

## **ANNEX G**

### **Partners Responses – Comments with Responses from BBP**

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ESCC	Partner Comments	BBP Responses
1.	Pg 32, 2.114 Woolworths has now been let to Alworths.	This comment post dates the report.
2.	Pg 32, 2.115 The library is not considering developing the Saxonholme site in phases and is currently looking for alternative sites in the town including temporary ones.	This is a misunderstanding. The report does not say the Library was considering developing the site in phases. The recent search for alternative sites also post dates the report
3.	Pg 34, 2.126 Hasn't LDC done a retail study? – could the conclusions not be included here. At present the need for more food retailing over and above the Sainsbury's extension and Lidl has not been made. Additionally town centre retailing needs to be protected so at present there is no justification for another food outlet on the East Bank.	The most recent retail study at the time of writing the report was from 2005. LDC had taken advice from their specialist retail adviser on recent applications but BBP were never given access to this advice.
4.	Pg 35, 2.135 The site that could be assembled in the north of the town 40,000 sq ft is larger than the Woolworth's site which was empty for a number of years and considered too big for the library. Library services were willing to consider co-locating with other services but none could be found.	The points on page 35 appear to have been misinterpreted; the report discusses assembling a site able to accommodate a 40,000 sq ft supermarket so as to meet the requirements of leading operators consulted during the study – this cannot be met by existing units. The report does not consider the re-use of the former Woolworths store in isolation, although at approximately 6,000 sq ft the latter would have been well suited to the Library as ESCC's specification requires 6,600 sq ft of space for the new facility.
5.	Pg 43, 2.159 'Ring of food' seems contrived also, although there may be benefit in exploring peri-urban areas for new allotment sites on lower lying land. Land on the downs is likely to be too chalky and stony, and too steep to cultivate.	If new allotments are to be provided, they must either be provided in existing green space or on the urban fringe. Converting public open space to allotments is controversial, but may be possible where there is an oversupply. 'The ring of food' is based on the idea of allotments being provided in different locations around the town so that people have equal access to them – and seems a sensible suggestion. However, the quality of soil is very important for allotments, and it may turn out that only certain places are suitable. Further research is clearly required
6.	Pages 44 & 45 The purpose or need for a river crossing between the Riverside Park and ERF is not convincing. This would be difficult to achieve as the ERF is enclosed by high flood protection banks.	The river crossing would give more direct access to the proposed leisure centre at Riverside Park from the other side of the river. The location of the crossing on the map is indicative, and all constraints would need to be considered before determining the location.
7.	Pg 42, 2.154 Circular walking route seems contrived though and all the proposed bridges may be impractical due to the	The idea behind the 'circular route' is to make it possible to go for short walks around the fringes of the town, but it is very much

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	<p>need to maintain river navigability. Support enhancement of routes.</p>	<p>conceptual. It is a concept that many towns and cities in the UK have adopted, for example the London Loop, and Peterborough's Green Wheel. The river is a major barrier to especially pedestrian and cycle movement, and new pedestrian/cycle bridges can help to 'stitch' the town together and encourage cycling and walking as a leisure activity and means of transport. The issue regarding river navigability is recognised as a major constraint, but other navigable rivers have bridges.</p>
8.	<p>It would be difficult to make a case that a new facility [Sixth Form College] would be sustainable - numbers would not be high, the breadth of the offer would be limited and it is an area where there was previously poor performance in sixth form provision (numbers and outcomes) In addition Seaford Head has recently suspended its provision.</p>	<p>A new facility is critical if the area is to improve the aspirations of its young population. Furthermore, the recent Seaford experience supports our view that a combined Peacehaven, Seaford and Newhaven facility is recommended in order to improve viability.</p>
9.	<p>Pg 106, 6.18 The Energy Recovery Facility should also be referred to in this para as it is currently under construction.</p>	<p>This para is about development sites - the ERF is not a development site</p>
10.	<p>Pg 127, 6.97 It does not state the critical mass of development (residential and employment) required to deliver the core objectives and to enable the required step change. 6.97 – mentions 'critical mass' however it is uncertain what this is and whether it includes everything identified in Figure 6.5.</p>	<p>There are 2 aspects to this issue – 1) financial and 2) economic / social / image etc  The value to be generated by new development throughout the town was calculated as part of the Phase 1 work and suggested that significant new development (5,000 houses and a mix of food retail and other commercial uses) could generate some £xm as developer / tariff contributions to fund the required infrastructure Given the current economic and property market, it was not thought to be useful to recalculate this figure as part of the Phase 2 work, given that these are abnormal conditions and would not reflect the position likely to exist over the next 25 years. Clearly this will need to be kept under review as development proceeds  There is therefore no 'magic' number of new homes and jobs that will deliver the objectives of the vision. Partners and consultees have however been in agreement that only the medium to large scale strategic regeneration of Newhaven, including a good balance of new homes and jobs, will be sufficient to raise aspirations and opportunities for local residents, and enable a 'step change' in how the town is perceived.</p>
11.	<p>Much of the vision is based on assumptions that think the Port will be reorganised to release a lot of development land on the area next to Railway Quay. What if this doesn't happen? What if it doesn't happen</p>	<p>There will need to be very close working with the Port to keep the Vision and various master plans continually under review as matters progress. Discussions with the Port</p>

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	for 10 – 15 years. What are the knock on effects.	so far have indicated that with the ELR in place, there may well be options to consider the re-use of these areas of land
12.	Pg 140, 7.40 An additional bridge across the river will not significantly improve access for pedestrian. Improved access for pedestrians and cyclists to the existing bridge would be a more realistic approach. The feasibility and practicalities of the new pedestrian bridge should be further considered.	The whole point is to create a new “circular” route. Upgrading facilities on the existing bridge is clearly one option – but it would not provide an additional route through the town.
13.	Pg 140, 7.40 It is wrong to assume that the bridge would provide an alternative to the swing bridge when it is open. Any new bridge would also need to open, unless it was considerably high which would lead to questions of accessibility.	This depends on the location of the new bridge – and its design. One clear option is for one bridge to open before/after the other – and therefore create a much shorter period when both means of access are out of commission. A much more flexible/quickly opening foot bridge would also help.
14.	Since the vision process started there has been a major shift in the economy and public finance in particular is very unlikely to be accessed in the foreseeable future. There is reference to a cocktail of funding however; much of this is, at least currently, unrealistic. The Vision needs to take the new situation more fully on board and scale down or prioritise the elements of the vision that require public funding.	This report reflects the public funding situation as of April 2010. The Vision will clearly need to be revisited regularly to have regard to ongoing changes. Since it is a 25 year Vision it is not expected that all funding will be immediately available but will materialize over time through a range of sources, both public and private. These challenges are being addressed all over the country at the present time and looking at more innovative ways of using what limited public budgets are available, considering public incentives, making better use of other assets, utilizing community and social funding, leveraging in private investment through specialist mechanisms, etc etc. Partners need to adopt this approach in Newhaven
15.	The document is challenging to read with a number of recommendations for actions that are just ‘one liners’ yet in themselves could be years of work. The actions are also, as said above, not prioritised. The number of actions needs to be substantially reduced so that the important elements can be focused on. The layout of the report means there is inevitably substantial repetition which, if laid out differently, may be avoided.	The Action Plan attempts to consolidate and simplify the key short, medium and longer term actions that are recommended – and the Project Lead will no doubt concentrate on what is deliverable / capable of being funded in the short term.
16.	The short term recommendations primarily focus on producing four more masterplans / development frameworks (and masterplans within masterplans as with the Eastside and Parker Pen, the town centre) for which there is no funding at present. This inevitably has a knock on affect on the deliverability of the actions.	As stated above - the report reflects the public funding situation as of April 2010 and over recent months the public and private sectors have had to come to terms with making progress on regeneration and development initiatives in a different way. There are ways of leveraging in some elements of pump priming funds or deferring upfront costs until later in a project – and these mechanisms will need to be used in Newhaven to deliver the necessary feasibility/viability work
17.	The timescales are very ambitious particularly given the economic climate and public funding situation and being	It is stated that this is a 20 / 25 year Vision – which will clearly need to be revisited

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	before the flood risk and land ownership issues are tackled. A recognition that much of the vision will need a longer time horizon than previously thought would seem sensible.	regularly to have regard to ongoing changes in the economy and the market. It is not expected that all funding or delivery will be immediately available / achieved - but will be secured over time. The recommended "project structure" comprising the Partner Steering Group and the Project Lead will create the mechanism through which to programme projects and initiatives accordingly

SEEDA		
18.	Page 49 - were you able to discuss this part of the report with Newhaven Port and Properties Ltd? If so are they happy with the content?	Recent discussions have taken place with NPP and the text has now been revised - based on updates provided by NPP.

LDC General Comments (also drawn from Track Changes Document)		
Comment	Action	
<b>Executive Summary</b>		
19.	Pg i, 3. Query re. when the final report for Stage 1 of the Physical Development Vision was submitted in April 2008	Correct.
20.	Pg iv, Action Plan and Delivery, bullets 3-5 Query re. funding for: <ul style="list-style-type: none"> <li>• A Town Centre Strategy</li> <li>• An Initial Phase of Development in the East Bank Quarter</li> <li>• A Masterplan for Comprehensive Development and Access in the Western Heights Area.</li> </ul>	These comments have in part been addressed above. Additionally, the owner of the main parcels of development land within Western Heights is known to be progressing initial work towards a masterplan for this area, now.
<b>Section 2</b>		
21.	Pg 13, 2.30, 1st bullet <ul style="list-style-type: none"> <li>• Delete the comment – "The old tunnels which form part of HMS Forward under Glynde Close may constrain further residential development due to concerns about subsidence".</li> </ul>	We are not aware of any reason that this bullet should be deleted.
22.	Pg 14, 2.30, 5th bullet The Environment Agency should be contacted to establish the level of remediation they would require if this site was found to have impacted the chalk aquifer. This section, like the previous section, is also quite strongly worded, and again does not make reference to a site	The nature of any actual risk and appropriate remediation requirements will be derived through risk assessment and remediation design in accordance with CLR11. In many cases the EA might accept a monitoring and natural attenuation approach thus avoiding the need for actual remediation, except potentially source removal.
23.	Pg 20, 2.62 It would be useful to consider what Royal Haskoning are proposing in detail, is it a different route to this?	Royal Haskoning's Port Masterplan work is currently ongoing and has not been made available to the consultant team. It is understood that short term, they are concentrating on improving the current route through their site – however we do not believe that the key principles outlined in the PDV are incompatible with the emerging masterplan and the suggested ELR

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		route could be accommodated.
24.	<p>Pg 33, 2.123 The following deletion is suggested –</p> <p>“The recent recession has exacerbated the very limited nature of the retailing offer within the town centre, with a number of additional closures and a depleted offer including the closure of Woolworths. <del>Anecdotally, the view of many people consulted as part of this study indicates that there is currently very little reason for anyone to visit the town centre at the present time.</del>”</p>	<p>This is a report of comments made to the consultant during the consultation exercises and is seen as a valid statement. It has not been deleted at this stage.</p>
25.	<p>Pg, 42, Enhancement of Routes within Newhaven, 2nd and 3rd bullets This is a very sensitive subject in the town, rewording would be advisable. NTC and Newhaven Port &amp; Properties are currently in a legal dispute over the access to the beach. NTC are trying to secure ‘Village green status’ for this beach which would mean access could not be denied.</p>	<p>While there are clearly sensitivities around the beach, our view is that the difficulties should not be insurmountable and therefore do not negate this being a part of the long term Vision.</p>
26.	<p>Pg 76, Food Sector – Key Opportunities, 3rd bullet “Encourage at least one entrepreneur to open a high quality restaurant selling locally caught fish and other seasonal local produce.”</p> <p>Great idea but how would they be encouraged without a financial incentive?</p>	<p>Forms of encouragement could include the availability of premises or a site on attractive terms, or to be part of another development opportunity, or as part of some wider marketing / promotional offer, or as part of a wider “food” education, skills or training initiative. Specific approaches to a number of key individuals in this sector may need to be initiated.</p>
27.	<p>Pg 76, Food Sector – Key Opportunities, 6th bullet “Consider local produce markets offering Sussex beef and lamb, local fruit and vegetables, local bakeries, butchers etc – similar to Brighton food festivals but smaller scale. This could build on successful initiatives such as the South Downs Landscape Enhancement Initiative which promoted high quality branded local products including ‘South Downs Lamb’.”</p> <p>Consider the cost of setting this up and the catchment.</p>	<p>This could form part of the whole Town Centre improved offer and marketing strategy – which should hopefully act as a catalyst to draw more people in from a wider catchment. Such initiatives should be self funding in the medium term</p>
28.	<p>Pg 105, 6.14, 10<sup>th</sup> Bullet “Capitalising on and expanding the visitor economy within Newhaven through the enhancement of the tourist offer within the town.”</p> <p>Investment?!</p>	<p>Funding has been addressed above.</p>
29.	<p>Pg 108, 6.18 Consider 6.18 that the port might be suited to a change of use against 6.33 which advocates the “strengthening and growth of the existing port activity”. The future plans for the port are not particularly clear.</p>	<p>Clearly we await the publication of the Port master plan, as mentioned in several places. However this paragraph highlights our view that there is definitely a future for key Port activities, but it is also recognised that there is a need to rationalise and consolidate its operation within the most accessible and cost efficient parts of its land holding. This will potentially mean a re-think of its current layout and facilities. This could identify significant areas which would be better</p>

**LDC General Comments (also drawn from Track Changes Document)**

		placed to accommodate other uses and which would also help the Port fund some of its proposed rationalisation.
30.	<p>Pg 110, 6.24, 5TH Bullet          “The whole area could be anchored at its eastern end by a new food retail operation.”</p> <p>This comes out of the blue and is at odds with the lack of retail analysis accepted in point 2.126 “it is not part of this study to assess retail capacity...”          Is there a conflict between retail regeneration plans on the East Bank and the town centre? Can the existing town sustain this level of retail provision/activity?</p>	<p>The Vision addresses matters from a regeneration and value generation perspective and reflects the demands which are in the market from operators at present. The town centre and East Bank retail issues are addressed in Section 6 of the report.</p>
31.	<p>Pg 113, 6.25          New Footbridge</p> <p>Would this prevent ships getting to North Quay? This could be controversial with users and not supported by NPP.</p> <p>What about the Port Access Road?</p>	<p>The report states that the footbridge will not prevent access to North Quay. Also do not understand the ref to the port access road</p>
32.	<p>Pg 113, 6.29          Agreed [public realm improvements within Eastbank and around the station], ideas for funding would be welcomed.</p>	<p>Funding has been addressed above – in particular public realm in this area would be embodied within any new retail, leisure and public interchange proposals.</p>
<b>Section 7:</b>		
33.	<p>Pg 131, Action Plan          How realistic is this given the new government, spending cuts and flat development market?</p>	<p>This comment post dates the report.</p>
34.	<p>Pg 136, 7.18, 3rd bullet i          These budgets are very limited.</p>	<p>Funding has been addressed above.</p>
35.	<p>Pg 136, 7.18, 3rd bullet iii          Budgets?</p>	<p>Funding has been addressed above.</p>
36.	<p>Pg 136, 7.21, first 3 bullets          Was this [more detailed design and working up of the ring road proposals] part of BBP remit?</p>	<p>The PDV commission sought to establish an overall framework through which key infrastructural challenges could in principle be addressed; the vision also provides the tools i.e. the transport model, through which to take identified solutions through to the next stage of detailed design and implementation.</p>
37.	<p>Pg 137, 7.24          first phase Development Framework for the East Bank and masterplanning work</p> <p>Funding for this?</p>	<p>Funding has been addressed above.</p>
38.	<p>Pg 137, 7.26, 2<sup>nd</sup> bullet          production of a Framework document [for Eastbank] which –</p> <p>Who will do this?</p>	<p>The Project Lead should drive this forward – organising the Partners, seeking funding contributions, drawing up the Brief, procuring an appropriate practice to formulate the Framework etc.</p>
39.	<p>Pg 138, 7.27          Progressing a mixed use, food retail led scheme (potentially using part of the Parker site), including a small</p>	<p>This Is merely the suggested Vision to work towards, and clearly further detailed feasibility and viability work would be</p>

<b>LDC General Comments (also drawn from Track Changes Document)</b>		
	<p>business workspace scheme More extensive and formal evaluation would have to be completed before a conclusion like this could be made.</p>	<p>required. However consultations to date suggest that Parker would not be tempted by any uses that were not value generating.</p>
40.	<p>Pg 139, 7.33, 8<sup>th</sup> bullet Subject to a satisfactory viability outcome, undertake a marketing exercise, in particular targeting specific developers and agents who are known to be interested in the types of development set out in the brief</p> <p>Landowners would choose a development partner, not public sector.</p>	<p>Given the nature of the regeneration task in Newhaven and the status of the sites / site ownerships – it would not be unusual for the public sector to take a lead in encouraging private owners to engage with the Vision or promoting the opportunities within a particular area. Indeed without such initiatives, progress would not be achieved. This would definitely be a task for the Project lead – who it is suggested in the report – should “work closely with the site owners and their agents”.</p>
41.	<p>Pg 140, 7.35, iii iii A contribution from the Port, in the light of future expansion or other uses developed within that site</p> <p>Please elaborate</p>	<p>NPP suggested during the course of the study - that if the Port were able to open up land to the south east of its landholding for new port and other uses (with value), then there may be a prospect of a contribution towards the costs of the new Eastern Link Rd.</p>
42.	<p>Pg 141, 7.39, 2nd bullet, 7th sub-bullet</p> <ul style="list-style-type: none"> <li>• Subject to a satisfactory viability outcome, undertake a marketing exercise, in particular targeting specific developers and agents who are known to be interested in the types of development set out in the brief</li> </ul> <p>Again, landowners will choose development partner (point 7.33).</p>	<p>See response above</p>
43.	<p>Pg 143, 7.42 final sentence towards top of pg “Working with the owner of Western Heights (Trafalgar Group) to develop a masterplan for comprehensive development and access in this area “</p> <p>This site must be considered first through the LDF core strategy and allocations DPD. This approach makes some assumptions about the LDF position which has not yet been set..</p>	<p>As already stated, the need to work through the LDF is realised and LDC’s planners will need to retain an independent stance, however this does not preclude Partners supporting the Trafalgar Group in working up proposals for this area.</p>
44.	<p>Pg 145, 7.50, 2nd bullet “Assemble a representative group of owners and longer term occupiers on the estate to consider some of the key strategic issues that have been identified in this study – “</p> <p>Would this be the role of LDC as landowner?</p>	<p>Our recommendation is that LDC could take the lead on this as it is the only business estate which enables them to promote the town for economic development purposes. However it may also be the Project lead, or preferably a private sector representative from one of the businesses on the estate</p>
<b>Section 8:</b>		
45.	<p>Pg 159,8.16, 1st Bullet “Revenue funding for the delivery team (as a minimum) “</p> <p>Source?</p>	<p>As stated above – this will not be easy and more innovative ways will need to be found to fund / drive forward initiatives. Partners would need to come together (including the private sector) in the light of changing government policy and work up innovative proposals to combine a whole range of funding sources to try and support</p>

**LDC General Comments (also drawn from Track Changes Document)**

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<b>General comments:</b>		
46.	<p>The report does not reflect the new Coalition Government's stated priorities in terms of large reductions in public spending, changes to the planning system, the localism agenda, Local Enterprise Partnerships and other initiatives.</p> <p>There is repeated reference to the last government's policies and spending programmes, many of which are likely to be either cut out, or have their funds drastically reduced. It is unfortunate that the report coincides with a very turbulent period in public policy, but it does need to reflect the new realities.</p>	<p>This comment post dates the report. Clearly the opportunities afforded by new government policies and incentives will need to be considered and captured / used to the benefit of the area where possible.</p> <p>This does not invalidate the main aspects of the Vision however – and activities / projects will need to be prioritised to respond to new policies, particularly in the short term. Planning, funding, programming and delivery mechanisms will all need to reflect the new (and emerging) landscape, going forward</p>
47.	<p>There is an air of unreality about the resources available to the local authorities (who will have to be the main drivers for many of the report's recommendations) to follow through and deliver projects, as recommended in section 7 of the report. The scope of work advocated there would need, I think, a full time team of at least 2-3 people to carry it through, with an annual staff cost approaching £100K and a sizeable working budget on top of that.</p>	<p>Local Authorities will clearly be involved, but with the new localism agendas and the focus on the private business sector taking a lead role in economic development – there is going to be a need for “delivery resources” to be considered on a much wider and more innovative basis.</p> <p>We do agree however that there will need to be a dedicated resource (one key “lead” as a minimum) and Partners will have to be innovative and work hard to secure this if the Vision is to be realised.</p>
48.	<p>This air of unreality also extends to the state of the private sector development market in the town, which seems to assume large scale speculative housing development, based on apartments, and generating the development value to pay, through s106 or other tariffs, large sums of money to provide large and expensive items of physical infrastructure, as well as all the routine things like access, schools, open space, affordable housing and the like to serve the development. We all know that Newhaven is one of the last places to feel the benefits of a buoyant development market and that development there is marginal economically, even at the best of times.</p>	<p>We don't believe that this view is supported by the recommendations in the current Report.</p> <p>Stakeholder consultation on the Vision has reinforced the view that there should be a good mix of housing types, sizes and tenures rather than being concentrated on apartments, and this is explained in Section 5.</p> <p>Overall, the Vision is ambitious but it is important to recognise that full realisation will take at least 20 / 25 years and as such some of the current challenges, relating to scarcity of public funding and recent, poor property market performance, should not be seen as long-term obstacles that cannot be overcome</p> <p>The current state of the development market should not be over exaggerated and in the longer term, value should be capable of being captured. Even today, value still does remain in certain uses.</p> <p>Also as stated in the report, a ‘step change’ is required in the way Newhaven is perceived and this is behind much of the Vision's thinking. This will go hand in hand with the ability to market new development opportunities and ultimately to generate values.</p>
49.	<p>The report is seriously lacking in setting the planning context for its proposals. In terms of the overall scale of</p>	<p>The importance of the statutory planning process is fully recognised and set out above.</p>

**LDC General Comments (also drawn from Track Changes Document)**

	<p>development in Lewes District , the role of Newhaven in comparison with other potential development options (SHLAA, ELR , Retail study etc), and the statutory process by which development is allocated. As a result, it jumps to conclusions on the future role of sites, for example food retail development at Eastside and residential development at Western Heights. As a local planning authority, we could not subscribe to premature conclusions drawn outside the statutory planning process.</p>	<p>This does not however prevent the main Partners in the area, developing a broadly based and challenging 20-25 year Vision for Newhaven – which will serve as a long term goal, a route map for concerted action, and provide a “touchstone” against which short and medium term decisions, projects and other initiatives can be judged. Therefore it is the consultants’ view that it will be necessary to look beyond current planning, infrastructure and other constraints to achieve something which is truly visionary and aspirational over the long term. Without this – decisions will always be ad hoc and based around “the lowest common denominator”</p>
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