



Lewes District Council

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Chailey Neighbourhood Plan Regulation 16 Consultation

12th February – 27th March 2020

The following page presents a summary, written by Officers at Lewes District Council, of the comments made during the Regulation 16 consultation on the Chailey Neighbourhood Plan. The summary is written to provide assistance to the Examiner and to allow anyone who wishes to see some of the issues raised; it does not contain every point a consultee has made. The Examiner will be provided with the comments made by each consultee in full.

Number	Consultee	Comments	Date Received
1	Natural England	Natural England does not have any specific comments on this draft neighbourhood plan	18.02.2020
2	National Grid	National Grid has identified that one or more proposed sites (proposed Local Green Spaces) have been identified as being crossed or in close proximity to National Grid assets.	18.03.2020
3	Southern Water	No comments to make	19.03.2020
4	Environment Agency	<ul style="list-style-type: none"> • Pleased to see the wording below included in Policy ENV3: Countryside Protection and Village Setting. <i>Development should include the following criteria:</i> <ol style="list-style-type: none"> 1. <i>take opportunities to restore the natural function of any watercourses to improve water quality, to reduce the risk of flooding and ensure that the development in question is not placed at an unacceptable risk of flooding and enhance wetland habitats;</i> • Reiterates points made at Reg. 14 about including further detail in the introductory section about the geographical context of the River Ouse and its' tributaries • Pleased to see the wording below included in Policy ENV5: Conservation of the environment, ecosystems and biodiversity: <i>Development will be expected to protect and retain well-established features of the environment, ecosystem and biodiversity, including mature trees, species-rich hedgerows, watercourses and other ecological networks together with the habitats alongside them including ponds.</i> 	23.03.2020
5	Gladman Developments Ltd	<p>Recommend modifications to ensure compliance with the Basic Conditions</p> <ul style="list-style-type: none"> • Policy HO1: Development Boundary repeats Local Plan Policy and should be deleted • Policy HO3: Housing Mix is supported in principle. The evidence informing this policy has been derived from a resident survey and is not a fully quantitative assessment of housing needs for the area. Gladman would recommend that the agreed mix of one, two and three bedroom starter homes and single level dwellings should be removed from the policy wording for flexibility. Flexibility should be provided so the policy seeks to 'encourage' rather than prescribe the provision of bungalows. New wording proposed. • Policy HO5: Building Height is considered too prescriptive in limiting building height to two storeys • Reiterate the concerns raised at Reg. 14 and the need for Policy HO9: Historic Buildings to be modified to ensure consistency with the requirements of national policy and guidance. Designated heritage assets already receive a high degree of protection nationally and the policy should have full regard to relevant paragraphs of the NPPF. Policy's reference to 'unacceptable impact' is too vague and will likely lead to conflicting decisions through the decision making process. Any harm should be weighed against the public benefits of the proposal. 	26.03.2020

		<ul style="list-style-type: none"> • In principle Policy HO10: Housing Considerations is supported to the extent that affordable housing is delivered where it meets a recognised need. However, the local connection eligibility requirement should be relocated to the community aspirations section, as it is just a statement of intent. • Gladman continue to have concerns with Policy ENV3: Countryside Protection and the Village Setting as it seeks to protect the existing landscape area of the countryside in order to preserve the open character of the gaps between settlement the local community consider to be important. This is not considered to be a NPPF requirement. Further modification of this policy is recommended. • Wording of Policy ENV4: Historic Environment is recommended to be changed to: “Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use” • Gladman consider Policy ENV6: Protection of open views should be modified so that development proposals ‘recognise’ the wider landscape character of the area in order to integrate future development opportunities within the setting of the local area. • Gladman supports Policy TRA2: Traffic Calming in principle, but remains concerned that it sets out a stricter requirement than legislation currently provides. Gladman is concerned that the wording used may lead to conflicting decisions through the decision making process. Gladman recommend that this policy is modified to reference an ‘acceptable degree’ rather than the term ‘eliminate or substantially reduce.’ • Gladman is promoting land within the neighbourhood area at land to the west of the A275. Whilst the Neighbourhood Plan has progressed, Gladman would welcome the opportunity to work with the Parish Council and the local community to bring this site forward for development • Gladman recognise the role of neighbourhood plans as a tool for local people to shape the development of their local community. In principle, Gladman welcome many aspects of the proposed neighbourhood plan but feel that a number of policies would benefit from additional modification to ensure their consistency with national policy and guidance. 	
6	Highways England	<ul style="list-style-type: none"> • Does not have any comments on the Chailey Neighbourhood Plan 2019-2034 submission version. 	26.03.2020
7	South East Water	<ul style="list-style-type: none"> • South East Water agree with Chailey Parish Council on points raised in the objectives section and would like to add that water efficiency could also be promoted to existing buildings and new buildings, either residential or non-residential across the Parish. • South East Water recommend the need of a mandatory housing standards for water use • We advise that the Council should include a policy that all residential and non-residential development shall meet the water efficiency standard of 110 litres/person/day (preferably lower). • South East Water will work with local authorities and developers to ensure that any necessary 	27.03.2020

		<p>infrastructure reinforcement is delivered ahead of the occupation of development but it is important to allow time to deliver necessary infrastructure.</p> <ul style="list-style-type: none"> • South East Water would like to reiterate that our primary concern is the water that we abstract and treat for public supply purposes and ensuring the required quality of drinking water is maintained. 	
8	Historic England	<ul style="list-style-type: none"> • Historic England has no objections to raise • It considers that the plan provides an impressive focus on the need to conserve the much valued heritage of the parish and provides a number of areas of advice that support a specific conservation approach that implements National and Local Plan Policy at the neighbourhood level. • Supports the identification of a limited number of well chosen local heritage assets 	27.03.2020
9	Lewes District Council – Planning Policy Officers	<ul style="list-style-type: none"> • Congratulate the Parish Council for getting to this stage of the process as it is clear that a great deal of time and effort has gone into producing the Plan. • Officers are pleased that the majority of its comments made at Reg. 14 have been taken into account in this submission version. Where the points raised have not been taken forward in the submission draft, the advice still stands. • There still appear to be a number of minor discrepancies in the introduction section of the Neighbourhood Plan with regard to the Neighbourhood Plan process. • The pre-submission (Reg. 14) draft of the Neighbourhood Plan did not include maps. It was advised at the time to ensure that appropriate maps were included in the submission draft. Some maps have been included in an annex, but for readability and usability of the Plan, maps should ideally accompany policies. In particular, Policies HO1, HO8, HO9, ENV3, ENV4, ENV6 and ENV8 would benefit from accompanying maps. Local Green Spaces should also be appropriately mapped for clarity. • Support the inclusion of Local Green Space designations and have no objection to the proposed designations • At the time of submission, the Local Plan Part 2 was ‘emerging’ and references to it within the Neighbourhood Plan reflect this. However, it has now been adopted and references to it should be updated. • Reference to the ‘Lewes Development Plan’ should be amended to ‘the Development Plan for Lewes’ • Term ‘development boundaries’ should be exchanged for ‘planning boundaries’ to reflect Local Plan terminology • Consider that the submission version of the Neighbourhood Plan meets the ‘basic conditions’. However, the evidence submitted may not be substantial enough to support Policy HO10 as currently worded. Also, wording of Policy ENV3 may require modification to ensure that the economic element of sustainable development can be delivered over the Plan period • Consultation throughout the preparation of the Chailey Neighbourhood Plan has been excellent and is considered to be an example of good community engagement 	27.03.2020

		<ul style="list-style-type: none"> • The following points are made with regard to specific policies: <ul style="list-style-type: none"> ○ Policy H08 makes reference to an 'existing retail core', however this area is not identified anywhere in the Plan ○ Policy COM1 appears to be more of a community aspiration, rather than a planning policy ○ The wording of Policy ECO1 could be made more effective. Notwithstanding this, it should be noted that the change of use from retail to residential use does not always require full planning permission, so may have limited application. In addition, it is not clear what 'core retail outlets' are. ○ Policy ENV1 stipulates that the definition for 'major development', but reference here is recommended to be made to the NPPF, if anything 	
10	East Sussex County Council	<ul style="list-style-type: none"> • Has no representations to make on the Reg. 16 draft 	30.03.2020