



Lewes District Council: Local Development Framework

Summary of Consultation on the Core Strategy: Issues and Emerging Options Topic Papers (Consultation Dates 21 May – 16 July 2010)

August 2011

Contents

Section	Page
1. Introduction	3
2. Summary of Comments received on the Topic Papers	7
3. Sessions with Town and Parish Councils/Meetings	58
4. Drop-in Sessions	66
5. Discussion Forums	70

1. Introduction

Background

Lewes District Council is currently preparing its Local Development Framework (LDF), a portfolio of planning documents that will be used to guide new development in Lewes District.

The Lewes District LDF will comprise a number of Local Development Documents (LDDs). This will include a Core Strategy Development Plan Document (DPD), a Site Allocations DPD (a document that identifies district-wide non-strategic site allocations for a range of uses including housing, employment, retail and leisure) and a Proposals Map. It may also include Supplementary Planning Documents (SPDs) and Area Action Plans, which are documents used to detail policies on one topic or in a specific geographic area.

Associated documents such as the Statement of Community Involvement (a document which sets out how and when the Council will involve the community in planning matters), a Local Development Scheme (a document that sets out the proposed production timetable for the LDF) and an Annual Monitoring Report (which amongst other things, reviews progress on the formation of the LDF) have already been produced and in some cases being updated.

Core Strategy

The Core Strategy DPD is the pivotal document of the LDF. It will set out the strategic policies to which all other documents in the LDF will need to conform with. With it being the central LDF document, it is the first DPD that will be produced.

As the policies of the Core Strategy will have an affect on the future land-use of the whole District, it is important to get the views of the public and bodies that operate in the District at various stages of the production process.

We have identified 6 stages in preparing the Core Strategy DPD and have highlighted in bold the three stages where public consultation has been/will be undertaken in the table below.

1. Issues and Emerging Options Topic Papers¹
2. Emerging Strategy (including other options considered)¹
3. Proposed Submission Document²
4. Formal Submission ³
5. Examination
6. Adoption ⁴

¹ Consultation to be carried out in accordance with Regulation 25 of The Town and Country Planning (Local Development) (England) Regulations 2004 (as amended in 2008 and 2009)

² Consultation to be carried out in accordance with Regulation 27 of the above regulations

³ In accordance with Regulation 30 of the above regulations

⁴ By both Lewes District Council and South Downs National Park Authority

Summary of Consultation – Issues and Emerging Options Topic Papers

For each consultation stage of the Core Strategy, the Council will prepare a summary of the representations received. This report relates to the first public consultation that took place between **21st May and 16th July 2010** on the Issues and Emerging Options Topic Papers.

A previous version of this document in October 2010 provided a simple summary of the comments made during the consultation. This updated version of document has been added to showing how the comments received have been used to influence the formulation of the Emerging Strategy document.

There were 9 separate Topic Papers (plus an introductory paper). These papers discussed different aspects of the Core Strategy, which included the characteristics of the District, options for strategic sites and options for how we could deliver and accommodate growth.

There were different ways for consultees to comment on the content of the Issues and Emerging Options Topic Papers. These are described below:

Representations received on Topic Papers

The community was invited to respond to the content of the Topic Papers. Each topic paper explained that responses could be made by email to ldf@lewes.gov.uk and by post to The Planning Policy Team, Southover House, Southover Road, Lewes, BN7 1AB.

We received comments from 126 groups and individuals on the topic papers. A summary of the comments we received can be found in **section 2** of this report. This summary identifies the number of representations received on each topic paper and then breaks down the comments into a number of sub-categories that cover different aspects of the topic paper, or the main issues raised by respondents.

Sessions with Town and Parish Councils/Meetings

All of the 28 Town and Parish Councils/Meetings in the District were invited to one of 6 sessions regarding progress with the LDF and the content of the Topic Papers. Representatives from 18 of the 28 Councils/Meetings attended.

The session ended with a discussion about issues that they would like to see addressed through the LDF. A summary of issues that they raised are detailed in **section 3**.

Drop-in Sessions

As part of the public consultation, we held 7 ‘drop in’ sessions across the District. These were held at Newick Village Hall, Lewes Leisure Centre, the High Street in Newhaven, Ringmer Village Hall, Rodmell Village Hall, the Meridian Centre at Peacehaven and Seaford Baptist Church. These sessions

were open to all members of the public and were held between **Monday 24th May and Thursday 10th June**.

There were 12 exhibition boards at each 'drop in' session, summarising the information contained within the topic papers. Two planning officers were present at each of the 'drop-in' sessions to answer any queries, while all of the topic papers as well as background documents were made available to the public.

Members of the public were invited to submit comments on the content of the topic papers by sticking post-it notes on the appropriate spaces of the exhibition boards. The comments were recorded and can be found in **section 4**.

Discussion Forums

Two Discussion Forums were held regarding the emerging Core Strategy. The first was held at The Corn Exchange at Lewes Town Hall and the second was held at the Assembly Hall of Tideway School in Newhaven. They were held on **Thursday 1st July and Monday 5th July**, respectively.

A PowerPoint presentation detailing the LDF process and the content of the Issues and Emerging Options Topic Papers was followed by discussions regarding some of the key issues that would need to be considered in progressing the Core Strategy. The comments/questions made were recorded and a summary of the comments made at both events can be found in **Section 5**.

Publicity of Consultation

The Topic Papers were published on the Council's website and were placed in the Council's Planning Offices in Lewes. Hard copies were sent to Town and Parish Councils/Meetings, District Councillors and MPs. Letters and emails relating to the publication of the Topic Papers and the dates of the consultation were sent to statutory bodies as well as non-statutory organisations and members of the public who had notified us that they wanted to be kept informed of progress on the LDF.

Hard copies of the Topic Papers were placed in the public libraries at Lewes, Newhaven, Peacehaven, Ringmer and Seaford. In addition, copies were placed in libraries outside of the District at Burgess Hill, Haywards Heath, Saltdean and Uckfield.

Posters were placed on the District Council's notice boards informing of both the 'drop-in' sessions and discussion forums. Posters were also sent to all Town and Parish Councils/Meetings in the District, the District's leisure centres and secondary schools/colleges. These groups were asked to display them on their noticeboards.

An advert containing information about the consultation was placed in the Sussex Express on 21st May. Press releases were prepared and circulated and as a result, 2 articles appeared in the Sussex Express regarding the

'drop-in' sessions and the Discussion Forums, on 21st May and 25th June, respectively. In addition, a radio interview was conducted by Bright FM with a member of the Planning Policy Team, which aired in May. The interview explained the purpose of the consultation, where the Topic Papers could be found and how comments on the content of the Topic Papers could be made.

2. Summary of the Comments received on the Topic Papers

Topic Paper 1– Summary of responses received

Total number of respondents who commented upon this Topic Paper – 30

Agree with content	
Number of respondents	18
Summary of the comments received The majority of respondents agreed with the key characteristics that are identified for the District, although a number of these respondents considered that further detail and statistical information about the identified characteristics should have been included or additional characteristics identified.	
How these comments have influenced the Emerging Strategy document <i>The broad agreement with the identified characteristics of the District is welcomed. Nevertheless, some amendments have been made in response to a number of comments and suggestions as outlined below.</i>	

Additional characteristics suggested	
Number of respondents	24
Summary of the comments received No general themes emerged from the responses received on the Topic Paper, with the majority of organisations making suggestions that relate specifically to the geographical area that they represent, or within which they have an interest. At a District-level, the following characteristics were put forward as also making a key contribution towards the distinctiveness of the area: <ul style="list-style-type: none">• The Ouse River and Estuary• Groundwater resources• Community bus services• Walking and cycling facilities• Peacehaven Waste Water Treatment Works• Archaeological resources• Waste and recycling• Gypsies and travellers• The proposed Hastings Bank off-shore wind farm• Cultural assets <p>In terms of Lewes town, the following characteristics were suggested as also making a key contribution towards the distinctiveness of the area: parking problems, North Street and tourism.</p> <p>In terms of Newhaven, the following characteristics were suggested as also making a key contribution towards the distinctiveness of the area: Great crested newts, the Marine Workshops on East Quay, the Marina, Tidemills, Sussex Downs College and Denton Island Family Centre.</p> <p>With regards to Seaford, the following characteristics were suggested as also</p>	

making a key contribution towards the distinctiveness of the area: Seaford Head Golf Course, the Martello Tower, the Cinque Ports union, Conservation Areas, the high proportion of independent retailers and the Cradle Hill Industrial Estate.

In terms of characteristics of Peacehaven, the Waste Water Treatment Works was suggested as also making a key contribution towards the distinctiveness of the area:

In terms of the rural areas of the District, one respondent suggested that a key characteristic of the Low Weald is its role in providing a setting for National Park, and another respondent suggested that the village of Wivelsfield Green should be specifically highlighted as making a key contribution towards the distinctiveness of the area.

How these comments have influenced the Emerging Strategy document

Further detail has been included about heritage assets which contribute to the distinctiveness of Newhaven and Seaford. The fact that Sussex Downs College has a small campus at Newhaven, in addition to the main campus at Lewes town, has also been added. It is acknowledged that Low Weald countryside has a strong influence on the landscape character of the South Downs, and this is now recognised in the text. The fact that Lewes town is a popular tourist destination has also been added. However, in the interests of brevity and the need to publish a concise document, it is not possible to list every individual characteristic of the District or its separate settlements. The remaining features suggested by respondents are not considered to make a particularly significant contribution to the character of the District or its towns and villages, apart from the Ouse river and estuary which are already mentioned three times within the text.

Disagree with any of the characteristics

Number of respondents

5

Summary of the comments received

With reference to the overall District characteristics, one respondent argued the Newhaven Enterprise Centre has only an 80% occupancy rate, not 100% as stated in the Topic Paper, and another argued that both the A27 and A26 are substandard roads.

With reference to Lewes town, a respondent argued that it is specifically the 'lower parts of the town' that are at risk of flooding, rather than 'significant parts' as stated in the Topic Paper.

With reference to Seaford, one respondent argued that the town's visitor economy is not 'underdeveloped' but in need of revitalisation, and another argued that the shingle beach is an amenity attraction as much as a sea defence.

With reference to the University of Sussex, a respondent argued that part of the campus lies *within* Lewes District, not just adjacent to it, and makes a

significant contribution to the local economy.

How these comments have influenced the Emerging Strategy document

It is acknowledged that occupancy rates at the Newhaven Enterprise Centre fluctuate marginally over time, that Seaford beach is also an amenity attraction, and that part of the campus of Sussex University lies within the District and these facts are now reflected in the text. The importance of the education sector to the local economy is already highlighted elsewhere in the text. It is considered that the other comments submitted represent subjective statements which do not warrant any specific changes to be made.

Topic Paper 2 – Summary of responses received

Total number of respondents who commented upon this Topic Paper – 32

Agree with content	
Number of respondents	20
Summary of the comments received	
There was broad agreement from a number of respondents with both the key strategic issues and challenges for the District identified in Topic Paper 2 and also with the need for partnership working in order to address them successfully.	
How these comments have influenced the Emerging Strategy document	
<i>The broad agreement with the key strategic issues and challenges is welcomed. Nevertheless, an additional issue has been added in response to comments submitted by the South Downs National Park Authority, as outlined below.</i>	

Additional issues/challenges suggested	
Number of respondents	20
Summary of the comments received	
One respondent, whilst acknowledging that protecting and enhancing the distinctive quality of the environment, thought that the South Downs National Park (SDNP) merited identification as a separate key strategic issue. Whilst another comment mentioned that there should be mention of the contribution that the SDNP could make to tourism in areas that border, but are not in, the SDNP's boundary.	
Other issues/challenges suggested the inclusion of the following:	
<ul style="list-style-type: none"> • the risks to multiple assets from coastal processes; • 'peak oil' as a challenge; • commuting within the district; • the need to address socio-economic deprivation by providing quality affordable housing; • the knock-on effects of the growth of tourism; • the challenge of meeting the retail and leisure needs of the district; • the future growth of universities; • the growth of Brighton and Hove; • the risks of water shortages due to water over-consumption; • increasing the vitality of the district's town centres; • a particular need to regenerate vacant, underused or poor quality employment sites and premises in Seaford. 	
How these comments have influenced the Emerging Strategy document	
<i>The sustainable use of water resources, the provision of affordable housing, the growth of Brighton & Hove and the need to tackle cross-boundary issues, such as the expansion of the two University campuses at Falmer, are already identified as key strategic challenges in the section 'Accommodating and delivering growth'. Accordingly, no changes have been made to the text in</i>	

respect of these issues.

Flood risk, including coastal inundation, and the protection of water supplies are already identified as key strategic issues in the section 'Protecting and enhancing the distinctive quality of the environment'. Whilst the opportunity to achieve economic benefits through tourism is likely to be enhanced by the designation of the South Downs National Park, these benefits will be sought across Lewes District, not just within the Park boundaries. Accordingly, no changes have been made to the text in respect of these issues. However, the importance and specific purposes of the National Park designation are acknowledged and are now identified as an issue that should be specifically addressed by the Core Strategy.

The need to promote and encourage the efficient use of water, the generation of renewable and low carbon energy, and the movement of people around the District in a sustainable manner, together with the need to ensure maximum accessibility to new development by walking, cycling and public transport, are already identified as key strategic issues in the section 'Tackling climate change'. However, it is acknowledged that a number of households in the rural areas of the District rely on oil for heating, which leaves them vulnerable to increases in fuel costs, and an amendment has been made to the 'Characteristics' section to recognise this issue.

The need to ensure adequate access to community facilities and to provide adequate recreational facilities for all the community are already identified as key strategic issues in the section 'Creating healthy, sustainable communities'. The additional provision of retail floorspace was not identified as an issue in the Council's most recent retail study. Accordingly, no changes have been made to the text in respect of these issues.

The need to improve the amount and availability of affordable housing is already identified as a key strategic issue in the section 'Improving access to housing', whilst determining the best way of raising the quality of all new development is addressed in the section 'Protecting and enhancing the distinctive quality of the environment'. Accordingly, no changes have been made to the text in respect of these issues.

The need to deliver the regeneration of vacant, underused or poor quality business sites and premises is identified as a key strategic issue across the District in the section 'Promoting sustainable economic growth and regeneration'. However, this issue is particularly acute in Newhaven, where the scale and extent of vacant, underused and poor quality sites and premises far exceeds that experienced in other towns in the District, including Seaford. Accordingly, no change has been made to the text in respect of this issue.

Disagree with any of the issues/challenges	
Number of respondents	5
Summary of the comments received	
A few respondents said that some of the key strategic issues and challenges	

for the district will need changing due to the revocation of the South East Plan, particularly as the Sussex Coast Sub-Region has been removed.

A comment received suggested that the word conserve should be used instead of preserve when discussing the quality of the environment. Another said that whilst they appreciate the need to protect the environment, the priority should be to deliver the much needed market and affordable housing and that this should be included.

Another respondent suggested that they did not understand or approve of the term 'town-cramming', stating that such terms invite NIMBY reactions which can prevent development of reasonably developable sites from occurring in towns.

How these comments have influenced the Emerging Strategy document

Some of the key strategic issues and challenges have been amended in the light of the Government's proposed revocation of the South East Plan. The need to meet the District's housing requirements is addressed in the sections 'Accommodating and delivering growth', 'Creating healthy, sustainable communities' and 'Improving access to housing'. It is considered that 'town-cramming' is a well-recognised and understood term that refers to an inappropriate increase in development density, leading to the loss of environmental, cultural or social resources. Accordingly, no other changes have been made to the text.

Topic Paper 3 – Summary of responses received

Total number of respondents who commented upon this Topic Paper – 46

Agree with content of the vision	
Number of respondents	16
<p>Summary of the comments received</p> <p>There was broad support from some respondents for all the content featured in the Topic Paper; some further reiterated their support for the vision stating that it was realistic, achievable and relevant to the District.</p> <p>A number of comments received supported general subject areas featured in this Topic Paper. For instance, some respondents welcomed that the vision highlights the need to respond to the challenges of climate change, whilst others were in agreement with the various character areas identified in the respective area visions but were happy that there was an over-arching vision for the entire District.</p>	
<p>How these comments have influenced the Emerging Strategy document</p> <p><i>The broad support for the vision is welcomed. Notwithstanding this a number of minor alterations have been made in response to a number of comments and suggestions as outlined below.</i></p>	

Comments on District-wide vision	
Number of respondents	20
<p>Summary of the comments received</p> <p>There were comments received that believed that the vision should have had greater scope including and expanding a range of land uses. In response to this some respondents suggested additions, whilst one respondent provided an alternative vision.</p> <p>Some thought the District-wide vision should have included greater reference to improve transport/accessibility. On a similar note, the mention of a reinstated Lewes to Uckfield railway line in the vision was largely supported, although there was a comment received that believed it was unrealistic to say that the line would be reinstated by 2026.</p> <p>There were comments that felt that there was not enough reference made to the need for housing to meet both the current needs of the District as well as the needs of the projected growing population, whilst similar comments were put forward concerning retail.</p> <p>Respondent's thoughts on the references to rural and landscape issues were mixed. Some expressed that a stronger emphasis on such issues were merited in the vision, whilst others felt that such issues were given too much prominence. In addition, there were comments that expressed outside influences such as Universities and neighbouring authorities should have been referred to in the vision.</p>	
<p>How these comments have influenced the Emerging Strategy document</p> <p><i>Where possible, the vision has been amended to reflect the comments that</i></p>	

were made on the relevant topic paper. However, in some instances conflicting comments have been received, which has meant that it has not been possible to address all concerns. In such instances the District Council has had to strike a balance between these conflicting views and refer back to the key issues and characteristics and ensure that any change to the vision relates to these influencing factors.

With regards to having reference to meeting retail need, at this stage it has not been established if such a need exists. Reference has though been included with regards to meeting housing need beyond just affordable housing and to the delivery of sustainable transport options, which relates to the point about improving transport/accessibility.

Within the vision, references to outside influences has been mentioned, including the planned growth at Burgess Hill, Haywards Heath and Uckfield, the Community Stadium at Falmer and the two universities.

Comments on Newhaven Vision

Number of respondents

6

Summary of the comments received

Mention of the regeneration of Newhaven as it appeared in the vision was generally supported and there was agreement that the renovation of the port would act as a key driver for the regeneration of the town.

One respondent did however believe that it was too optimistic to suggest that port-related activities would automatically help to improve the rest of the town. The same respondent commented that the vision should include a clear role for the town centre that stated how it could help with regeneration efforts.

Another respondent believed that Newhaven's ring road should be redesigned and that this aspiration should be included in the vision.

How these comments have influenced the Emerging Strategy document

Reference has already been made to improving the accessibility to the town centre in the vision, including with regard to the ring road. The issue of the ring road is not the only current highways issue experienced in and around the town (i.e. the swing bridge creates congestion at times). Therefore, the comment relating to the redesign of the ring road has been encapsulated in a reference being made in the vision to improving the highway network.

The District Council considers port generated activities as an integral part to any regeneration at Newhaven and therefore this part of the vision has not been altered.

Comments on Peacehaven & Telscombe vision

Number of respondents

3

Summary of the comments received

There were very few comments received which related directly to this vision. One respondent agreed that the regeneration of Newhaven was very important to the prospects of Peacehaven and Telscombe and was correctly

highlighted in the vision.

One respondent thought that the vision of the A259 should be as a high quality corridor for all forms of transport and not just public transport, while it was suggested in one comment that improving the Meridian Centre should be referenced specifically in the vision for this area.

How these comments have influenced the Emerging Strategy document

In light of the comment regarding the A259, the relevant section of the vision has been expanded so that reference is now made to a 'sustainable transport corridor' rather than just a 'public transport character'. The need to improve the Meridian Centre has not been identified as an issue for Peacehaven and is therefore not mentioned in the vision.

Comments on Seaford vision

Number of respondents

7

Summary of the comments received

There were comments received that were in support of a regenerated seafront, although some thought that it should be made clear what 'regeneration' involved whilst another respondent added that a regenerated seafront should be in keeping with the character of the town.

A respondent believed that the vision should seek to preserve and enhance the historic parts of the town, whilst another comment received thought that the vision should mention that Seaford is the most populous town in the District.

It was felt by other respondents that the town should have improved infrastructure and services that would be of benefit to both the residents and visitors and that this should be mentioned in the vision.

How these comments have influenced the Emerging Strategy document

The main change that has been made has been to include reference to the historic characteristics of the town in the final sentence of the vision. Few other changes have been made.

With regards to defining what 'regeneration' will involve, this will be for the spatial strategy to set out.

In terms of mentioning that Seaford is the most populous town in the District, this is not for the vision to say as it is a current characteristic and is hence referenced in the characteristics section of the Core Strategy.

The improvement of infrastructure and services is not just seen as an aspiration to Seaford, but the whole plan area. Hence, reference has already been made to this in the District-wide vision and it is therefore not considered necessary to repeat for the Seaford section.

Comments on Lewes Town vision

Number of respondents

14

Summary of the comments received

Comments received generally made additions to the vision or questioned the

omission of certain subject areas. Having said this, there were some respondents who agreed that Lewes in 2026 should be home to a range of premises suitable for modern businesses' needs.

There were queries about how and why the County Town function would be strengthened, as stated in the vision. Some comments pointed to mooted plans to move County Hall and the District Council out of Lewes Town which it felt would weaken the County Town function. Others stated that the public and indeed the tourism sectors already dominated the local economy and thus it was difficult to see how they would not dominate in the future.

Comments received suggested that the following were incorrectly missing from the vision:

- Reference to flood defences.
- The need to maintain and enhance the historic character of the town.
- The need for improved retail and leisure offerings.

There were comments which rephrased parts of the vision or rewrote the entire vision. In addition, there was a respondent who felt that the vision was too short, poorly phrased and lacking in balance.

How these comments have influenced the Emerging Strategy document

In light of the comment made regarding maintaining and enhancing the historic character of the town, the final sentence of the vision has been added to in order to reflect this point. It is considered that reference to flood defences is already encompassed in the District-wide vision, where reference is made to measures to reduce flood risk, particularly in the urban areas. The need for improved retail and leisure offerings in the town has not been identified within the key issues and is therefore not reflected within the vision.

It is accepted that the public sector and tourism industry are presently dominant within Lewes town. However, the aspiration of the vision is to encourage a greater range of businesses within the town so that Lewes becomes more resilient to any downturn in any particular employment sector (e.g. if significant public sector cuts are to take place). Although some consider this unlikely to happen, it will be the role of the LDF to set strategies and policies to try and ensure that it does.

Comments on Low Weald vision

Number of respondents

5

Summary of the comments received

There were relatively few comments received relating to this vision.

Respondents stated that:

- the vision was too optimistic due to the fact that the area is not in a designated area (such as National Park, etc.) unlike most other parts of the District and thus will emerge as the 'dumping ground' for new and unwanted development;
- they are in support of mention of providing affordable housing for local needs;
- the vision was to the point;

- mention should be made of the need for the villages to provide their own renewable energy; and
- agreement that Plumpton needs an improved rail service.

How these comments have influenced the Emerging Strategy document

In light of the comments made it has not been considered necessary to make any significant changes to the vision for the rural area of the Low Weald.

In respect to the first point made, it is considered that the vision presented for the Low Weald will not become a ‘dumping ground’ for new and unwanted development. It is accepted that a certain amount of development will take place in this part of the District (as with all areas), although the vision clearly states that “the majority of recent development will have been directed to the urban areas of the District”.

Reference to increased production of green energy, which incorporates renewable energy, is made in the District wide vision.

Comments on South Downs vision

Number of respondents

4

Summary of the comments received

Again, there were relatively few respondents that commented on this vision. It should be mentioned that the Interim South Downs National Park Authority welcomed the vision, although suggested that “where possible” was removed from the first sentence of the vision (“By 2026, the highly valued character of the South Downs will have been protected and, where possible, enhanced.”).

There was a comment received that mentioned that the vision was to the point and another respondent stated (as they had done for the Low Weald vision) that rural villages should provide their own renewable energy in the future. One respondent felt that there should be mention of the need to provide affordable housing for the local population.

How these comments have influenced the Emerging Strategy document

Changes made to this vision have been minor, reflecting the relatively few comments that were made in relation to it in the topic paper. The suggested change made by the Interim South Downs National Park Authority has been reflected in the Emerging Strategy document. This has resulted in this part of the vision better reflecting the twin National Park purposes.

Reference to increased production of green energy, which incorporates renewable energy, is made in the District wide vision. Part of the vision has been altered to place more of an emphasis on the need to meet affordable housing need for the existing communities.

General Comments on the visions

Number of respondents

10

Summary of the comments received

There were a few suggestions that applied generally to the set of visions provided and are thus recorded here. Comments received included the following:

- that the importance of the Ouse and other waterbodies should be referred to more in the visions;
- that it is welcomed that the visions contain a strong focus on sustainable transport;
- that the visions were not particularly distinctive to the District;
- the visions should aim to protect more of the countryside/greenfield sites in favour of developing brownfield land; and
- the healthier communities theme of the Sustainable Community Strategy should be carried through the visions, with mention of recreation and sport.

How these comments have influenced the Emerging Strategy document

The Ouse and other waterbodies are referred as key characteristics of the district and in the characteristics of individual towns and areas where relevant. However because key strategic issues and challenges relating to the Ouse and other waterbodies (with the exception of dealing with flood risk) were not identified, further reference to them in the strategic vision, which stems from the identified issues and challenges, has not been included. Reference to the conservation and enjoyment of our natural environment would also encompass waterways and specific mention is made of enhancing the recreation opportunities provided by our rivers.

The Emerging Strategy continues to have a strong focus on sustainability, including sustainable transport.

The significant majority of respondents did not raise lack of local distinctiveness as a problem with the visions. The District Council considers that there is a high degree of local distinctiveness incorporated both within the district wide vision and through the fact that there are specific visions for distinct areas within the district. However, the question, "Do you consider the vision to be locally distinctive to Lewes District?" will be asked again in the Emerging Strategy consultation.

It is stated that the majority of development will be directed to the urban areas and that the unique, distinctive and general high quality of the natural environment of the district will have been preserved. In order to achieve this there is an intrinsic brownfield before greenfield presumption.

Recreation is referred to with regard to the opportunities given in the natural environment. Accessible healthcare provision is also a districtwide element of the vision. Enhancement of recreational facilities is also a specific point in the vision for Peacehaven, Telscombe, Newhaven, Seaford, Lewes and the South Downs National Park area.

Topic Paper 4– Summary of responses received

Total number of respondents who commented upon this Topic Paper – 35

Agree with content	
Number of respondents	22
<p>Summary of the comments received</p> <p>Most of the comments received stated that they agreed with certain strategic objectives, whilst some stated their broad support for the complete set of objectives.</p> <p>A comment received stated that the objectives should help ensure that the draft vision set out in Topic Paper 3 is achieved.</p>	
<p>How these comments have influenced the Emerging Strategy document</p> <p><i>We are pleased that there was agreement with a particular objective or the whole set of objectives as they were originally worded in the topic papers. Notwithstanding this, we have changed the wording of some of the objectives where relevant to better reflect the comments seen below.</i></p>	

Additional objectives suggested	
Number of respondents	17
<p>Summary of the comments received</p> <p>There were comments received by a number of respondents who suggested topic headings that an additional objective should cover. Topics included:</p> <ul style="list-style-type: none"> • water efficiency; • health issues; • waste and recycling; • the rapid loss of biodiversity; • the loss of fossil fuels; • to encourage learning with the nearby universities; and • meeting the needs of disabled residents. <p>There were comments which suggested that certain amendments to objectives should be undertaken. These included:</p> <ul style="list-style-type: none"> • changing the order of the objectives to reflect importance; • making reference to sports and cultural facilities in objective 3; • mentioning in objective 7 the continuous cycle route between Newhaven and Eastbourne; • adding “encouraging and promoting low emission transport options” in objective 8; and • adding “promoting low emission building and transport options” in objective 4. <p>Additionally, some respondents suggested that there was a need to define phrases seen in the Topic Papers. One respondent considered that it was important to clarify the definition of functional floodplain that was identified in the Strategic Flood Risk Assessment, another thought that the word sustainable needed to be defined, a third thought that Green Infrastructure</p>	

needed more explanation, whilst another respondent felt that the word ‘they’ needed to be better defined in Objective 2.

How these comments have influenced the Emerging Strategy document

- *Changes have been made to Objective 6 to include mention of the efficient uses of resources, such as water, as had been alluded to by one respondent.*
- *Health issues, including the ageing population (Objective 1) and healthcare provision (Objective 3) are already mentioned directly, while the promotion of cycling and walking, mentioned in Objective 7, should also encourage healthier lifestyles. With these points in mind we have decided not to include an objective specific to all.*
- *LDC is not the planning authority for issues related to waste, as the responsibility for waste and minerals planning lies with East Sussex County Council (ESCC), who produce their own Minerals and Waste Local Development Framework in conjunction with Brighton & Hove City Council. As a result it is not appropriate to include an objective on this matter, as it is not something that our Core Strategy can directly address.*
- *Biodiversity and negative impacts on biodiversity is explicitly mentioned in objective 8 and implicitly mentioned in objectives 2 and 10. We think therefore this issue is already prominent and thus a new objective is unnecessary.*
- *In objective 6, we mention that we are seeking to reduce locally contributing causes of climate change, which includes the consumption of fossil fuels by promoting a low carbon lifestyle in relation to construction and the consumption of renewable energy. We therefore do not feel that it is necessary to create a new objective that specifically deals with the loss of fossil fuels.*
- *We recognise the point that working with universities (as well as colleges and schools) can be of benefit to the district as a whole and have added a line in objective 9 to reflect this.*
- *With regards to meeting the needs of disabled residents, we believe that objective 1 (providing suitable accommodation for the district’s population), objective 3 (providing infrastructure to the benefit of the wider community and redress current inequalities in provision) and objective 4 (“the creation of safe legible layouts that provide inclusive access to all) already addresses the point made by one respondent.*
- *We do not feel it appropriate to order objectives in terms of importance. Doing so would be a highly subjective process and would be open to much contention. We consider all of the objectives to be important and the aim of the Core Strategy will be to seek the achievement of all of them.*

- *We have added a line in objective 3 which refers to recreation and open space, which meets a part of the point stated by a consultee.*
- *Objective 7 explains that sustainable transport will be promoted and explicitly mentions that one of the aims is to improve the facilities that enable cycling. With this in mind, we do not think it is appropriate to include mention of a particular transport route, which includes a cycle route between Newhaven and Eastbourne.*
- *We have chosen not to add “encouraging and promoting low emission transport options” in objective 8, as words to that effect are included in Objective 7.*
- *Similarly, we have chosen not to add “promoting low emission building and transport options” in objective 4. This is as low emission transport options already feature in objective 7. Furthermore, we have mentioned in Objective 6 the aim of promoting sustainable construction methods, which we feel already addresses the points made by the consultee.*

We have produced a glossary for the Emerging Strategy which defines words, including those listed above, as a direct result of some respondents feeling that some terms needed more explanation.

In order to improve understanding of objective 2 and meet the point raised by one respondent, we have replaced the word ‘they’ with ‘collectively we’.

Disagree with any/all of the objectives	
Number of respondents	11
Summary of the comments received	
There were a number of respondents who felt that some/all of the objectives were not appropriate or disagreed with the wording in the Topic Paper.	
A few comments received stated that the objectives weren't SMART (S pecific, M easureable, A chievable, R ealistic and T ime-bound) and thus reference to SMART should be deleted. Another comment received stated that the healthier communities objective expressed in the Sustainable Community Strategy had not been carried through.	
It was felt by some that the objectives were too generic, indistinctive (to Lewes District) and did not pick up certain issues highlighted in Topic Papers 2 and 3. Another felt that Newhaven's continental potential (highlighted in Topic Paper 2) had not been further developed as an objective.	
It was felt by a few respondents that some objectives should be changed, particularly objectives 4, 8 and 9, in order to widen their scope. This included adding air quality and noise to objective 4, including all aspects of adaptation to climate change with respect to objective 8 and mentioning that suitable employment land and business premises should be protected from competing land uses in objective 9. Respondents re-wrote objectives to expand their particular theme.	

With regards to objectives 1 and 5, it was felt by some that we should be planning for growth more than the 4,400 homes stated in the now revoked South East Plan because of the findings of the most recent Housing Needs Survey and Strategic Housing Market Assessment. As a result, it was felt that we should not restrict development by seeking to maximise previously developed land (PDL) as building on PDL can have a range of costs and constraints and thus can stall developments.

How these comments have influenced the Emerging Strategy document

In response to one comment, we do believe that the objectives meet the priorities of the Healthy Communities aim in the Sustainable Community Strategy. For instance, in objective 1 we refer to the ageing population that is mentioned in the Healthy Communities aim, in objective 3 we aim to redress current inequalities in healthcare provision, while the promotion of walking and cycling will encourage an active lifestyle – one of the aim's priorities.

As suggested by some respondents, we have removed reference to the objectives being SMART, as had appeared in the Topic Papers. This is because the SMART idea was provided as a tool to aid readers in responding to the Topic Papers. Such a tool was not well used nor would it feature in an adopted version of the Core Strategy and thus it is not thought necessary to include it in the Emerging Strategy.

We have taken on board the point made by some respondents that the original objectives were too generic and indistinctive. We hope the changes we have made to them will help to make them more specific to Lewes District.

We have added a line in Objective 7 in order which refers to accessing continental Europe through Newhaven Port in order to carry on this point throughout the Emerging Strategy.

Mention in objective 6 of reducing low carbon emissions will help to improve air quality, as will the promotion of sustainable modes of transport in objective 7 and thus do not think it necessitates inclusion in objective 4.

The issue of noise, and indeed other negative impacts with regards to new development, is covered in broad terms in objective 5 (“to plan for new development... without adversely affecting the character of the area”) and thus we believe that this topic is sufficiently covered.

It is not possible to mention everything that could be affected by climate change that we would have to adapt to in objective 8. Thus, we have included some of the main impacts of a changing climate.

In response to the comment relating to the protection of suitable employment land from other land uses, we feel that objective 9 supports this stance. Notwithstanding this, it may be the case that a particular policy/policies would be needed to achieve that rather than a mention in the objectives.

In the topic papers we stated that we planned to deliver 220 homes until 2026

through the Core Strategy, in line with the figure of the South East Plan (SEP). With the SEP now likely to be revoked by the time the Core Strategy is adopted, we agree with some of the respondents and thus have not used the target that it set. Instead, we have used evidence base documents such as the Strategic Housing Market Assessment (SHMA), the Local Housing Needs Assessment (LHNA), the Strategic Housing Land Availability Assessment (SHLAA) and the Landscape Capacity Study to identify a locally derived housing target to 2030.

Whilst we appreciate that there can be a range of costs associated with developing on PDL, the choice to maximise opportunities for the development of such sites is preferred and remains in objective 5. This is because it reduces the need to build on greenfield land and also because such sites are likely to be near to the existing infrastructure and facilities that the development would rely on.

Topic Paper 5– Summary of responses received

Total number of respondents who commented upon this Topic Paper – 76

Housing requirement (RSS, sub-region, etc)	
Number of respondents	13
<p>Summary of the comments received</p> <p>Topic Paper 5 was written prior to the revocation of the South East Plan, which set out the District’s housing requirement up until 2026. This meant that a number of the comments that were received on this paper related to whether or not it was appropriate to continue with the level of growth that was assigned to the District in the South East Plan. Those in favour of continuing to plan for this level of growth gave the following reasons;</p> <ul style="list-style-type: none"> • The level of housing growth assigned to Lewes District was the same as the level proposed in the document ‘New Homes for East Sussex 2006 – 2026’, which was prepared by East Sussex County Council. This level of provision was endorsed by the Panel of Inspectors and the Secretary of State. • The level of growth set for Lewes District in the South East Plan was consistent with historical building rates. <p>A couple of respondents were of the opinion that a lower level of housing growth should be planned for (than that set out in the South East Plan). This included respondents who wanted to see a lower level of housing growth in the part of the District that was outside of the Sussex Coast sub-region. Such comments included;</p> <ul style="list-style-type: none"> • The volatility in markets mean that the predicted housing needs are likely to be significantly less than that determined through the South East Plan. • Too large a proportion of new housing was allocated to the Low Weald area in the South East Plan. <p>The only other comments that were made on this subject area were concerned with how sites that already benefitted from allocation and/or planning permission had been dealt with. The following comment is typical of those that were made on this subject:</p> <ul style="list-style-type: none"> • Until such time as the SHLAA is published and the deliverability of the Allocations Without Consent/Unimplemented Planning Permissions is known the district cannot say they only need to provide for a further 1,992 residential units to meet the South East Plan targets. In addition the Council should have a contingency/non-implementation allowance to account for allocated sites and sites with planning permission that do not come forward for development. 	
<p>How these comments have influenced the Emerging Strategy document</p> <p><i>The Emerging Strategy includes an option for a locally derived housing target for the District. It has become clear that the likelihood is that the South East Plan will have been revoked via the Localism Bill by the time the Core Strategy is adopted. As a result the Council, in partnership with the National</i></p>	

Park Authority, has developed a locally derived target, the methodology for which is explained in an accompanying Background Paper. There is currently a lack of detailed government guidance on how to establish a housing delivery target. The Background Paper sets out how current evidence, including in the Strategic Housing Land Availability Assessment (SHLAA) and the Local Housing Needs Assessment (LHNA) have informed the locally derived methodology, together with the wider strategic context and constraints to housing development in the district. Other options for further consideration and comment in the Emerging Strategy consultation will include retaining a housing target based on the outgoing South East Plan requirements.

General comments relating to distribution and the delivery of housing (infrastructure provision, etc)

Number of respondents

27

Summary of the comments received

Although the majority of representations raised comments on specific options for distributing growth, many of them made generic comments that could be applied to all options, or how the Council appraises them. A summary of such comments is as follows;

- There should be a preference for development within settlements, rather than on the edges, given the presence of the National Park within the majority of the southern half of the District.
- The evidence which supported the South East Plan showed that there should be a focus of development on the coast and to existing towns. This position is still justified although it is now up to Lewes District Council to decide whether this is still the best approach to take.
- The housing delivery strategy needs to meet rural need for affordable housing to support the rural economy and deliver the rural area visions.
- All towns and villages in the District would benefit from the provision of both market and affordable housing.
- The vision and objectives show that there is a requirement for housing in all towns to either lead to economic regeneration or to maintain and stimulate growth.
- There should be a priority for distributing growth to the areas that make the best use of public and sustainable transport and where existing transport infrastructure would support new development.
- New housing should be delivered predominantly on brownfield sites.
- The constraint represented by the National Park has been underplayed in many of the growth options.
- It would make sense to locate a far higher percentage of growth to the north of the District since growth at Burgess Hill is likely to create demand for workers. There were respondents who disagreed with this view.
- There is a need for the phasing of housing development to be in line with job growth.
- New housing in the villages should be small scale (no more than 25 units).

- The constraints to development within the towns, which have been identified in the Topic Paper, should not be seen as a barrier to development.
- The exclusion of private gardens from the definition of previously developed land is likely to significantly reduce opportunities for infill development. This will increase the need for development on the edge of settlements.
- The need for recreational/outside space needs to be addressed in new developments.
- There is significant housing need at the villages and small settlements.
- The number of new houses built in any location should be proportionate to the services and infrastructure currently available to serve them. Equally the building of houses can be used to support and secure existing services and infrastructure which may be under threat due to lack of local demand. It therefore makes sense to locate new housing where there are existing schools, shops, railway stations and other necessary facilities to serve the increased population.
- Wherever new housing is delivered every effort must be made to secure an adequate supply of social housing.
- Whatever option/combination of options is chosen needs to make sure that there is sufficient flexibility/contingency built in. This will be to compensate for delays in planned schemes coming forward, or not at all.
- The options that only allow for development within the existing settlements cannot on their own be relied upon to meet a five year housing land supply.

How these comments have influenced the Emerging Strategy document

The Emerging Strategy gives weight to the most sustainable development options, which includes preference for development within settlements, whether within or outside the National Park boundary.

The emerging affordable housing core policy approach and the emerging approach to a locally derived housing target have been developed including evidence of rural housing need.

The evidence shows that there is significant affordable housing need throughout the district and that the delivery of affordable housing is intrinsically linked to the delivery of market housing. As a result the Emerging Strategy recognises the need for both market and affordable housing development in terms of housing needs and for maintenance/stimulus of the local economy.

Accessibility to sustainable transport and services is a key criterion that has been used for the consideration of the emerging approach for the distribution of growth.

There is a presumption in favour of development on brownfield land whenever such land is suitable, available and achievable to meet requirements.

The Emerging Strategy document has been developed in partnership with the National Park Authority and having regard to the statutory National Park purposes.

Locating more development in the north of the district to serve Burgess Hill has been considered. While there is some merit in the idea, there are also

significant constraints on the level of development that can be realistically accommodated in that part of the district, including highways constraints. When appropriate and necessary housing development will be phased in the Core Strategy. There are a number of potential reasons for doing this and where it emerges that it is necessary it will be set out when detailed policies are written for relevant sites.

In villages within the National Park boundary the emerging approach is that housing development will be small scale and to meet the evidenced local need. For villages outside the National Park the level of development in the Emerging Strategy is guided by various influences including, housing needs, land availability and landscape constraints, infrastructure and transport constraints, the size, character and sustainability of the settlement etc. Identified constraints to development in the towns can sometimes be overcome within the confines of the financial viability of the development and the relevant mitigation measures. In other cases it emerges that the constraint is insurmountable or that the necessary mitigation measures would render development unviable. In such insurmountable circumstances the option has been removed from the Emerging Strategy as we would not be able to demonstrate that there is a reasonable prospect of the development taking place during the plan period.

The exclusion of private gardens from the definition of previously developed land has the potential to significantly affect windfall housing development in the district. However, it does not materially affect the Emerging Strategy, which is concerned with strategic level development (defined as being capable of delivery at least 100 homes).

It is agreed that recreational/outside space requirements for new developments will need to be addressed. Specific requirements for strategic sites will be set out in the details for the options taken forward into the Proposed Submission document.

Housing needs have been assessed in the Local Housing Needs Assessment, the outcomes of which have informed the emerging policy approaches.

In terms of sustainability it is agreed that housing development is best located with good access to existing shops and services wherever possible. This approach runs through the Emerging Strategy and all options presented have been subject to Sustainability Appraisal.

Given the identified level of need for affordable housing across the district, it is recognised that every effort must be made to secure an adequate supply of affordable homes. The emerging approach, based on the Strategic Housing Market Assessment and the Local Housing Needs Assessment seeks to do so. The Council and the National Park Authority are currently seeking to engage a consultant to carry out an up-to-date Affordable Housing Viability Assessment (AHVA) for the district to ensure we seek the optimum level of affordable housing that still renders developments viable, in the knowledge that viable market housing is essential to the delivery of affordable housing. The evidence from the AHVA, which is expected to be carried out in autumn 2011, will be used to inform the detailed affordable housing policy that will be included in the Proposed Submission document.

It is a national requirement that we plan for a continuous five year housing land supply. The Core Strategy must ensure we can meet this requirement

and so the Emerging Strategy sets out a combination of strategic site options and broad locations for development options.

Comments on option 1 - Focus the majority of housing growth on sites immediately adjoining Haywards Heath and/or Burgess Hill. Minimal growth would take place in the settlements elsewhere in this part of the district.

Number of respondents	12
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Summary of the comments received

The majority of representations that were made on this option expressed support for its inclusion in the Core Strategy. The main reasons cited were; proximity to infrastructure, jobs and key highway and rail routes; and the relatively unconstrained nature of the land in this area.

Those who were not in favour of the option, or expressed concern about taking it forward in the Core Strategy, raised the following issues;

- Development at Burgess Hill is constrained by Ditchling Common nature reserve and SSSI.
- Sites in this location would lie some distance from the town centres and would not necessarily result in a sustainable option with regard to services and public transport links.
- If this option is taken forward then new fit for purpose, access roads must be provided...as envisaged in the Feasibility Studies commissioned by Mid Sussex DC and undertaken by Atkins in 2005/6.

One respondent sought clarification as to whether the option implied Greenfield sites would be delivered immediately adjacent to Burgess Hill/Haywards Heath, or that the development would take place within the villages that are within close proximity to the two towns. Their view was that the latter was the more sustainable approach.

How these comments have influenced the Emerging Strategy document

The updated SHLAA has identified options for broad locations for development at:

- *Land East of Valebridge Road, Burgess Hill, within Wivelsfield Parish (up to 150 residential units);and*
- *Land at Greenhill Way/Ridge Way, Haywards Heath, within Wivelsfield Parish (up to 180 residential units).*

These options are set out in the Emerging Strategy for consultation.

Comments on option 2 - Focus a significant proportion of the growth at Plumpton Green and Cooksbridge (i.e. where mainline train stations currently exist), and possibly Wivelsfield/Wivelsfield Green, due to its relative close proximity to Wivelsfield train station. The remaining growth required would be directed to the other settlements in this part of the district (a few allocations to the larger villages with the greatest range of services and facilities).

Number of respondents	24
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Summary of the comments received

The majority of respondents who commented upon this option generally

focused on the issue of additional housing at Plumpton Green and Cooksbridge. There were slightly more representations that stated opposition to significant additional housing at Plumpton and Cooksbridge than those that were in favour. Reasons given for this opposition were:

- Visual impact of new development on the National Park and/or increased recreational pressure.
- Significant new housing in these locations would contradict some of the key objectives of the Core Strategy.
- Occupants of new development in these localities will still use the private car to travel and not use the stations.
- Development would result in the character, identity and sense of place being lost.

Those who supported development in these localities provided the following reasoning:

- New development would have easy and rapid access by bus into Lewes for shopping and employment. The railway station (Cooksbridge) has easy connections to London and elsewhere.
- It would make viable the provision of a local shop and other facilities.
- Agree with growth along rail routes.

Other comments that were made with regards to this option were:

- This option should not result in further expansion of Newick as the village has already 'done its bit' for housing provision and should not be expanded further.
- What is meant by 'a significant proportion of growth'?
- If larger allocated sites are necessary, they should be sub-divided into distinct phases, with distinct styles, avoiding 'estates'.
- Any housing development at Cooksbridge should make use of existing 'brownfield' locations only.
- One respondent highlighted sites at Riddens Lane and Plumpton School where limited and affordable housing would be appropriate.
- A couple of respondents also made detailed comments relating to a site to the south of the Plough PH at Plumpton, which had been submitted for consideration in the SHLAA. These respondents were opposed to development taking place on this site.

How these comments have influenced the Emerging Strategy document

The updated SHLAA has not identified any strategic scale site options or broad locations for development at a strategic scale in Plumpton or Cooksbridge and so no strategic options are included in the Emerging Strategy for these locations.

Comments on option 3 - Growth in this part of the district is directed on a proportional basis, in that the larger villages take the largest proportion of growth and the smaller villages/hamlets take minimal growth (likely to be infill development and redevelopment, along with a degree of development that is social housing required to meet local needs).

Number of respondents

15

Summary of the comments received

A significant number of the comments that were made on this option referred to the amount of housing that the South East Plan required to be delivered in the part of the District outside of the Sussex Coast Sub-region. These comments were generally along the lines that a lower level of housing growth should be planned for in the Low Weald area (this comment is made and will be responded to under the first sub-section of this feedback paper).

Other comments that were made on this option are summarised as follows:

- Directing growth on a proportional basis may help meet local needs, but the larger villages are not always the most sustainably located settlements for further growth.
- We believe that all the villages should have minor development that would respect the character of each village, whether Wealden or Downland.
- We would like to see a strategy that seeks to balance all communities, large and small, so that the mix of housing and jobs enables people to live and work locally and reduces overall commuting both within the area and to distant locations.
- Surely every rural village needs a measure of development to ensure it remains sustainable.
- Logically, any house building should be spread equitably across many small rural communities within our region, supplying the local need without changing the intrinsic rural nature of each community.
- If additional housing is provided at Ringmer it will almost inevitably exacerbate the already congested road into or out of Lewes at peak times.
- Proportional growth is in our opinion less suitable than options 1 and 2, and is unlikely to provide the quantum of development that would provide for new/improved infrastructure.
- Option 3, to distribute growth equitably around the district outside the Sussex Coast Sub Region, has something to commend it, but is flawed on the basis that there is no assessment of capacity or need to determine where growth could be located. The 'Sustainability of settlements' document is now out of date, and no other background work has been completed to assess the infrastructure and housing/employment needs of individual settlements.
- It would seem appropriate to spread development across the district to limit the effect of substantial house building to the edge of settlements which bound or lay close to the National Park, and subject to other constraints such as Conservation Areas, flood/erosion risk, SSSI/SNCIs and important heritage assets.
- Option 3 would not seem to meet a number of the strategic objectives set out in Topic Paper 4, in particular appropriate levels of access to public transport nodes and appropriate services/facilities.

How these comments have influenced the Emerging Strategy document

An emerging approach to the distribution of residential development across the district is set out in the Emerging Strategy for consultation. It has taken into consideration a range of factors derived from the evidence base, including the SHLAA, Local housing Needs Assessment, National Park

purposes, Landscape Capacity Assessment and settlement sustainability and hierarchy. In the first instance it was assumed that the Secondary Regional Centre (Haywards Heath) and the District Centres should be the main focus for development given their high sustainability ratings in the Settlement Hierarchy. However it is apparent in the updated SHLAA that some of these settlements have limited potential to accommodate growth and so the emerging distribution for consultation in the Emerging Strategy is more complex than a simple proportionate distribution according to settlement size but takes into account a whole range of constraints.

Comments on option 4 - Growth within the existing built up area of Lewes town (i.e. no greenfield extensions to the town). This will involve infill development and the redevelopment of certain sites (to be informed by the SHLAA), one or two of which could be significant in size.

Number of respondents

10

Summary of the comments received

A number of the representations that commented upon this option concentrated on the possible strategic development site at North Street. These comments are covered in the feedback paper for Topic Paper 7.

Those representations that commented upon the principle of the option, without considering site specifics, were generally in favour of it being pursued in the Core Strategy. The reasoning that was given included:

- In Lewes District, Lewes itself is by far the most suitable town as; it has much the best transport links; it offers many more employment opportunities, and; has a high demand for housing - reflected by high house prices.
- This option seeks to avoid urban spread beyond the existing edges of the settlements, and maximises land available within the existing built up areas.

Although not opposing this option, a couple of respondents, which included the South Downs National Park Authority, highlighted that development in Lewes town would need to be justified primarily in terms of National Park needs.

How these comments have influenced the Emerging Strategy document

The general support for the sustainability of this site location is noted. North Street is identified as an option for a broad location for growth in the Emerging Strategy. A detailed boundary has not been identified as there are a number of key matters that would need clarifying before the exact boundary could be defined, including ensuring any development scheme would be able to generate sufficient development value to provide all necessary infrastructure, including upgraded flood defences, and meeting National Park purposes.

Comments on option 5 - As option 4, but allow for small-scale housing developments on land immediately adjoining the town (note: all such sites would be within the National Park).

Number of respondents

3

Summary of the comments received

As can be seen above, very few respondents made specific comments on this

option. Those comments that were made can be summarised as follows:

- We are unable to support the option unless the exact potential development sites can be identified.
- Whilst it is recognised that Option 5 would involve the development of greenfield sites within the National Park, there is no national policy that prevents such an approach. Paragraph 21 of Planning Policy Statement 7 is clear that suitably located and designed development necessary to facilitate the economic and social well-being of National Parks and their communities, including the provision of housing to meet identified local needs, is acceptable and can be included as planning policies within Local Development Documents.
- Development around Lewes town would need to be justified primarily in terms of National Park needs.

How these comments have influenced the Emerging Strategy document
Old Malling Farm is identified as a broad location for growth in the Emerging Strategy as an option for helping to meet housing requirements in the Lewes town area. National Park purposes remain a key consideration in this emerging option.

Comments on option 6 - Growth within the existing built up area of Seaford (i.e. no greenfield extensions to the town). This will involve infill development and the redevelopment of sites (to be informed by the SHLAA).

Number of respondents	8
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Summary of the comments received
 The majority of the comments that were made on this option related to the amount of development this option could deliver. Comments made in this regard included:

- This option will be constrained by the lack of brownfield sites within the town.
- Other than possible ‘windfall’ sites there are no suitable sites for development within Seaford.

Other representations made on this option were generally in support of it being taken forward in the Core Strategy. One respondent considered that industrial or commercial development should be brought forward at Brooklyn Road, Cradle Hill and in the town centre.

How these comments have influenced the Emerging Strategy document
No strategic level (100+ units) housing site options have been identified for Seaford in the Emerging Strategy. Seaford is particularly constrained by a limited supply of sites available in the town and by the close proximity of the National Park boundary around the town. A level of new houses to be found through small-scale sites in or possibly around the town of 155 is presented for consultation. Together with the existing commitments of 190 houses this would mean a total of 345 for Seaford over the Core Strategy plan period. The 155 new sites would be identified and allocated in the subsequent Allocations Development Plan Document and/or Neighbourhood Plans.

Comments on option 7 - As option 6, but allow for small-scale developments on land immediately adjoining the town.

Number of respondents	18
Summary of the comments received	
<p>The vast majority of the representations made on this option were opposed to it. The primary reason for this was due to the possibility of a site to the south of Chyngton Way being developed for housing if this option was to be pursued in the Core Strategy. Several reasons were given as to why this site should not be developed, including that it provides an essential gateway into the National Park, the site has significant landscape and archaeological value and that it should be used for agricultural purposes.</p> <p>Two respondents were in favour of this option and specifically development on the aforementioned Chyngton Way site.</p> <p>The only other comments on this option related to the limited amount of development that could be delivered, due to the National Park being immediately adjacent to the town, and that if development were to take place within the National Park then it would need to be justified primarily in terms of National Park needs.</p>	
How these comments have influenced the Emerging Strategy document	
<p><i>No strategic level (100+ units) housing site options have been identified for Seaford in the Emerging Strategy. Seaford is particularly constrained by a limited supply of sites available in the town and by the close proximity of the National Park boundary around the town. A level of new houses to be found through small-scale sites in or possibly around the town of 155 is presented for consultation. Together with the existing commitments of 190 houses this would mean a total of 345 for Seaford over the Core Strategy plan period. The 155 new sites would be identified and allocated in the subsequent Allocations Development Plan Document and/or Neighbourhood Plans.</i></p>	

Comments on option 8 - Infill and redevelopment of sites in Peacehaven/Telscombe (to be informed by the SHLAA).	
Number of respondents	5
Summary of the comments received	
<p>Very few comments were made on this option. Those who did comment on it were either in favour of it being taken forward in the Core Strategy, or considered that very few infill and redevelopment opportunities exist in Peacehaven and Telscombe, hence the option is unlikely to deliver any significant level of housing.</p>	
How these comments have influenced the Emerging Strategy document	
<p><i>No strategic level (100+ units) housing options have been identified within Peacehaven and Telscombe in the Emerging Strategy. No suitable sites with sufficient capacity have been identified.</i></p>	

Comments on option 9 - As option 8, but to also allow for greenfield extensions on land that adjoins the existing built up area boundary of Peacehaven/Telscombe, prioritising sites that do not fall within the National Park.	
Number of respondents	4
Summary of the comments received	
<p>From the four representations made on this option, two were in favour of it</p>	

and two were opposed. The reasons given in support of the option were as follows;

- Sites around Peacehaven perhaps offer the only large sites in the district without flood risk constraints.
- The sites around Peacehaven could accommodate the needs of a Care Village.

In opposing the option the following reasons were provided;

- Development that extends the Peacehaven planning boundary towards Newhaven should be resisted as it will lead to coalescence.
- There is not a need to develop on greenfield sites around Peacehaven and Telscombe.

How these comments have influenced the Emerging Strategy document

Two broad locations for development on the edge of Peacehaven have been identified as options in the Emerging Strategy. These are at Valley Road (approximately 110 units) and at Lower Hoddern Farm to the north of the proposed Sports Park (approximately 450 units plus some small-scale employment (probably office) provision).

Comments on option 10 - Strategic level development on brownfield land at Newhaven as part of a comprehensive regeneration scheme for the town.

Number of respondents

6

Summary of the comments received

A number of the representations that commented upon this option concentrated on the possible strategic development site at Eastside. These comments are covered in the feedback paper for Topic Paper 8.

The majority of those representations that commented upon the principle of the option, without considering site specifics, were generally in favour of it being pursued in the Core Strategy. The reasoning that was given included;

- There are plenty of potential development sites within the planning boundary.
- Development within the town will aid in the regeneration of Newhaven and the wider area.
- This option would not result in urban spread beyond the existing edge of the settlement.

There were a couple of representations that did raise concerns with this option. Reasons given were that a number of potential sites within Newhaven are constrained by flood risk and that certain sites previously allocated for housing in the town through the Local Plan have not been developed due to access and infrastructure constraints.

How these comments have influenced the Emerging Strategy document

The Emerging Strategy includes the option of allocating Eastside for strategic level development that would be employment –led but allow for a mixed use of the site (potentially including housing) to provide higher value ‘enabling development’ if this is shown to be necessary in development viability terms in order to deliver the required employment development and help with the regeneration of Newhaven. Development viability is a key issue here given

that the site has remained undeveloped for employment use alone for many years and has contamination and flood risk mitigation expenditure associated with its development.

Comments on option 11 - Strategic level development on the fringes of Newhaven (land not within the designated National Park).	
Number of respondents	2
Summary of the comments received From the two representations made on this option, one was in support and one was opposed to it. The reasoning given for opposing the option was that it could result in the coalescence of Newhaven with Peacehaven and/or Seaford.	
How these comments have influenced the Emerging Strategy document <i>No strategic development options have been included on the fringes of Newhaven in the Emerging Strategy.</i>	

Comments on option 12 - Small-scale housing developments to meet local needs for the villages that fall within the National Park (the amount of development that this could equate to will be dependent on the outcomes of the SHLAA and the update that is due to be undertaken of the Housing Needs Survey).	
Number of respondents	2
Summary of the comments received The two representations made on this option considered it to have some merit. The reasoning provided was as follows; <ul style="list-style-type: none"> • Focus new housing development at the under-used railway stations at Glynde and Southease. This would ensure more passengers use these stations ensuring their survival and would lessen the need for upgrading of the coastal road. • Option could be incorporated as part of any of the others – small scale developments for villages within the National Park might be acceptable in principle if they are to meet identified local needs. 	
How these comments have influenced the Emerging Strategy document <i>Glynde is identified in the Emerging Strategy as a Service Village, having a basic level of services and facilities and public transport provisions and as such potentially able to accommodate some small scale housing growth (taking into account its level of sustainability in the settlement hierarchy and the identified level of need in the local area). Southease is categorised as a hamlet in the settlement hierarchy and as such it is not identified as a location for growth. It is also located within the National Park boundary. Within the National Park, small scale development in villages and hamlets to meet identified local needs only is set out. This would be in the form of ‘exception’ schemes and currently unidentified infill developments within the planning boundary of these settlements.</i>	

Comments on Annex A	
Number of respondents	11
Summary of the comments received The comments that were made on the Annex in the Topic Paper were either	

concerning the revocation of the South East Plan, were identifying other key policies and influences relating to housing growth, or were raising queries relating to the Council's evidence base. The comments concerning the South East Plan have been identified in the first sub-section of this feedback paper and are therefore not repeated here.

The additional key policies and influences on distributing housing growth that were highlighted by respondents were;

- Local Transport Plan 2 (and emerging LTP3)
- Bus Strategy
- East Sussex Accessibility Strategy and relevant Accessibility Strategy Local Assessments
- East Sussex Economic Development strategy
- Waste and Minerals Local Plans (and emerging Waste and Minerals Development Framework)
- East Sussex Community Strategy - Pride of Place
- Lewes District Council Sustainability Checklist

Queries that were made on the evidence base are summarised as follows;

- Concern was raised that the Employment Land Review, the Strategic Housing Land Availability Assessment (SHLAA) and the updated Retail Study were not available to inform the content of Topic Paper 5.
- It was stated that the Strategic Flood Risk Assessment should also have been mentioned in Annex A as it will be a key consideration in distributing development.
- A couple of respondents were concerned that a map that identified SHLAA sites was included within a presentation provided by the consultants AECOM. This presentation was concerned with the Renewable Energy and Low Carbon Development Study and this was not considered to be the appropriate way of identifying the SHLAA sites.

How these comments have influenced the Emerging Strategy document

The Employment Land Review (Economic and Employment Land Assessment), SHLAA and SHLAA 2011 update and other relevant evidence have informed the Emerging Strategy, as will the updated Retail Study when it is completed. AECOM used some SHLAA sites to help inform the potential for renewable energy generation in potential new development in the District, rather than using the Renewable Energy and Low Carbon Development Study as a determinant of SHLAA sites. Regard has been had to the ESCC documents mentioned – ESCC officers have been involved in commenting on the emerging document. The Emerging Strategy is intrinsically linked to the SCS.

Additional options suggested

Number of respondents

14

Summary of the comments received

As well as commenting upon the 12 options presented in the Topic Paper, a number of additional options were also put forward to the Council for consideration for inclusion within the Core Strategy. These additional options

were;

- Expand option 2 to include Glynde and Southease as both of these villages have train stations.
- Focus housing provision and employment on the parts of the District that currently suffer from the greatest levels of deprivation.
- If the Lewes to Uckfield Railway Line is to be reopened then new housing could be built close to its line of route with appropriately located stations.
- An option that allows for small scale development in locations on the fringes of Newhaven.
- To deliver small-scale development within Newhaven.
- An option that recognises the potential to deliver significant growth at Ringmer.
- Develop the smaller towns, villages and/or hamlets to provide the critical mass necessary for the enhancement/provision of a viable sustainable transport network and to sustain local services (which can benefit the less mobile sectors and help to enhance the community).
- There should an option available that recognises both the north of the district and the larger villages. House prices are higher in this area, and constraints much reduced, thus making delivery more likely.
- To locate a far higher percentage of growth to the north of the District since growth at Burgess Hill is likely to create demand for workers.

How these comments have influenced the Emerging Strategy document

Glynde and Southease lie within the National Park boundary and as such these small settlements do not offer potential for strategic level growth even with the benefit of train stations.

An aim in the Emerging Strategy is to provide the required level of development as close as possible to where the need lies.

It is not realistically expected that the Lewes to Uckfield line will reopen in time to influence development options to 2030.

Small scale development options, including at Newhaven, will be identified and allocated in the subsequent Allocations DPD. The Emerging Strategy anticipates that approximately 300 homes will be identified at Newhaven in this way.

Regard has been given to the fact that some development can help to sustain important village services and facilities (such as shops and public transport).

As such the more sustainable settlements outside the National Park boundary are indicated in the Emerging Strategy for a level of small-scale development.

Any development in villages within the National Park boundary is expected to be small scale 'exceptions' type development for local needs only.

Three potential options for strategic level (100+ units) broad areas for housing growth at Ringmer have been identified in the Emerging Strategy. These are at land South of Lewes Road (up to 154 units), land North of Bishop's Lane (up to 226 units) and at Fingerpost Farm (up to 100 units).

Insufficient potential suitable sites have been identified to allow for an emerging approach of a far higher level of development near Burgess Hill.

House prices and development viability will be an ongoing consideration. The Affordable Housing Viability Assessment will consider this factor, including an assessment of whether development in the residual rural area to the north of

the District could deliver a higher proportion of affordable housing as set out in the Strategic Housing Market Assessment and reflected in the Emerging Strategy.

Topic Paper 6 – Summary of responses received

Total number of respondents who commented upon this Topic Paper – 35

Comments that agreed with the policy areas identified	
Number of respondents	21
<p>Summary of the comments received</p> <p>A number of the respondents who agreed with one or more of the policy areas to be covered in the Core Strategy also made comments on the strategic objectives, which appeared in this paper. Such comments on the objectives have been summarised in Topic Paper 4.</p> <p>Proposed policy areas that received considerable support were affordable and appropriate housing and climate change, flood risk and environmental resource management.</p> <p>Those who supported one or more of the proposed policy areas generally provided reasoning for doing so. For instance, the policy area on affordable and appropriate housing was supported by many respondents. This was because they considered that it was essential to have a policy that addressed the need for affordable housing, particularly in rural areas, and to deliver specialist housing that will meet the needs of an ageing population.</p> <p>One of the more detailed comments made concerning this topic paper was concerning the sentence that emphasised the need for Core Strategy policies not to just simply reiterate national or regional planning policy. It was implied that this should also apply to the Minerals and Waste Development Framework.</p>	
<p>How these comments have influenced the Emerging Strategy document</p> <p><i>Noted. Support for these policy areas is welcomed.</i></p>	

Comments that suggested additional policy areas for inclusion within the Core Strategy	
Number of respondents	17
<p>Summary of the comments received</p> <p>One of the more fundamental issues raised in response to this Topic Paper was concerning the revocation of the South East Plan and the possible need to include further policy areas in the Core Strategy as the result of a lack of regional policy in certain subject areas. Respondents who raised this issue went onto suggest policies that were in the South East Plan that should now be reflected in our emerging Core Strategy. This included policies CC7 (Infrastructure), CC8 (Green Infrastructure) and NRM3 (Strategic Water Resource Development).</p> <p>The additional policy areas that were suggested for inclusion in the Core Strategy were:</p> <ul style="list-style-type: none"> • A policy specifically devoted to the subject of Peak Oil. It was suggested that such a policy area should address the issue of developing and maintaining a local food supply. 	

- Retaining the current Local Plan policy (E9) on the conversion of redundant farm buildings for business or tourism.
- A policy on landscape protection, particularly one that can be applied to the Low Weald area.
- An education strategy on conservation.
- Facilitating crime reduction/prevention.
- Health and community facilities, culture or space.

Although not specifically identifying an additional policy area, one respondent felt that the topic paper did not reflect the healthier communities theme, which is set out in the Sustainable Community Strategy.

Although some respondents did not suggest additional policy areas they did consider that the policy areas put forward should be amended or added to. Such comments included:

- The infrastructure policy needs to include the delivery of flood defences, green infrastructure and electronic communications (broadband, etc).
- The proposed policy area on affordable and appropriate housing should include a clear strategy on houseboats and also address access standards for homes (i.e. lifetime homes).
- The policy area on climate change, flood risk and environmental resource management needs to consider utilising tidal power and should specifically consider local renewable energy generation. It was also suggested that the policy should include the issue of air quality.
- Any policy on town centres needs to recognise the key role played by leisure and cultural facilities in creating vital and vibrant town centres.

A couple of representations identified further documents that will need to be considered in taking forward the proposed policy areas. This included the Lewes Integrated Urban Drainage Study and the relevant Coast Defence Strategies.

How these comments have influenced the Emerging Strategy document

The Emerging Strategy includes policy directions relating to Infrastructure, Green Infrastructure and Resource Management, among others.

Detailed infrastructure requirements will be set out in the Infrastructure Delivery Plan to accompany the Core Strategy. The Infrastructure Delivery Plan cannot be prepared until we know which development options will be progressed as requirements will vary for different combinations of options. Healthier communities themes are related through a number of elements of the Emerging Strategy.

Broadband communications etc are recognised as important for the future economic development of the District.

The Emerging Strategy sets out options relating to affordable housing and housing type and mix (including consideration of Lifetime Homes standards). Houseboats are not considered to have a strategic position in the District and as such a specific policy area relating to houseboats in a strategic level document such as the Core Strategy is not warranted.

Policy areas relating to climate change, flood risk, environmental resource

*management and air quality feature in the Emerging Strategy.
The role of leisure and cultural facilities in the vitality and viability of town centres is recognised in the Emerging Strategy.
The Integrated Urban Drainage Study and the coastal management plans/defence strategies etc have informed the Emerging Strategy.*

Comments that suggested policy options for the policy areas identified

Number of respondents	10
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Summary of the comments received

The policy options that were identified, by policy area, were as follows:

Economic Development and Regeneration

- A policy that seeks to retain existing employment sites, unless it can be demonstrated that particular sites can be better used for other purposes. This would need to take into account market conditions and other economic information.
- A policy that supports local food production, processing and storage.

Affordable and appropriate Housing

- A policy that seeks to provide smaller properties for younger families and for the elderly to downsize.
- A policy that allows village communities to identify suitable sites for affordable housing.

Climate Change, Flood Risk and Environmental Resource Management

- A strategic policy that emphasises the requirement for appropriate water saving measures in new residential developments in accordance with the Code for Sustainable Homes (BREEAM for non-residential buildings).

Design and the Historic Environment

- An option with an emphasis on the reuse and refurbishment of empty properties that contribute to the townscape before demolition is considered.

How these comments have influenced the Emerging Strategy document

Significant elements of the above comments are encapsulated in the Emerging Strategy options.

Topic Paper 7 – Summary of responses received

Total number of respondents who commented upon this Topic Paper - 38

General Comments on the North Street Site	
Number of respondents	29
<p>Summary of the comments received</p> <p>Most comments supported the identification of the North Street area as a possible strategic development site. Respondents pointed out that the site is both large and on brownfield land, whilst some comments received also stated that the site has become dilapidated in recent years, due in part to the floods in 2000, and thus needs to be improved.</p> <p>Some pointed out that the site lies within an area of flood risk whilst others mentioned that new infrastructure would be needed to cope with any new development. A couple of respondents disagreed with the site being identified as a possible strategic development site in the Core Strategy as they considered that it should remain as it currently is.</p> <p>One respondent did not believe that there was enough evidence supporting the case for the North Street Area to be considered as a strategic development site and that the Topic Papers should have stated when the site was expected to come forward for development.</p>	
<p>How these comments have influenced the Emerging Strategy document</p> <p><i>North Street is a broad location for growth option in the Emerging Strategy. It is acknowledged that there would be significant associated infrastructure requirements, including flood defences, which are relevant to the ultimate development viability of the options. However the site is well located close to the town centre.</i></p>	

Comments on Option A – Retain the North Street area for employment use, upgrading and redeveloping the existing buildings for employment use as opportunities arise. No upgraded hard flood defences would be provided.	
Number of respondents	9
<p>Summary of the comments received</p> <p>There was little support for this option. Those opposed to it considered that the option was unimaginative, not comprehensive enough, not economically viable and a loss of an opportunity.</p> <p>Those who did support it suggested that the North Street site should be kept as a predominantly industrial site in order to keep jobs in the town as there is a lack of alternative sites for the current occupants.</p>	
<p>How these comments have influenced the Emerging Strategy document</p> <p><i>Comments noted. Such a response would be unlikely to be sustainable and would not be likely to ever deliver improvements to flood defences.</i></p>	

Comments on Option B - Comprehensive redevelopment to create a new neighbourhood for the town, with a mix of housing, employment and other

uses, which is able to generate sufficient value to provide all necessary supporting infrastructure, including upgraded hard flood defences.	
Number of respondents	10
Summary of the comments received	
<p>The responses from those who commented on this option were mixed. Some stated that this was their desired option as it provides housing where there is demand, whilst others favoured this approach providing that there was clarity on the mix of uses provided in this development option.</p> <p>Those who did not favour this option reasoned that it would not be economically viable in the current climate and that the upgrading of the flood defences at this point of the River Ouse would increase peak water levels upstream.</p>	
How these comments have influenced the Emerging Strategy document	
<i>Comments noted. Mixed uses seem likely to be necessary in development viability terms to cover associated costs including flood defences.</i>	

Comments on Option C - Clearance of the existing buildings from the area and utilising it for flood storage and/or low key uses such as open space if surface car parking. In effect this restores the flood plain in this location. No upgraded hard flood defences would be provided.	
Number of respondents	11
Summary of the comments received	
<p>There was little support for this option. Although there was acknowledgement that this would likely lead to the best environmental outcome, most comments received suggested that this option was impractical, not financially viable, would increase pressure for development elsewhere in Lewes Town and would be difficult to justify in light of the high demand for housing and employment land in the District.</p>	
How these comments have influenced the Emerging Strategy document	
<i>Comments noted. Not a preferred option in the Emerging Strategy. It was not a popular option and difficult to justify financially and in terms of limited availability of land in Lewes town for employment and housing needs.</i>	

Comments on Option D - Restore some of the flood plain, but allow an element of flood resistant and flood resilient development in selected, lower risk, locations within the site and integrate this with a wide package of flood risk management measures both on-site (e.g. open landscaped areas) and off-site (e.g. managing surface water drainage). No upgraded hard flood defences would be provided.	
Number of respondents	9
Summary of the comments received	
<p>There was some support for this option, particularly from individuals and groups based in Lewes Town. Reasons cited for this support included, that this option would provide welcomed new amenities, it would cater to potential tourists to the South Downs National Park and was an option that is likely to be most in keeping with the existing town.</p> <p>Those who did not favour this option generally suggested that such a development would not be financially viable. Another comment felt that</p>	

<p>providing a range of uses, such as residential, retail, employment and leisure would be far more beneficial than the approach identified in option D.</p> <p>The Environment Agency stated that it will be important for the District Council to consider the vulnerability of the development proposed by this option, and clarify the flood zone the site is in, to make sure development proposals are in accordance with Table D3 of PPS25.</p>
<p>How these comments have influenced the Emerging Strategy document <i>Comments noted. Questionable financial viability and flood risk issues.</i></p>

Comments proposing other options at North Street	
Number of respondents	3
<p>Summary of the comments received There were three suggestions that proposed other options for the North Street site.</p> <p>Two of the comments suggested that the basis for any development should be to improve the riverfront, making it vibrant and encouraging people to visit.</p> <p>Another comment proposed that a dock should be created on the site allowing for the river to provide transport routes for heavy goods, thus supporting the current industrial uses that would be retained.</p>	
<p>How these comments have influenced the Emerging Strategy document <i>Improvements</i></p>	

Comments on the area identified as the strategic development site	
Number of respondents	7
<p>Summary of the comments received Some respondents suggested that the Eastgate area of Lewes (including the Wenban-Smith site) should be joined together with the North Street site to create an extended strategic development site that the Core Strategy. However, there was some disagreement with this view with some respondents having the opinion that the Eastgate site should be considered as a strategic development site by itself.</p>	
<p>How these comments have influenced the Emerging Strategy document <i>The wider Eastgate area is not presented as an option in the Emerging Strategy as there is uncertainty over the availability of the site in the SHLAA.</i></p>	

Comments on the background to the site (including documents referenced)	
Number of respondents	9
<p>Summary of the comments received Respondents suggested that the following documents should be considered as key influences on the future development of the North Street site and thus should be included in Annex A:</p> <ul style="list-style-type: none"> • Planning Policy Statement 23: Planning and Pollution Control; • The Local Transport Plan 2 (and emerging LTP3); • The East Sussex Bus Strategy; 	

- The East Sussex Accessibility Strategy;
- The East Sussex Economic Development Strategy;
- The East Sussex Community Strategy – Pride of Place;
- The East Sussex and Brighton and Hove Waste and Minerals Development Framework; Waste and Minerals Core Strategy – Preferred Strategy (October 2009);
- The Ouse Catchment Flood Management Plan; and
- The Beachy Head to Selsey Bill Shoreline Management Plan.

Some comments received asked for clarification on the affect that the findings of the Strategic Flood Risk Assessment (SFRA) have on the future development of this site. Whilst some respondents suggested the lack of an up to date Strategic Housing Land Availability Assessment (SHLAA), Employment Land Review (ELR), a Housing Needs Study and a Housing Market Assessment made commenting on the options proposed difficult.

Another set of comments did not believe that the site should be assessed through the ELR or the SHLAA, as it was the view of the respondents that it should be assessed at a town level rather than at a district-wide level.

How these comments have influenced the Emerging Strategy document

The above studies and strategies have influenced the Emerging Strategy options to a greater or lesser degree as appropriate. Since the previous consultation the SHLAA, ELR and Housing Needs Assessment have been completed and inform the options for growth set out in the Emerging Strategy.

Topic Paper 8 – Summary of responses received

Total number of respondents who commented upon this Topic Paper – 25

Comments on the principle of change at Eastside	
Number of respondents	14
<p>Summary of the comments received</p> <p>The majority of representations that were made on this Topic Paper supported the principle of change in the area to the east of the River Ouse in Newhaven.</p> <p>A number of comments stated that the strategic area at Eastside is of sufficient size to effect a catalytic change to address problems at Newhaven including the future of the port, economic investment, affordable housing, education, skills and training and general economic prosperity. One respondent raised concern that the area should not be overdeveloped.</p> <p>Although supporting change in this area of Newhaven, a number of respondents also supported the continued use of the port for freight and passengers as well as resisting the loss of business uses on the site. It was recognised by many of these respondents that the port area could be improved, which would help facilitate the economic regeneration of the port area and town. One comment highlighted potential for the concept of a ‘green port’ and other respondents highlighted the part the area could play in becoming a renewable energy centre through the opportunities for renewable power (including the Hastings Bank wind farm).</p> <p>A number of comments stated that change would need to be mindful of the relationship of Eastside with the Ouse estuary, beach, Tidemills, the National Park and adjacent SSSI. Another respondent commented that development should not adversely impact on the landing of marine aggregates in the port.</p>	
<p>How these comments have influenced the Emerging Strategy document</p> <p><i>The Eastside area is presented as an option for a strategic development site for employment led growth. The continued use and development of the port for freight and passenger ferry services and for wider economic regeneration is also recognised, including potential business development relating to the Hastings Bank wind farm. The proximity to the Ouse estuary, the SSSI, the beach, Tidemills, and the National Park have influenced the emerging strategy for Eastside.</i></p>	

Options identified for Eastside	
Number of respondents	5
<p>Summary of the comments received</p> <p>One respondent commented that light industry does seem to thrive in this area and another similar comment suggested that the site should be safeguarded for employment even if the uses expand from B1/B8 (business and storage or distribution) to B2 and D2 uses (general industrial and leisure). Another respondent stated that the area does not lend itself to residential development. It was also suggested that any development proposal for this area should include low cost business premises.</p>	

The agent for a developer indicated that his client was proposing a range of uses for the land namely:

- A large retail food store
- 300 units including starter homes
- Hotel
- Pub
- First phase of a new port road.

One respondent highlighted that three options for the reconfiguration of the harbour area are being considered by Newhaven Port and Properties (NNP):

- A ferry terminal and offshore windfarm facility including a large windfarm assembly area and smaller units for other port users.
- A ferry terminal and other medium size port users including an offshore windfarm.
- A ferry terminal with smaller port related areas.

One respondent suggested that the infrastructure costs required to develop the site for solely industrial use would make such a scheme unviable. It was also suggested that whatever scheme comes forward in the Core Strategy for this area it should include integration of the proposed port access road as well as pedestrian and cycle links.

How these comments have influenced the Emerging Strategy document

The Eastside area is presented as an option for a strategic development site for employment led growth. Viability has been a concern on this site for many years, particularly given the cost of flood risk mitigation. As such it is considered that some 'value adding' development will be required to support employment development on this site. The continued use and development of the port for freight and passenger ferry services and for wider economic regeneration is also recognised, including potential business development relating to the Hastings Bank wind farm.

Comments on the area covered by Eastside

Number of respondents

8

Summary of the comments received

A couple of comments commented that the National Park has not been mentioned and that development on the eastern and southern parts of Eastside have the potential to impact on the setting of the National Park (including views towards/from the National Park), the Tidemills Site of Nature Conservation Importance and the beach. Another respondent considered that reference to the marine workshops and the marina outside of the site should be made, as well as the existence of 2 listed buildings within the site.

One of the respondents suggested that reference should be made as to how the development could enhance and provide access to Tidemills and the beach. It was pointed out that the area has archaeological interest and evaluation which should form part of the consideration of development options.

The risk of tidal and fluvial flooding to the area was highlighted by one respondent. This included ensuring that any proposals developed for this area were in accordance with PPS25.	
How these comments have influenced the Emerging Strategy document <i>The Eastside area is presented as an option for a strategic development site for employment led growth. The continued use and development of the port for freight and passenger ferry services and for wider economic regeneration is also recognised, including potential business development relating to the Hastings Bank wind farm. The proximity to the Ouse estuary, the SSSI, the beach, Tidemills, and the National Park have influenced the emerging strategy for Eastside.</i>	

Comments on the background to the site (inc. documents referenced)	
Number of respondents	3
Summary of the comments received As with the comments made on the same issue for Topic Paper 7 (The North Street site), respondents said the following documents should be seen as key influences to the future development of the Eastside : <ul style="list-style-type: none"> • Planning Policy Statement 23: Planning and Pollution Control; • The Local Transport Plan 2 (and emerging LTP3) • The East Sussex Bus Strategy • The East Sussex Accessibility Strategy • The East Sussex Economic Development Strategy • The East Sussex Community Strategy – Pride of Place • The East Sussex and Brighton and Hove Waste and Minerals Development Framework; Waste and Minerals Core Strategy – Preferred Strategy (October 2009) • The Ouse Catchment Flood Management Plan; and • The Beachy Head to Selsey Bill Shoreline Management Plan. 	
How these comments have influenced the Emerging Strategy document <i>The above studies and strategies have influenced the Emerging Strategy options to a greater or lesser degree as appropriate, including the Eastside site options.</i>	

Other comments	
Number of respondents	2
Summary of the comments received The Environment Agency stated that the position stated in paragraph 3 of page 3 of the Topic Paper was incorrect as they do not issue “prior approval”. They suggested that this part of the topic paper should have stated; "In order for this site to be allocated, it must pass a Sequential Test to justify its location in an area of flood risk. If this is passed, then any development must be safe, have safe access and egress and not increase the risk of flooding elsewhere in line with the Exception Test in PPS25. We will continue to work with the Environment Agency on flood risk on this site." Another respondent mentioned that the Topic Paper incorrectly states that the site is owned by Newhaven Port and Properties (NPP). Instead, the land “is currently subject of a 999 year lease which has defaulted to the Royal Bank of	

Scotland”.

How these comments have influenced the Emerging Strategy document

Noted. We continue to work with the EA on flood risk matters.

Topic Paper 9 – Summary of responses received

Total number of respondents who commented upon this Topic Paper – 18

Comments on the issues identified	
Number of respondents	7
<p>Summary of the comments received Most of those who commented felt that the Topic Paper had correctly captured the key sustainability issues.</p> <p>Notwithstanding the above, some comments were received suggesting the following:-</p> <ul style="list-style-type: none"> • climate change mitigation and adaption should be identified as a key sustainability issue; • the 5th bullet point of the key sustainability issues should have “and in renovation” added to the end of the last sentence; • traffic congestion and parking are not currently identified as concerns but should be; and • the reduction of fossil fuel energy supplies should be a headline sustainability issue as it will have an impact on every policy area. 	
<p>How these comments have influenced the Emerging Strategy document</p> <ul style="list-style-type: none"> • <i>Climate change has a direct/indirect influence on, or is influenced by a number of the sustainability issues identified (flooding, coastal erosion, biodiversity, resource use, etc.). Thus, we have chosen to state the many issues that it impacts upon rather than having one all-encompassing issue and this remains.</i> • <i>The words “and in renovation” has been added to what was the fifth bullet point of the key sustainability issues.</i> • <i>Congestion was already mentioned in the original document, both in the characteristics section (in the full Sustainability Appraisal Scoping Report rather than the topic papers) and in the key sustainability issues. This will remain, although the paragraphs that it features in have changed. Parking issues have been added to the characteristics and key sustainability issues.</i> • <i>The sustainability appraisal already recognises the need to reduce resource use and promote sustainable transport options and this will remain.</i> 	

Comments in agreement with the objectives and indicators	
Number of respondents	8
<p>Summary of the comments received Some of the respondents broadly agreed with all/most of the objectives and indicators whilst others supported the inclusion of particular objectives and indicators.</p> <p>Some of the respondents who stated their broad agreement with the objectives and indicators did however point out some suggested additions and changes. A summary of such views are found in the following sections.</p>	

How these comments have influenced the Emerging Strategy document

We are pleased that there was support for some/all of the objectives and indicators.

Comments that identify additional objectives**Number of respondents****5****Summary of the comments received**

There were a few representations that suggested additional objectives to be included in the Sustainability Appraisal. Among the suggestions received were that air quality should be considered as a stand alone objective and that there should be an objective which seeks to protect the cultural heritage of the built environment.

How these comments have influenced the Emerging Strategy document

Air quality, which was previously attached to another objective (transport), is now a stand alone objective.

Objective number 9 seeks to protect and enhance the historic environment and will remain.

Comments that identify additional indicators**Number of respondents****6****Summary of the comments received**

Whilst there were relatively few respondents who proposed additional indicators, those that did often suggested a range of possible indicators.

Suggested indicators included the following:

- the District's ecological footprint;
- the District's greenhouse gas footprint;
- percentage of adults with degrees or equivalent (for the then objective 16);
- land use change;
- cement production/use;
- new or converted homes that incorporate Lifetime Homes standard (for objective 1);
- number of people who work from home;
- loss of property value attributable to coastal erosion;
- the provision of green infrastructure (for objective 5 or 8); and
- number of people who participate in formal sport (for objective 5).

Another comment received said that there should be an indicator based on the Code for Sustainable Homes for Objective 1 but the respondent was not able to suggest an indicator.

How these comments have influenced the Emerging Strategy document

- *There are a number of different factors which collectively create the ecological footprint (resource use, waste production, etc.). We have chosen to use some of these factors rather than ecological footprint. This is due in part to the availability of the statistics, but also because one all encompassing score could mask variations of different*

components that make up a score.

- We use readily available data on carbon emissions per capita per sector as the indicator that relates to greenhouse gas emissions. We believe this to be an adequate measure that does not need to be replaced by another indicator.
- The percentage of adults with degrees or equivalent has been added as an indicator for objective 6, we believe it is a good measure of the ability level that exists in the District.
- There already exists two indicators relating to land use change for objective 7 (percentage of new homes built on previously developed land and amount of grade 1,2 and 3 agricultural development lost to new development) which we feel is appropriate to reflect land use change.
- Whilst cement production/use has an influence on the amount of carbon dioxide emissions, we already have the carbon emissions per capita per sector indicator and don't feel that the suggested indicator is needed. In addition, we are not aware of any recorded statistics on the subject.
- Unfortunately we do not collect data on the amount of new or converted homes that incorporate Lifetime Homes Standards and thus cannot use it as an indicator at this time.
- The amount of people who work from home is already incorporated into the mode of travel to work indicator for objective 3.
- There are no figures available that measure the loss of property values associated with coastal erosion and therefore this cannot be added as an indicator.
- Green infrastructure relates to a collection of different land types. We already collect the amount of rights of way is an indicator for objective 9 and the change in public open space is an indicator for objective 4. Most of the indicators for objective 8 also relate to the condition and extent of key environmental designations too.
- We do not believe an indicator relating to the number of people who participate in formal sport is necessary. This is as increases/decreases to the amount of participants is unlikely to be related to planning policy and thus it wouldn't be indicative of the success, or otherwise, of the Core Strategy.

Comments that suggest changes to objectives and indicators

Number of respondents

8

Summary of the comments received

Comments were received that suggested changes both to indicators and objectives. Such suggestions amounted to the rewording and the deletion of objectives and indicators, whilst some comments proposed that objectives and indicators were split into two.

A number of respondents suggested that Objective 12, "to address the causes of climate change through reducing emissions of greenhouse gases and ensure that the District is prepared for its impacts", should be split up into 2 separate objectives. It was felt that the first should seek to reduce CO2

emissions and the second should aim to enhance resilience to climate change.

Some of the comments received that suggested the rewording or replacement of indicators are shown below:

- The initial 2 indicators of objective 11 which measure water quality should be replaced by recently released indicators which provide a more detailed assessment;
- Percentage change in unit vacancy rates should only count long-term vacancies;
- Sustainable Urban Drainage Systems should be clearly defined in indicator 2 of objective 2;
- Percentage change in number of VAT businesses should be rectified to include all businesses; and
- Percentage of jobs in tourism sector should be changed to number of jobs in tourism sector.

It was suggested that the following indicators should be deleted as they were either incapable of being monitored, or would not provide meaningful information against the respective objectives:

- Number of planning applications approved in the SDNP or Conservation Areas;
- Number of planning applications approved contrary to advice given by the Environment Agency on biodiversity matters;
- Number of planning applications approved contrary to advice given by the Environment Agency on water quality grounds; and
- Percentage of agreed actions to implement long term flood and coastal erosion risk management plans that are being undertaken satisfactorily.

How these comments have influenced the Emerging Strategy document

- *The ways by which water quality is measured by the Environment Agency has changed since the Topic Paper was originally prepared and the previous indicators have been removed and replaced by its successors.*
- *We agree that measuring long-term retail unit vacancies would be a better measure of the vibrancy of the retail sector than the overall vacancy rate. However, we don't have these statistics; therefore we will continue to use the overall vacancy rate as it is still a useful indicator.*
- *The sustainable urban drainage system indicator comes from EMAS 3 monitoring information given in planning applications by the applicant. EMAS 3 asks "does the development incorporate sustainable urban drainage systems, such as porous paving, or does the development minimise water consumption, e.g. through rainwater harvesting or greywater recycling? The indicator has though now been reworded to include developments that minimise water consumption.*
- *The indicator has now been changed so the number of business enterprises includes all PAYE registered businesses as well as VAT registered businesses.*

- *We have changed the indicator relating to jobs in the tourism sector, in light of the suggestion made. It now counts the total number of jobs rather than the percentage in the tourism field.*
- *We agree that the number of planning applications approved in the South Downs National Park or in Conservation Areas doesn't indicate whether the environment has been protected and this indicator has therefore been removed.*
- *We have removed reference to advice given by the Environment Agency on biodiversity matters and water quality grounds in the set of indicators.*
- *We have removed the percentage of agreed actions to implement long term flood and coastal erosion risk management plans that are being undertaken satisfactorily as an indicator.*

