site provided that appropriate infrastructure was included.

<table>
<thead>
<tr>
<th>How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Support noted.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Oppose development on Old Malling Farm</th>
</tr>
</thead>
<tbody>
<tr>
<td>Number of respondents</td>
</tr>
</tbody>
</table>

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5 Page 47 of the Emerging Core Strategy
Summary of the comments received

The greenfield nature of the site and the impact on the landscape of the South Downs National Park were regularly cited as reasons for opposing development in this location. One respondent suggested that the site helped convince the Inspector to include Lewes town within the National Park and development of the site would therefore be illogical.

Other objections included:

- the adverse impact on Malling Deanery Conservation Area
- the lack of tree belts or landscaping requirements
- development would jeopardise the restoration of the Lewes to Uckfield railway line
- poor vehicular access to the site via Church Lane and Old Malling Way
- traffic congestion along South Downs Road/ Mayhew Way and on Church Lane
- road safety
- flood risk, both within the site itself and elsewhere in the town
- impact on wildlife
- distance from shops, public transport and other amenities
- inadequate primary school capacity

How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy.

In identifying potential strategic housing options for Lewes brownfield sites were sought in preference to greenfield. Due to the very constrained nature of the town, strategic scale potential housing options were very limited. The North Street site is a strategic option for the town that would include housing and is an entirely brownfield site. The remainder of the planned housing allocation figure for Lewes town will be identified in the SDNPA Local Plan in due course (this may or may not include housing development at Old Malling Farm, depending on further consideration of the availability of sites and site assessments). Housing at North Street, together with existing commitments and windfalls will meet the town’s housing requirements in the shorter term.

Topic Area: South of Lewes Road, Ringmer^6

General comments on South of Lewes Road, Ringmer

| Number of respondents | 9 |

Summary of the comments received

The comments received can be summarised as follows:

- The development of the site should ensure that the strategic gap between Ringmer and the Broyle is not compromised. This may necessitate only developing part of the site, or setting development back from the B2192 with sufficient screening.
- Land to the east of Chamberlains Lane floods.
- The western half of the site would be more suitable for business use as it would be closer to the units north of Laughton Road.

How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy.

General comments on site’s suitability are considered in SHLAA.

^6 Page 49 of the Emerging Core Strategy
Since the Emerging Core Strategy consultation discussions have been held with the site proponents promoting the land to the west of Chamberlaines Lane. The focus of these discussions was on the proponent's aspirations for the site and to gather any further technical work that will feed into the further consideration of the site as a strategic allocation. This part of the site is outlined for 100 units. The eastern section, with a capacity of 54 units, does not constitute a strategic site.

The Strategic Housing Land Availability Assessment (SHLAA) concludes that, in light of the above, the site is now considered Deliverable rather than Developable. This is to reflect the joint agreement between proponents to resolve the transport concerns at Earwig Corner which had previously impacted on the site's Achievability.

Representations received through the public consultation will be a key consideration in determining the eventual policy direction for the area south of Lewes Road. At this stage the site has not been taken forward as an allocated strategic site.

### Support development on South of Lewes Road, Ringmer

| Number of respondents | 18 |

#### Summary of the comments received

A significant proportion of those who supported the location for housing did so through the online survey and did not provide reasoning for their support. Those who did gave the following reasons:

- The existing recreation/leisure allocation will only be delivered if there is an element of housing.
- The sustainability credentials of the site have been established through the evidence base.
- The area around the Community College does provide an opportunity for some imaginative development that combines housing as well as improving community amenities including additional education facilities.
- Ringmer College provided support for this location on the proviso that part of the site is reserved for additional playing fields.

The representation received from the proponent of Broyle Gate Farm confirmed that as well as housing they are also promoting the site for open space, recreational and/or community use.

#### How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy.

General comments of support noted.

This site has an established allocation for recreation and leisure facilities which remain as needed facilities within the village for both the College and residents. Ringmer currently has a shortfall of informal and equipped play space. The site is being promoted for mixed use, which is being actively supported by the site proponents.

### Oppose development on South of Lewes Road, Ringmer

| Number of respondents | 49 |

#### Summary of the comments received

Reasons against the development of this site included:

- Impact on setting of the South Downs National Park;
• Development would compromise the valued ‘strategic gap’ between Ringmer and the Broyle.
• Intermittent flooding experienced in area;
• Allocation of playing fields is more suited to the site;
• Development of this land, together with Fingerpost Farm, will rule out the Lewes to Uckfield line diversion through Ringmer;
• Broyle Side will be a small town rather than hamlet;
• If development south of Lewes Road takes place it will be difficult to resist development north of Lewes Road resulting in the joining of Ringmer and Broyleside and loss of ‘village’ feel.

How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy.

General comments with regards to site suitability are considered in SHLAA.

The strategic gap between Ringmer and Broyle Side is recognised as an important feature to the parish by residents. In addition, it is recognised that views to the South Downs National Park will need to be carefully considered. Issues raised in representations will also be considered in SHLAA and subsequently in potential allocations made through the Site Allocations Development Plan Document.

Ringmer and Broyle Side have been allocated 220 net additional units over the plan period compared to the range of 176 – 647 outlined in the Emerging Core Strategy. The lower figure partly reflects concerns raised by representations but also the options assessed within the Sustainability Appraisal. The level of development allocated within Ringmer and Broyle Side will be considered through the Site Allocations Development Plan Document stage.

The 2008 Lewes-Uckfield Reinstatement Study concluded that diverting the line to serve Ringmer was outside the scope of re-opening the line. It is therefore not considered a realistic option to consider with regards to the development of this site.

Topic Area: Land north of Bishops Lane, Ringmer

General comments on Bishops Lane, Ringmer

<table>
<thead>
<tr>
<th>Number of respondents</th>
<th>5</th>
</tr>
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</table>

Summary of the comments received

There were a few respondents who commented upon the land north of Bishops Lane option, but did not either state outright support or opposition for the whole area coming forward for housing. A summary of the comments received is as follows:

• One respondent suggested that development should extend no deeper than current properties on Bishops Lane.
• One respondent stated that the option should be extended to the west to include the Glebe land, which is to the west of Norlington Fields.
• A couple of representations stated that if the Diplocks Industrial Site is demolished then detailed proposals should be included as to where this new industrial site will be and that it should be in place before any housing development is started.
• A representation, received from the proponent of a significant part of the area, suggested that the ‘broad location for growth’ was too large and that its future release would be subject to the delays incurred while detailed development plan documents are produced and adopted. It was suggested that the western portion

7 Page 50 of the Emerging Core Strategy
of the site be allocated for development in the Core Strategy, while the land to the east could still be identified as a 'broad location for growth', details of which would then be the subject of other documents produced following the adoption of the Core Strategy.

How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy.

Through the evidence collected for the Core Strategy, it is considered that a case can be made for the delivery of a strategic housing allocation at Ringmer during the early part of the plan period. The identification of such an allocation would help to maintain a sufficient supply of deliverable housing sites during this period and up until the point that further allocations are made in subsequent plans. However, Ringmer Parish Council is at an advanced stage of producing a Neighbourhood Plan (it was selected as one of the first Neighbourhood Plans to be commenced under the Government’s Neighbourhood Planning Vanguard scheme). The Parish Council proposes that this plan will identify sites for the delivery of housing.

Given the above scenario, the preference is to allow the Ringmer Neighbourhood Plan to determine the location of all the 220 additional dwellings assigned to Ringmer and Broyle Side in the Proposed Submission Core Strategy. However, in the event that the Ringmer Neighbourhood Plan is not adopted by June 2014, or that it fails to allocate sites that will secure delivery of sufficient dwellings by April 2019, a contingency allocation of 120 dwellings at land to the north of Bishops Lane is included in the Proposed Submission document in order to ensure an adequate supply of housing land during the early part of the plan period.

<table>
<thead>
<tr>
<th>Support development on Bishops Lane, Ringmer</th>
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</thead>
<tbody>
<tr>
<td><strong>Number of respondents</strong></td>
</tr>
<tr>
<td><strong>Summary of the comments received</strong></td>
</tr>
</tbody>
</table>

A significant proportion of those who supported the location for housing did so through the online survey and did not provide reasoning for their support. Those who did, gave the following reasons:
- Part of the site is already identified as a reserve allocation for housing in the Local Plan.
- Developing the land to the north of Bishops Lane would not have a significant impact upon eroding the countryside gap between Ringmer and Broyle Side.
- From the options being considered at Ringmer this site has the best accessibility to the services and facilities in the village.

There were a few respondents, including Ringmer Parish Council, who whilst opposing a housing development that is consistent with this option, did consider that some level of development would be acceptable in this location. Such views have been accounted for in the subsequent topic paper.

How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy.

Support noted. Through the evidence collected for the Core Strategy, it is considered that a case can be made for the delivery of a strategic housing allocation at Ringmer during the early part of the plan period. The identification of such an allocation would help to maintain a sufficient supply of deliverable housing sites during this period and up until the point that further allocations are made in subsequent plans. However, Ringmer Parish Council is at an advanced stage of producing a Neighbourhood Plan (it was selected as one of the first Neighbourhood Plans to be commenced under the Government’s Neighbourhood Planning Vanguard scheme). The Parish Council proposes that this plan...
will identify sites for the delivery of housing.

Given the above scenario, the preference is to allow the Ringmer Neighbourhood Plan to determine the location of all the 220 additional dwellings assigned to Ringmer and Broyle Side in the Proposed Submission Core Strategy. However, in the event that the Ringmer Neighbourhood Plan is not adopted by June 2014, or that it fails to allocate sites that will secure delivery of sufficient dwellings by April 2019, a contingency allocation of 120 dwellings at land to the north of Bishops Lane is included in the Proposed Submission document in order to ensure an adequate supply of housing land during the early part of the plan period.

### Oppose development on Bishops Lane, Ringmer

| Number of respondents | 53 |

**Summary of the comments received**

As well as Ringmer Parish Council, a number of people objected to this option. Most of these respondents objected to the option as a whole, although there were a few who felt that some development would be acceptable in this location, but not to the scale envisaged through the Core Strategy. The reasons given for these views were as follows:

- The proposal for 283 houses in this location, is completely out of scale with any village.
- The site has a valued current and thriving employment use that is valued by local residents, and has the potential for further expansion. In this regard, developing the whole site for housing would be contrary to the Ringmer Parish Council Employment Strategy and Core Policy 4 of the Emerging Core Strategy.
- The site covers the known epicentre of Ringmer's medieval pottery industry which is important to regional archaeology.
- The local road network, particularly Bishops Lane, is not appropriate for a development of this size. Concerns were also expressed on the impact upon the wider highway network, particularly Earwig Corner.
- Development will be of great inconvenience to and contribute a very negative effect on the quality of many local residents' lives.
- The water table in the general area of Christie Avenue is very high already, especially in the winter/spring. The area under consideration, lies in part even lower than the Christie Avenue general area. Also the hydrological properties of the clay make for very poor drainage.
- Concerns were cited over the issue of noise and air pollution.
- Development would increase the strain on already over-stretched services and facilities (e.g. schools, healthcare).

In opposing this option for housing, there were a couple of respondents who suggested that expansion of the industrial estate might be acceptable and might help reduce the number of residents commuting out of Ringmer.

**How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy.**

Through the evidence collected for the Core Strategy, it is considered that a case can be made for the delivery of a strategic housing allocation at Ringmer during the early part of the plan period. The identification of such an allocation would help to maintain a sufficient supply of deliverable housing sites during this period and up until the point that further allocations are made in subsequent plans. However, Ringmer Parish Council is at an advanced stage of producing a Neighbourhood Plan (it was selected as one of the first Neighbourhood Plans to be commenced under the Government’s Neighbourhood Planning Vanguard scheme). The Parish Council proposes that this plan will identify sites
for the delivery of housing.

Given the above scenario, the preference is to allow the Ringmer Neighbourhood Plan to determine the location of all the 220 additional dwellings assigned to Ringmer and Broyle Side in the Proposed Submission Core Strategy. However, in the event that the Ringmer Neighbourhood Plan is not adopted by June 2014, or that it fails to allocate sites that will secure delivery of sufficient dwellings by April 2019, a contingency allocation of 120 dwellings at land to the north of Bishops Lane is included in the Proposed Submission document in order to ensure an adequate supply of housing land during the early part of the plan period.

The contingency allocation on land north of Bishops Lane does not include the existing employment units. Development will be subject to a geophysical survey and trial trench evaluation due to the high archaeological potential of the area. In order to reduce the impact on the local highway network, the development will be required to contribute towards improvements to the Earwig corner junction and to the extension of the partially constructed Lewes-Ringmer cycle path. The development will also be required to provide/contribute to equipped play space and sports pitches and towards other infrastructure, such as educational spaces as required.

An appropriate surface water management plan will be required to be prepared and implemented (in agreement with the Environment Agency) to ensure appropriate drainage of the development.

Some inconvenience and disruption to nearby residents is unfortunately to be expected from development works. However the Council would make best efforts to ensure that such inconvenience and disruption is kept to a minimum, through mechanisms such as planning conditions and construction management plans.

**Topic Area: Fingerpost Farm, Ringmer**

<table>
<thead>
<tr>
<th>General comments on Fingerpost Farm, Ringmer</th>
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<tbody>
<tr>
<td><strong>Number of respondents</strong></td>
</tr>
<tr>
<td><strong>Summary of the comments received</strong></td>
</tr>
<tr>
<td>The comments received can be summarised as follows:</td>
</tr>
<tr>
<td>- Intermittent flooding issues on site.</td>
</tr>
<tr>
<td>- A limited number of housing could be acceptable.</td>
</tr>
<tr>
<td>- If the site does come forward for housing it should ensure that the strategic gap between Ringmer and the Broyle is not compromised. This may necessitate only developing part of the site, or setting development back from the B2192 with sufficient screening.</td>
</tr>
<tr>
<td><strong>How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy.</strong></td>
</tr>
<tr>
<td>Comments on the site’s suitability have been considered within the SHLAA.</td>
</tr>
<tr>
<td>The Landscape Capacity Study indicates some capacity for change in this location. The Strategic Housing Land Availability Assessment (SHLAA) concludes that the site is Deliverable rather than Developable which previously reflected the unknown/ marginal achievability associated with the transport concerns at Earwig Corner. However, there has been joint agreement between proponents to resolve these issues if the site is taken forward.</td>
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</tbody>
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8 Page 51 of the Emerging Core Strategy
The planned level of development for Ringmer and Broyle Side has been set at 220 net additional units, compared to the range of 176 – 647 in the Emerging Core Strategy, to reflect representations made and the outcome of the Sustainability Appraisal. Distribution of housing to meet this figure will be considered through the Ringmer Neighbourhood Plan currently being prepared by Ringmer Parish Council. At this stage this site has not been specifically allocated as a housing site.

Support development on Fingerpost Farm, Ringmer

<table>
<thead>
<tr>
<th>Number of respondents</th>
<th>13</th>
</tr>
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</table>

Summary of the comments received

Those who supported the location for housing generally did so through the online survey and did not provide reasoning for their support.

How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy.

Support noted. The planned level of development for Ringmer and Broyle Side has been set at 220 net additional units, compared to the range of 176 – 647 in the Emerging Core Strategy, to reflect representations made and the outcome of the Sustainability Appraisal. Distribution of housing to meet this figure will be considered through the Ringmer Neighbourhood Plan currently being prepared by Ringmer Parish Council. At this stage this site has not been specifically allocated as a housing site.

Object to development on Fingerpost Farm, Ringmer

<table>
<thead>
<tr>
<th>Number of respondents</th>
<th>47</th>
</tr>
</thead>
</table>

Summary of the comments received

Reasons for objections to the Fingerpost Farm housing option covered a number of issues, including (in no particular order):

- If this quantum of development is brought forward Broyleside will lose its hamlet status. Also considered inappropriate for a ‘Local village’.
- Brownfield sites should be considered first.
- Insufficient capacity on Broyle Lane for this quantum of development, as well as unsuitable access to the site.
- Development of this site, with South of Lewes Road, would rule out the Lewes to Uckfield diversion route to Ringmer.
- No facilities at Broyleside and therefore any new development in this location would be reliant on private transport to access facilities
- Ringmer frequently experiences power failures.
- The option has no logical association with the existing development pattern of Broyleside which is mostly east of Broyle Lane.
- Development would compromise the valued ‘strategic gap’ between Ringmer and the Broyle.

How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy.

The planned level of development for Ringmer and Broyle Side has been set at 220 net
additional units, compared to the range of 176 – 647 in the Emerging Core Strategy, to reflect representations made and the outcome of the Sustainability Appraisal. Distribution of housing to meet this figure will be considered through the Ringmer Neighbourhood Plan currently being prepared by Ringmer Parish Council. At this stage this site has not been specifically allocated as a housing site.

**Topic Area: Valley Road, Peacehaven**

<table>
<thead>
<tr>
<th>General Comments on Valley Road, Peacehaven</th>
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</thead>
<tbody>
<tr>
<td><strong>Number of respondents</strong>: 6</td>
</tr>
<tr>
<td><strong>Summary of the comments received</strong></td>
</tr>
<tr>
<td>There were comments from a small number of respondents who, while not supporting or objecting to development at the Valley Road made some general comments as follows:</td>
</tr>
<tr>
<td>• The site is currently in the Local Plan as a reserve site</td>
</tr>
<tr>
<td>• The site is on the border of the National Park and development would need to be carefully planned to ensure that there is no negative impact on the Park</td>
</tr>
<tr>
<td>• Development should have regard to its impact upon air quality in Newhaven and Rottingdean and thus should be linked to the public transport network</td>
</tr>
<tr>
<td>• The map, included in the Emerging Core Strategy, indicates an area that is not available for development</td>
</tr>
</tbody>
</table>

**How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy.**

Since the publication of the Emerging Core Strategy, East Sussex County Council (the local transport authority) has changed its view on the acceptable level of traffic growth that can be accommodated on the A259 west of Peacehaven. The County Council’s new transport advice is set out in the document ‘New housing in Peacehaven and Newhaven. Impacts on the A259 west of Peacehaven; on Newhaven Ring Road; and consequences for housing numbers’. As a result of this more recent transport advice, which concludes that in the morning peak on the A259 west of Peacehaven the headroom for additional westbound traffic is only 70 vehicles per hour, no strategic housing allocation is proposed in Peacehaven and Telscombe at this stage.

Housing allocations to meet the planned level of growth of 220 in Peacehaven and Telscombe will be allocated through either a Neighbourhood Plan or the Site Allocations and Development Management Policies Development Plan Document. The site proponent is considering an area and level of development which differs from the site option outlined in the consultation document. This site presents a figure of 158 units north and south of Valley Road but restricted to the western side of the Valley Road area. The departure from the site consulted upon will need to be considered in terms of its suitability should the site be considered for allocation in future.

<table>
<thead>
<tr>
<th>Support Development at Valley Road, Peacehaven</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Number of respondents</strong>: 44</td>
</tr>
<tr>
<td><strong>Summary of the comments received</strong></td>
</tr>
</tbody>
</table>

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9 Page 52 of the Emerging Core Strategy
Approximately half of the consultees identified themselves as either landowners or as representatives of landowners. Generally such comments were identical and indicated joint working to promote the site.

Other supporting comments stated:
- The site is home to low quality agricultural land
- Development would ‘smarten up’ the overgrown scrubland
- There is support from local landowners
- The site is serviced by a range of shops and services

**How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy.**

Support noted. Since the publication of the Emerging Core Strategy, East Sussex County Council (the local transport authority) has changed its view on the acceptable level of traffic growth that can be accommodated on the A259 west of Peacehaven. The County Council’s new transport advice is set out in the document ‘New housing in Peacehaven and Newhaven. Impacts on the A259 west of Peacehaven; on Newhaven Ring Road; and consequences for housing numbers’. As a result of this more recent transport advice, which concludes that in the morning peak on the A259 west of Peacehaven the headroom for additional westbound traffic is only 70 vehicles per hour, no strategic housing allocation is proposed in Peacehaven and Telscombe at this stage. Housing allocations to meet the planned level of growth of 220 in Peacehaven and Telscombe will be allocated through either a Neighbourhood Plan or the Site Allocations and Development Management Policies Development Plan Document.

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### Object to Development at Valley Road, Peacehaven

<table>
<thead>
<tr>
<th>Number of respondents</th>
<th>13</th>
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</table>

**Summary of the comments received**

Peacehaven Town Council stated that landowners of Valley Road were ‘incensed’ that their land was being considered as an option for development. This view was shared by one resident of Valley Road, who indicated that they were unaware of the promotion of the site.

Other comments included the following:
- Development would lead to a loss of green infrastructure, that the Core Strategy elsewhere attempts to protect
- The terrain of the site would make development very difficult
- The road network could not cope with additional traffic that would result from such a development
- The site is not serviced by nearby shops and services.

**How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy.**

Since the publication of the Emerging Core Strategy, East Sussex County Council (the local transport authority) has changed its view on the acceptable level of traffic growth that can be accommodated on the A259 west of Peacehaven. The County Council’s new transport advice is set out in the document ‘New housing in Peacehaven and Newhaven. Impacts on the A259 west of Peacehaven; on Newhaven Ring Road; and consequences for housing numbers’. As a result of this more recent transport advice, which concludes that in the morning peak on the A259 west of Peacehaven the headroom for additional westbound traffic is only 70 vehicles per hour, no strategic housing allocation is
proposed in Peacehaven and Telscombe at this stage. Housing allocations to meet the planned level of growth of 220 in Peacehaven and Telscombe will be allocated through either a Neighbourhood Plan or the Site Allocations and Development Management Policies Development Plan Document.

| Other Suggestions for Valley Road, Peacehaven | 16 |
| Number of respondents | |
| Summary of the comments received | |
| Many landowners in the Valley Road area suggested that the identified area could be extended to include land lying on the north side of Valley Road and requested that the number of dwellings referred to should be increased. One respondent commented that development could result in the construction of a new road out of Peacehaven. | |

| How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy. | |
| Since the publication of the Emerging Core Strategy, East Sussex County Council (the local transport authority) has changed its view on the acceptable level of traffic growth that can be accommodated on the A259 west of Peacehaven. The County Council’s new transport advice is set out in the document ‘New housing in Peacehaven and Newhaven. Impacts on the A259 west of Peacehaven; on Newhaven Ring Road; and consequences for housing numbers’. As a result of this more recent transport advice, which concludes that in the morning peak on the A259 west of Peacehaven the headroom for additional westbound traffic in is only 70 vehicles per hour, no strategic housing allocation is proposed in Peacehaven and Telscombe at this stage. Housing allocations to meet the planned level of growth of 220 in Peacehaven and Telscombe will be allocated through either a Neighbourhood Plan or the Site Allocations and Development Management Policies Development Plan Document. | |

| Topic Area: Valebridge Road, Burgess Hill (Wivelsfield Parish) | |
| General Comments on Valebridge Road | 4 |
| Number of respondents | |
| Summary of the comments received | |
| Mid Sussex District Council felt that development at the edge of Burgess Hill and Haywards Heath would not make communities within Lewes District more sustainable. It indicated concern that development at locations on the boundary would place pressure on the provision of services in Mid Sussex. | |

| It also stated that should this site be allocated, s106 / CIL contributions should go to Mid Sussex as it would provide much of the services for the residents and also argued that the administrative boundary would have to change, moving this site into its jurisdiction. It also argued that, since these sites would be effectively extensions to communities in Mid Sussex, development should contribute to meeting the Mid Sussex housing requirement rather than that of Lewes District. | |

| One respondent felt that any plans for development at the edge of these towns should take account of the content of the emerging Neighbourhood Plans in Mid Sussex. This was reflected in Mid Sussex DC’s comments too, who felt that engagement with councils | |

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10 Page 53 of the Emerging Core Strategy
Comments Supporting development at Valebridge Road

Number of respondents | 20

Summary of the comments received

One respondent was pleased that transportation issues are being considered and wondered whether this is being conducted with Burgess Hill Town Council and Mid Sussex District Council. It was considered essential that a total study is carried out involving all parties involved which would look at LDC development options taking into account traffic from additional development within Mid Sussex and not just the current level of traffic.

Recognising the need for houses, one respondent commented that they had no specific objection in principle to further development in this area but that it needs to be very carefully considered so that the number of houses proposed is not too high.

Another respondent felt that with the site being on the border between two district councils it will be difficult balancing the requirements between the two. They were fully supportive of the retention of the tree lined character of the site, which they considered to be of prime importance to maintain the character of the area, together with the natural ecology of the site. Support was expressed for the provision of flexible and adaptable housing accommodation on this site.

One respondent felt that it made great sense to develop the sites within Wivelsfield Parish (Valebridge Road and Greenhill Way), as these have very good infrastructure, with good rail connections and employment opportunities nearby in Haywards Heath and Burgess Hill. Another respondent commented that one of the major attractions of development in the northwest corner of the District is the large employment attractions of Haywards Heath, Crawley and Gatwick, already identified in some of the supporting papers for the LDF.

The representative of the landowner stated that they have taken legal advice that confirms that the overage clause attached to large parts of the land no longer bar development until 2018, making it available now. They continued by explaining that the economic climate and current land values in this area were considered to now be such that this clause would not hinder this land coming forward earlier for development. Given such reasons it was felt that it should be a Strategic Site in the Core Strategy, not a Broad Location for Change, as it could contribute towards housing land supply in both the short and medium term.

How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy.

Comments were noted. This site is not included in the Core Strategy as deliverability is uncertain due in part to unresolved land ownership issues.
Support noted. This site is not included in the Core Strategy as deliverability is uncertain due in part to unresolved land ownership issues and no identified means of access for housing development.

<table>
<thead>
<tr>
<th>Comments Objecting to Development at Valebridge Road</th>
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<tbody>
<tr>
<td>Number of respondents</td>
</tr>
<tr>
<td>Summary of the comments received</td>
</tr>
</tbody>
</table>

A number of respondents felt that 4,000 planned new homes across the top of Burgess Hill, very close to Valebridge Road, should render this development totally unnecessary. Traffic impact was also a concern of most respondents, with one commenting that the combined traffic impact current homes under construction at Sandrocks and St Francis Park (in Haywards Heath) has not been adequately taken into account.

One respondent cited the current development being built at Gainsborough Place, Burgess Hill as ‘a prime example of a botched scheme on another boundary’ and made a number of comments relating to development difficulties, such as access, construction disruption and environmental damage. It was suggested that a development at the Valebridge Road Site would have similar negative impacts. Those who objected also considered that the traffic impact on existing residents would be intolerable.

A number of respondents shared the sentiment that Lewes DC should concentrate on brownfield sites and leave attractive green spaces on the district boundaries well alone.

Haywards Heath and Burgess Hill Town Councils, in a joint representation, expressed deep concern that relatively unsustainable broad locations for housing should be promoted at the north-west fringe of Lewes District when there appear to be more appropriate sites for development along the coastal strip.

One respondent stated that the centre of the site is too far away from services necessary for such a development as accepted by the Institute of Highways and Transportation. Another felt that the only apparent justification for the proposed broad locations at Valebridge Road and Greenhill Way related to recent additions to leisure facilities in Mid Sussex.

How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy.

Burgess Hill is considered a sustainable location for development with shops and services available locally including public transport. While the site is on the edge of the town, and across the administrative boundary, it is still the case that development here, with access to a good range of services etc is more sustainable than in more remote areas of the district or in smaller villages. It is acknowledged that residents would be likely to access more services in MSDC/WSCC than in the LDC/ESCC area and as such development contributions would need to be divided accordingly to support the provision of appropriate school places etc, while other services such as refuse collection would be the responsibility of LDC.

LDC has undertaken consultation with neighbouring authorities and will continue to, including Burgess Hill Town Council on their Neighbourhood Plan. Future developers can be expected to do the same as part of their wider community consultation.

It is considered that established character of the site with mature trees providing the setting is important to retain.

The Core Strategy supports flexibility and adaptability of homes through Core Policy 2.
Housing Type, Mix and Density and this would apply to this site too.

Parts of the site may technically be available for development before 2018 now. However there will be a need to phase strategic development across the district to ensure a steady housing supply across the plan period and to avoid over-saturation of local housing markets by releasing too much housing development at any one time in any one area of the district.

Brownfield sites are considered in preference to Greenfield, however due to the constrained nature of the district, very few brownfield options of a potentially strategic scale (capable of accommodating 100+ houses) have been identified as deliverable and developable. Hence some sites will be required to deliver the district’s housing requirements for this plan period.

The need to provide housing for the district in a balanced manner, together with the various constraints to housing development and the location of demand, means that it would not be appropriate or deliverable to assign all or most of the housing to the coastal towns. This approach would also not conform to the South East Plan requirement to provide approximately ¾ of the district’s housing in the Sussex Coast sub-region and ¼ in the northern area of the district. In the northern part of the district, which is rural in nature with a number of villages and smaller settlements, the edge of Burgess Hill and Haywards Heath are the most sustainable locations in terms of access to shops, schools, employment, other services and public transport. Sites are also being considered in the coastal area to meet the housing requirement there.

This site cannot be shown to be deliverable at this time due in large part to multiple land ownership and associated uncertainty over access. It is therefore not included as a strategic development site in the Core Strategy.

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**Topic Area: Greenhill Way, Haywards Heath (Wivelsfield Parish)**

<table>
<thead>
<tr>
<th>Comments Supporting Development at Greenhill Way</th>
</tr>
</thead>
<tbody>
<tr>
<td>Number of respondents</td>
</tr>
</tbody>
</table>

**Summary of the comments received**

A number of respondents commented that it makes sense to develop the site, due to good infrastructure, good rail connections and employment opportunities nearby in Haywards Heath and Burgess Hill. There was also mention of the proximity to hospitals, schools and shops, which made it a sustainable location.

The site proponents’ transport consultants have had recent correspondence with West Sussex County Council which revealed that the relevant stage of the relief road (stage 6) is scheduled for completion in Summer 2012. From this they have concluded that, “it is likely the entirety of the site would become available for development in highway terms”, and initial transport assessment findings reveal that the wider highway network would be able to sustain a scheme on (the northern) part of the site now (even prior to completion of Stage 6). The site proponent therefore considered that the site could come forward within 5 years and thus should be a strategic housing allocation to help meet the short-term needs of the area for housing.

One respondent considered that subject to viability matters, a strategic housing allocation on this site offers numerous opportunities, including affordable housing; a mix of housing sizes and types; infrastructure contributions; open green space; renewable and sustainable design; sustainable urban drainage solutions; and sustainable transport.

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11 Page 54 of the Emerging Core Strategy
Some respondents commented that the site is well contained from the open countryside beyond as it is bordered on its eastern and south-western boundaries by woodland and a mature tree belt.

How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy.

Support noted.

### Disagree with development at Greenhill Way

<table>
<thead>
<tr>
<th>Number of respondents</th>
<th>157</th>
</tr>
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</table>

#### Summary of the comments received

This option for housing in the Core Strategy received the most comments, which were almost entirely from residents in Haywards Heath. Objections to the site covered a range of different arguments, which were regularly repeated. Reasons given against development at this site included:

- Development would threaten ancient woodland and other habitats, such as Asylum Wood.
- It would lead to a loss of existing open space
- It would lead to a loss of productive farmland
- CIL/Section 106 payments/Council Tax would not be paid to the appropriate bodies but to Lewes District Council
- The development would not rely on services in East Sussex
- Development would result in the loss of views
- Development would result in ‘traffic chaos’
- Existing infrastructure and services cannot cope
- Access to the site is dangerous and more homes will increase accidents
- Although the land is in Wivelsfield Parish, it does not relate to the existing settlement or to other areas in Lewes District
- The site has only been chosen as it is the furthest possible piece of land away from the town of Lewes
- Development would encourage car use
- It would result in increased crime and anti-social behaviour, due to any social housing element of the development
- The strategic gap between Haywards Heath and eastern villages would be lost
- Too much development is occurring in the area, such as at Bolnore
- Development would negatively affect house prices
- Development would not be in accordance with the District Plan of Mid-Sussex
- That development would increase overcrowding which is causing bad tempers which can be experienced when shopping in Haywards Heath
- Development would create problems with flooding
- There would be a negative impact on an adjacent Conservation Area
- The development would not be meeting any need
- There are better sites in Lewes District
- Development should be focused on brownfield land
- Development does not support sustainable transport
- There has been no cross-boundary agreement between MSDC and LDC
- The development is not sustainable in terms of the three measures of social, economic and environmental
- The development does not comply with ESCC “Local Design Guide for Residential
**General Comments on Greenhill Way**

<table>
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<tr>
<th>Number of respondents</th>
<th>4</th>
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<tbody>
<tr>
<td><strong>Summary of the comments received</strong></td>
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</table>

West Sussex County Council acknowledged that in highways terms the site would potentially be available for development from 2017 onwards, once the Haywards Heath Relief Road is completed. The impact on the A272 and local road network needs assessment through a transport study and model and, if necessary, the identification of appropriate mitigation measures before it could be allocated.

See general comments on Valebridge Road for Mid Sussex District Council’s representation, which also applies to this site.

**How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy.**

Development would be phased from 2017 to allow for the prior completion of the Haywards Heath Relief Road.

Ecology/tree surveys will be required. Any necessary mitigation measures would be recommended as a result, which may include a buffer zone from the woodland and TPO trees.

Access could be gained from Ridge Way and Greenhill Way (primary and secondary access points). The primary access point would be from Ridge Way considering the location of TPO trees in the vicinity of the Greenhill Way access point, which could restrict width and accessibility at this point.

The existing permissive open space usage is an informal one, understood to be part of a land stewardship scheme, allowing access to the edges of the field, which would not preclude development. The site proponents propose that development would include a ‘material amount’ of publically accessible open space, including through contributions to off-site provision as required as well as on-site play provision.

The Agricultural Land Classification of the site is Grade 3 (good to moderate quality), which constitutes about half of the agricultural land in England and Wales. Grade 3 can be divided into two sub-grades 3a (good quality) and 3b (moderate quality). Grades 1 - 3a are defined for planning purposes as the ‘best and most versatile agricultural land’ in the NPPF (which carries forward the previous definition from the now deleted Planning Policy Statement 7: Sustainable Development in Rural Areas). Insufficient details are available to determine whether the land at Greenhill Way would fall into sub-grade 3a or 3b. However, in order that the benefits of best and most versatile agricultural land are duly considered we are assuming that if this land was sub-graded it would fall within 3a rather than 3b.

Council tax/S106 monies/CIL has also been raised as an issue. LDC and ESCC would remain responsible for some roles for which council tax is payable, such as refuse.
collection and highway maintenance, as well as collecting council tax precepts for other local authorities including Sussex Police and the local parish council. Other infrastructure is more likely to be delivered/accessed in MSDC/WSCC/HHTC administrative area and an appropriate proportion of developer contributions would need to passed on accordingly to the relevant authority.

The development would result in the loss of some countryside views/outlook to a number of properties in the Greenhill Way/Ridge Way/Lewes Road. Appropriate residential amenity considerations will be required in order to protect the existing residential properties however, the loss of householder views is not a material planning consideration. The impacts of development in this area on the character and appearance of the surroundings and landscape, including the Lewes Road conservation area, have been weighed against the other benefits and disbenefits of development.

The impacts of development of this site on traffic and the local highway network will need further assessment through a Transport Assessment/Statement and appropriate mitigation and support for sustainable transport modes through the implementation of a travel plan to ensure reliance on the car is kept to a minimum. Additionally, S.016/CIL monies received to support sustainable transport would be used to support measures to encourage sustainable transport options and reduce the development’s reliance on the car.

The road layout for the development has not yet been established so it is premature to conclude that it does not comply with ESCC guidance (or other relevant documents such as Manual for Streets 1 and 2 and the Design Manual for Roads and Bridges etc). The ESCC guidance advises that as a good practice guideline there should be a 200 dwelling limit on a single point of access in order to have due regard to the amenities of nearby residential properties resulting from that point of access. The proposed level of development of 140 units therefore falls well within that guidance level. The development would have a primary and secondary point of access, albeit both access points would be in close proximity (Ridge Way and the end of Greenhill Way).

The site has been submitted and assessed through the SHLAA methodology. It has been assessed on the same criteria as the other potential strategic sites in the district. The district’s housing needs apply to the northern parts of the administrative area just as they do to the Lewes town area and the coastal strip and this part of the district lies within the same strategic housing market area as Haywards Heath. The district has various significant planning constraints, including 56% being designated as National Park, including Lewes town. The national park boundary is drawn quite tightly around the coastal towns, especially around Seaford (the most populous settlement in the district). It is important for a number of reasons that the housing requirements are distributed around the district as far as possible and not concentrated in one or two locations (market forces would be likely to render such an approach undeliverable due to saturation of the local property market at any one time). The approach regarding potential sites in Wivelsfield parish or anywhere else in the district has not been to push development as far from Lewes town as possible.

It is not accepted that development of this site, including any affordable housing, would directly result in an increase in crime and antisocial behaviour.

There is no formal ‘strategic gap’ between Haywards Heath and villages to the east in Lewes district. The development proposed would be for up to 140 dwellings. This site would not project as far to the east as existing development along Lewes Road and to the north of it (Franklands area) and so would not materially affect the separation between Haywards Heath and places like Scaynes Hill in MSDC’s area.

‘Too much development’ in the area is a matter of individual opinion. However, we take
into account existing and proposed development in the local area, including across the administrative boundary, when assessing development impacts, including on issues such as traffic movements and other infrastructure capacity.

Individual house price changes as a result of development are not a material planning consideration. However on a more strategic level it is an aim of the core strategy to seek to provide more affordable housing and to provide more housing to meet the need as far as possible in order to reduce the house price affordability problem, which is currently fuelled by the lack of supply to meet the significant demand for housing in the area. This has meant significant house price rises in the district over recent years, particularly as the area is popular with people moving from relatively higher value locations, such as London.

Proposed development in Lewes district may not always be entirely in accordance with the Mid Sussex draft Plan as MSDC is producing its own plan for its administrative area and LDC is producing a plan for its area and many matters will not have material cross-boundary impacts. However, we are in joint discussions under the Duty to Cooperate on matters that arise with the potential for cross-border implications, such as development close to the district boundary. LDC and MSDC have been in dialogue over this site both prior to and since the Duty to Co-operate came into force. It is intended to continue liaison between the relevant authorities as proposals progress for this site in order to allay concerns over the infrastructure of Haywards Heath being overstretched and the manner in which infrastructure requirements arising from the development of 140 homes here would be addressed.

The site lies entirely in Flood Zone 1 (lowest probability of flooding). A site specific Flood Risk Assessment would be required once the details of the development numbers and type are known, at the planning application stage. Nonetheless, Sustainable Drainage Systems (SuDS) and associated flood risk mitigation would be required as practicable on site to minimise the risk of surface water flooding arising from the development.

The Lewes Road Conservation Area is another consideration in the masterplanning and subsequent detailed planning at application stage for development on this site. Potential mitigation could include a separation belt, planting, appropriate design and orientation of the development, appropriate materials etc.

The development would help to meet some of the identified housing need locally identified in the district, which applies in part to the northern areas of the district as well as the Lewes town area and the coastal belt. The northern part of Lewes District lies in the same strategic housing market area as Haywards Heath. Given the various planning constraints in the district we know that it will not be possible to meet all of the identified need. Therefore, it would be wrong to say that the development of this site would not meet any need to 2030. Indeed, if that was the case then market forces would also be likely to mean that the site would not be being promoting for housing development by the developer.

As previously mentioned, the options for strategic housing sites in the district are particularly limited due to the significant planning constraints that the district experiences. All site options have been considered under consistent criteria and this site has come through as a realistic and deliverable option, capable of development in the early part of the plan period in order to help meet the district’s short-term housing supply requirements. The preference is for brownfield options where possible. However we have not got sufficient developable options to deliver the district’s housing requirements for the plan period on brownfield sites only.

The edge of Haywards Heath, being a secondary regional centre and therefore higher order than any settlement in Lewes District, is one of the more sustainable areas in this
highly constrained district.

**Topic Area: North Street, Lewes**

<table>
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<tr>
<th>General comments</th>
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<tbody>
<tr>
<td><strong>Number of respondents</strong></td>
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</table>

**Summary of the comments received**

East Sussex County Council stated that reference should be included to the local transport network improvements that would be required to minimise potential traffic impacts arising from development at this location, including a new access to Phoenix Causeway west of the river; appropriate changes to the one-way system including the junction of Phoenix Causeway with Eastgate Street; measures to effectively build in and enhance high levels of sustainable accessibility; and mitigation of any air quality impacts in light of the adjoining Air Quality Management Area’. In addition, if the site is taken forward, its development should maximise the green infrastructure potential of the Ouse and its river banks.

Other respondents commented that delivering development on this site should be a priority, in accordance with strategic objectives. It was noted that the present market in employment land and premises is weak, and may remain so for some years, whilst the demand for new housing in Lewes town is urgent. It is therefore argued that a mixed use development of the site will require a high proportion of housing in order to provide the necessary flood protection and a proportion of affordable housing.

Other respondents argued that options for the future development of the site should be left open as North Street would be a key area for public consultation when a Lewes neighbourhood planning programme comes forward.

**How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy.**

Any strategic site allocations included within the Core Strategy will be accompanied by a set of development principles that reflect the constraints that need to be overcome and the opportunities that could be realised should the development proceed. It is not considered that the issues raised by ESCC are unreasonable, or would impact upon the delivery of a mixed use scheme in this location.

Whilst recognising the importance of neighbourhood planning, it is not considered appropriate for a Lewes Neighbourhood Plan to set the policy framework for the North Street area. Addressing the future direction of this key site is of strategic importance to both Lewes town and the wider area. Such decisions should be taken at a strategic planning level, which in this case is the Core Strategy, and not a Neighbourhood Plan. Notwithstanding this, the views expressed through public consultation have been a key influence in determining the eventual policy approach for the North Street area.

<table>
<thead>
<tr>
<th>Support preferred option</th>
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</thead>
<tbody>
<tr>
<td><strong>Number of respondents</strong></td>
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**Summary of the comments received**

The majority of respondents, including Lewes Town Council, supported the preferred option for a mixed development on the site for a variety of reasons, including:

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12 Page 56 of the Emerging Core Strategy
Priority should be given to developing brownfield sites
This option would absorb most of the pressure for development elsewhere in the town centre, thereby safeguarding the historic core
It is agreed that the development value of any scheme must be sufficient to fund upgraded flood defences as well as improvements to the local highway network
This site comprises largely vacant, underused and poor quality properties and is wholly preferable to other development options in the town
This option would enhance the environment of the town and provide access to the river frontage
Housing development in this location would minimise traffic movements, as residents would be less likely to use their cars for shopping trips, etc, compared with more peripheral sites elsewhere
There is a need to retain development in the town and mixed use is desirable
Mixed use developments have been shown to be more resilient in times of change or difficulty and would avoid swamping the town with any one monoclonal development, whether retail or housing

The new owners of much of the North Street site (Santon) submitted a representation that set out their broad vision for a residential led mixed-use scheme which will be integrated with the town centre and will include:
- the creation of a new town square linking Eastgate with the North Street area providing a cohesive link with the town centre
- high quality landscape and public realm with connections along the river and improvements to the eastern gateway to Lewes
- a 50 bedroom hotel to strengthen the offer of tourist accommodation in the town
- market and affordable housing with a broad range of dwelling types
- retail units of varying sizes, restaurants and cafes complement the scheme.
- associated infrastructure including flood defences and surface water management
- business space including offices and box space which will provide accommodation for a wide range of businesses.

How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy.

Support noted. Since the consultation on the Emerging Core Strategy, a number of discussions have been held with the site proponents. This has been predominantly focussed on learning more about their aspirations for the site and the collation of further technical work, evidence and community views that will inform the eventual policy approach for the area.

The further technical work and evidence has concluded that there is a need, in qualitative terms, for further retail floorspace. This is particularly for comparison goods shopping in the form of larger space units suited to multiple traders’ requirements. This would help to retain some shopping trips that are currently going to Brighton, Eastbourne and more distant centres. The SHLAA has also concluded that the North Street area is deliverable for housing.

Support Option 1 – retain for employment use
Number of respondents 8
Summary of the comments received
Some respondents considered that North Street is an inappropriate location for new
housing due to the risk of flooding, while others felt that the whole site should be retained for employment use in order to deliver the Core Strategy Vision for reducing out-commuting and securing more business premises for Lewes town. Concern was expressed that inadequate provision has been made for meeting existing and future employment needs at Lewes and that no firm statement had been made about the availability of the site for mixed use development, nor any timescale provided for delivery.

How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy.

Comments noted. Any housing brought forward at North Street will need to be conditional on appropriate flood defences incorporated into the scheme. In this regard the proponents of the scheme have made clear that this will be provided. In principle, the Environment Agency is satisfied with this approach.

It is acknowledged that at present the North Street site is a predominantly used for employment purposes. However, in view of the number a vacant units and units that are also in a poor state of repair, it is seen as an under-performing site in economic terms, particularly when considering its central location in the town. This situation is not expected to improve whilst the site remains at a significant level of flood risk. Therefore retaining the site for employment use is not seen as an appropriate approach, particularly given the unlikelihood of flood defences being delivered in such circumstances.

It is accepted that a key element of the vision is to reduce out-commuting and ensure that there is a sufficient supply of employment land. Therefore, any redevelopment of the North Street site will be conditional on the existing industrial and warehousing uses being relocated elsewhere in the town (Malling Brooks has been earmarked for this). In addition, given the findings of the Lewes District Employment and Economic Land Assessment, an appropriate level of employment uses will be incorporated into the North Street scheme.

Support Option 2 – utilise for flood storage and other low key uses

<table>
<thead>
<tr>
<th>Number of respondents</th>
<th>3</th>
</tr>
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</table>

Summary of the comments received

The few respondents who supported this option did not provide any reason for their view.

How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy.

This is also not an option that received any significant level of support, or performed well in the Sustainability Appraisal process, when compared to the preferred option.

Support Option 3- restore part of the flood plain and allow flood resistant and flood resilient development in areas of lower flood risk.

<table>
<thead>
<tr>
<th>Number of respondents</th>
<th>8</th>
</tr>
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</table>

Summary of the comments received

The following reasons were given in support of this option:

- This would seem to be the most appropriate solution in the light of the challenges presented by climate change
- Talbot Terrace and surrounding streets are likely to be adversely affected by flood defences of both North Street development and Malling side of the river, hence this option should be pursued
- Most suitable option should the economic recession be prolonged
• Local infrastructure and services are unable to cope with any significant new housing development
• Some of the existing community uses on a low budget, e.g. Zoo Studios, may be unable to afford the rents if a large new development goes ahead.

How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy.

Although the support and comments provided on this option have been noted, this option for the strategic site did not perform as well as the chosen policy approach through the Sustainability Appraisal process.

In developing the spatial policy for the North Street site, recognition has been given to the existing community uses on site, such as the creative arts studios. It is for this reason why the policy has reference to the provision of community floorspace.

The comments regarding infrastructure provision and flood defences increasing flood risk in areas away from the site are noted. However, through the evidence collected by the District Council and National Park Authority there are no apparent infrastructure constraints that cannot be overcome in delivering the strategic policy on this site. This view has been arrived at through work on the Infrastructure Delivery Plan and through close liaison with infrastructure providers. In addition, through liaison with the Environment Agency, no reasons for not delivering the strategic policy on flood risk grounds have been identified.

<table>
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<tr>
<th>Number of respondents</th>
<th>12</th>
</tr>
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</table>

Summary of the comments received

There were a range of alternative options and approaches put forward for the development of this site.

Several respondents suggested that the site area should be widened to include the land currently occupied by Waitrose, the bus station, the former Wenban Smith site and the car park off Eastgate. The reasons given for this approach were to address the problems caused by traffic movements between Phoenix Causeway, Eastgate Street and East Street and to allow a wider range of uses, including retail, leisure and a hotel. It was argued that such uses would improve and strengthen facilities in both Lewes town and the District as a whole.

Others considered that the cost of developing the North Street area would be prohibitive and a better option would be to just redevelop the land currently occupied by Waitrose, the bus station, and the former Wenban Smith site in order to provide a large town centre shopping, office and housing area with a multi storey car park

Other suggested options for the site included:

• a substantial amount of high density housing, together with other appropriate types of development, and sensitively designed parking provision to consolidate parking from other less suitable sites in the town centre which could then be utilised for more appropriate development, including housing
• a mix of housing, employment, leisure and open space with a riverside frontage with cafes at ground floor level is wanted by townspeople, according to research carried out by the Lewes Community Land Trust
• a mix of small-scale uses and buildings, including employment, housing (inc. significant proportion of affordable), open space, retail, community, arts and
culture, cinema, a riverside walkway from Phoenix Causeway to Willey's Bridge, landscaped public open space, tree planting, and additional private green space; all development should be safe and resilient to flooding, incorporating flood water storage and conveyance in the open spaces and should be self sufficient in energy generation and incorporate water efficiency and re-use measures.

- a continued focus on employment uses in order to maintain an accessible and sustainable supply of employment floorspace in Lewes.

It was also suggested that the Core Strategy should identify how a comprehensive, planned approach to the redevelopment of the North Street site will be progressed, e.g. through the Site Allocations DPD and Action Area Plan or through a masterplan put forward as part of a planning application. Alternatively, it was suggested that the Council should prepare a clear vision and masterplan in partnership with local residents and businesses and adopt a development brief as a supplementary planning document.

**How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy.**

The broad area indicated in the Emerging Core Strategy for the North Street site was the land to the north of the Phoenix Causeway (the majority of this land is in the ownership of the Santon Group and Lewes District Council). In order to aid in integrating any scheme at North Street into the existing town centre, it makes sense to consider the land to the south of the Causeway (i.e. the land occupied by Waitrose, the former Wenban Smith site). This is particularly considered pertinent given the redevelopment plans that have been considered for this area (replacement supermarket). Hence, it is agreed that a holistic approach that addresses a future planning strategy for land to the north and south of the Phoenix Causeway makes sense. Such an approach should aid in addressing the problems caused by existing traffic movements in the area.

In terms of how the redevelopment of North Street will be progressed in planning terms, regard needs to be had as to when any such scheme will be implementable. The Santon Group have made it clear that they wish to bring forward a scheme early on in the plan period. There are no reasons to suggest that this is not achievable. Therefore, with a short to medium term need for additional office floorspace and the need to have a sufficient supply of developable sites in the early stages of the plan period for the Core Strategy, it makes sense to allocate a scheme that will deliver both of these elements.

**Topic Area: Caburn Enterprise Centre Area of Search, Ringmer**

<table>
<thead>
<tr>
<th>Comments of support on Caburn Enterprise Centre</th>
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<tbody>
<tr>
<td><strong>Number of respondents</strong></td>
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**Summary of the comments received**

Support was generally received through the online survey with few reasons given, except for the following:

- There is limited land in Lewes for employment development but Ringmer has space for such development
- There is an identified need to provide more employment opportunities in Ringmer in order to reduce out-commuting by car

There were a few respondents supported employment uses being developed in this area of search, but were of the opinion that the allocation of the site should be a matter for the neighbourhood plan to consider.

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13 Page 59 of the Emerging Core Strategy
How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy.

Support noted. This option has not been progressed due to uncertainty over deliverability in the prevailing economic conditions and the identification of alternative provision in the preferred position as set out in the Employment and Economic Land Review of Lewes town.

### Comments of objection to Caburn Enterprise Centre

<table>
<thead>
<tr>
<th>Number of respondents</th>
<th>27</th>
</tr>
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</table>

#### Summary of the comments received

Objections to this policy area, commented either upon the suitability of the site or the principle of significant employment development being directed to Ringmer.

Those who raised concerns over the principle of employment development in Ringmer commented that:

- It is unrealistic to expect businesses that wish to locate in Lewes town, to do so in Ringmer instead.
- There is more than enough space in Lewes for employment space, particularly at North Street and Phoenix Place.
- The proposed strategic planning approach is flawed as existing brownfield sites within the wider District should be considered before allocation of green field land at Ringmer. If there is a shortfall of employment floorspace in Lewes town, the area of search should be widened to existing or previously developed employment sites that are equally well located to transport routes within the District and lie outside the National Park boundaries.

Whilst not specifically objecting to the principle of employment development being directed to Ringmer, the Parish Council considered that the creation of new employment opportunities in this rural area must not be at the consequence of undercutting existing provision at more sustainable locations (e.g. central Lewes), which then remain empty. Hence, they asked that policies on new employment land are qualified with a condition that the release of new employment allocations will be dependent on a market assessment that such allocations are required.

Newhaven Port and Properties does not agree there is a need for a 1.5 hectare industrial site in Lewes or Ringmer, particularly given the regular and quick train service between Lewes and Newhaven Port and the proposed improvement the Port will make to the transport interchange at Newhaven Town station.

A number of respondents argued against the expansion of Caburn Enterprise Centre because:

- It is not viable as there are sites on the A26 which are more suitable.
- Inappropriate highways in the vicinity of the site – ‘B’ roads were never built to carry heavy traffic.
- The existing Broyle Lane B2192 junction is inadequate and uncontrolled, therefore further development of the Broyle Business Park, putting more traffic on the B2192 and more traffic existing onto it from Broyle Lane would only worsen this problem.
- New employment sites should be well screened and away from housing.
- There is not a need for this site as there are many empty and under-utilised
premises that could be used.

How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy.

Noted. This option has not been progressed due to uncertainty over deliverability in the prevailing economic conditions and the identification of alternative provision in the preferred position as set out in the Employment and Economic Land Review of Lewes town.

Alternative sites suggested to Caburn Enterprise Centre

Number of respondents | 4

Summary of the comments received

Some respondents considered that there are more appropriate sites for employment use. The sites and the reasons why they were suggested, were:

- The area of scrubland between Ham Lane and the A27 at Lewes.
- It was suggested that a more appropriate and co-ordinated solution to Caburn Enterprise Centre would be the allocation of Southerham Pit for employment use.
- New employment sites should be developed in Peacehaven/Telscombe in order to take some pressure off the transport network.

One respondent considered that in order to best meet the needs of the District in terms of employment and industry, the Council’s existing allocation of the site at the former Woodgate Dairies must be retained and reallocated within the Core Strategy.

How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy.

The area between Ham Lane and the A27 has outstanding access problems.

Southerham Pit has been assessed for employment use using the EELA site assessment methodology. Its remoteness from the town, poor access and National Park and SSSI designation meant it did not score highly and has been ruled out for allocation for employment on this basis, as well as lack of identified need for it.

The EELA recommends the retention of existing employment sites to meet future needs and to support their development, intensification and improvement for employment use as appropriate. This would include the former Woodgate Dairy site and sites in Peacehaven/Telscombe, where no requirement for additional employment land allocations has been identified in the EELA.

Topic Area: Other suggested locations for housing

Suggestions for a New Settlement

Number of respondents | 3

Summary of the comments received

Several respondents suggested that a new settlement could be built to accommodate the housing needs of the district. The following quote reflects such a thought: “Surely it would be better to build a complete new town or village with its own facilities instead of damaging a downland village.” One respondent suggested that new villages could be created between Cooksbridge and Plumpton or Glynde and Selmeston (not in Lewes
How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy.

Given the comments above, and similar such comments being made at the Issues and Options stage, the District Council has undertaken a new settlement scoping exercise to determine whether there is any potential for such an approach to be pursued in meeting an element of the housing need. The New Settlement Scoping Report, published in April 2012, sets out how this exercise was undertaken and concludes that there is no potential for a new settlement to be delivered in the district.

Suggest alternative sites

<table>
<thead>
<tr>
<th>Number of respondents</th>
<th>48</th>
</tr>
</thead>
</table>

Summary of the comments received

Several additional sites/areas have been suggested for inclusion as housing sites/areas within the Core Strategy. The majority of sites have been suggested for housing only, although some respondents suggested mixed-use schemes on these sites, which would incorporate an element of housing. These sites are:

- The University of Sussex, Falmer;
- Land north and east of Broyle Side, Ringmer;
- Little Inholmes site, Plumpton;
- Land adjacent to the Meridian Centre industrial estate, Peacehaven;
- Land adjacent to the Brighton & Hove Football Stadium, Falmer;
- Downs Leisure Centre and surrounding land, Seaford (redeveloped for mixed leisure and residential use);
- Harvey’s Depot, Lewes;
- Her Majesty’s Revenue and Customs (HMRC)/Department for Work and Pensions (DWP) buildings, Lewes;
- Derelict land east of Newhaven dock, Newhaven;
- Redundant commercial buildings opposite Glynde Place, Glynde;
- NHS building, Lewes;
- Natural England building, Lewes;
- Land at Railway Quay, West Quay, West of Meeching Quarry, South of Valley Road and Eastside, Newhaven should all be considered as strategic sites;
- Old Shipyard, Newhaven;
- Surplus land adjacent to Tideway School, Newhaven;
- Land at the edge of Denton, Newhaven;
- Lewes Garden Centre, Kingston (housing/employment and/or leisure use);
- Westgate Street Children’s Centre and Nursery Facilities in Lewes (housing and improved community uses).

A couple of comments suggested amendments to existing sites currently identified as options for strategic housing development. Such comments are picked up within the topic papers that deal with such sites/locations.

How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy.

The sites suggested above have been assessed in the latest version of the SHLAA (some had already been assessed) in order to determine whether or not they have potential for housing. The majority of sites are considered to be non-strategic and therefore they would not be identified in the Core Strategy, irrespective of whether or not they are considered deliverable or developable in the SHLAA. In such cases it will be for
respective Neighbourhood Plans, or the Site Allocations and Development Management Policies Development Plan Document to determine whether or not to allocate the sites.
Comments on Section 7 (Core Delivery Policies)

Topic Area: Core Policy 1 - Affordable Housing

Agree with the preferred policy approach

<table>
<thead>
<tr>
<th>Number of respondents</th>
<th>18</th>
</tr>
</thead>
</table>

Summary of the comments received

Respondents felt that the preferred policy approach would aid the delivery of greater levels of affordable housing, particularly in the rural areas of the district, thereby enabling local people to stay in their local communities.

A few respondents felt that the approach was right but emphasised that it was important that flexibility is clearly written into the policy, especially given the uncertain economic climate, so that site by site consideration of affordable housing viability can be undertaken.

One respondent agreed with the preferred policy approach but felt that the term ‘affordable housing’ should be clearly defined.

How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy.

The support for the proposed policy approach is welcomed.

Disagree with the preferred policy approach

<table>
<thead>
<tr>
<th>Number of respondents</th>
<th>13</th>
</tr>
</thead>
</table>

Summary of the comments received

Varied reasons were put forward for disagreeing with the preferred policy approach, although there was a general focus upon viability. Typical comments were:

- Affordable housing is desperately needed and must be provided but a rigid percentage will not be appropriate everywhere
- Would such a high proportion of affordable housing allow development to be financially viable?
- The level for rural areas has not been justified and doesn’t take account of past experience
- The case for differentiating between areas of the District for affordable housing provision has not been made
- The policy would be counter-productive for securing more affordable housing in rural areas as the threshold is too low and the percentage requirement is too high
- Rural areas already have the existing exceptions sites mechanism for delivering affordable housing
- 40% should be a target not a requirement in the rural areas
- S106, CIL and Code for Sustainable Homes costs may make development unviable when coupled with affordable housing requirements
- The policy needs greater flexibility in the difficult economic climate
- Without viability evidence the approach set out is premature
- Need to set the levels so that they do not deter development
- Don’t want affordable/council estates anywhere in Sussex.

How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy.

It was agreed that a rigid percentage would not be appropriate, especially given the uncertain economic climate. As such a target percentage (40%) has been set out, which has been shown to be broadly viable across the district, but allowing the in-built flexibility for schemes to include a lower (or higher) proportion of affordable units where viability dictates, provided this is justified.

A district wide Affordable Housing Viability Assessment (AHVA) has been undertaken to inform the proposed policy approach. Viability has been the central thread in determining the best policy approach to ensure that development will not be deterred by the affordable housing policy. The AHVA factored in other costs to developers such as meeting the Code for Sustainable Homes, S106 and CIL contributions. Monitoring is proposed, with policy review where monitoring shows it is appropriate.

Rural affordability was examined in the AHVA, which demonstrated the 40% target to be comfortably viable in most instances in the rural areas. The threshold is 3 units (net) so the smallest schemes would not be required to provide affordable units. The lower threshold is expected to allow more affordable units to be delivered in rural areas than has taken place historically. The Rural Exception Sites policy will also continue to be used as this has shown reasonable success rates in delivering affordable units in villages.

It is no longer proposed to differentiate between different areas of the district in terms of different percentage targets for different geographical locations.

The housing type, mix and density policy (Core Policy 2) seeks to ensure that affordable housing is fully integrated throughout the development and indistinguishable in factors such as design, layout and materials from the open market housing.

### Summary of the comments received

From the alternative options consulted upon, only option 1a (continuation of the current Local Plan policy) received support. Reasons for this were as follows:

- It is appropriate to have even thresholds across the district and hence, option 1(a) should be pursued.
- Option 1(a) together with continuing the current exceptions policy would be more likely to secure maximum contribution from affordable housing (in places such as Plumpton Green)

### How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy.

The viability evidence in the Affordable Housing Viability Assessment has added further detail to the affordable housing policy approach since the Emerging Core Strategy consultation. This has shown that continuing with the Local Plan policy would not provide optimum affordable housing to help address the high levels of need in the district. The approach to affordable housing has therefore been significantly updated and amended in Core Policy 1 of the Proposed Submission Core Strategy. The existing Local Plan policy for rural exception sites will continue to be used to compliment the main policy approach.
Again, a number of varied responses were received suggesting alternative approaches. These were as follows:

- Use a sliding scale – 10 houses require 10% affordable, 50 houses require 50%
- In Lewes a much higher percentage should be set due to the high cost of market housing and the fact that more smaller and family houses and homes suitable for the elderly are needed. If not 100% affordable housing until housing needs are met, then the threshold should be 4 units and the percentage set at 50% (provided this is supported by the viability study).
- Seaford Town Council would like to see the threshold for the Coastal Towns lowered from 15 to 10 units. They also requested the right to be consulted on the affordable housing percentage requirement.
- Parish Councils should decide the appropriate approach to securing affordable housing through local evidence and Neighbourhood Plans
- It would be fairer if all developments, including conversions and subdivisions, contributed to the provision of affordable housing
- Newhaven Town Council suggested the percentage is raised to 40% in all cases, given the high demand for affordable housing. The threshold would be 15 in urban areas and 5 in rural areas and the housing would be delivered on site. Financial contributions should be sought below these thresholds.
- In villages, small developments under the threshold should make payments in lieu
- Affordable housing should mean affordable market housing not just rented and shared ownership.
- The highest levels should be required where the need is greatest – thresholds should be lower and percentages higher in Lewes town than elsewhere
- Some sites may require expensive remediation/flood defences etc so may not be able to afford the full level of affordable housing in addition to CIL and other development costs – a hierarchy should be set out showing which charges may be waived in such circumstances.
- Is there any actual shortage of housing? Rather the district’s growing housing list reflects the insecure tenure of private rented housing and the secure tenure of affordable housing
- The great majority of affordable housing (except in smaller villages) should be social rented.
- Need to look at how the resumption of council house building might affect the position as many low-paid and unemployed cannot access so-called affordable homes.
- The total affordable housing percentage of all developments over a 5 year period may be more appropriate in small parishes.
- Need to consider the urgent need for rural housing (not just for farmworkers) as local rural businesses cannot recruit the right people due to the high costs of rural homes in this area.

How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy.

Flexibility has been clearly written into the policy, especially given the uncertain economic climate, so that site by site consideration of affordable housing viability can be undertaken. A district wide target percentage for affordable housing has been established. This is one target for the whole district for consistency (supported by viability evidence) but with flexibility to allow lower or higher amounts where viability justifies it. A sliding scale was suggested as an alternative approach (10 units requires 10% through to 50 units requires 50% provision). The viability evidence does suggest a sliding scale of sorts with the varied thresholds between 1 and 10 units, recognising the increasing development costs associated with smaller developments and the consequent
reduced viability levels. The simple sliding scale suggested does not present as the optimal viable option as 10% on 10 units would be excessively low and 50% on 50 units would be unviable in most cases in the towns across the district.

Affordable housing in the terms of Core Policy 1 has been clearly defined in accordance with the NPPF definition. This should avoid any confusion with ‘low cost market housing’, which will not constitute affordable housing in this context.

Financial viability is at the centre of the recommendations of the Affordable Housing (and CIL) Viability Assessment (AHVA) together with the recognition of the very high levels of housing need in the district. S106, CIL and CSH costs (as well as other issues and associated likely abnormal build costs eg such as flood risk mitigation) have been factored into the viability appraisals, together with the need to provide a willing developer and willing landowner with a reasonable competitive return.

House prices are recognised to be high in Lewes town. Largely because of the high cost of market housing there are a large number of people in housing need in the town. However, the viability evidence identifies significant additional costs to development such as contaminated and remediation, flood risk mitigation, infrastructure requirements and higher specification costs as a result of National Park status that impact on the viability of development in Lewes town. This means that the affordable housing percentage needs to be tempered in Lewes town to allow for such costs and provide a competitive profit margin, without which development is extremely unlikely to proceed. High levels of affordable housing provision (50% - 100%) were not shown to be generally viable for the town.

The AHVA recommends a reduced threshold to 3 (net) units, with a graduated percentage requirements increasing to 40% for 10+ units. Town and Parish Councils will continue to be consulted on planning applications, which will continue to include details of the proportion of units proposed to be affordable. If the case involved a request for a different level of affordable housing then it would also need to be objectively assessed in development financial viability terms (generally LDC engages the District Valuer to independently assess the details). The town/parish council could also take a role in advising on the appropriate tenure mix for the local area, based on local information and in discussion with LDC Housing officers.

Financial contributions will not be sought for developments below the threshold (i.e. 1 and 2 unit schemes) because the evidence suggests that this would generally not be viable on these smallest schemes, together with Code for Sustainable Homes and S.106/CIL requirements.

Affordable housing provision is a key strategic issue and as such it is necessary for the Core Strategy to set a district wide policy. However, where appropriate Neighbourhood Plans could set more detailed local policies on the matter, provided they are generally consistent with the overall target for the district and supported by local needs and viability evidence. They could also seek to identify appropriate sites for affordable housing and/or exception sites.

Affordable housing as defined in the NPPF and for the Core Strategy does not include low cost market housing. It is important to differentiate between genuine affordable housing in perpetuity and any forms of market housing. The majority of affordable housing will be expected to be affordable rented (generally 75%), unless local evidence shows otherwise.

There are high levels of affordable housing need across the district due to the high house price to income ratio. However a number of factors affect affordable housing viability, which means that a direct relationship between levels of need and affordable housing
requirements would not be deliverable.

The NPPF (para 55) sets out guidance on the provision of the special circumstances in which other rural dwellings (such as for rural workers) would be acceptable.

Some respondents preferred option 1a, which was to continue with the Local Plan 25% threshold 15 units requirement, which was felt to be likely to deliver more affordable housing, presumably because it was felt that the less onerous affordable housing provision would be more likely to encourage development in the district overall. However the SA appraisal and viability assessment indicate that to keep to this level would miss the opportunity to deliver the optimum viable level of affordable housing while providing a meaningful competitive return to developers and landowners.

It is not considered appropriate to set out which charges might be ‘waived’ in cases where the set affordable housing target and/or threshold are not viable. This is because the individual site conditions, infrastructure requirements and development economics will vary in each case where it can be shown that the policy target level of affordable housing cannot be achieved. As such any variations should be considered on a case-by-case basis.

Other mechanisms for providing affordable housing such as reinstating council house building and bringing empty properties back into use are also being considered through the Housing Strategy. These mechanisms would be required alongside new build affordable homes delivered through wider housing development because the level of need in the district outstrips the level that can realistically be expected to be delivered. Evidence suggests that even if every new house built in the district to 2030 was affordable, the affordable housing need would still not be met. Development economics mean that 100% affordable housing delivery district wide would not be viable or deliverable. However the key point is that the implementation of other methods of affordable housing delivery in the district would not remove the need to also provide for optimum affordable housing provision from new development via the plan-led process.

One respondent to Core Policy 2 (below) suggested that the policy should include clarity on affordable housing policy for C2 and C3 Uses. This has been included in the supporting text for Core Policy 1.

**Topic Area: Core Policy 2 - Housing Density and Mix**

**Agree with the preferred policy approach**

<table>
<thead>
<tr>
<th>Number of respondents</th>
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<tbody>
<tr>
<td>52</td>
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**Summary of the comments received**

A large proportion of respondents agreed with the approach set out. Although most who supported the policy did so through the online survey (and therefore generally did not provide reasoning), those who did give specific reasons for this support made the following points:

- Support for the flexible approach, especially with regard to density
- Market housing should be small in nature (i.e. 2-3 bedrooms) and targeted towards young families and the elderly, hence support reference being made to this in the policy.
- Agree with Lifetime Homes not being a requirement for all new dwellings, as it will not be appropriate in all instances.

**How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy.**
The support for the proposed policy approach is welcomed.

<table>
<thead>
<tr>
<th>Disagree with the preferred policy approach</th>
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<tbody>
<tr>
<td>Number of respondents</td>
</tr>
<tr>
<td>Summary of the comments received</td>
</tr>
<tr>
<td>Relatively few respondents disagreed with all or part of the preferred approach. Those who did, without specifying a preference for an alternative approach, gave the following reasons:</td>
</tr>
<tr>
<td>• Clarity is needed on the position with Use Classes C2 and C3, particularly with regard to older people’s housing (as Eastbourne BC has done)</td>
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<tr>
<td>• References to ‘elderly’ should be replaced with ‘older people’</td>
</tr>
<tr>
<td>• The density approach may work in urban environments but would have to be very simplistic or very complex to protect the natural environment and rural villages as they are all different</td>
</tr>
<tr>
<td>• There is apparent conflict between the need for more family houses and the proposed density targets (as higher densities means more flats).</td>
</tr>
<tr>
<td>• Developers are only interested in profits and that usually that means 4-5 bedroom houses, hence it is doubted as to how effective the policy will be.</td>
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<thead>
<tr>
<th>How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy.</th>
</tr>
</thead>
<tbody>
<tr>
<td>C2 and C3 clarity is provided with regard to affordable housing in Core Policy 1.</td>
</tr>
<tr>
<td>References to ‘elderly’ have been replaced with ‘older people’.</td>
</tr>
<tr>
<td>The policy recognises that the district is very diverse in character and is flexible to allow high or lower densities where appropriate to local context.</td>
</tr>
<tr>
<td>Supporting evidence shows that the main areas of need to 2030 will be for smaller units (1-2 beds) and flexibility/adaptability of accommodation. While there will be some call for larger family homes too, it is considered important to direct development, whenever locally appropriate, to meet the overriding need for smaller units.</td>
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<table>
<thead>
<tr>
<th>Prefer another option consulted upon</th>
</tr>
</thead>
<tbody>
<tr>
<td>Number of respondents</td>
</tr>
<tr>
<td>Summary of the comments received</td>
</tr>
<tr>
<td>Those who commented on the alternative options consulted upon, generally did so when supporting the option of requiring Lifetime Homes standards to be met in all new residential developments. It was felt that this should be insisted upon due to the ageing population in the district.</td>
</tr>
<tr>
<td>There was also support for option 2(b) as it was felt that different demographic mixes across the district would necessitate different approaches to housing types and sizes.</td>
</tr>
<tr>
<td>Some felt that densities should be assessed on a site by site basis as every site is different and planners have great experience in evaluating individual sites, hence they supported option 2(e). Another reason cited for supporting this option was that not all things are the same in every town.</td>
</tr>
</tbody>
</table>
Core Policy 2 will seek flexible, socially inclusive and adaptable accommodation to meet the diverse needs of district’s community and the changing needs over time. Lifetime Homes standards will be encouraged in this respect. Elements of Lifetime Homes will become requirements through the tightening Building Regulations and the Core Strategy requirement to meet at least the full Level 4 of the Code for Sustainable Homes (where Lifetime Homes elements are often used as credits towards achieving the required Code Level).

Full Lifetime Homes standards have not been made mandatory in the policy due to the need for ensuring that additional burdens do not deter development from the district and the need to balance other benefits to be sought from development such as CIL contributions and affordable housing.

<table>
<thead>
<tr>
<th>Suggest another approach</th>
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<tbody>
<tr>
<td><strong>Number of respondents</strong></td>
</tr>
</tbody>
</table>

**Summary of the comments received**

Again, a variety of other alternative approaches were suggested (some of which overlap with the ‘prefer another option’ comments above):

- Set a percentage requirement to meet Lifetime Homes standards
- It would be better to set a maximum density that cannot be exceeded
- Housing type, density and mix should be for Neighbourhood Plans to determine
- Follow the preferred option but expand it to ensure that new dwellings are designed to be easily extended as families grow (e.g. with ready to convert roof space)
- New houses should have kitchens accessible from more than one room and/or an annex with shared facilities so older people can be looked after by younger family members
- 55 to 60 dwellings per hectare is necessary in the towns to help improve affordability but much reduced levels should be set in villages (e.g. no more than 20 dwellings per hectare) to minimise pressure on local infrastructure
- Lewes town density targets should be separated from Lewes district targets or the national park area should be separated from the rest of district targets to avoid the town being crammed with flats
- Building heights should be limited to preserve historic views
- Flood resilience standards should be set out in this policy
- Local requirements should be specified for nursing homes
- Cohousing should be provided (a type of intentional community of typically 15-40 private homes with additional shared facilities including a common house with shared spaces and facilities).

How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy.

Lifetime Homes standards have not been made mandatory in the policy due to the need for ensuring that additional burdens do not deter development from the district and the need to balance other benefits to be sought from development such as CIL contributions. Elements of Lifetime Homes will be delivered through the need to provide flexible, socially inclusive and adaptable accommodation. Different approaches may be more appropriate for different schemes and/or locations. Flexibility is therefore provided in the policy approach.
The purpose of the Core Policy 2 approach set out is to provide a clear guide while allowing sufficient flexibility to ensure developments are appropriate to the existing character of the vicinity of the site, allowing for higher or lower densities depending on the proposal and the local context given that the district is so diverse in character.

Neighbourhood Plans could provide more detail on this policy area, where local evidence justifies it. The Core Strategy will set a strategic level guide for housing density, type and mix, however within this a Neighbourhood Plan could take up much more detail according to the specifics of the plan area, particularly where there is an identified need locally for a certain type or size of dwelling, or where the area has a definable local character that should affect density or where there is some other local characteristic such as a key historic view to preserve, provided it is in general conformity with the Core Strategy and the NPPF.

Flood resilience standards are not necessary in this policy. Core Policy 12 deals with flood risk. Resilience methods are a matter for site by site determination, in consultation with the Environment Agency.

Provision for co-housing is not considered to be a strategic level issue for the district and is therefore not an appropriate matter for the Core Strategy to address.

It is recognised that with an ageing population appropriate housing for older people needs to be provided in the district. This is recognised in Core Policy 2. More detailed local requirements for special needs housing, such as nursing homes, will be addressed in a Site Allocations and Development Management Policies DPD and/or the SDNPA Local Plan as appropriate.

**Topic Area: Core Policy 3 - Gypsy and Traveller Accommodation**

<table>
<thead>
<tr>
<th>Agree with the preferred policy approach</th>
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<tbody>
<tr>
<td><strong>Number of respondents</strong></td>
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</table>

**Summary of the comments received**

The majority of comments on this policy area supported the approach in recognition of Gypsy and Traveller accommodation needs, rather than indicating support of the two specific sites outlined as options for the provision of pitches. Respondents agreed with the approach of identifying sites in the Core Strategy rather than later at the site allocations stage. Both the Denton and Offham sites identified in the policy received a few comments of support (three respondents for each).

**How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy.**

The support for the proposed policy approach is welcomed. However, insufficient sites have been identified for inclusion within the Core Strategy, and therefore sites to meet Gypsy and Traveller accommodation needs will be allocated in the Site Allocations Development Plan Document.

<table>
<thead>
<tr>
<th>Disagree with the preferred policy approach</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Number of respondents</strong></td>
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</table>

**Summary of the comments received**

Overall approach (16)
Hamsey Parish Council voiced concerns with the background evidence (covered in a previous topic paper) and the site identified at Offham (covered below). Lewes Town Council indicated concern with the approach as the large set of criteria makes it difficult to agree suitable sites. Others commented that further sites should not be provided until the need is proved due to the apparent under use of the existing site on A27, or considered that the Council has not considered issues such as the extra costs and pressure on local services such as schools, health care and police.

**Denton (71)**

Reasons for objecting to the Denton site included:
- Travellers make mess;
- Newhaven Town Council do not consider the site to be suitable or economically justifiable for four pitches;
- People of Newhaven should be treated with more respect and other towns should have their fair share of troublesome issues and unwanted sites;
- Newhaven is being dumped on with unpopular projects;
- People on the housing waiting list should be the Council’s priority not Travellers;
- Unsuitability of site due to its location within the National Park; flood risk, no pavement, no lighting, location on a bend, site is too small to provide accommodation and required facilities;
- The site will cause tension and disharmony for residents and house prices will be affected;
- Travellers sites will not help the regeneration of Newhaven as investors will be discouraged;
- Why is there a need for this site when there is an unused site at Beddingham.

**Offham (13)**

Hamsey Parish Council considers the number of pitches proposed to be provided at Offham to be disproportionate to the size of the parish. It is also concerned that development would set a precedent for further development along the A275 and whether, based on the site’s history, planning restrictions would be followed.

Other respondents raised issues of suitability of the site, including increased danger of traffic accidents; poor drainage; impact on local landscape, especially the National Park; loss of habitats from part removal of hedge, and; the site has a building of historical interest. Other objections related to taxpayers having to pay for the necessary amenities, the site being in private not public ownership and obstruction to views from nearby residents.

**How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy.**

The broad level of need for Gypsy and Traveller permanent pitches has been established in earlier work within the Gypsy and Traveller Accommodation Assessment (GTAA) undertaken across the East Sussex Local Authorities with Brighton & Hove City Council. The current site along on A27 is a Transit site which meets a different need of accommodation.

Paragraph 12 of *Planning Policy for traveller sites* states that sites in rural locations should not dominate the nearest settled community. Hamsey Parish Council raised this as a concern with regards to the Offham Barns site option. Consider this recent Government factor when considering the allocation of sites at the Site Allocation Development Plan Document stage.

Continued work with infrastructure providers and statutory bodies, through work such as the Infrastructure Delivery Plan, will ensure that any level of development does not place undue pressures on local services and that suitable sites are identified for future.
development. Relevant infrastructure issues will be considered when allocating specific sites.

### Suggest other approach/ Comments on Gypsies and Travellers in general

<table>
<thead>
<tr>
<th>Number of respondents</th>
<th>18</th>
</tr>
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</table>

#### Summary of the comments received

Most of the respondents provided general comments (positive and negative) and suggested alternative sites to be considered. Other respondents commented on the content of the policy area.

One respondent considered that the Core Strategy should not identify sites but have criteria based policy against which neighbourhood plans can identify suitable sites. However, concerns were raised by another respondent over the potential stifling of otherwise suitable sites through the use of policy criteria.

Two contrasting comments were made regarding the proposed level of pitches; one suggested that pitch provision should be higher, so as to conform to the South East Plan figure of 16 pitches; and the other suggested that Lewes District Council should reduce its quota of pitch provision by two thirds (11 to 3) to reflect the area that falls within the jurisdiction of the South Downs National Park Authority.

#### Suggested locations/ sites put forward for consideration were:

- Lewes town and Brighton
- Harvey's depot site, Lewes;
- End of Mountfield Road, Lewes;
- Timber yard off South Street, Lewes;
- Cockshut Road, Lewes;
- End of North Street, Lewes;
- Land at Cooksbridge, Hamsey;
- Land around Glyndebourne;
- Sites consistent with traditional associations (e.g recycling)
- Existing Bridies Tan site, Southerham (make four of the 10 pitches available here);
- Council owned land

Some of the alternative approaches identified by respondents included licensing sites for a period of time (1 month and up to 3 years were suggested) after which Travellers should move on or seek permanent housing or rent/buy a static caravan should they wish to stay in the area.

Some respondents called for further community engagement to encourage further sites to come forward and for Gypsy and Traveller accommodation to be classified under social/affordable housing in Section 106 agreements and provision be made in major development schemes. One respondent considered the issue of Traveller accommodation was being ignored and that with proper sites the travelling community can fit in. Other respondents suggested not providing accommodation for the Gypsy and Traveller community.

### How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy.

Government policy states that local planning authorities should identify specific sites where a need has been identified, rather than setting criteria-based policies.
In terms of identifying specific sites, the supporting policy document (Planning Policy for traveller sites) to the National Planning Policy Framework (NPPF), states that specific deliverable sites should be identified to provide a five year supply, extending to 10 years where possible. These sites should be identified in Core Strategy (Local Plan), rather than relying on neighbourhood plans to bring sites forward.

With regards to the level of accommodation that should be provided, this figure has been based on the most recent available evidence. It is expected that in the future there will be an update to the accommodation needs assessment. This will ensure that the appropriate level of accommodation is being planned for. This work is anticipated to be updated in partnership with the South Downs National Park Authority and neighbouring local planning authorities.

In order to ensure a thorough approach to identifying potential sites, the additional sites suggested by respondents have been assessed, together with previous filtered Strategic Housing Land Availability Assessment (SHLAA) sites and available LDC owned land. Monitoring of the occupancy levels at Bridie’s Tan Transit site, Southerham, has shown that it is a valuable asset and so is not considered for permanent pitches. This additional work is presented as an addendum to the original Gypsy and Traveller Site Assessment and published as a background document to the Proposed Submission Core Strategy.

**Topic Area: Core Policy 4 - Encouraging Economic Development and Regeneration**

**Agree with the preferred policy approach**

| Number of respondents | 54 |

**Summary of the comments received**

Supported was either for the policy approach in general (often done so through the online survey) or for a specific part of the policy approach, with the following reasons given:

- The approach promotes economic development in a sustainable manner.
- It is a realistic and pragmatic approach.
- Welcome the safeguarding of existing employment sites and allocations.

Some respondents felt the conversion of redundant farm buildings for small businesses has worked very well in the District and should be encouraged in the future. Others felt that parts of the policy approach, whilst laudable, may be difficult to implement.

**How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy.**

The support for the proposed policy approach is welcomed. There was specific support for the conversion of redundant farm buildings for small businesses which it was felt had worked very well in the district and should continue to be encouraged in the future. This was also recognised in the Employment and Economic Land Assessment and so Core Policy 4 (point 5) now includes explicit reference to support for economic growth in rural areas in this way.

There was some concern that, while laudable, point 10 of Core Policy 4 as set out in the Emerging Core Strategy may be difficult to deliver, especially when university education has become very costly for those on modest means (point 10 was to “increase the skills and educational attainment level of the district’s labour supply”). It is recognised that the Core Strategy alone cannot achieve this. However it is intended to ensure that a supportive planning policy framework is put in place through the Core Strategy for
opportunities to improve education, training and skills in the district’s labour force. As such the policy wording for point 10 is now to, “Support opportunities for the improvement of the skills and educational attainment levels of the district’s labour supply, including new education and training facilities”.

<table>
<thead>
<tr>
<th>Disagree with the preferred policy approach</th>
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<tbody>
<tr>
<td>Number of respondents</td>
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</table>

**Summary of the comments received**

A small number of respondents disagreed with the preferred policy approach, generally focusing on the issue of safeguarding existing employment sites. Some respondents felt that the policy was too flexible and could result in the loss of employment land in areas of high residential land values, whilst others sought the deletion of this part of the policy on the grounds that safeguarding land for employment would be counter to the goals of the draft National Planning Policy Framework.

One respondent felt that a more proactive approach to attracting businesses should be sought that would facilitate a transition to higher value sectors through a range of modern, business premises, coupled with a proactive marketing strategy. Another respondent felt similarly and also stated that businesses could relocate to district, by a policy highlighting the unique high quality environment and the good transport links to Lewes town.

The contribution of arable and dairy farming to the local economy was highlighted as not being mentioned in the document and in particular within this policy.

**How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy.**

It is still proposed to safeguard existing employment sites unless there are demonstrable economic viability or environmental amenity reasons not to. The Lewes District Employment and Economic Land Assessment (EELA), including the 2012 update, recommends that due to the very constrained nature of the district we need to retain our existing employment land for future needs once the local economy is growing again post recession to serve the plan period and beyond, unless particular overriding circumstances demonstrate otherwise. Once employment land is lost to higher value use (residential) it is extremely unlikely to be returned to employment use and suitable employment sites are few and far between in this district. It is felt that this approach strikes the right balance between needing to ensure enough employment sites for the future, while allowing suitable flexibility/discretion in certain circumstances to allow other uses where justified.

While the EELA has only identified a modest need for land allocation for employment purposes, it does suggest a need is likely to arise that should be met through the improvement, modernisation and intensification of use of existing employment sites and that the loss of such sites would result in too little choice, stifling the employment market. Therefore it is considered that retaining existing sites, together with modest new allocation makes the right balance, provided there is appropriate flexibility for mixed uses where this would bring forward employment development that would not otherwise come forward. The policy wording seeks to strike this appropriate balance. The characteristics section of the Proposed Submission document highlights the attributes of the various parts of the district, including the good transport links and environs of Lewes town. It is therefore not necessary to restate those points in this policy.

An improved marketing strategy for the district is primarily role for the economic development team. However, setting a positive planning policy framework that does not
set unnecessary barriers to employers looking to set up business or relocate to the district is part of that, including highlighting the unique high quality environment and the good transport links in the district. These characteristics are set out in the scene setting parts of the Core Strategy and so do not need reiterating in this policy itself.

The importance of agriculture to both the performance of the rural economy and to landscape management and biodiversity is now included in the supporting text for the policy. The policy itself also now includes support for farm diversification and the re-use of redundant rural buildings for rural economic development as mentioned above.

### Changes sought to the policy

| Number of respondents | 12 |

#### Summary of the comments received

Changes sought the proposed policy approach were as follows:

- Reference should be made to the recession
- Reference should be made to the Local Enterprise Partnerships
- There should be support for the proposed Rampion Offshore Windfarm and the economic benefits it could deliver to Peacehaven.
- Reference should be made to the East Sussex Local Economic Assessment.
- The policy should be made more flexible to allow for a mix of uses on employment sites
- Redundant commercial sites should be able to be brought forward for housing development
- New office space should be focussed on all parts of the district
- Peacehaven would benefit from an Enterprise Centre for local businesses to grow and develop
- The Old Gas Works site in Seaford should be redeveloped
- Cradle Hill Industrial Estate in Seaford should have improved access
- Point 7 of the policy should be: “*Work in partnership with Newhaven Port to increase the utilisation of the ferry service for freight and passengers, support its plans for modernisation, redevelopment and expansion as set out in the Port Authority’s Port Master Plan, and promote the use of existing industrial and business sites at the Port and its undeveloped land ahead of previously undeveloped sites in the district*”
- Point 4 of the policy should be “*Promote the delivery of new office space in and around Lewes town, including consideration of a new employment village*”
- The policy should have a strong relationship with the Infrastructure Delivery Plan
- The policy should not prohibit growth in the coastal areas, which already underperforms according to the South East Plan analysis
- That more support should be given for tourism and agriculture in the policy
- There should be more emphasis on protecting and encouraging rural businesses if rural communities are to be sustainable
- Policies for employment sites for Peacehaven and Telscombe should be a priority
- Reflect the importance of the agricultural industry

#### How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy.

Reference is now made to the recession/economic climate at the time of policy preparation and evidence gathering.

The Proposed Submission document is supportive of the Rampion Offshore Windfarm and the wider benefits and opportunities available to the district as a result.
The Local Enterprise Partnerships (unusually, LDC is in two LEPs) are now referred to. As is ESCC’s East Sussex Local Economic Assessment.

It was mentioned that new office space should be focused on all parts of the district. The evidence suggests that the overriding need/demand for office space will be in Lewes town, and this is the only area where a new allocation is recommended (including in the EELA 2012 Update). However, the Proposed Submission document sets out that the plan isn’t only supportive of offices in Lewes town and that appropriate economic development will indeed be encouraged district wide. In particular there is an acknowledged need/desire for flexible, modern start-up business space, which may include offices, district wide (facilities similar to the Newhaven Enterprise Centre are often quoted as desirable to achieve for the district’s other towns).

Some comments, such as the need for an improved access to Cradle Hill Industrial Estate were too detailed and not sufficiently strategic in nature to be addressed in the Core Strategy.

The proposed amended wording to include consideration of a new employment village outside Lewes is not considered appropriate as the evidence does not identify a need for this and sites around Lewes town are in the National Park. Southerham Grey Pit was suggested as a potential location for such an employment village. It has been assessed against the EELA site assessments criteria and was not concluded to be appropriate or required for allocation. The site was also not considered favourable in discussions with officers at SDNPA. It was therefore not considered appropriate to progress this suggestion in the Proposed Submission document.

The suggested re-wording of point 7 from Newhaven Port and Properties (NPP) was considered acceptable in general direction, although the specific wording suggested was not quite right for the policy. The point NPP makes about supporting the use of Port undeveloped land ahead of other previously undeveloped land elsewhere in the district does not support the EELA evidence and the identified need in Lewes town (which could not realistically be served at Newhaven Port which is too far removed from Lewes to fill that role). Point 7 of Core Policy 4 reflects local planning authority support for appropriate development at the Port, recognising that it has a key role to play in the local economy and the future regeneration of Newhaven.

It was stated that this policy should have a strong relationship with the Infrastructure Delivery Plan, which is true of the whole Core Strategy and so does not need reiterating under this policy.

The policy seeks to support appropriate economic development district wide and does not prohibit growth and business improvement in the coastal areas – it supports the regeneration of the coastal towns.

No strategic requirement for employment site allocation for Peacehaven and Telscombe has been identified. However, existing employment sites there will be safeguarded and suitable economic development and business improvements/redevelopments etc will be supported by the policy. In the event that a need for a new employment allocation is identified in Peacehaven or Telscombe in the future Point 1 will allow for this to be done through the Site Allocations and Development Management Policies DPD (or possibly through a Neighbourhood Plan).
**Topic Area: Core Policy 5 – The Visitor Economy**

<table>
<thead>
<tr>
<th>Agree with the preferred policy approach</th>
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<tr>
<td><strong>Number of respondents</strong></td>
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<tr>
<td><strong>Summary of the comments received</strong></td>
</tr>
<tr>
<td>The majority of those who supported this policy did not give their reasons. Reasons given were:</td>
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<tr>
<td>- In light of the new National Park designation, and its Purposes, this is a realistic policy approach to take.</td>
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<tr>
<td>- The policy recognises the natural assets of the district.</td>
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<tr>
<td>In supporting the policy some respondents felt that tourist development should be conditioned by the need to conserve the landscape.</td>
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</table>

**How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy.**

The support for the proposed policy approach is welcomed. The policy is supportive of the sustainable development of the visitor economy where it is of a scale, type and appearance appropriate to the locality. The application of this would include ensuring that development proposals were appropriate to the landscape setting.

<table>
<thead>
<tr>
<th>Disagree with the preferred policy approach</th>
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<tr>
<td><strong>Number of respondents</strong></td>
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<tr>
<td><strong>Summary of the comments received</strong></td>
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<tr>
<td>Reasons for disagreeing with the preferred policy approach included:</td>
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<tr>
<td>- One respondent was concerned about the development of tourism in the Seaford area on the grounds that tourism does not play a large part in the local economy and from their understanding that is the way the residents prefer it</td>
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<tr>
<td>- There is no need to spend money on the visitor economy - if the market is there, then people will come</td>
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<tr>
<td>- There are sufficient hotels in the area</td>
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<tr>
<td>- The retention of existing sites must not take precedent over the provision of high quality visitor accommodation</td>
</tr>
<tr>
<td>- While it is important that visitor attractions are sustainable, they should also be of a high standard (reflecting the National Park designation)</td>
</tr>
<tr>
<td>- Investment in and promotion of existing attractions should be prioritised.</td>
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</table>

**How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy.**

It is recognised that Seaford is a ‘town by the sea’ rather than a ‘seaside town’ with a low-key seafront that many people value for its understated character. The policy now requires that sustainable development of the visitor economy is of a scale, type and appearance appropriate to the locality. Significant changes to the understated character of Seaford that many residents value are not therefore proposed.

The Proposed Submission policy seeks to provide a positive framework in which the visitor economy can undergo appropriate development to support and provide for the needs of this market sector, which is recognised as important to the local economy of the district, including the rural areas. The SDNP is expected to boost the local market and increase awareness of the area for visitors.
It is agreed that there are sufficient hotels of certain types, although a need/opportunity for budget and boutique type hotels has been identified, together with demand for other innovative/emerging types of visitor accommodation. The policy seeks to be supportive of such proposals where they are sustainable and of a scale, type and appearance appropriate to the locality.

It is agreed that the retention of existing visitor sites should not take precedence over the provision of high quality visitor accommodation. The provision of appropriate high quality visitor accommodation is supported by the policy, including the upgrading/enhancement of existing facilities. While there is a presumption in favour of retaining existing visitor accommodation stock in order to provide sufficient sites and a variety of types of accommodation, quality is emphasised in the policy too. In the National Park this will include the need to meet National Park Purposes and benefit the National Park designation. The presumption in favour of retention of existing sites will facilitate their retention for promotion and improvement, ahead of new developments where these would not otherwise be needed.

### Changes sought to the policy

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<thead>
<tr>
<th>Number of respondents</th>
<th>9</th>
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</table>

### Summary of the comments received

Natural England felt that point 5 of the policy could refer to the potential for walking and cycling as a component of sustainable tourism and it would be helpful to provide some examples of sustainable visitor attractions and tourism in order to demonstrate what the policy is aiming to achieve.

East Sussex County Council thought that the policy should mention the need to improve and provide sustainable travel choices for those wishing to visit attractions in/around Lewes District, comprising of bus, rail and cycling opportunities. One respondent continued on this theme and thought that the Bluebell Railway line needed protection.

Some commented about the lack of car parking stifling the tourism industry, while others mentioned that better signage was required for certain attractions. One respondent suggested further investment to enhance the seafront at Seaford with the provision of public amenities to attract and retain visitors.

Glyndebourne was suggested as the ideal site for the construction of a hotel and other visitor/tourist centres by one respondent. Another felt that the policy should support local B&Bs and not risk the establishment of permanent housing on existing caravan sites. They also felt that the policy needs caution as the building of a new hotel could raise real problems if a corporate design motel type of accommodation is proposed.

One comment received said that there is a need to distinguish between what could be all year round caravan/camping sites in the countryside or edge of towns and transient light weight tenting sites for walkers or cyclists.

It was also suggested that the policy could provide an opportunity to regenerate Newhaven. However, there was also caution expressed that an expansion of the visitor economy may impact on highway routes and thus infrastructure improvements may be needed that should be reflected in the Infrastructure Delivery Plan.

### How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy

Support for this policy was tempered in some cases by concern to protect the character of the landscape (particularly in the SDNP) and low-key attractions such as Seaford.
seafront (although it was generally felt that some facilities to attract and retain visitors on the seafront were needed, albeit low key). The policy is worded to ensure high quality development that is sensitive to its locality. Proposals for things like signage and car parking would need to be considered in this context.

Sustainable tourism and sustainable transport are included as key policy areas in the Proposed Submission Core Strategy. Core Policy 5 point 5 also supports sustainable transport for visitors to reduce the impacts of visitors on the highway network.

There is a presumption in favour of retaining visitor attractions/facilities, which would include the Bluebell Railway.

Some of the district’s key tourist destinations/facilities have been mentioned in the Characteristics section of the Proposed Submission document and so are not reiterated here. This is of course, not an exhaustive list as there are many visitor destinations/facilities/attractions of different types and scales within the district.

Glyndebourne is not considered appropriate for allocation for hotel development in the policy due to the sensitive nature of the setting of Glyndebourne and its location in the SDNP. The identified need for an allocation for a 1ha site for hotel development will be met at North Street in the Proposed Submission document.

It is not considered that there is a specific need to differentiate in terms of sites suitable for year-round accommodation and those for more transient, light weight camping. This will be on a case by case basis rather than prescribed in the strategic level policy. It will be appropriate for overarching aims to protect the landscape, support the visitor economy, reduce seasonality etc will still apply but be afforded different weight depending on the scheme proposed, the location etc. Further details could be added if needed to subsequent more detailed development management policies.

The opportunity to regenerate Newhaven Port and surrounding area are addressed in the wider economic development support for the Port in Core Policy 4 which recognises its wider role in local regeneration as well as for ferry passengers and a tourism focus/gateway.

Topic Area: Core Policy 6 – Retail and Sustainable Town and Local Centres

<table>
<thead>
<tr>
<th>Agree with the preferred policy approach - General</th>
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<tbody>
<tr>
<td>Number of respondents</td>
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</table>

Summary of the comments received

One respondent felt the policy would help refuse out-of-town supermarket development and was a positive. Another felt that a number of points of the policy were positive, particularly those that attempted to protect and enhance local shops and facilities, although did think a definition for ‘facilities’ was necessary.

One retailer supported the overall thrust of the policy “in so far as it seeks to protect and enhance the vitality and viability of its centres in accordance with national policy set out in both PPS4 and the draft NPPF”.

How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy.

The support for the proposed policy approach is welcomed. It is agreed that a definition of the term ‘facilities’ would add to the clarity of the document and a change to the text
<table>
<thead>
<tr>
<th>Agree with the preferred policy approach for Newhaven town centre</th>
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<tbody>
<tr>
<td><strong>Number of respondents</strong></td>
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<tr>
<td><strong>Summary of the comments received</strong></td>
</tr>
<tr>
<td>Whist a large number of consultees indicated support for this option, most did so by the online survey and thus did not give reasons.</td>
</tr>
<tr>
<td>Newhaven Town Council recognised that the town centre had changed significantly and stated that it no longer fulfils the function of a primary shopping centre. As a result they felt that declassification was appropriate especially “if this provides the opportunity for other uses to establish and facilitate regeneration of the old town centre.”</td>
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<table>
<thead>
<tr>
<th>Agree with the preferred policy approach for Peacehaven</th>
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<tbody>
<tr>
<td><strong>Number of respondents</strong></td>
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<tr>
<td><strong>Summary of the comments received</strong></td>
</tr>
<tr>
<td>The consultees who submitted their support for this approach did so, almost exclusively, via the online survey and did not explain their reasons. One retailer did believe the approach was correct and particularly around exploring the potential for further improvements and development opportunities.</td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>Disagree with the preferred policy approach – General comments</th>
</tr>
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<tbody>
<tr>
<td><strong>Number of respondents</strong></td>
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<tr>
<td><strong>Summary of the comments received</strong></td>
</tr>
<tr>
<td>Westmeston Parish Council considered that the policy is very negative in approach in respect of accepting the change of use of shops in the area to other uses. A stronger support for local shops within the parishes would be more supportable.</td>
</tr>
<tr>
<td>Most respondents who raised concern over the policy in general felt that at the current point in time, the policies within the Core Strategy are premature and could prejudge any recommendations and evidence within an updated retail study, which was felt to be required.</td>
</tr>
</tbody>
</table>

**How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy.**

The updated Lewes District Shopping and Town Centres Study has now been published and informs the Proposed Submission document. The Study recognises the value of rural shops.

In respect to Westmeston Parish Council’s concerns, the policy approach seeks to protect local shops and only signals a flexible approach where premises are not viable.

<table>
<thead>
<tr>
<th>Disagree with the preferred policy approach for Newhaven town centre</th>
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<tbody>
<tr>
<td><strong>Number of respondents</strong></td>
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<tr>
<td><strong>Summary of the comments received</strong></td>
</tr>
<tr>
<td>One District Councillor felt that removing the primary shopping area designation was inappropriate and unwelcome as they considered that the approach would not revitalise</td>
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Newhaven town centre. The view was that it did not make sense to allow Newhaven to decline and thus encourage yet more people to travel elsewhere.

A similar comment maintained that approaches to sections 3 and 5 of the overall policy were at odds with allowing residential development in Newhaven town centre whilst seeking to encourage active ground floor frontages. Another comment felt that allowing residential development would further exacerbate the problem in the town centre, although they did support other non-retail uses within the area.

One retailer felt the policy “could serve to undermine any potential scope to strengthen the retail function of the centre of the plan period” and prejudged the findings of the retail study update which was not yet completed.

How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy.

The approach to Newhaven is supported by the updated Lewes District Shopping and Town Centres Study and the National Planning Policy Framework confirms that residential development can play an important role in ensuring the vitality of centres. However, the centre of Newhaven is still identified as having primary shopping frontage, where there is a presumption against loss of retail to residential at street level. Outside of primary shopping frontages, other non-retail uses will provide opportunities for active frontages and increase vitality and therefore viability. Accordingly, no change has been made to the Core Strategy in response to the comments received.

Disagree with the preferred policy approach for Peacehaven

| Number of respondents | 2 |

Summary of the comments received

Those that disagreed with the approach did so by online survey and did not explain their reasoning.

How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy.

No change has been made to the Core Strategy in response to the comments received.

Prefer other option - Newhaven

| Number of respondents | 6 |

Summary of the comments received

One retailer felt that the designation should continue to focus on consolidating retail uses to help strengthen the retail function of the area. Others who preferred such an approach were from those who submitted online surveys and did not provide reasons.

How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy.

See comments above for Newhaven. The updated Lewes District Shopping and Town Centres Study identifies primary and secondary shopping frontages, which will help to strengthen areas of retail use. A strong policy direction and hierarchy is proposed to give protection to retail uses and ensure the health and vitality of centres.
<table>
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<tr>
<th>Prefer other option - Peacehaven</th>
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<tbody>
<tr>
<td><strong>Number of respondents</strong></td>
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<tr>
<td><strong>Summary of the comments received</strong></td>
</tr>
<tr>
<td>Those that preferred another approach did so by online survey and did not explain their reasoning.</td>
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</tbody>
</table>

**How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy.**

No change has been made to the Core Strategy in response to the comments received.

<table>
<thead>
<tr>
<th>Suggest other Retail Approaches</th>
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<tr>
<td><strong>Number of respondents</strong></td>
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<tr>
<td><strong>Summary of the comments received</strong></td>
</tr>
<tr>
<td>Newhaven Town Council suggested that the policy could support the provision of links between the town centre and other areas of the town to support cohesion as they did not want to jeopardise opportunities for regeneration east of the river. Key to these proposals is the need to retain and improve pedestrian, cycle and public transport access.</td>
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</tbody>
</table>

South Heighton Parish Council commented that they would like to see reference in the Core Strategy for the potential opportunity for the replacement of local village facilities, should the opportunity arise. Another consultee felt that measures to support the local delivery of services in rural areas, to avoid the need to travel by car, should be included in this policy.

One consultee suggested that shop front protection in Lewes should be extended to the ‘bottleneck’ to preserve the attractive appearance of the High Street. They also commented that protecting the independent shops from residential conversion away from the flood plain would be a sensible approach.

One consultee favoured a policy that set out an acceptable level of supermarket provision in each town to prevent the decline of local shops and thus maintain the vibrancy of local town centres.

It was also suggested that as part of any audit of retail and functional hierarchy of Towns, Local Centres and other Settlements, consideration should be given to the likely growth of settlements that would be required to ensure a continuation and, if possible, an expansion of service provision.
The Proposed Submission Core Strategy now requires developments in edge of centre or out of centre locations to provide, enhance or make contributions to improved pedestrian and cycle linkages to the town centre.

The policy for rural facilities and services is strengthened. The Core Strategy seeks to protect local shops and facilities. The National Policy Planning Framework states that local planning authorities support local strategies to deliver sufficient community facilities and services to meet local needs. Where service not viable another community facility will be sought for use of premises.

In respect of concerns over the retention of shop front up to the Lewes High Street ‘bottleneck’, this part of the High Street lies within the town centre as defined in the Lewes District Shopping and Town Centres Study 2012. The Study also extends the primary shopping frontage so more of High Street has protection from change of use from retail to residential. The Proposed Submission Core Strategy seeks to reinforce and enhance the character and mix of retailers in this part of the town, so protection will be afforded to its character. Core Policy 11 fulfils development management policies for historic building and conservation identifying importance of local historic assets.

Accordingly, no changes have been made in response to the comments submitted.

In respect of setting out a target for retail provision, the Lewes District Shopping and Town Centres Study 2012 identified a qualitative need for retail floorspace and this is reflected in the Proposed Submission Core Strategy.

Concern over ensuring retention of local retail facilities raised. Core Policy 6 seeks to retain local shops where viable and with stringent evidence required, where argued they are unsustainable. Alternative community uses required as a first alternative,

Suggestion that retail hierarchy take into consideration potential to support/expand shops. Shopping hierarchy based on level of existing provision and function. However Newhaven has been identified as currently having local service centre status with opportunity to return to a District Centre if regeneration assisted by Core Strategy policy increases vitality and vibrancy.

**Top Area: Core Policy 7 - Infrastructure**

**Agree with the preferred policy approach**

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<tr>
<th>Number of respondents</th>
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<td>52</td>
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**Summary of the comments received**

The vast majority of respondents supported the proposed approach to this policy area. East Sussex County Council (ESCC) welcomed the approach but requested a more explicit explanation of how the policy would be applied to ensure that key infrastructure requirements will be met in a timely manner. ESCC also suggested that the policy should explain that the Infrastructure Delivery Plan’s focus should be on identifying the infrastructure required to support the level and broad distribution of development proposed by the Core Strategy not existing deficiencies. ESCC also suggested some detailed amendments to the text in order to reflect the following:

- CIL charges will rarely raise the whole cost of the infrastructure required to support development
- some development will be exempt from CIL
• where necessary and / or appropriate to maintain viability, nil charges may be applied to non-exempt development
• the terms physical infrastructure and social infrastructure should be defined
• in order to avoid conflict and/or duplication, and to facilitate programming and prioritisation, Core Policy 8: Green Infrastructure and Core Policy 13: Transport should explain that development contributions towards infrastructure will be dealt with under Core Policy 7.

Southern Water qualified its support for the overall approach to Core Policy 7 with the proviso that it must be supported by evidence of the water and wastewater infrastructure required to enable the amount of development proposed (consistent with paragraphs 4.8 and 4.9 of PPS12).

How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy.

Support for the preferred policy approach is welcomed and some of the suggested textual amendments have been incorporated. It is acknowledged that the Core Strategy needs to be underpinned by robust evidence about the key critical infrastructure that is required to support the new development proposed and the mechanisms which will be put in place to secure this infrastructure at the appropriate time. The importance of ensuring that infrastructure providers can plan and align their own strategies and budgets to support the developments proposed in the emerging spatial strategy for the District is also recognised. The District Council and the South Downs National Park Authority are therefore seeking to build a partnership approach with the relevant agencies and organisations, including the Water Companies, to ensure that infrastructure provision is properly planned, funded and delivered as necessary and in a timely fashion alongside planned development in the District.

Disagree with the preferred policy approach

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<tr>
<th>Number of respondents</th>
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</table>

Concern was expressed by some members of the public that the proposed spatial strategy cannot be delivered because there is already inadequate infrastructure to meet the existing needs of the District.

South East Water expressed disappointment that the Emerging Core Strategy makes no reference to new water resource development requirements over the Plan period and requested that the text makes specific reference to the provision of water supply infrastructure. It considers that the Core Strategy should provide explicit policy recognition and support for necessary new water supply infrastructure, and be sufficiently flexible to deliver planned water demand and infrastructure improvements identified within South East Water's statutory Water Resources Management Plan (WRMP). South East Water is therefore unable to support the policy approach at this stage.

Sport England expressed concern over the lack of an up-to-date PPG17 assessment to provide a robust and credible evidence base for the provision of open space and recreation. It considers that the proposed policy is an inappropriate blanket protection as it fails to take into account possible areas of under or over supply of indoor and outdoor sports facilities and playing pitches. Sport England is therefore unable to support the policy approach at this stage.

How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy.

It is acknowledged that some parts of the District currently experience deficiencies in
terms of certain facilities and services, as identified in the Infrastructure Position Statement. However, the infrastructure planning work carried out to date indicates that there are no fundamental infrastructure deficits or requirements that would prevent delivery of the development proposed in the Core Strategy. There will, nevertheless, be a need for investment in infrastructure improvements and new infrastructure provision to support new development in the District and it is considered that Core Policy 7 appropriately sets out how this will be achieved.

The importance of developing new water resources is recognised, as detailed in the Infrastructure Position Statement. However, the extent to which the provision of new strategic water resources is required needs to take into account environment, social and economic costs and benefits, and South East Water is currently undertaking an extensive appraisal of the options for new infrastructure provision across the whole of its area. The Council acknowledges its role in assisting with the timely delivery of new strategic water resource schemes but will need to see the strategic need for any such schemes in the District confirmed by the Secretary of State’s endorsement of South East Water’s Water Resources Management Plan 2014 before it incorporates specific policy support in the Lewes District LDF Core Strategy. If a need for a new strategic water resource (or resources) within the District is eventually identified in the WRMP 2014, a specific allocation (or allocations) can be made within the Site Allocations and Development Management DPD which will follow adoption of the Core Strategy.

As part of the evidence base for the Core Strategy, the Council commissioned two separate assessments of recreational and other open space within the District, as detailed in the Infrastructure Position Statement. The Lewes District Outdoor Playing Space Review 2004 reviews and assesses the provision of outdoor sports space, children’s equipped play space and children’s informal play space. The Lewes District Informal Recreational Space Study 2005 reviews and assesses the provision of informal recreation space, including accessible countryside, natural and semi-natural urban green space, parks and gardens and greenways. It is acknowledged that both assessments are now out-of-date, but it is considered unlikely that there have been significant changes in the level of provision sufficient to negate their value for plan making purposes.

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<th>Suggest other approach and changes to the policy</th>
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<td><strong>Number of respondents</strong></td>
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**Summary of the comments received**

Burgess Hill and Haywards Heath Town Councils argued that financial contributions towards infrastructure provision should spent within the areas where new development will make a demand on services; they should not be ring-fenced by the boundaries of Lewes District. If housing sites are allocated on the edge of Burgess Hill or Haywards Heath, Core Policy 7 should address the need for infrastructure contributions to supplement services in these towns.

Newhaven Town Council suggested that the policy and text should be amended to address (i) existing infrastructure deficits, (ii) the provision of car parking particularly with regard to subdivision of existing dwellings, and (iii) the provision of a multi-use, flexible indoor space with a 300 – 500 seating capacity.

Seaford Town Council commented that a combination of S106 planning obligations and CIL would be insufficient to fund all the necessary infrastructure requirements and therefore other funding options and mechanisms should therefore be considered.

Lewes District Council’s Head of Environmental Health agrees with the overall policy approach but considers that both a Low Emission Strategy and the use of CIL/S106 contributions to deliver the Shoreline Management Plan, Lewes to Seaford Flood
Defence Strategy and other local surface water management plans should be a key element.

Other respondents commented that:
- the Core Strategy should state more clearly that housing development should not proceed before there is at least a commitment to the development of infrastructure
- the re-opening of the Lewes to Uckfield line is key to new infrastructure provision in terms of ensuring better public transport links
- the words 'appropriate or proportionate' should be inserted between the words 'require' and 'developer' in the wording of the third part of the policy.

How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy.

Core Policy 7 will not prevent financial contributions towards infrastructure provision in areas beyond the District boundaries where there is evidence that insufficient capacity is available in existing infrastructure to meet the needs of new development. The CIL and S106 legislation enables charging authorities to pass money to bodies outside their area and the NPPF clearly states that plan strategies should seek to meet objectively assessed infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.

It is acknowledged that some parts of the District currently experience deficiencies in terms of certain facilities and services, as identified in the Infrastructure Position Statement. The Council will work in partnership with all infrastructure providers in order to support their work in determining the most appropriate approach to addressing such deficiencies. However, developer contributions can only be used to help fund the infrastructure that is needed to make development acceptable and sustainable; they cannot be used to resolve pre-existing problems or deficiencies in infrastructure.

It is recognised that developer contributions and S106 planning obligations and CIL would be insufficient to fund all the necessary infrastructure requirements. The delivery and management of essential infrastructure is funded through a variety of public and private sector sources and arrangements. Many of these are listed in the Infrastructure Position Statement and will be identified in the Infrastructure Delivery Plan accompanying the Proposed Submission Core Strategy where critical to the delivery of necessary infrastructure.

Sea, river and surface water defences all come within the definition of infrastructure for the purposes of the Core Strategy, as detailed in the Infrastructure Position Statement. However, for clarity, it is accepted that the glossary to the Core Strategy should more comprehensively list all the types of infrastructure that fall within the scope of Core Policy 7. Similarly, the policy does not preclude the provision of infrastructure which may be necessary to help deliver the objectives of the Lewes Air Quality Action Plan or a future Low Emission Strategy. This issue is addressed in more detail in Core Policy 9 – Air Quality.

The individual suggestions put forward for specific items of infrastructure to support the growth proposed in the Emerging Core Strategy are noted. The Infrastructure Delivery Plan will identify all critical infrastructure required over the period of the Core Strategy, together with the lead organisation and/or delivery partners, funding arrangements and delivery timescales.

The NPPF is clear that plans should be deliverable and the sites and scale of development identified should not be subject to such a scale of obligations that their
ability to be developed viably is threatened. It also states that planning obligations should (i) be necessary to make the development acceptable in planning terms, (ii) directly related to the development and (iii) fairly and reasonably related in scale and kind to the development. The inclusion of the words ‘appropriate and proportionate’ in Core Policy 7 is therefore considered unnecessary and no change is proposed in this respect.

**Topic Area: Core Policy 8 – Green Infrastructure**

### Agree with the preferred policy approach

| Number of respondents | 61 |

**Summary of the comments received**

The vast majority of respondents welcomed the policy approach to green infrastructure, with supporting representations received from the Environment Agency, Natural England, East Sussex County Council and a number of Town and Parish Councils. East Sussex County Council suggested that the policy could also include the production of a Green Infrastructure Strategy for the district which would identify green infrastructure requirements that could feed into the prioritisation of infrastructure delivery and the CIL process, a reference to National Ecosystem Services Assessment and how the Green Infrastructure Strategy for the district could protect and enhance the ecosystem services provided by the rich and varied natural environment of the district.

**How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy.**

The support for the preferred policy approach is welcomed. Whilst acknowledging that green infrastructure strategies have the potential to engage and concentrate a wide range of partners in a common focus, it is not considered that this is necessarily required to deliver green infrastructure needs within Lewes District. Such strategies are more usually developed in the context of high levels of planned housing growth. In Lewes District, it is considered that an overarching green infrastructure policy, in association with other development plan policies, will be sufficient to support the implementation of multifunctional green infrastructure and ensure that it is prioritised in planning decisions.

### Disagree with the preferred policy approach

| Number of respondents | 9 |

**Summary of the comments received**

Respondents gave a variety of reasons for not supporting the policy approach.

Sport England supported the definition of green infrastructure but was unable to support the policy approach due to the lack of an up-to-date PPG17 assessment, which it considers is required to justify seeking developer contributions towards green infrastructure provision.

One respondent objected to the inclusion of chalk pits within the definition of green infrastructure, noting that whilst this reflects the definition in the South East Plan and PPG17, these documents are likely to be redundant by the time the Core Strategy is adopted. The respondent points out that draft National Planning Policy Framework offers a new definition of open space which limits it to land with a sport and recreation role and contribution to visual amenity.

Another respondent objected to the lack of mention of the fact that much of the green space is actually part of the farming economy and its practices can impact hugely upon the nature of the green environment. The respondent seeks good policies supporting
agriculture.

**How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy.**

As part of the evidence base for the Core Strategy, the Council commissioned two separate assessments of recreational and other open space within the District, as detailed in the Infrastructure Position Statement. The Lewes District Outdoor Playing Space Review 2004 reviews and assesses the provision of outdoor sports space, children’s equipped play space and children’s informal play space. The Lewes District Informal Recreational Space Study 2005 reviews and assesses the provision of informal recreation space, including accessible countryside, natural and semi-natural urban green space, parks and gardens and greenways.

It is acknowledged that both assessments are now out-of-date, but it is considered unlikely that there have been significant changes in the level of provision sufficient to negate their value for plan making purposes. Nevertheless, the Council is examining the possibility of undertaking a review of these studies in order to inform the detailed development management policies in the Site Allocations & Development Management Policies DPD.

The Core Strategy is required to be in general conformity with the South East Plan whilst this document still forms part of the development plan. Accordingly, it is not considered that there is any justification for adopting an alternative definition for green infrastructure at this stage, nor can any conflict be identified between the South East Plan definition and the NPPF.

Farming/agriculture is not a function explicit in the South East Plan definition of green infrastructure. However, it is acknowledged that agricultural practices and land management often impact upon the key functions of green infrastructure within the District, such as conserving biodiversity or increasing access to and enjoyment of the countryside. Whilst agricultural practices fall outside of planning control, the Council does work in partnership with a wide range of bodies and organisations, including farmers and landowners, to conserve and enhance the natural environment and improve opportunities for access to the countryside through a wide range of initiatives, the most recent of which is the South Downs Way Ahead Nature Improvement Area Partnership, and this will be addressed through Core Policies 8 and 10.

### Suggest other approach

| Number of respondents | 6 |

### Summary of the comments received

Whilst welcoming the overall policy approach, a number of respondents sought a difference in emphasis or wording, or suggested that the policy should address either wider, more detailed or location-specific issues.

Newhaven Town Council seeks changes that:

- Identify the need for and allocate appropriate additional green infrastructure sites in Newhaven, including land east of Lewes Road and as part of the proposals west of Meeching Quarry and at Eastside
- Place greater emphasis on the importance of green infrastructure, particularly within and adjoining urban areas, and require its provision as a key element of any development
- Ensure that adequate mechanisms are in place to provide appropriate green infrastructure on small sites and financial contributions from individual dwellings
and subdivisions

Other respondents seek changes that:

- Include consideration of a safe cycle route between Lewes and Kingston
- Include the word ‘proportionately’ between the words ‘contribute’ and ‘to the creation’
- Require developers to provide as a minimum on-site, safe children’s play areas for housing that could accommodate children, i.e. with two bedrooms or more where private gardens are not provided
- Give more weight to creating green corridors for flora and fauna

How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy.

Many of the suggested changes relate to specific items of green infrastructure, often with no clear means of delivery, and their inclusion is therefore considered inappropriate in a strategic level policy. Other suggested changes relate to specific locations, which are considered unnecessary as there will be an overall policy requirement for all major new development and regeneration schemes to design in green infrastructure. Nevertheless, where strategic housing sites are allocated in the Core Strategy, the specific infrastructure requirements for each site will be identified in the document.

The funding of infrastructure, including green infrastructure is addressed by Core Policy 7. The NPPF is clear that plans should be deliverable and the sites and scale of development identified should not be subject to such a scale of obligations that their ability to be developed viably is threatened. It also states that planning obligations should (i) be necessary to make the development acceptable in planning terms, (ii) directly related to the development and (iii) fairly and reasonably related in scale and kind to the development. The inclusion of the word ‘proportionately’ in Core Policy 8 is therefore considered unnecessary and no change is proposed in this respect.

Topic Area: Core Policy 9 – Air Quality

Agree with the preferred policy approach

| Number of respondents | 51 |

Summary of the comments received

Many respondents indicated their support for the proposed policy approach. However most of these were received from the online survey and did not indicate how they had come to their opinion. Other comments were generally received from written responses which commented on most aspects of the Emerging Core Strategy and though making clear their support for the approach, also did not explain the reasoning behind their support.

How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy.

The support for the preferred policy approach is welcomed.

Disagree with the preferred policy approach

| Number of respondents | 3 |

Summary of the comments received
All of the respondents who disagreed with the approach did so by online survey. Only one explained why they had come to this opinion, revealing that they thought the approach was likely to be ineffective.

**How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy.**

No change has been made to the Core Strategy in response to the comments received.

**Suggest other Approach**

| Number of respondents | 8 |

**Summary of the comments received**

Southern Water expressed the opinion that the policy area should be broadened to include a range of environmental matters. They particularly advocated the inclusion of policies relating to the protection of water resources.

East Sussex County Council agreed with much of the approach but thought the policy should include the aim of guiding development away from an AQMA. They also wanted to broaden the scope of point 4 of the policy approach, stating that development should require both mitigation and compensation if it were to affect the Air Quality Management Area (AQMA), while another representation went further stating that no development should take place if it would affect either directly or indirectly an AQMA.

Newhaven Town Council felt the policy should consider the need to declare an AQMA for South Way in Newhaven. The District Council’s Environmental Health Team submitted a number of suggested detailed changes to the policy, including:

- changing part 1 of the policy to read: “Seek improvements in air quality through the implementation of Air Quality Action Plans having particular regard to the impacts of development on areas with existing poor air quality as defined by AQMA and their surrounding areas of influence”
- deleting, in part 2 of the policy, “will have an acceptable impact” and replacing with “does not impact”
- adding “actively” before the start of part 3 of the policy
- adding at the end of part 4 of the policy “or could lead to a declaration of a new AQMA. Development should make a positive contribution to improving air quality.”
- replacing “seek” with “ensure” at the beginning of part 5 of the policy.

**How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy.**

Generally the proposed approach was seen positively by those who commented on the policy and has changed little in nature.

ESCC’s position was noted but it is thought that the policy should help with air quality issues in areas and thus development would help to alleviate the situation in AQMAs, meaning that development in such areas shouldn’t necessarily be avoided. Equally, in the reasoned justification it is explained that measures of an Air Quality Action Plan includes providing funding for their delivery and thus there is no need to state that compensation may be required in the policy.

Apart from changing to wording to reflect the views of the Environmental Health Team (who were involved in the final drafting of the policy), there were no other realistic options considered to pursue for air quality – there were other options suggested but they have been added to the other policy areas as they discussed water quality.
Agree with the preferred policy approach

| Number of respondents | 57 |

Summary of the comments received

The majority of those who commented on this policy did so via the online survey and thus generally did not give reasons for their support of the policy. Natural England (NE) and Mid Sussex District Council (MSDC) both welcomed the further Habitats Regulation Assessment work, with MSDC wishing to be kept informed to ensure a consistent approach. South East Water (SEW) supported the approach but wanted to see sufficient flexibility in policy to permit future essential works to new or enhanced infrastructure.

How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy.

The support for the preferred policy approach is welcomed. Officers will continue to work with NE, MSDC and Wealden DC to ensure a consistent approach with regards to HRA work. The comments made by SEW are noted, but this aspect is considered to be addressed by Core Policy 7.

Disagree with the preferred policy approach

| Number of respondents | 5 |

Summary of the comments received

Plumpton Parish Council indicated concerns over the level of protection that species identified in or around potential development sites would be given by this policy. One District Councillor suggested that equal weight should be given to SSSIs as to SACs.

How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy.

Plumpton Parish Council’s views are noted. Given that the policy is strategic in nature, it will not address particular sites unless they have formal designations which requires, under either European or British Law, protection by the planning system. The process of allocating sites for development in the Proposed Submission Core Strategy takes into consideration the capacity of a site to accommodate housing and the effect development will have on biodiversity assets.

SACs, SPAs and Ramsar sites are afforded the maximum amount of protection in the planning system and are protected by European Law and international agreements due to the biodiversity that they host. SSSIs are national designations, though highly important and home to biodiversity of great value, they are not protected in the same way and a distinction between the two needs to be drawn.

Suggest other approach

| Number of respondents | 13 |

Summary of the comments received

The majority of representations received were supportive of the policy, but suggested amendments and/or additions to strengthen the policy or reflect issues which are currently not mentioned.

East Sussex County Council suggested that reference to the County’s Landscape...
Assessment and the Integrated Assessment for the South Downs National Park should be made as a decision making tool for activities in the National Park. The policy should also include protection and enhancement of areas of tranquillity, as required by the National Noise Policy Statement.

Several respondents, including Ringmer Parish Council, specifically mentioned the importance of agriculture in the district and considered that this has not adequately been recognised in the Core Strategy. It was suggested that more emphasis and protection should be given to high value agricultural land for locally grown food rather than losing the land to development and other uses, such as biomass production.

The CPRE considered that the policy currently gives limited protection to the characteristics of the Low Weald, particularly: ancient woodland; wood pasture; ancient shaws and hedgerows, mature trees, meadows and wetlands.

Newhaven Town Council commented that the policy does not adequately reflect the importance of the landscape on the setting of and impact within urban areas.

Other points suggested for inclusion were the role of mitigation and stating the Sandford Principle within first bullet point under item 4 of the policy. The point of prioritising brownfield sites was reiterated by a District Councillor and furthermore, a presumption against developing land identified as having none/ negligible capacity for development.

One comment agreed with the overall policy approach but, in terms of sustainability, where local benefits significantly outweigh the conservation or landscape interests consent should be considered.

One comment was concerned with the loss of the historic pattern of settlements, such as the linear villages in the Low Weald, and this should be protected and made explicit in the policy.

How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy.

Generally the approach outlined in the Emerging Core Strategy was supported and has changed little in nature, although changes have been made to reflect comments, up-to-date information and to ensure clarity. References sought by consultees to a number of different points have generally been added into the policy or supporting text. The preference to bring forward development on brownfield land has been considered in the spatial strategy section, albeit this policy seeks to protect the loss of important natural environments.

The issue of noise has been covered by para 123 of NPPF therefore protection afforded by high level policy and is not considered in this policy. Agriculture is now mentioned throughout the Core Strategy.

The purposes of National Parks are identified as being important throughout the Core Strategy and in this policy - it is not therefore felt necessary to refer to the Sandford Principle in the policy.

Additions have been made to reflect the findings of the HRA and to maintain a consistent approach with our neighbours on protected sites. The effect of development on towns and villages are considered in Core Policy 11.

In respect of creating a balance between need and environmental interests, Core Policy 10 makes provision for not permitting new development that would harm landscape unless the benefits outweigh the harm caused.
### Agree with the preferred policy approach

| Number of respondents | 39 |

#### Summary of the comments received

The majority of those who commented on this policy did so via the online survey and thus generally did not give reasons for their support of the policy. Those that did give reasons said they were pleased that flood defences were given prominence and that there was a commitment to a dialogue with the development industry to raise standards in respect to design and construction.

Other representations suggested that all development must include provision for rainwater harvesting and be built to high technical and architectural standards.

However, one comment was concerned with the loss of the historic pattern of settlements, such as the linear villages in the Low Weald, and this should be protected and made explicit in the policy.

#### How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy.

The support for the preferred policy approach is welcomed. The need to build to high technical and architectural standards and to provide for rainwater harvesting are addressed by the proposed policy requirement for new development to be of high quality design and to reduce water consumption respectively.

### Disagree with the preferred policy approach

| Number of respondents | 4 |

#### Summary of the comments received

Concern was raised that generic district-wide guidance on the built environment could impact on the character of individual parts of the district and that applications needed to be considered in respect of a site’s surroundings. Another comment on the policy stated that the wording should be stronger as it should require redevelopment to be of the highest quality of design and materials.

#### How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy.

It is considered that the proposed policy requirements for new development to be locally distinctive, to make a positive contribution to the unique character and appearance of the surrounding area, and to respond to its local context will address any concerns that local character may be adversely affected by Core Policy 11. The references to high quality design, the use of local materials and sustainable construction techniques are considered to be an appropriate form of wording that properly reflects the core planning principles and national policies on the design of the built environment set out in the NPPF. Accordingly, no change has been made to the Core Strategy in response to the comments received.

### Prefer Other Option

| Number of respondents | 8 |

#### Summary of the comments received

Core Policy 11 advocated a preferred policy approach but also detailed 2 other options.
for the policy area. All of those who chose a different option did so by the online survey and did not provide reasons.

**How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy.**

No overriding justification has been produced for departing from the Council’s preferred approach to Core Policy 11 and accordingly no change has been made to the Core Strategy in response to the comments received.

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<td><strong>Number of respondents</strong></td>
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**Summary of the comments received**

Lewes District Council’s Environmental Health section felt that there needed to be reference to noise because noisy developments can have a large impact on the built environment and thus it should be an important consideration reflected in policy. They also felt that there should be reference to contaminated sites. Such commentary, it was felt, would be able to influence developers at important parts of the planning process.

Newhaven Town Council thought that there should be emphasis on the need to prevent urban areas coalescing (referring to Newhaven and Peacehaven) and also thought that mention was needed to highlight the need for the quality design of the public realm.

East Sussex County Council thought that the policy would be stronger if it made specific mention of the importance of the wider historic environment and the full range of heritage assets it contains to ensure that the Core Strategy meets the requirements of Planning Policy Statement 5.

**How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy.**

The need to ensure that development does not cause unacceptable harm to the amenity of neighbouring properties or to the character of an area in terms of noise is addressed in Local Plan Policy ST3, which would be retained in the Core Strategy.

In respect of contaminated land issues, it should be recognised that the purpose of Core Policy 11 is to set out design principles that the Council will apply in order to achieve high quality development. Clearly it is important that planning decisions should ensure that new development is appropriate to its location, but whether or not a site is affected by contamination is not considered to fall within the scope of this policy.

The need to retain the identity and ‘sense of place’ of individual settlements is recognised and identified as a strategic objective in the Emerging Core Strategy. It is acknowledged that the coalescence of Newhaven with Peacehaven would conflict with this aim but it is considered that the prevention of the coalescence of urban areas would be more effectively addressed through the definition of settlement planning or development boundaries than through the design principles set out in Core Policy 11.

In terms of implementing planning policies for the historic environment, the Council will have full regard to national guidance set out in the NPPF (which revokes and replaces PPS5).

Accordingly, no change has been made to the Core Strategy in response to the comments received.
Agree with the preferred policy approach

| Number of respondents | 46 |

Summary of the comments received

Like many other policy areas, most of those supporting the preferred policy approach did so through the online survey without providing any explanation. The Environment Agency stated that they “fully support the approach and inclusion of this policy”.

How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy.

The support for the preferred policy approach is welcomed.

Disagree with the preferred policy approach

| Number of respondents | 5 |

Summary of the comments received

Very few respondents disagreed with the approach. Seaford Town Council was unable to support the policy as it had not considered the Seaford Community Partnership Seafront Plan. Another respondent stated that the policy should have a stronger emphasis on resisting development in the floodplain.

One respondent disagreed with part 5 of the policy relating to the re-creation of the River Ouse corridor because such an approach would encourage the destruction of existing weirs, which in turn could both increase the risk of flooding on the Ouse and negatively impact the local biodiversity.

How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy.

The policy is clear that it seeks to steer development away from areas of flood risk and therefore needn’t be stronger. Although Seaford Town Council’s view is noted, the policy is strategic in level and so should not get into the detail proposed by the town council.

The comment about part 5 of the draft policy is noted. The policy no longer contains such an aim because it relates to the point about delivering the goals of other strategies made by partners.

Suggest other Approach, or changes to the preferred approach

| Number of respondents | 11 |

Summary of the comments received

The Environment Agency recommended that point 4 of the policy makes reference to the Local Lead Flood Authority (East Sussex County Council).

One District Councillor felt that, while the parts of the proposed policy approach are good, the policy was too narrow and should be expanded to reflect certain conclusions from the Renewable Energy and Low Carbon Development Study (e.g. building orientation and the identification of Combined Heat and Power plants) to aid the District’s response to the challenges of climate change.

Another District Councillor felt that the policy should be much more precautionary in
approach and consider avoiding all residential development in Flood Zone 3 on the basis that flooding will increase due to climate change and thus it is possible that there will be risk to homes during their lifetime whether they are protected by flood defences or not. A similar point was made by some other respondents.

Barcombe Parish Council commented that flood risk in their locality is dependant on what happens upstream in Wealden District and wanted the Core Strategy to mention that Lewes District Council would commit to liaising with Wealden District Council on the matter.

Newhaven Town Council considered that the wording of the potential approach to this area may prevent regeneration of some areas near the Ouse and thus suggested that the Core Strategy should “make reference to the possibility of utilising design and other solutions to facilitate the development of some areas at risk of flooding and that these will be considered in a positive light where they achieve regeneration and the provision of facilities serving the needs of the local community”. Another consultee asked that point 8 of the policy should not apply to areas where Newhaven Port could expand.

One consultee considered that the prefix to part 1 of the policy – “when possible” should be removed to strengthen the policy and that part 6 of the policy was too weak as green roofs and permeable paving should be mandatory for new development and conversions in the flood plain. Another felt that mention should be made to the EU Water Framework Directive.

**How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy.**

Generally the approach was supported and the overall thrust of the policy remains the same. Notwithstanding the above, point 5 has been omitted as it is felt it covered by wording at the end of the policy which states that the local planning authorities should help in the implementation of other flood and coastal protection plans.

We have included ESCC within point 4 as requested by the EA. It would not be possible to prevent all development in the flood risk zone as a councillor indicated. Hopefully the first part of the policy should act as a disincentive for development in such areas.

Whilst understanding BPCs position, WDC’s Core Strategy will have been considered by relevant authorities (EA/ESCC). We are a statutory consultee (as are BPC) on other planning documents and thus, where appropriate, will make comments highlighting their concerns.

Newhaven TCs concerns are well-known but their wording is very precise for the policy. Design, as well as the regeneration of Newhaven, is covered in other policies.

If, in an application, the port could prove that a specific, undeveloped rural site was required than the policy would not apply to them. There is no need to identify the Port in the policy. Development of the port is encouraged in Core Policy 4

‘When possible’, is needed given that the sequential and exception test seeks to guide development away from areas of flood risk rather than to reduce development in the area completely.

It cannot be made mandatory that permeable paving and green roofs are provided on all development in areas of flood risk as they may not be necessary. These solutions are types of SuDS and would be encouraged by the policy.
Topic Area: Core Policy 13 – Sustainable Travel

### Agree with the preferred policy approach

**Number of respondents**

| 51 |

**Summary of the comments received**

The majority of respondents welcomed and supported the policy approach, although concern was expressed that implementation may be difficult when the District Council is not the transport authority for its area. East Sussex County Council, who is the local transport authority, gave strong support, commenting that the policy approach aligns well with the East Sussex Local Transport Plan 2011-2026 but suggesting that improvements to public transport infrastructure and travel information should be included.

**How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy.**

The support for the preferred policy approach is welcomed.

### Disagree with the preferred policy approach

**Number of respondents**

| 15 |

**Summary of the comments received**

The majority of respondents that disagreed with the policy approach, including Barcombe Parish Council, were concerned that the policy would not be sufficiently flexible to permit new development within rural areas, particularly job-creation development, due the lack of opportunities for travel by sustainable modes of transport. A number of respondents felt that the policy approach simply represents an unrealistic aspiration, particularly in the current and future economic climate.

**How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy.**

The need to support thriving rural communities is recognised and it is acknowledged that the opportunities to maximise sustainable transport solutions will vary between urban and rural areas. A balanced approach to the determination of planning applications will therefore be needed to take account of the nature and location of different sites but it is not considered that this requires a change to the overall thrust of Core Policy 13, which will assist in achieving Strategic Objective 7 of the Core Strategy.

### Suggest other approach, or changes to the preferred approach

**Number of respondents**

| 11 |

**Summary of the comments received**

Most respondents, including a number of Town and Parish Councils, seeking an alternative approach considered that the policy should identify or provide solutions to specific existing and future transport problems in various locations around the District as follows:

- traffic on the A27 through Firle Parish
- measures to manage the volume and speed of traffic on the C7
- a multi-storey car park in Lewes town
- the re-opening of the Lewes to Uckfield railway
- a comprehensive, integrated transport interchange at Newhaven
- new transport infrastructure required in association with allocated sites in
Peacehaven/Telscombe
- cycle routes, in both urban and rural areas

Newhaven Town Council also suggested that the policy should specifically recognise the need for particular transport facilities and solutions for those with limited mobility or access to conventional transport modes.

Seaford Town Council felt that the A26 into Newhaven should be made into a dual carriageway.

Westmeston Parish Council wanted to see a more pro-active, District wide approach to address the issues of traffic flows and traffic calming. It does not consider that there is a real or relevant strategy for delivering the proposed policy approach to sustainable transport.

Several respondents felt that there should be better cross referencing to other policies and plans that help to contribute towards sustainable travel objectives, such as the Transport Assessment, Travel Plans, Air Quality Assessments and Core Policy 9 – Air Quality.

Other respondents, including Plumpton Parish Council, commented that there is a lack of consistency between the proposed policy approach and the spatial strategy, because the latter allocates a significant level of housing development to rural villages, thus encouraging even more commuting.

How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy.

The District Council is working in partnership with East Sussex County Council, as the local transport authority, to identify the key transport infrastructure improvements required to support the delivery of the Core Strategy. These infrastructure requirements will be set out in Infrastructure Delivery Plan that will accompany the Core Strategy and will include details on costs, funding, timescales and delivery agencies. It is not considered appropriate to repeat this information within the wording of Core Policy 13.

The aspiration of some communities for specific transport measures, such as traffic calming on certain routes, is acknowledged, but the transport strategy and policies of LDF must reflect and have regard to the transport plans and programmes of the responsible agencies. These are East Sussex County Council and the Highways Agency in respect of the highway network, and Network Rail in respect of the rail network.

The preferred policy approach already makes reference to Transport Assessments and Travel Plans. In terms of air quality, the contribution of transport to this important issue is recognised in the supporting text and is addressed in the Sustainability Appraisal that accompanies the Emerging Core Strategy.

It is acknowledged that the rural villages offer fewer opportunities to maximise sustainable transport solutions compared with the towns. However, it is the role of the spatial strategy to resolve competing objectives and community priorities, and the Core Strategy also needs to address the issues of lack of access to affordable housing in the countryside and declining local services and community facilities. Supporting thriving rural communities is one of the Government’s core planning principles, as set in the NPPF.

Accordingly, no change has been made to the Core Strategy in response to the comments received.
### Agree with the proposed policy approach

| Number of respondents | 52 |

**Summary of the comments received**

The proposed approach for this policy area received considerable support, including from the Environment Agency, Natural England, Southern Water and a number of the town and parish councils. Inclusion of the Energy Opportunities Map within the supporting text to the policy was also welcomed by a number of respondents.

**How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy.**

Support for the preferred policy approach is welcomed.

### Disagree with the proposed policy approach

| Number of respondents | 9 |

**Summary of the comments received**

Such representations were almost entirely received through the online survey and any reasoning for coming to this view was not provided. The few reasons given for disagreeing with this policy focused on the Energy Opportunities Map and challenged the identification of opportunity areas for the growing of biomass on the grounds that this would take land out of vital food production, and also the lack of opportunity areas identified for hydro power, particularly on the Ouse.

**How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy.**

The Energy Opportunities Map is not intended to provide a fully comprehensive and exhaustive assessment of opportunities for energy generation from renewable and/or low carbon sources. It summarises the results of a high level assessment of energy opportunities in the district. The study was undertaken at a district level and therefore, in most instances, did not go down to a detailed geographical scale. The production of the EOM did take into account the quality of agricultural land when identifying potential biomass areas. Hence, high quality agricultural land that is often used for food production (Grade 1 and 2) has been excluded from the potential areas for growing biomass. Accordingly, no change has been made to the Core Strategy in response to the comments received.

### Prefer one of the other options consulted upon

| Number of respondents | 14 |

**Summary of the comments received**

Most of representations preferring the alternative policy option were submitted through the online survey without giving any reason for coming to this view. Where reasons were provided, they included:

- Having this approach would avoid the duplication of regulatory controls.
- Such an option would not increase build costs and should therefore aid in the timely delivery of housing.
How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy.

The alternative option was to rely on the Building Regulations to secure improvements in the sustainability of new developments. While the Building Regulations are tightening it is considered that this alternative option would not take advantage of the potential in the district for new development to play a stronger-than-Building-Regulations position in this policy area. The build costs of meeting the full Code for Sustainable Homes Level 4 was factored into the Affordable Housing and CIL Viability Assessment. The additional build costs of this policy implication, beyond meeting the tightening Building Regulations, was not found to be significant and did not materially impact on the broad level of viability for housing identified across the district.

Suggested an alternative approach to the policy area

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<th>Number of respondents</th>
<th>13</th>
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Summary of the comments received

The majority of respondents suggesting an alternative approach were seeking the policy to ‘go further’ in seeking high building sustainability standards. This included suggesting that the highest possible standards of energy conservation should be sought in new developments, that all new homes should be ‘zero carbon’ and that Code level 6 should be made a requirement.

Other suggested alterations to the policy were:

- The policy should reference Policies WMP2d and WMP20 in the draft Waste and Minerals Plan which seek to ensure that sustainable waste management and minerals production and adherence to the waste hierarchy are considered in non-waste related developments in the County.
- The policy needs to address external apparatus from renewable installations and the use of imported prefabricated buildings.
- The policy should encourage community schemes on industrial roofs to supply solar energy or hot water rather than permitting such panels on old roofs in full public view.
- No mention is made of the opportunity for biomass-based power generation and gas powered generation from anaerobic digestion, landfill and water treatment facilities. There may be an opportunity to locate a biomass power plant at Newhaven.

How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy.

Some respondents felt that the level of building sustainability should not be a planning policy issue and instead should be addressed by Building Regulations. Cost of building to Code levels was cited as one reason for this view. The Affordable Housing Viability Assessment has factored in the cost of building to Code Level 4 and it has been deemed that alongside a 40% affordable housing rate, CIL contributions and other development costs, building to Code Level 4 is entirely viable. Therefore, the proposed policy should not impact upon the timely delivery of housing, as cited as a reason for opposing the policy by some respondents.

In response to the flood risk policy approach, a District Councillor suggested that approaches to deal with climate change, including building orientation and combined heat and power plants should be considered. Building Orientation is recognised as an affective way to reduce the demand for energy in new developments and is one of the measures that comes under the category of passive solar design, something that the Renewable Energy and Low Carbon Development Study advocates. It has been deemed appropriate to refer to building orientation in the design policy so that it can be
considered alongside wider site layout issues. In terms of combined heat and power (CHP) plants, it is agreed that these should be considered as a source of energy for the district and Core Policy 14 does not rule this out by referring to low carbon energy sources, something which CHP Plants are classified as. However, it is not considered necessary to refer to particular low carbon or renewable energy sources in the policy as each area and development site will have its own characteristics meaning that certain technologies may not be appropriate (this could include CHP).

**Topic Area: Suggested additional policy areas**

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<th>Suggest other policy areas</th>
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<tr>
<td><strong>Summary of the comments received</strong></td>
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Several respondents suggested additional policy areas to be included within the Core Strategy. The various suggested additional/amended policy areas are outlined in turn below under broad categories:

**Housing**
- A policy on the subdivision of larger properties into smaller dwellings to meet some of the housing need.
- The proposed policy related to infill development in villages does not specify which villages will have development boundaries – the Core Strategy will need to set this out.

**Sustainability**
- A policy on the orientation of buildings to make best use of solar energy.
- More emphasis should be placed on issues of climate change and sustainability.
- The importance of agriculture, horticulture and forestry to the economy, tourism and public amenity is seriously underestimated and understated.

**Infrastructure**
- A policy on the provision of new or extensions to burial grounds.
- A policy that addresses the potential future expansion of the University of Sussex.

**How these comments have influenced the Proposed Submission Document and further information relating to this part of the Core Strategy.**

More policy detail such as the subdivision of larger properties into smaller dwellings would be dealt with in a Development Management DPD. Matters such as the orientation of buildings would also be considered in such a DPD.

Climate change and sustainability are threads that run through the Proposed Submission document and have been addressed according to the evidence available for suitability in this district, including from the Renewable Energy and Low Carbon Development Study and Affordable Housing Viability Assessment.

Increased recognition of the importance of agriculture and other rural enterprise to the local economy, landscape and tourism has been included in the Proposed Submission document.

The development boundaries will be set out on the Proposals Map that will accompany the Proposed Submission document.

In addition to the above comments, Southern Water in their comments on the Air Quality
Policy Area suggested the addition of policies relating to the protection of water resources and this is agreed. This has been inserted in Core Policy 10.

The provision of new or extended burial grounds will be considered through the Site Allocations and Development Management Policies DPD.

Regarding the University of Sussex, there is a ‘saved’ Local Plan policy (FL1), which the Council and NPA intend to keep in place at the point of adoption of the Core Strategy that addresses the issue of future expansion of the University.
Comments On the: Sustainability Appraisal/ Strategic Environmental Assessment

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<th>Comments on the Sustainability Appraisal/SEA</th>
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<td>Number of respondents</td>
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Summary of the comments received

Very few consultees made reference to the Sustainability Appraisal (SA) that accompanied the Emerging Core Strategy. The Environment Agency provided information relating to the Water Framework Directive to help with the monitoring element of the SA. South East Water noted that their Water Resource Management Plan was correctly identified as a plan that has an influence on the Core Strategy.

Ringmer Parish Council and three Parish Councillors from Ringmer were the only other consultees who commented on the SA. Their comments on the document were mainly concentrated on the appraisal of options relating to housing in Ringmer.

Comments on SA Table 2 included:
- There was an incorrect reference to Newhaven in SA Table 2
- Ringmer was not deprived in relation to housing and services
- That the appraisals for the waste, water and recycling objectives were inconsistent with the appraisals for the housing
- That the appraisals should read more negatively for the education objective
- That large amounts of new housing would impact negatively on community life.

Comments on SA Table 8 included:
- That one of the sites in Ringmer is not in the most deprived area of the District.
- That there should be no difference in deprivation in relation to different sites in Ringmer
- That one of the Ringmer sites is threatened by flooding
- That there was not consistent appraisal of landscape impacts
- That the sites in Ringmer are greenfield not brownfield sites.

The aforementioned respondents undertook a re-appraisal of some of the tables to highlight the fact that corrections were needed to remove the “systematic bias” towards development at Ringmer. There was also the feeling that SA Table 1 should be redone in light of the consideration of Ringmer for strategic housing.

How these comments have influenced the Proposed Submission Sustainability Appraisal and further information relating to the Sustainability Appraisal.

The Sustainability Appraisal (SA) has taken into account the comments received from Ringmer Parish Council on some of the SA tables and, as it has done with every appraisal table, has been updated to reflect up-to-date information and additional options for policy areas.
A. Appendix

A1. Copies of the letters and emails notifying people about the consultation can be found below. Please note that, in some cases, slightly different letters were sent to some consultee groups.

A2. The letter below was that sent to Town and Parish Councils as referred to in paragraph 2.1 of Section 2 of this report

Dear Sir/Madam,

**Lewes District Local Development Framework – Core Strategy: Emerging Strategy**

Lewes District Council, in conjunction with the South Downs National Park Authority, is preparing a Core Strategy. This is the key part of the Local Development Framework for Lewes District, which will eventually replace the Local Plan. It will set out the strategic planning policies for Lewes District until 2030 and is the document that will set the context for all future planning documents forming part of the Local Development Framework.

As part of the production process, we will be looking to go out for public consultation on the Core Strategy: Emerging Strategy document from late September/early October. The release of the document is dependant on gaining approval from both our Cabinet and the National Park’s Planning Committee earlier in September.

We understand that it is important to involve as many members of the community as possible in the consultation and that advertising the consultation will be a critical part of achieving this. As part of our advertising effort, we would be grateful if you would be able to accommodate posters on your noticeboard(s).

Posters will be produced and distributed in September, once the precise dates for consultation are known. In the meantime, we would appreciate it if you could inform us as to whether or not you are able to display them and how many copies of the poster you would require.

As part of our consultation on the Core Strategy: Emerging Strategy document, we will be making ourselves available to Town and Parish Councils from early September. Should you wish the Planning Policy Team to meet with your Town/Parish Council to discuss the details of the Core Strategy: Emerging Strategy, please get in touch with us.

If you have any queries about the preparation of the Core Strategy, do not hesitate to contact us, either by emailing us at ldf@lewes.gov.uk or by telephoning (01273) 484449.

Yours Faithfully,

Tal Kleiman
A3. Below is the email alert sent to consultees on 19th September 2011 as referred to in paragraph 2.2 in Section 2 of the report.

Dear Sir/Madam,

**Lewes District Council: Local Development Framework Email Alert**

This is an email alert from Lewes District Council’s Planning Policy Team, in conjunction with the South Downs National Park Authority, concerning the release of a consultation document.

When adopted, the Core Strategy will be the key document of the District's Local Development Framework - the portfolio of documents which will replace the existing Local Plan. It will set out strategic planning policies for the district until 2030, setting the context for all future planning documents and will be used in determining planning applications.

The Emerging Core Strategy is the second stage of the Core Strategy production process and is being produced by the District Council and the South Downs National Park Authority. The document details the possible approaches that the Core Strategy could eventually take to achieve its vision and lists other options that were considered for each policy area. In addition, it puts forward options being considered for key strategic housing sites/broad locations for growth.

The Emerging Core Strategy will go out for public consultation between 30 September and 11 November for a six week consultation (in line with the Lewes District Statement of Community Involvement). We would like to give you an early opportunity to see the document and the background documents which have influenced its content. Please be aware that the design of some of the documents (including the Emerging Core Strategy) may change before consultation commences but the content itself will not.

The Emerging Core Strategy can be seen online at [www.lewes.gov.uk/corestrategy](http://www.lewes.gov.uk/corestrategy). The same webpage features the Sustainability Appraisal (incorporating a Strategic Environmental Assessment), a housing background paper, an Appropriate Assessment Screening Opinion as well as a summary document containing the views of the previous consultation on the Core Strategy and how they have influenced the Emerging Core Strategy.

Additional background documents have also been published which have informed the production of the Core Strategy to date. They can be found on the [www.lewes.gov.uk/planning/backgroundreps.asp](http://www.lewes.gov.uk/planning/backgroundreps.asp) webpage.

Another email alert will be sent when consultation officially commences. The email will also detail the ways in which you can submit your comments on the Emerging Core Strategy to us.

Please feel free to send this email onto any other people and groups who you think would be interested. This email was sent to you as the Planning Policy Officer.
Dear Sir/Madam,

**Lewes District Local Development Framework – Emerging Core Strategy**

Lewes District Council, in partnership with the South Downs National Park Authority, is preparing a Core Strategy. This is the key part of the Local Development Framework for Lewes District, a collection of planning documents that will replace the Lewes District Local Plan (2003).

The Core Strategy will set out the strategic planning policies for Lewes District for the period to 2030. It will set the context for all future planning documents forming part of the Local Development Framework and be used in the determination of planning applications.

As part of the process of preparing the Core Strategy, we have published the Emerging Core Strategy for consultation. The Emerging Core Strategy sets out options for planning policies and locations for new development. At this stage we are seeking comments on the suitability of the options.

The Emerging Core Strategy is available to view on the Council’s website at [www.lewes.gov.uk/corestrategy](http://www.lewes.gov.uk/corestrategy) and also all libraries within the District. The document is published alongside a Sustainability Appraisal (which incorporates a Strategic Environmental Assessment). The Sustainability Appraisal (SA) has been used to help identify the most sustainable approaches for different policy areas in the Emerging Core Strategy. We would welcome any comments on the SA.

The consultation on both documents lasts between 30 September 2011 and 11 November 2011. All comments must be made in writing, preferably via email to [ldf@lewes.gov.uk](mailto:ldf@lewes.gov.uk). Alternatively, they can be sent via post to the Planning Policy Team, Southover House, Southover Road, Lewes, BN7 1AB or by fax to 01273 484452. Please note that as this is a public document, comments received during consultation will be made public. All comments must be received no later than 11 November 2011.

The document has also been informed by background documents. These documents cover a number of different topics and can be found on our website at [www.lewes.gov.uk/planning/backgroundreps.asp](http://www.lewes.gov.uk/planning/backgroundreps.asp).
If you have any queries about the preparation of the Core Strategy, do not hesitate to contact us, either by emailing us at ldf@lewes.gov.uk or by telephoning (01273) 484417.

Yours faithfully,

Lindsay Frost
Director of Planning and Environmental Services

A5. Below is the letter sent to consultees notifying them of an extended deadline. This is referred to in paragraph 2.4 of Section 2 of the report.

Dear Sir/Madam,

Lewes District Local Development Framework – Emerging Core Strategy: Extension of Deadline

As you will be aware Lewes District Council, in partnership with the South Downs National Park Authority, are out for consultation on the Emerging Core Strategy. The Core Strategy will be the key document of the District's Local Development Framework as it will set out the strategic planning policies for Lewes District until 2030. As such it will set the context for all future planning documents forming part of the Local Development Framework and be used in the determination of planning applications.

The Emerging Core Strategy can be found online at www.lewes.gov.uk/corestrategy. The document is accompanied by the Sustainability Appraisal and other background documents, which can also be found online.

The document has received significant interest in the community and we have already received hundreds of comments on the content of the Emerging Core Strategy. We want to ensure that everyone who wants to have their say on the document is able to. To allow for this, we have extended the deadline for receiving comments by 3 weeks until Friday 2nd December. We thank those that have already sent us comments on the Emerging Core Strategy. If you or your organisation has already sent us your comments, feel free to submit additional comments.

Comments can be sent by emailing us to ldf@lewes.gov.uk, completing an online Survey (https://www.surveymonkey.com/s/WTB8ZGZ) or by writing to us at Planning Policy Team, Lewes District Council, Southover House, Southover Road, Lewes, BN7 1AB. In addition, you can get involved in our online discussion forum on facebook (http://on.fb.me/uY84PT) and receive updates from our twitter account (www.twitter.com/LewesDC).

Yours faithfully,
Lindsay Frost
Director of Planning and Environmental Services