

REGULATION 22(d) STATEMENT OF REPRESENTATIONS

Ordered by Representor

Volume 1 (including Table of Contents)

This Statement of Representations has been prepared to comply with Regulation 22(d) of the Town & Country Planning (Local Planning) Regulations 2012 (as amended) in the Submission of the Lewes District Local Plan Part 2: Site Allocations and Development Management Policies DPD.

All duly-made representation received on the Lewes District Local Plan Part 2: Site Allocations and Development Management Policies DPD – Pre-Submission version, which was published for representations in accordance with Regulation 19 of the Town & Country Planning (Local Planning) Regulations 2012 (as amended), are provided within the volumes of this statement.

Each representation has a form setting out the details of the representations. Where representations were submitted on-line or via the official representation form, there is no additional information provided.

Where representations were received via email or through a letter attachment, the original submission appended alongside the form showing the representations details.

The representations are ordered by the representor that submitted them.

TABLE OF CONTENTS

Volume 1

Representor ID	Representor	Requested to speak
REP/001	Lucy Bartley (National Grid)	1
REP/002	Sue Berry (Newick Parish Council)	5
REP/003	Alan Byrne (Historic England)	8
REP/004	Alan Byrne (Historic England)	16
REP/005	Elizabeth Cleaver (Highways England)	18
REP/006	Richard Cowser (Sussex Ornithological Society)	23
REP/007	Karen Crowhurst (Ringmer Parish Council)	38
REP/008	Cllr Johnny Denis (Lewes District Council)	44
REP/009	Chris Flavin (East Sussex County Council)	47
REP/010	Liz Gander (Wivelsfield Parish Council)	66
REP/011	Mary Greenwood (CPRE Sussex)	70
REP/012	Lucy Howard (South Downs National Park Authority)	97
REP/013	Laura Hutson (Sport England)	113
REP/014	Nicky Jackman (Rottingdean Parish Council)	136
REP/015	Catherine Jackson (Plumpton Parish Council)	139
REP/016	Geoff Johnson (Seaford Town Council)	154
REP/017	Susie Mullins (Newhaven Town Council)	157
REP/018	Cllr Sarah Osborne (Lewes District Council)	169
REP/019	Marguerite Oxley (Environment Agency)	172
REP/020	Lois Partridge (Mid Sussex District Council)	179
REP/021	Rebecca Pearson (Natural England)	195
REP/022	Jess Price (Sussex Wildlife Trust)	242
REP/023	Sandra Rogers (Brighton and Hove City Council)	298
REP/024	Julia Shelley (Barcombe Parish Council)	308
REP/025	Stephen Treharne (Chailey Parish Council)	315
REP/026	Charlotte Mayall (Southern Water)	323
REP/027	Ann Schulte	325
REP/028	Dawn Thompson	328
REP/029	Richard Hume	333
REP/030	Geoff King	336
REP/031	John Adams	341
REP/032	James Aiken	344
REP/033	Ian Airey	347

Representor ID	Representor	Requested to speak
REP/034	Michael Akehurst	350
REP/035	Shan Allan	352
REP/036	Mick Allen	354
REP/037	Gill Andersson	358
REP/038	Tosca Anstis (The Old Brickworks)	361
REP/039	AGE, CFJ, G & P Appleton	364
REP/040	Jason Aubrey	370
REP/041	Beverley Aubrey	373
REP/042	Mark Baker	376
REP/043	Peter and Kathy Baker	378
REP/044	Jenny Banks	381
REP/045	Keith Banks	384
REP/046	Philip Banks	387
REP/047	Rob Banks	390
REP/048	W Banks	400
REP/049	Esther Barnes	403
REP/050	Craig Barnes (Gladman Developments Ltd)	405
REP/051	Paul Barratt	475
REP/052	Daniel Barr-Richardson	477
REP/053	Milly Bassett	480
REP/054	Julie Bates	485
REP/055	Lynn Baxter	488
REP/056	Rebecca Bearn	491
REP/057	Polly Beaumont (1955)	493
REP/058	Nicholas Beaumont (1955)	497
REP/059	Sarah Beaumont	502
REP/060	Alice Beaumont	506
REP/061	Alison Beech	509
REP/062	Daisy Bees	512
REP/063	Mark Behrendt (HBF)	520
REP/064	Lauren Bergeron	522
REP/065	Timothy Berrett	525
REP/066	Joanna Best	527
REP/067	Joe Betts	530
REP/068	Susannah Bishop	532
REP/069	Jeremy Blakiston	535
REP/070	Gill Blanchard	538

Representor ID	Representor	Requested to speak
REP/071	Laura Boniface 541	
REP/072	Daniel Booth (Vista Partitions UK) 544	
REP/073	Clare Bount 552	
REP/074	Teresa Brinkley 555	
REP/075	Julia Brock 562	
REP/076	Rob Brown 564	
REP/077	Zoe Brown (The Old Brickworks) 567	✓
REP/078	David Brown 573	
REP/079	Mark Brunt 583	
REP/080	Andrew Bryant 586	✓
REP/081	Christine Burford 588	
REP/082	Paul Burford 591	
REP/083	Robert Burns 594	
REP/084	Jeremy Burton (Plumpton Green Studios) 597	
REP/085	Diana Burton 600	
REP/086	Julia Bush 603	
REP/087	Stephanie Butler 606	
REP/088	Ann Butterfield 608	
REP/089	Ian Cairns 611	
REP/090	DLA Delivery 614	✓
REP/091	Clare Carroll 623	
REP/092	John Carroll 626	
REP/093	Maria Caulfield MP 629	
REP/094	Edward Cazalet 631	
REP/095	Iris Chalice 636	
REP/096	Gaynor Chambers 639	✓
REP/097	Dennis Chanter 654	
REP/098	Chris Chapman 657	
REP/099	Jonathan Chappell 659	✓
REP/100	Juliet Charrington 661	
REP/101	Daniel Clark 663	
REP/102	Simon Clark 665	
REP/103	Richard Clayton 667	
REP/104	Sandy Clayton 670	
REP/105	Patrick Collins 673	✓
REP/106	Pamela Conlon 681	
REP/107	Michael Conlon QC 684	

Representor ID	Representor	Requested to speak
REP/108	Johanna Constable.....	687
REP/109	John Cooper	689
REP/110	Joanne Cooper	696
REP/111	John Cottenham.....	699
REP/112	Sally Cottenham.....	702
REP/113	Liz Cowlett	705
REP/114	Tim Cox	708
REP/115	Graham Crawford	710
REP/116	Melanie Crawshaw	716
REP/117	Emma Creighton	719
REP/118	Karen Crouch	727
REP/119	Katie Cunningham	730
REP/120	Michael Currivan	734
REP/121	Jamie and Alison Curtain (heat solutions sussex ltd)	737
REP/122	Alison and Jamie Curtain.....	739
REP/123	Oliver Darlington	742
REP/124	Cheryl Davies.....	745
REP/125	Lynne Davies	748
REP/126	Chris Dawson.....	750
REP/127	Mary de Pleave.....	754
REP/128	Daniele de Winter	757
REP/129	Roger Deakin	759
REP/130	Anthony Delaney	761
REP/131	Mike Deubert	763
REP/132	Shirley Deubert.....	766
REP/133	Marilyn Dewberry.....	769
REP/134	Kirsty Dickie.....	771
REP/135	Ken Dijksman (Dijksman Planning (UK) LLP)	774
REP/136	Johnny Dimond.....	780
REP/137	Hilary Diver.....	783
REP/138	Beverley Downard	786
REP/139	John Downard	790
REP/140	Bob Downing	794
REP/141	Josephine and Eddie Dubber.....	803
REP/142	Martyn Dunne.....	808
REP/143	Barbara Dye	811
REP/144	Robert Eade	814

Representor ID	Representor	Requested to speak
REP/145	Mick Easton	✓
REP/146	Michael Easton	
REP/147	Rowena Easton	
REP/148	John Edson	
REP/149	Terry Edwards	
REP/150	Hamish Elder (Harveys Brewery)	
REP/151	Alice Eldridge	
REP/152	Ian Ellis	
REP/153	Rod Evans	
REP/154	Margaret Evans	
REP/155	Jean fairbairn	
REP/156	Sue Fasquelle	
REP/157	Richard and Sioban Fawdrey	
REP/158	Sarah Feeley	
REP/159	Chloe Firman.....	
REP/160	Alistair Fleming (Plumpton Green Studios)	
REP/161	Anne Fletcher.....	✓
REP/162	Penelope Forbes	
REP/163	Meredith Forman	
REP/164	Emma Forrest	
REP/165	Imogene Foss	
REP/166	Ann and Colin Fox	
REP/167	Jane Franklin	
REP/168	Helen Frederick	
REP/169	Dan Freeland	
REP/170	Sally Freeman	
REP/171	Julian and Rosalie Frost.....	
REP/172	Rachel Fryer	
REP/173	Margaret Galletly	
REP/174	Rebecca Gallington	
REP/175	Jane Gane	
REP/176	Susan Garcia	
REP/177	Ruben Garcia-Dols.....	
REP/178	Frances and Phil Gazzard	
REP/179	Tessa George and Mike Boice	
REP/180	Martin Gilbert	
REP/181	Mark Gilbert.....	

Volume 2

Representor ID	Representor	Requested to speak
REP/182	Ann Giles..... 1000	✓
REP/183	Nick Keeley (Gleeson Strategic Land) 1002	✓
REP/184	Timothy Good (Mach4 Solutions Ltd) 1007	
REP/185	Emma Good 1009	
REP/186	James and Helen Grant 1012	
REP/187	Linda Green..... 1015	
REP/188	Nigel Greenhalgh (Portgreen Properties Ltd) 1018	✓
REP/189	Susannah Griffin 1031	
REP/190	David Griffiths..... 1033	
REP/191	D G Hadden 1036	
REP/192	Diane Hall (Newhaven Town Council) 1040	
REP/193	Thomas Hall 1043	
REP/194	Mr P Hamblin, Ms L Hamblin, Ms C Dean 1046	
REP/195	Laverne Hamill..... 1061	
REP/196	Jonathan Hammond 1063	✓
REP/197	Robert Handy 1065	
REP/198	Kim Harlow..... 1067	
REP/199	Gordon Harper..... 1070	
REP/200	Sally Harper..... 1075	
REP/201	David Harris..... 1078	
REP/202	Charles Hartridge 1086	
REP/203	Sheila Hartridge 1088	
REP/204	Lyn Hartwell..... 1090	
REP/205	Tracey Harwood..... 1092	
REP/206	Nick Harwood..... 1095	
REP/207	Frances Hasler 1100	
REP/208	Charlotte and David Hatchard 1103	
REP/209	Sarah Hawkes 1106	✓
REP/210	Shirley Heapy (Rentplus UK) 1108	✓
REP/211	Katie Heath 1115	
REP/212	Brian Henderson 1118	
REP/213	Linda Heyworth..... 1121	
REP/214	Georgina Hickey..... 1124	
REP/215	Pippa Hildick-Smith 1126	✓

Representor ID	Representor	Requested to speak
REP/216	Paul and Jane Hildyard.....	1154
REP/217	Martin Hill	1157
REP/218	Coral Hinbest	1159
REP/219	David Hoare	1163
REP/220	Keith Hoare (High Weald Lewes Havens CCG)	1165
REP/221	Kim Hogan	1170
REP/222	Steve Holder	1173
REP/223	Karen Holmes	1175
REP/224	Peter Home	1178
REP/225	Bellway Homes Ltd	1181
REP/226	Tim Honess	1187
REP/227	Tim Honess	1192
REP/228	Matthew Honnor.....	1194
REP/229	Neal Hovey.....	1197
REP/230	Julia Howe	1200
REP/231	Caroline Hoy	1208
REP/232	Sally Huband	1211
REP/233	Howard Hughes	1214
REP/234	Linda Hughes.....	1217
REP/235	Tom Hughes	1220
REP/236	Ruth Hume	1223
REP/237	Rona Hunnisett	1226
REP/238	David and Ann Hunt	1228
REP/239	Paul Hurst.....	1231
REP/240	Marion Hutt.....	1234
REP/241	David Ince.....	1236
REP/242	Allison Ingram	1239
REP/243	Lynne Ismail	1242
REP/244	Peter Isted	1244
REP/245	Romney and Sandie Jackson.....	1246
REP/246	Audrey Jarvis	1251
REP/247	Carl Jenkins.....	1254
REP/248	Simon Jones	1257
REP/249	Ron Jury.....	1259
REP/250	Lucy Kalogerides (Mid Sussex Area Bridleways Group (MSABG))	1262
REP/251	John Kay	1270
REP/252	Jane Keane	1272

Representor ID	Representor	Requested to speak
REP/253	Kathryn Kennedy	✓
REP/254	Mr and Mrs Kenyon	
REP/255	Peta King (Gorgeous Things Ltd & Kings Framers)	
REP/256	Geoffrey King	
REP/257	Todd Kingsley-Jones	
REP/258	Andrew Kniveton (BT Openreach)	
REP/259	Rob Lane (Koop Furniture)	
REP/260	Nick Lawden	
REP/261	Lynn Lawson.....	
REP/262	Robert Lawson	
REP/263	Bob Leeds.....	
REP/264	Sophie Levey	
REP/265	Teresa Lewington	
REP/266	Simon and Hew Lincoln (G. Lincoln & Sons)	
REP/267	Stuart Little	
REP/268	Wendy Little.....	
REP/269	Jeremy Long	
REP/270	Steve Long	
REP/271	Donna Lonsdale-O'Brien	
REP/272	John Lorkin.....	
REP/273	Sheila Lothian	✓
REP/274	Nigel Lothian	
REP/275	Sheila Lothian	
REP/276	Emma Loughlin.....	
REP/277	Gary Loughlin.....	
REP/278	Graham Lower.....	
REP/279	Penelope Lower	
REP/280	Jane Lucas.....	
REP/281	Johannes Makonnen.....	
REP/282	Guy Malyon	
REP/283	Sarah Mann (Friends Families and Travellers)	
REP/284	Diane Marks	
REP/285	Jason Martin (Buckle Seaford B&B)	
REP/286	Rachel Martin	
REP/287	Kevin Massingale	
REP/288	Nichola Massingale	
REP/289	John Masters	

Representor ID	Representor	Requested to speak
REP/290	Dennis Matthews 1576	✓
REP/291	EA Strategic Land LLP 1581	
REP/292	Katharine McKay 1646	
REP/293	Jeremy Midmer 1648	
REP/294	Denise Miller 1652	
REP/295	Alison Mills 1656	
REP/296	Josh Mitchell 1658	
REP/297	Lissa Mitchell 1664	
REP/298	Sally Mockford 1667	
REP/299	Doris Moorhead 1670	
REP/300	Dinah Morgan..... 1673	
REP/301	Peter Morgan 1676	
REP/302	Alexandre Morin 1680	
REP/303	Alison Morris 1683	
REP/304	Keith Morris 1685	
REP/305	Maryvonne Morris 1688	
REP/306	Stephen Morris 1691	
REP/307	Andrew Munton (Reside Developments Ltd) 1694	
REP/308	Angela and Sean Murphy 1699	
REP/309	Irene Mynott 1729	
REP/310	Simon Neale (University of Sussex) 1732	
REP/311	Kirstie Negus 1734	
REP/312	Trevor Negus 1737	
REP/313	Kate Newman..... 1741	
REP/314	Declan Newman (Source Stream Ltd.) 1744	
REP/315	Lucy Newman 1746	
REP/317	Catherine Noyce 1751	
REP/318	Roger Nurse 1753	
REP/319	Michael O'Brien..... 1757	
REP/320	Robin O'Brien..... 1769	
REP/321	Teresa O'Brien 1774	✓
REP/322	Emily O'Brien (Community Action Newhaven) 1777	
REP/323	Sheila Ogden 1792	
REP/324	Sheila Ogden 1795	
REP/325	Anna Owczarski 1798	
REP/326	Tracey Page 1806	
REP/327	Nicole Palmer (The Plough Inn) 1809	

Representor ID	Representor	Requested to speak
REP/328	Helen Palmer 1825	
REP/329	Anthony Palmer 1827	
REP/330	Victoria Palmer 1829	
REP/331	Walter Panis 1832	
REP/332	S Parmenter 1835	
REP/333	Martin Parry 1838	✓
REP/334	Linda Payne 1860	✓
REP/335	Muriele & Tom Pearce 1862	
REP/336	Timothy Pearce & Stephanie Miles 1867	
REP/337	Anthony and Linda Pedley 1880	
REP/338	June Pegna 1883	
REP/339	Cindy Penny 1885	
REP/340	Tony Perris 1888	
REP/341	Martin Perry (The Community Stadium Limited) 1890	✓
REP/342	Michael Petty 1893	
REP/343	Susan Petty 1896	
REP/344	Corinne Philibert-Lockyer 1899	
REP/345	Anna and David Phillips 1901	
REP/346	Deborah Phillips 1905	
REP/347	Ron Phillips 1908	
REP/348	Nick Phillips 1913	✓
REP/349	Peter Pick (aural witness) 1915	
REP/350	S Pinnock 1917	
REP/351	Christine and Chris Platford 1920	
REP/352	David Pleasence 1923	
REP/353	Amanda Plummer 1925	
REP/354	Georgina Poacher 1927	
REP/355	Melanie Potter 1930	
REP/356	Pat and Steven Poynter 1939	
REP/357	Peter and Gill Pratt 1942	
REP/358	Judy Preece 1945	
REP/359	John Prout 1948	
REP/360	Jean M Rainger 1950	
REP/361	Tony Ramsay 1953	
REP/362	Sarah Rayfield (British Horse Society) 1956	
REP/363	David Reavely 1986	
REP/364	Donna Reid 1989	

Representor ID	Representor	Requested to speak
REP/365	Stuart Reid 1992	
REP/366	Marion Reynolds 1994	
REP/367	Rachel Richardson (Thakeham Homes Ltd) 1998	

Volume 3

Representor ID	Representor	Requested to speak
REP/368	Stuart Ridley 2015	
REP/369	Carol Roberts 2018	
REP/370	R Roberts 2021	
REP/371	Matthew Roberts (Croudace Homes) 2024	
REP/372	Sarah Roberts 2038	
REP/373	Alan Robinson (The St Helena Farm Partnership) 2044	
REP/374	Mark and Carolyn Robinson 2048	
REP/375	Fairfax Acquisitions Limited 2051	
REP/376	Ann Roe 2058	
REP/377	Alan Rogers 2062	
REP/378	Catherine Rogers 2066	
REP/379	Christine Rogers 2069	
REP/380	Timothy Rogers 2072	
REP/381	Ruth Rose 2075	
REP/382	Crispin Rose-Innes 2080	✓
REP/383	Megan Rowse 2082	
REP/384	Nick Rse 2084	
REP/385	Tessa Russell 2086	
REP/386	Sharon Sansom 2089	
REP/387	Lee Saunders 2092	
REP/388	D Scarlett 2094	
REP/389	Gordon Scourfield 2097	
REP/390	Peter Sharp (Lewes District Council) 2103	
REP/391	John Sheeran 2105	
REP/392	Louise Sheeran 2108	
REP/393	Nicola Shefras 2111	
REP/394	Orry Sheridan (Heritage Testing) 2116	
REP/395	Sarmed Sheridan (Vista Partitions Ltd) 2120	
REP/396	Eli Sheridan 2125	

Representor ID	Representor	Requested to speak
REP/397	Helen Short	2128
REP/398	Rosalie Sinclair-Smith	2131
REP/399	Nicola Singleton	2134
REP/400	Martin Sinnock.....	2136
REP/401	Jim Skinner (Chair of the Friends of Tide Mills)	2139
REP/402	Ruth Skinner	2141
REP/403	Chris Smith (Open Spaces Society)	2144
REP/404	Smithson Smithson	2147
REP/405	Susan Smyth	2149
REP/406	Barnaby Smythe.....	2152
REP/407	N Southin (Eagle Boat Windows)	2156
REP/408	Kelvin Speirs.....	2159
REP/409	Robin St Clair Jones	2161
REP/410	Oliver St John.....	2168
REP/411	Caroline Standen (Letchmore Broiler Company Limited)	2171
REP/412	John Staplehurst	2179
REP/413	Joy Stephenson	2182
REP/414	Paul Stevens.....	2184
REP/415	Leila Stevens.....	2186
REP/416	Lisa Still	2188
REP/417	Mike Stoakes	2190
REP/418	Anita Stokes	2193
REP/419	David Stokes.....	2197
REP/420	David J Stone.....	2200
REP/421	D Stuart.....	2203
REP/422	Lynne Sturland	2206
REP/423	Claire Sumners (Plastic Free Seaford)	2210
REP/424	Sarah Sutcliffe (Thakeham Homes)	2213
REP/425	Deborah Swaine.....	2239
REP/426	George Swaine	2242
REP/427	Ellen Sykes (Theobalds Road Residents Association)	2246
REP/428	V J Taplin	2248
REP/429	B Taplin.....	2252
REP/430	Sue Taplin.....	2255
REP/431	Eve Taylor.....	2257
REP/432	Natalie Taylor.....	2259
REP/433	Kate Taylor.....	2262

Representor ID	Representor	Requested to speak
REP/434	Rosemary Tether.....	2265
REP/435	Raina Thompson-Brody	2268
REP/436	Emily Ticehurst	2273
REP/437	John Tidey	2275
REP/438	Drew Timmins	2279
REP/439	Tony Titchener.....	2284
REP/440	Alun Tlusty-Sheen	2287
REP/441	Isia Tlusty-Sheen.....	2289
REP/442	Catherine Tonge	2292
REP/443	David Treadwell	2294
REP/444	Lorraine Trenchard.....	2296
REP/445	Edward Tuckley	2299
REP/446	Carol Turley.....	2302
REP/447	Chris Turner	2306
REP/448	Martin Turner	2310
REP/449	April Turville.....	2315
REP/450	Ingrid Venus	2318
REP/451	Laurence Venus	2321
REP/452	D and L Vincent	2324
REP/453	Elizabeth Walker	2327
REP/454	Robin Walker (Theobalds Road Residents' Association)	2329
REP/455	Maurice Waller.....	2371
REP/456	Jacqui and Stuart Wallis.....	2373
REP/457	T & C Walton	2380
REP/458	Katherine Ward.....	2383
REP/459	Simon Ward.....	2386
REP/460	C Warren	2388
REP/461	Richard Watson	2391
REP/462	Michael and Linda Watson	2394
REP/463	Bryony Weaver	2397
REP/464	Sara Webb Ekstrand.....	2400
REP/465	Paul Welch.....	2402
REP/466	Dan Wells	2405
REP/467	Ian Weston.....	2408
REP/468	Russell Wheatland (R W Motor Engineering)	2411
REP/469	Graham Whittaker.....	2415
REP/470	Jo Wightman.....	2417

Representor ID	Representor	Requested to speak
REP/471	John Wigzell 2419	✓
REP/472	Jane Wilde 2421	
REP/473	Claire Williams..... 2423	
REP/474	Dominic Williams 2425	
REP/475	Tia Williams 2427	
REP/476	Faye Willis 2429	
REP/477	Thomas Wilson (Koop Ltd) 2432	
REP/478	Graham Wimbhurst..... 2434	
REP/479	Helen Winters..... 2440	
REP/480	Gaye Wolfson..... 2443	
REP/481	Michael Wood 2446	
REP/482	Wendy Wood 2449	
REP/483	Kay Woolner 2452	
REP/484	Irene Woolway..... 2456	
REP/485	William Wyndham 2458	
REP/486	Newhaven Port and Properties Ltd 2462	✓
REP/487	Dominic Lawson Bespoke Planning 2465	✓
REP/488	European Property Ventures 2475	
REP/489	Epic Real Estates Ltd..... 2519	
REP/490	Harvey & Son (Lewes) 2971	
REP/491	Taylor Wimpey South Thames Ltd 2981	
REP/492	Taylor Wimpey UK Ltd..... 2990	
REP/493	Wates Development Ltd..... 3004	
REP/494	Plumpton Action Group..... 3047	
REP/495	Michael Young..... 3061	
REP/497	Tony Turk 3063	
REP/498	Janet Clifford (Newick Village Society) 3065	
REP/499	G D Ketley 3067	
REP/500	Heather A Catchpole..... 3072	
REP/501	Martin and Gillian Blanhard 3076	
REP/502	G Galletly..... 3080	
REP/503	Paul and Emma Taplin 3084	
REP/504	P A Keyley 3087	

Representation ID: REP/001/GENRepresentor Details:

Representor ID:	REP/001
Name:	Lucy Bartley
Organisation:	National Grid
Consultation Body:	Specific
Stakeholder Type:	Infrastructure/service provider

Agent Details:

Name:	Hannah Bevins
Organisation:	Wood E&I Solutions UK Ltd

Contact Details:

Email Address:	lucy.bartley@woodplc.com
Address:	Warwick Technology Park Gallows Hill Warwick CV34 6DA

Representation:

Policy/Section:	General
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	Yes
Representation: National Grid has appointed Wood to review and respond to development plan consultations on its behalf. We have reviewed the above consultation document and can confirm that National Grid has no comments to make in response to this consultation.	

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public?
--

Why do you feel it is necessary to participate at the Examination in Public?

Lewes District Council Offices
Southover House
Southover Road
Lewes
BN7 1AB

Hannah Lorna Bevins
Consultant Town Planner

Tel: 01926 439127
n.grid@amecfw.com

Sent by email to:
ldf@lewes.gov.uk

22 October 2018

Dear Sir / Madam

**Lewes District Council: Local Plan Part 2 Consultation
SUBMISSION ON BEHALF OF NATIONAL GRID**

National Grid has appointed Wood to review and respond to development plan consultations on its behalf.

We have reviewed the above consultation document and can confirm that National Grid has no comments to make in response to this consultation.

Further Advice

National Grid is happy to provide advice and guidance to the Council concerning our networks. If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us.

To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which may affect our assets. Please remember to consult National Grid on any Development Plan Document (DPD) or site-specific proposals that could affect our infrastructure. We would be grateful if you could add our details shown below to your consultation database:

Hannah Lorna Bevins
Consultant Town Planner

n.grid@amecfw.com

Wood E&I Solutions UK Ltd
Gables House
Kenilworth Road
Leamington Spa
CV32 6JX

Spencer Jefferies
Development Liaison Officer, National Grid

box.landandacquisitions@nationalgrid.com

National Grid House
Warwick Technology Park
Gallows Hill
Warwick
CV34 6DA

Yours faithfully

[via email]

Hannah Lorna Bevins
Consultant Town Planner

cc. Spencer Jefferies, National Grid

Representation ID: REP/002/HSA


Representor Details:

Representor ID:	REP/002
Name:	Sue Berry
Organisation:	Newick Parish Council
Consultation Body:	Specific
Stakeholder Type:	Parish Council

Agent Details:

Name:
Organisation:

Contact Details:

Email Address:	newickpc@newick.net
Address:	

Representation:

Policy/Section:	Paragraph 2.117
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	
Representation: I have been asked by Newick Parish Council to forward the following comment in connection with the consultation on the Lewes District Local Plan Part 2:- We have no further comments to make, but should point out a typographical error in paragraph 2.117. The reference should be to future review of Plumpton's Neighbourhood Plan, not Newick's.	

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public?
--

Why do you feel it is necessary to participate at the Examination in Public?

From: Newick PC Clerk <newickpc@newick.net>
Sent: 31 October 2018 16:35
To: ldf
Subject: Comments from Newick Parish Council on Draft Local Plan Part 2

Categories: LPP2 comment to code - stakeholder details have been added

I have been asked by Newick Parish Council to forward the following comment in connection with the consultation on the Lewes District Local Plan Part 2:-

'We have no further comments to make, but should point out a typographical error in paragraph 2.117. The reference should be to future review of Plumpton's Neighbourhood Plan, not Newick's.'

Regards

Sue Berry

Clerk to Newick Parish Council

01825 722135

This originates from the Parish Clerk and the email and any files transmitted with it may contain confidential information. It is intended solely for the individual or entity to whom it is addressed. If you have received this email in error please notify the sender immediately and delete the email from your inbox.

Data Protection - Any personal information such as name, postal address, telephone number and email address given to Newick Parish Council will only be used to respond to your communication and will not be disclosed to any third party without your prior permission or unless we are required to do so by law.

Representation ID: REP/003/BA02Representor Details:

Representor ID:	REP/003
Name:	Alan Byrne
Organisation:	Historic England
Consultation Body:	Specific
Stakeholder Type:	National group or organisation

Agent Details:

Name:
Organisation:

Contact Details:

Email Address:	Alan.Byrne@HistoricEngland.org.uk
Address:	Historic England South East Eastgate Court, 195-205 High Street Guildford Surrey GU1 3EH

Representation:

Policy/Section:	BA02 - Land adjacent to the High Street
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	
Representation: Suggested minor change to bullet 3: Development respects the character, appearance and setting of the adjacent Barcombe Cross Conservation Area, including the setting the adjacent listed buildings (see attached for detail)	

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public?
--

Why do you feel it is necessary to participate at the Examination in Public?

Representation ID: REP/003/E1Representor Details:

Representor ID:	REP/003
Name:	Alan Byrne
Organisation:	Historic England
Consultation Body:	Specific
Stakeholder Type:	National group or organisation

Agent Details:

Name:
Organisation:

Contact Details:

Email Address:	Alan.Byrne@HistoricEngland.org.uk
Address:	Historic England South East Eastgate Court, 195-205 High Street Guildford Surrey GU1 3EH

Representation:

Policy/Section:	E1 - Land at East Quay, Newhaven Port
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	
Representation:	
Minor addition suggested to Policy E1: Land at East Quay, Newhaven Port in view of the potential to impact on the significance of Newhaven Fort by intrusion into views to and from its setting:	
Land at East Quay, as defined on the Policies Map, is allocated for employment uses associated with Newhaven Port. Employment development which is not associated with	

port-related activity will be permitted only where it can be demonstrated that such development would not undermine the operational use of the Port. All development proposals should ensure that the visual impact on the landscape and scenic beauty of the South Downs National Park and the setting of Newhaven Fort Scheduled Monument is minimised.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public?

Why do you feel it is necessary to participate at the Examination in Public?

Representation ID: REP/003/DM33
--

Representor Details:

Representor ID:	REP/003
Name:	Alan Byrne
Organisation:	Historic England
Consultation Body:	Specific
Stakeholder Type:	National group or organisation

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	Alan.Byrne@HistoricEngland.org.uk
Address:	Historic England South East Eastgate Court, 195-205 High Street Guildford Surrey GU1 3EH

Representation:

Policy/Section:	DM33: Heritage Assets
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	
Representation: We support this policy but suggest a minor change to the wording to make the intention clearer: Development affecting a heritage asset will only be permitted where the proposal would make a positive contribution to conserving or enhancing the significance of the heritage asset, taking account of its character, appearance and setting. All development	

proposals that affect a heritage asset or its setting will be required to submit a heritage impact assessment proportionate to the significance of the asset.... and,

Where the loss of the whole or part of a heritage asset can be justified by being outweighed by substantial public benefit, the Council will seek, by a legal agreement and/or condition, to ensure that the new development will proceed within a reasonable timescale after the loss has occurred.

Historic England would strongly advise that the Council's own conservation staff are closely involved throughout the preparation of the Local Plan, as they are often best placed to advise on local historic environment issues and priorities, sources of data and, consideration of the options relating to the historic environment, in particular the requirement to set out a positive strategy for the conservation and enjoyment of the historic environment (NPPF para 185).

Please see attached - for full response.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public?

Why do you feel it is necessary to participate at the Examination in Public?

Planning Policy Team
Lewes District Council
Southover House
Southover Road
Lewes BN7 1AB

By email only to ldf@lewes.gov.uk

Our ref: PL00243322
Your ref:

Telephone 01483 252020
Fax 01483 252001
Email e-seast@historicengland.org.uk
Date 2 November 2018

Dear Sir / Madam

Lewes District Local Plan Part 2: Site Allocations and Development Management Policies DPD - Pre-Submission version

Thank you for your email of 24 September 2018 inviting comments on the above document.

As the Government's adviser on the historic environment Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the local planning process, and welcomes the opportunity to comment upon this key planning document.

Historic England's comments are set out detail below.

Housing Site Allocations

Policy NH02 - Land at The Marina

The proximity of the site to the Newhaven Fort Scheduled Monument is noted in the supporting text (paragraph 2.30) but is not referred to in the policy wording itself. In view of the potential to impact on the setting of the Fort we suggest an additional bullet point is added to the policy:

a heritage impact assessment is undertaken with particular reference to the setting of the Newhaven Fort scheduled monument, and appropriate design measures are included in the development to avoid or limit harm to the significance of the heritage asset.

Policy BA02 - Land adjacent to the High Street

Suggested minor change to bullet 3:

Development respects the character, appearance and setting of the adjacent Barcombe Cross Conservation Area, including *the setting the adjacent listed buildings* of historic interest;

3 EMPLOYMENT SITE ALLOCATIONS

Minor addition suggested to **Policy E1: Land at East Quay, Newhaven Port** in view of the potential to impact on the significance of Newhaven Fort by intrusion into views to and from its setting:

Land at East Quay, as defined on the Policies Map, is allocated for employment uses associated with Newhaven Port. Employment development which is not associated with port-related activity will be permitted only where it can be demonstrated that such development would not undermine the operational use of the Port. All development proposals should ensure that the visual impact on the landscape and scenic beauty of the South Downs National Park and the setting of Newhaven Fort Scheduled Monument is minimised.

4 DEVELOPMENT MANAGEMENT POLICIES

PROTECTING AND ENHANCING THE DISTINCTIVE QUALITY OF THE ENVIRONMENT

Historic England supports **Policy DM25: Design** and **Policy DM27: Landscape Design**.

Policy DM33: Heritage Assets

We support this policy but suggest a minor change to the wording to make the intention clearer:

Development affecting a heritage asset will only be permitted where the proposal would make a positive contribution to conserving or enhancing the significance of the heritage asset, taking account of its character, appearance and setting.

All development proposals that affect a heritage asset or its setting will be required to submit a heritage impact assessment ~~supporting information~~ proportionate to the significance of the asset...

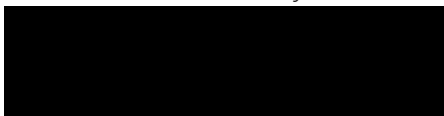
and,

Where the loss of the whole or part of a heritage asset can be justified by being outweighed by substantial public benefit, the Council will seek, by a legal agreement and/or condition, to ensure that the new development will proceed within a reasonable timescale after the loss has occurred.

Historic England would strongly advise that the Council's own conservation staff are closely involved throughout the preparation of the Local Plan, as they are often best placed to advise on local historic environment issues and priorities, sources of data and, consideration of the options relating to the historic environment, in particular the requirement to set out a positive strategy for the conservation and enjoyment of the historic environment (NPPF para 185).

These comments are based on the information provided by you at this time and for the avoidance of doubt does not reflect our obligation to advise you on, and potentially object to, any specific development proposal which may subsequently arise from this or later versions of the plan and which may, in our view, have adverse effects on the historic environment.

Yours sincerely



Alan Byrne

Historic Environment Planning Adviser



Historic England, Eastgate Court, 195-205 High Street, Guildford GU1 3EH

Telephone 01483 25 2020 HistoricEngland.org.uk

Please note that Historic England operates an access to information policy.

Correspondence or information which you send us may therefore become publicly available.



Representation ID: REP/004/NH02
--

Representor Details:

Representor ID:	REP/004
Name:	Alan Byrne
Organisation:	Historic England
Consultation Body:	Specific
Stakeholder Type:	National group or organisation

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	e-seast@historicEngland.org.uk
Address:	Eastgate Court 195-205 High Street GUILDFORD GU1 3EH

Representation:

Policy/Section:	NH02 - Land at The Marina
<p><i>Do you consider the document to be:</i></p> <p>Legally Compliant:</p> <p>Sound:</p>	
<p>Representation:</p> <p>The proximity of the site to the Newhaven Fort Scheduled Monument is noted in the supporting text (paragraph 2.30) but is not referred to in the policy wording itself. In view of the potential to impact on the setting of the Fort we suggest an additional bullet point is added to the policy: a heritage impact assessment is undertaken with particular reference to the setting of the Newhaven Fort scheduled monument, and appropriate design measures are included in the development to avoid or limit harm to the</p>	

significance of the heritage asset.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public?

Why do you feel it is necessary to participate at the Examination in Public?

Representation ID: REP/005/DM31
--

Representor Details:

Representor ID:	REP/005
Name:	Elizabeth Cleaver
Organisation:	Highways England
Consultation Body:	Specific
Stakeholder Type:	Infrastructure/service provider

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	PlanningSE@highwaysengland.co.uk
Address:	Federated House London Road Dorking RH4 1SZ

Representation:

Policy/Section:	DM31: Advertisements
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	
Representation:	<p>Thank you for inviting Highways England to comment on the Lewes District Local Plan Part 2: Site Allocations and Development Management Policies DPD - Pre-Submission version.</p> <p>Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network</p>

(SRN). The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity. We will therefore be concerned with proposals that have the potential to impact the safe and efficient operation of the SRN.

Having reviewed the published documentation, with regard to Policy DM31: Advertisements, Highways England would be concerned about any advertisements that would have an impact on the Strategic Road Network. Otherwise, Highways England does not have any comments on the Lewes District Local Plan Part 2: Site Allocations and Development Management Policies DPD - Pre-Submission version with regard to the safe and efficient operation of the SRN.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public?

Why do you feel it is necessary to participate at the Examination in Public?

Thea Davis

From: Franklin, Richard <Richard.Franklin@highwaysengland.co.uk>
Sent: 05 November 2018 15:42
To: ldf
Cc: Planning SE; Cleaver, Elizabeth; Bowie, David
Subject: RE: #5911 [LPP2_R19] Lewes District Local Plan Part 2: Site Allocations and Development Management Policies DPD - Pre-Submission version - Invitation to Join

Categories: LPP2 comment to code - stakeholder details have been added

Dear Planning Policy Team,

Lewes District Local Plan Part 2: Site Allocations and Development Management Policies DPD - Pre-Submission version

Thank you for inviting Highways England to comment on the Lewes District Local Plan Part 2: Site Allocations and Development Management Policies DPD - Pre-Submission version.

Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity. We will therefore be concerned with proposals that have the potential to impact the safe and efficient operation of the SRN.

Having reviewed the published documentation, with regard to Policy DM31: Advertisements, Highways England would be concerned about any advertisements that would have an impact on the Strategic Road Network. Otherwise, Highways England does not have any comments on the Lewes District Local Plan Part 2: Site Allocations and Development Management Policies DPD - Pre-Submission version with regard to the safe and efficient operation of the SRN.

Please continue to consult Highways England as the plan progresses via our inbox:
planningse@highwaysengland.co.uk.

Regards,

Sent on behalf of Elizabeth Cleaver, Assistant Spatial Planning Manager

Richard Franklin

Highways England Company Limited | Registered Office: Bridge House, 1 Walnut Tree Close, Guildford GU1 4LZ | Registered in England and Wales No. 9346363
Web: www.highwaysengland.co.uk

From: Eastbourne Borough Council - Online Consultations (do not reply) [mailto:do-not-reply@planningpolicyconsult.lewes-eastbourne.gov.uk]

Sent: 24 September 2018 08:14

To: Planning SE

Subject: #5911 [LPP2_R19] Lewes District Local Plan Part 2: Site Allocations and Development Management Policies DPD - Pre-Submission version - Invitation to Join

Lewes and Eastbourne Planning Policy Consultations

Lewes District Local Plan Part 2: Site Allocations and Development Management Policies DPD - Pre-Submission version

You've been invited to participate in the **Lewes District Local Plan Part 2: Site Allocations and Development Management Policies DPD - Pre-Submission version** consultation by the consultation manager, Lewes and Eastbourne Councils (Mr Matthew Hitchen).

This consultation is open from 24 Sep 2018 at 09:00 to 5 Nov 2018 at 17:00.

Consultation on Lewes District Local Plan Part 2 Pre-Submission Document

Lewes District Council is preparing the 'Lewes District Local Plan Part 2' which, when adopted, will allocate specific sites for development and provide detailed development management policies. This document is needed to support and help deliver the strategic objectives and spatial strategy of the Lewes District Local Plan Part 1: Joint Core Strategy, adopted in 2016.

As part of the process of preparing the Local Plan Part 2, we have published a final draft – the Pre-Submission Document, for consultation. This follows two earlier Local Plan Part 2 consultations; 'Issues and Options' consultation undertaken in 2013/14 and 'Draft Plan' consultation undertaken in 2017/18.

We are therefore seeking representations during this consultation period. Representations on the Draft Local Plan Part 2 are invited over a 6 week period from 24 September 2018 to midnight on 5 November 2018.

How to respond:

The easiest way to comment on the Pre-Submission Plan is via our website, where you can comment on each aspect of the plan separately, which will then be submitted directly to us for consideration:

www.planningpolicyconsult.lewes-eastbourne.gov.uk

In order that your representation can be accurately recorded, please let us know which section or policy in the document that you are commenting on. All representations will be published on the council's website and anonymous submissions cannot be accepted.

Other ways to respond to the consultation:

- Emailing comments to ldf@lewes.gov.uk
- Writing to the District Council at the following address:

Planning Policy Team
Lewes District Council
Southover House
Southover Road
Lewes
BN7 1AB

Paper copies are available to read at the District Council Offices at Southover House, Southover Road, Lewes, BN7 1AB, and at all local libraries including Burgess Hill, Haywards Heath, Saltdean and Uckfield.

Please do not hesitate to contact the Planning Policy Team by email at ldf@lewes.gov.uk if you have any queries about this consultation.

Participate in this consultation

To change your email alerts, please visit [the website](#)

This email may contain information which is confidential and is intended only for use of the recipient/s named above. If you are not an intended recipient, you are hereby notified that any copying, distribution, disclosure, reliance upon or other use of the contents of this email is strictly prohibited. If you have received this email in error, please notify the sender and destroy it.

Highways England Company Limited | General enquiries: 0300 123 5000 | National Traffic Operations Centre, 3 Ridgeway, Quinton Business Park, Birmingham B32 1AF |
<https://www.gov.uk/government/organisations/highways-england> | info@highwaysengland.co.uk

Registered in England and Wales no 9346363 | Registered Office: Bridge House, 1 Walnut Tree Close, Guildford, Surrey GU1 4LZ

Consider the environment. Please don't print this e-mail unless you really need to.

Representation ID: REP/006/CH02Representor Details:

Representor ID:	REP/006
Name:	Richard Cowser
Organisation:	Sussex Ornithological Society
Consultation Body:	General
Stakeholder Type:	Local group or organisation

Agent Details:

Name:
Organisation:

Contact Details:

Email Address:	[REDACTED]
Address:	[REDACTED]

Representation:

Policy/Section:	CH02 - Layden Hall, East Grinstead Road
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	
Representation: We object to the policy to develop six houses on this 0.5ha site across the road from the Chailey Common SSSI, as this SSSI is a significant area for birds, including Nightjar, Woodcock, Cuckoo and Woodlark. Its development will require that half the site has to be cleared of trees and we cannot see that the benefit of this development can in any way be justified right next door to the SSSI. Its omission will not prevent Lewes achieving its house-building target and it achieves nothing but a net loss of biodiversity	

adjacent to an SSSI which is already under pressure from dog walkers.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public?

Why do you feel it is necessary to participate at the Examination in Public?

Representation ID: REP/006/E1

Representor Details:

Representor ID:	REP/006
Name:	Richard Cowser
Organisation:	Sussex Ornithological Society
Consultation Body:	General
Stakeholder Type:	Local group or organisation

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	E1 - Land at East Quay, Newhaven Port
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	
Representation:	<p>SOS objects to the allocation of the substantial portion of this site that is east and south of the PAR roundabout to future development.</p> <p>We object for the following reasons:</p> <p>1) It will destroy a substantial portion of the remaining LWS which remains a rich habitat for wildlife, including birds. This area is part of the SOS site referred to as 'Tide Mills'. Tide Mills is one of the premier birding sites in Sussex, and our database contains</p>

16,165 records of 201 species (plus one subspecies) of bird recorded at Newhaven Tide Mills since 2007. This means that nearly half of the 403 species on the Sussex Bird List have been recorded there. Although some of the pelagic species, such as Puffin and the Skuas, will have been observed at sea from the beach at Tide Mills, most have been observed on land or using Mill Creek. This is shown by the illustrative records of each of the 201 species in the separate attachment with this letter. Of these 201 species no less than 42 of them are afforded protected status under Schedule 1 of the 1981 Wildlife and Countryside Act.

2) Policy E1 is a replacement of policy NH20 dating from 2003, which was, we understand, designed to create sites for employment opportunities in Newhaven as part of an overall policy to regenerate Newhaven. However, paragraph 3.3 specifically states that there is no longer a requirement to allocate additional sites for employment purposes in the Local Plan Part 2. So from an employment point of view the Local Plan Part 2 is saying there is no need for Policy E1.

3) Paragraph 3.13 says that It is anticipated that (the East Quay developments approved in 2016) will allow the port to remain competitive by offering modern facilities to future investors and customers and allowing the port to accommodate larger vessels should the opportunity arise. We note that all reference to increased ferry activity at the port, which was a feature of the 2003 Local Plan, has now been dropped. It therefore appears that Policy E1 is not needed to either make the port competitive or to support an increased level of ferry activity.

4) By failing to safeguard a designated Local Wildlife Site, this policy fails to deliver on the specific policies which relate to biodiversity and conservation laid out in Part 1 of the Core Strategy. Moreover, as shown in 2) and 3) above, no reasons are being put forward as to why this destruction of a significant part of the remaining LWS is being proposed.

5) To summarise: The Local Plan, Part 2, clarifies that the land to the south and east of the PAR roundabout is not needed to provide either employment opportunities or expansions of the port to make the latter competitive. All policy E1 appears to be achieving is the further destruction of a Local Wildlife Site. For these reasons SOS objects to this policy, and to the majority of this land being set aside for development as it meets no defined need, and it will destroy part of an important Local Wildlife Site which is a significant area for birds.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public?

Why do you feel it is necessary to participate at the Examination in Public?

Representation ID: REP/006/DM24Representor Details:

Representor ID:	REP/006
Name:	Richard Cowser
Organisation:	Sussex Ornithological Society
Consultation Body:	General
Stakeholder Type:	Local group or organisation

Agent Details:

Name:
Organisation:

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	DM24: Protection of Biodiversity and Geodiversity
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	
Representation: We believe that the first paragraph of this policy needs to be substantially strengthened, as it applies to the most internationally important sites – RAMSAR, SAC and SPA sites – the 'crown jewels' of conservation sites. Clearly under any policy headed Protection of Biodiversity it is absolutely essential that there should be no doubt that development can only occur under the most exceptional circumstances at such sites , and that if it does occur there must be full, like-for-like mitigation or compensation. We would therefore ask	

that the first paragraph of this policy be amended as follows:

Development which would be likely to adversely affect a designated Ramsar site, designated or candidate Special Area of Conservation (SAC) or a classified or potential Special Protection Area (SPA) will only be permitted where adverse likely significant effects can be avoided and/or fully mitigated against. After avoidance and mitigation measures have been considered, where residual adverse likely significant effects arise, development will only be permitted if there is no alternative solution, there are imperative reasons of over-riding public interest that would justify the development and suitable like for like compensation is provided.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public?

Why do you feel it is necessary to participate at the Examination in Public?



SUSSEX ORNITHOLOGICAL SOCIETY

Registered charity 256936

www.sos.org.uk



5 November 2018

By e-mail only

Planning Policy Team,
Lewes-Eastbourne District Council,
Southover House,
Lewes BN7 1AB

SOS Response to Lewes Local Plan Part 2

As well as this submission we would like our right to be represented at the public examination of this Local Plan to be recognised. We object to three specific policies as follows:-

Policy Ch02

We object to the policy to develop six houses on this 0.5ha site across the road from the Chailey Common SSSI, as this SSSI is a significant area for birds, including Nightjar, Woodcock, Cuckoo and Woodlark. Its development will require that half the site has to be cleared of trees and we cannot see that the benefit of this development can in any way be justified right next door to the SSSI. Its omission will not prevent Lewes achieving its house-building target and it achieves nothing but a net loss of biodiversity adjacent to an SSSI which is already under pressure from dog walkers.

Policy E1

SOS objects to the allocation of the substantial portion of this site that is east and south of the PAR roundabout to future development.

We object for the following reasons:

1) It will destroy a substantial portion of the remaining LWS which remains a rich habitat for wildlife, including birds. This area is part of the SOS site referred to as 'Tide Mills'. Tide Mills is one of the premier birding sites in Sussex, and our database contains 16,165 records of 201 species (plus one subspecies) of bird recorded at Newhaven Tide Mills since 2007. This means that nearly half of the 403 species on the Sussex Bird List have been recorded there. Although some of the pelagic species, such as Puffin and the Skuas, will have been observed at sea from the beach at Tide Mills, most have been observed on land or using Mill Creek. This is shown by the illustrative records of each of the

201 species in the separate attachment with this letter. Of these 201 species no less than 42 of them are afforded protected status under Schedule 1 of the 1981 Wildlife and Countryside Act.

2) Policy E1 is a replacement of policy NH20 dating from 2003, which was, we understand, designed to create sites for employment opportunities in Newhaven as part of an overall policy to regenerate Newhaven. However, paragraph 3.3 specifically states that ***there is no longer a requirement to allocate additional sites for employment purposes in the Local Plan Part 2.*** So from an employment point of view the Local Plan Part 2 is saying there is no need for Policy E1.

3) Paragraph 3.13 says that ***It is anticipated that*** (the East Quay developments approved in 2016) ***will allow the port to remain competitive by offering modern facilities to future investors and customers and allowing the port to accommodate larger vessels should the opportunity arise.*** We note that all reference to increased ferry activity at the port, which was a feature of the 2003 Local Plan, has now been dropped. It therefore appears that Policy E1 is not needed to either make the port competitive or to support an increased level of ferry activity.

4) By failing to safeguard a designated Local Wildlife Site, this policy fails to deliver on the specific policies which relate to biodiversity and conservation laid out in Part 1 of the Core Strategy. Moreover, as shown in 2) and 3) above, no reasons are being put forward as to why this destruction of a significant part of the remaining LWS is being proposed.

5) To summarise: The Local Plan, Part 2, clarifies that the land to the south and east of the PAR roundabout is not needed to provide either employment opportunities or expansions of the port to make the latter competitive. All policy E1 appears to be achieving is the further destruction of a Local Wildlife Site. **For these reasons SOS objects to this policy, and to the majority of this land being set aside for development** as it meets no defined need, and it will destroy part of an important Local Wildlife Site which is a significant area for birds.

Policy DM24 Protection of Biodiversity and Geodiversity

We believe that the first paragraph of this policy needs to be substantially strengthened, as it applies to the most internationally important sites – RAMSAR, SAC and SPA sites – the ‘crown jewels’ of conservation sites. Clearly under any policy headed Protection of Biodiversity it is absolutely essential that there should be no doubt that development can only occur under the most exceptional circumstances at such sites, and that if it does occur there must be full, like-for-like mitigation or compensation. We would therefore ask that the first paragraph of this policy be amended as follows:

*Development which would be likely to adversely affect a designated Ramsar site, designated or candidate Special Area of Conservation (SAC) or a classified or potential Special Protection Area (SPA) will only be permitted where adverse likely significant effects can be avoided and/or **fully** mitigated against. After avoidance and mitigation measures have been considered, where residual adverse likely significant effects arise, development will only be permitted if there is no alternative solution, there are imperative reasons of over-riding public interest that would justify the development and suitable **like for like** compensation is provided.*

Yours sincerely,

Richard Cowser
(SOS Conservation Officer, conservation@sos.org.uk)

SOS records of Species recorded at Tide Mills, Newhaven

SOS has 16151 records of 202 species at Tide Mills. One record for each species is shown below. Most records have 4-figure grid references for TQ4500, an area that covers Newhaven Hbr, Tide Mills and the Ouse Estuary Nature Reserve. Where a species has a record with a six-figure grid reference it can be pinpointed to the Tide Mills/Mill Creek LWS that will be affected by this development. Records for TQ4500 have only been considered if they also have a site name of Newhaven Tide Mills, or if information in the Notes (column G) makes it clear that this was the location. No records are included where the site is shown as Newhaven Ouse Estuary. **Red additions to the notes have been added to provide additional information included with the full SOS record, or to clarify why the record is included.**

Record N	Site Name	Species Name	Status	Arrival Date	Nur Grid Ref	Notes
3600788	Newhaven	Tide Mi Brent Goose	Amber listed	04/03/2017	TQ4500	(09:55-11:59)
487409	Newhaven	Tide Mi Pale Bellied Brent Goose		17/01/2001	1 TQ4500	Sub species of Brent Goose
2116347	Newhaven	Tide Mi Canada Goose		24/10/2013	TQ4500	
1042338	Newhaven	Tide Mi Barnacle Goose	Amber listed	04/06/2007	2 TQ4500	flew E
301146	Newhaven	Tide Mi Greylag Goose	Amber listed	16/01/1997	9 TQ4500	
605707	Newhaven	Tide Mi White-fronted Goose	Red listed	12/01/1985	18 TQ4500	upto 18 between dates
2485564	Newhaven	Tide Mi Mute Swan	Amber listed	04/03/2014	TQ4500	(11:30-13:00)
136267	Newhaven	Tide Mi Whooper Swan	Amber Listed	29/10/1988	1 TQ4500	flew WSW
598997	Newhaven	Tide Mi Egyptian Goose	Amber Listed	09/04/2002	2 TQ4500	flew NW
3498646	Newhaven	Tide Mi Common Shelduck	Amber Listed	23/11/2016	TQ4500	
1210141	Newhaven	Tide Mi Mandarin Duck		29/12/2008	8 TQ4500	7 female
1041807	Newhaven	Tide Mi Garganey	Schedule 1 species, amber listed	21/04/2007	2 TQ4500	(Migrant) pair on sea
3098836	Newhaven	Tide Mi Shoveler	Amber listed	22/01/2015	2 TQ4500	(11:00-14:30) Adult Female 1; Adult Male 1
2205212	Newhaven	Tide Mi Gadwall	Amber listed	27/03/2014	1 TQ4500	
3601276	Newhaven	Tide Mi Eurasian Wigeon	Amber listed	01/01/2017	TQ4500	(10:00-11:30)
3758011	Newhaven	Tide Mi Mallard	Amber listed	16/05/2017	TQ4500	(18:00-20:00)
3602137	Newhaven	Tide Mi Eurasian Teal	Amber listed	19/02/2017	2 TQ4500	(15:15-17:00) On Mill Creek
1210145	Newhaven	Tide Mi Common Pochard	Red listed	15/02/2008	1 TQ4500	male
926689	Newhaven	Tide Mi Tufted Duck		01/02/2006	7 TQ4500	1M 2FF 11/2 {arb. date}
542851	Newhaven	Tide Mi Greater Scaup	Schedule 1 species, red listed	06/11/2001	1 TQ4500	
3324599	Newhaven	Tide Mi Common Eider	Amber listed	13/12/2015	1 TQ4500	
3342331	Newhaven	Velvet Scoter	Schedule 1 species, red listed	20/02/1986	TQ456002	TQ456002
3357096	Newhaven	Tide Mi Common Scoter	Schedule 1 species, red listed	04/05/2016	8 TQ4500	W 8

454033	Newhaven	Tide Mi Long-tailed Duck	Schedule 1 species, red listed	08/01/1999	1 TQ4500	Bird from 1998 until 08/01/99
1003956	Newhaven	Tide Mi Goldeneye	Amber listed	21/01/2007	2 TQ4500	2 male swimming and diving just east of the e
2005225	Newhaven	Goosander		17/02/2012	1 TQ455000	Adult; Female.
505875	Newhaven	Tide Mi Red-breasted Merganser		28/01/2001	1 TQ453007	On the tidemills not on the sea
96852	Newhaven	Tide Mi Ruddy Duck		27/11/1983	1 TQ4500	FEM
1210149	Newhaven	Tide Mi Red-legged Partridge		11/04/2008	1 TQ4500	on shingle
423989	Newhaven	Grey Partridge	Red listed	05/12/1999	2 TQ4500	{Newhaven; Tidemills} pair
2551668	Newhaven	Tide Mi Common Pheasant		24/01/1999	1 TQ4500	
757944	Newhaven	Harbou Red-throated Diver	Schedule 1 species	04/01/2005	1 TQ450003	on river in harbour
390526	Newhaven	Tide Mi Black-throated Diver	Schedule 1 species, amber listed	07/12/1998	1 TQ4500	
452671	Newhaven	West Pi Manx Shearwater	Amber listed	01/05/2000	1 TQ457004	Record included as from Grid Reference site r
3597639	Newhaven	Tide Mi Little Grebe	Amber listed	19/02/2017	1 TQ4500	(15:15-17:00) On Mill Creek
3462608	Newhaven	Tide Mi Red-necked Grebe	Amber listed	25/01/1987	1 TQ4500	
1099795	Newhaven	Tide Mi Great Crested Grebe		24/03/2008	2 TQ4500	1 offshore; 1 Harbour
1042042	Newhaven	Tide Mi Slavonian Grebe	Schedule 1 species, amber listed	15/12/2007	1 TQ4500	on sea
1561924	Newhaven	Tide Mi Black-necked Grebe	Schedule 1 species, amber listed	01/01/2011	1 TQ4500	
2064871	Newhaven	Tide Mi Spoonbill	Schedule 1 species, amber listed	26/11/2013	1 TQ4500	still there in Mill Creek
133894	Newhaven	Tide Mi Eurasian Bittern	Schedule 1 species, amber listed	11/01/1982	1 TQ4500	
2184494	Newhaven	Tide Mi Grey Heron		01/12/2013	3 TQ4500	In roost north of Mill Creek
3498358	Newhaven	Tide Mi Little Egret		21/06/2016	2 TQ4500	(11:45-12:30) At opposite ends of the creek.
3598214	Newhaven	Tide Mi Gannet	Amber listed	19/02/2017	1 TQ4500	(15:15-17:00) Seen off East Pier
637227	Newhaven	Tide Mi Shag	Red listed	01/01/2004	1 TQ4500	sitting on E Pier low Ringed L leg inreadable
2484981	Newhaven	Tide Mi Cormorant		03/01/2014	1 TQ4500	(09:30-10:45) in Newhaven Harbour
131592	Newhaven	Tide Mi Osprey	Schedule 1 species, amber listed	10/05/1993	1 TQ4500	IN OFF SEA
2361445	Newhaven	Tide Mi Honey-buzzard	Schedule 1 species, amber listed	11/10/2014	1 TQ4500	(Migrant) Flew W @ 14:45; photographs on K
4077330	Newhaven	Tide Mi Sparrowhawk		23/08/2017	1 TQ4500	
1041832	Newhaven	Tide Mi Marsh Harrier	Schedule 1 species, amber listed	05/05/2007	1 TQ4500	(Migrant) male
82371	Newhaven	Tide Mi Hen Harrier	Schedule 1 species, red listed	10/01/1987	1 TQ4500	RINGTAIL
452678	Newhaven	West Pi Montagu's Harrier	Schedule 1 species, amber listed	06/05/2000	1 TQ457004	Record included as from Grid Reference site r
3604859	Newhaven	Tide Mi Common Buzzard		22/01/2017	1 TQ4500	(13:15-16:30)
3606537	Newhaven	Tide Mi Water Rail		04/03/2017	TQ4500	(09:55-11:59)
3098897	Newhaven	Tide Mi Moorhen		04/03/2015	1 TQ4500	
3098903	Newhaven	Tide Mi Coot		22/01/2015	TQ4500	(11:00-14:30)

3334771	Newhaven	Oystercatcher	Amber listed	02/10/2016	1	TQ455003	This vegetated shingle; coastal grassland; scrub
2005230	Newhaven	Avocet	Schedule 1 species, amber listed	17/02/2012	1	TQ455005	Adult;
3010657	Newhaven	Tide Mi Lapwing	Red listed	24/01/2015	##	TQ4500	
2288182	Newhaven	Tide Mi Golden Plover	Amber Listed	30/10/2014	1	TQ4500	Flew in and tried to land on beach
1942998	Newhaven	Tide Mi Grey Plover	Amber listed	09/02/2012	7	TQ4500	+ 1 on 26/02; on Mill Creek
1942719	Newhaven	Tide Mi Ringed Plover	Amber listed	13/05/2012	1	TQ4500	On nest
454046	Newhaven	Tide Mi Little Ringed Plover	Schedule 1 species	24/04/1999	3	TQ4500	Display flight
611033	Newhaven	Tide Mi Kentish Plover		10/05/2002	1	TQ4500	
2293507	Newhaven	East Pie Eurasian Whimbrel	Schedule 1 species, red listed	03/05/2014	1	TQ4500	(Migrant) Off Mill Creek
571766	Newhaven	Tide Mi Curlew	Amber listed	05/10/2002	10	TQ455004	
1944651	Newhaven	Tide Mi Bar-tailed Godwit	Amber listed	09/02/2012	2	TQ4500	+ 2 on 26/02; on Mill Creek
3763834	Newhaven	Tide Mi Black-tailed Godwit	Schedule 1 species, red listed	29/04/2017		TQ4500	(07:50-09:15)
2288187	Newhaven	Tide Mi Turnstone	Amber listed	21/10/2014	8	TQ4500	On beach near E Pier
1548207	Newhaven	East Pie Knot	Amber listed	21/02/2011	1	TQ4500	Mill Creek
623229	Newhaven	Tide Mi Ruff	Red listed	31/08/2003	2	TQ459004	juvs roosting
533050	Newhaven	Tide Mi Curlew Sandpiper		02/09/2001	1	TQ4500	
1594284	Newhaven	Tide Mi Sanderling		22/05/2011	11	TQ4500	
3608610	Newhaven	Tide Mi Dunlin	Amber listed	19/02/2017	47	TQ4500	(15:15-17:00) On Mill Creek
3302529	Newhaven	Tide Mi Purple Sandpiper	Amber listed	30/01/2016	10	TQ452002	below the east harbour arm mix of shingle b
575171	Newhaven	Tide Mi Little Stint		29/08/2002	1	TQ4500	
533048	Newhaven	Tide Mi Woodcock	Amber listed	20/10/2001	1	TQ4500	
2206192	Newhaven	East Pie Jack Snipe	Amber listed	18/01/2014	3	TQ4500	in vicinity of East Pier
2488861	Newhaven	Tide Mi Common Snipe	Amber listed	03/01/2014	1	TQ458004	(09:30-10:45) TQ458004
2207261	Newhaven	Tide Mi Grey Phalarope		03/11/2013	1	TQ4500	Adult seen on western creek near bridge at 14
969311	Newhaven	Tide Mi Common Sandpiper	Amber listed	27/08/2007	3	TQ4500	on Mill Creek
1595398	Newhaven	Tide Mi Green Sandpiper	Schedule 1 species, amber listed	22/05/2011	1	TQ4500	
2294525	Newhaven	Tide Mi Common Redshank	Amber listed	28/11/2014	54	TQ4500	in Mill Creek
838984	Newhaven	Tide Mi Wood Sandpiper	Schedule 1 species, amber listed	26/07/2005	1	TQ4500	
3555291	Newhaven	Tide Mi Spotted Redshank	Amber listed	12/03/2016	1	TQ4500	Creek
1945572	Newhaven	Tide Mi Greenshank		26/08/2012	1	TQ4500	
657300	Newhaven	Tide Mi Kittiwake	Amber listed	06/12/2003	1	TQ4500	On East Pier of Harbour
1625630	Newhaven	Tide Mi Sabine's Gull		1853-10-22	1	TQ4500	Arb date: 1 killed nr Newhaven on or just bef
3055077	Newhaven	Black-headed Gull	Amber listed	28/06/2015		TQ454002	Old instrustrial site plus areas of shingle head

520904	Newhaven	Little Gull	Schedule 1 species, amber listed	02/01/2001	1 TQ4500	{Newhaven; Tidemills} First winter
2293511	Newhaven	Tide Mi Mediterranean Gull	Schedule 1 species, amber listed	03/05/2014	3 TQ4500	2 2ndCY 1 3rdCY
2489502	Newhaven	Tide Mi Common Gull	Amber listed	03/01/2014	10 TQ4500	(09:30-10:45) followed the ferry into Newhav
3767384	Newhaven	Tide Mi Great Black-backed Gull	Amber listed	16/05/2017	TQ4500	(18:00-20:00)
1362640	Newhaven	Tide Mi Glaucous Gull	Amber listed	24/01/2009	1 TQ4500	2nd winter
3055076	Newhaven	Herring Gull	Red listed	28/06/2015	TQ454002	Old industrial site plus areas of shingle head
431352	Newhaven	Tide Mi Yellow-legged Gull	Amber listed	14/03/1999	2 TQ459002	two on east end of tidal creek
3498413	Newhaven	Tide Mi Lesser Black-backed Gull	Amber listed	18/05/2016	4 TQ457003	TQ457003
3498397	Newhaven	Tide Mi Sandwich Tern	Amber listed	18/05/2016	3 TQ457003	TQ457003
284164	Newhaven	Tide Mi Little Tern	Schedule 1 species, amber listed	07/08/1996	1 TQ4500	Sat 20 min on beach until driven off by Herrin
1445333	Newhaven	Tide Mi Common Tern	Amber listed	27/06/2010	TQ4500	
1210218	Newhaven	Tide Mi Arctic Tern	Amber listed	08/10/2008	1 TQ4500	juv;also on 14/10
434619	Newhaven	Tide Mi Black Tern	Schedule 1 species, amber listed	17/09/1999	1 TQ4500	juvenile along tideline feeding on whitebait
3376132	Newhaven	Tide Mi Pomarine Skua		04/05/2016	1 TQ4500	one east at about 09:20; looked like intermer
1041862	Newhaven	Tide Mi Arctic Skua	Red listed	27/05/2007	1 TQ4500	(Migrant) dark phase
3612548	Newhaven	Tide Mi Common Guillemot	Amber listed	19/02/2017	2 TQ4500	(15:15-17:00) Winter plumaged birds seen of
3612567	Newhaven	Tide Mi Razorbill	Amber listed	22/01/2017	1 TQ4500	(10:30-12:30) Seen off East Pier
2111780	Newhaven	Tide Mi Puffin	Red listed	15/02/2014	2 TQ4500	
3768283	Newhaven	Tide Mi Feral Pigeon		16/05/2017	TQ4500	(18:00-20:00)
1951310	Newhaven	Tide Mi Stock Dove	Amber Listed	23/11/2012	1 TQ4500	
3769753	Newhaven	Tide Mi Woodpigeon		16/05/2017	TQ4500	(18:00-20:00)
641729	Newhaven	Tide Mi Turtle Dove	Red listed	30/06/2003	1 TQ453003	
3771049	Newhaven	Tide Mi Collared Dove		16/05/2017	TQ4500	(18:00-20:00)
1168455	Newhaven	Tide Mi Common Cuckoo	Red listed	31/08/2008	1 TQ4500	
2571712	Newhaven	Tide Mi Barn Owl	Schedule 1 species	26/03/2013	1 TQ4500	
390604	Newhaven	Tide Mi Little Owl		03/12/1998	1 TQ4500	
3055080	Newhaven	Short-eared Owl	Amber listed	14/10/2015	2 TQ4500	Two shorteared owls hunting over Tide Mills.
2493338	Newhaven	Tide Mi Common Swift	Amber listed	19/06/2014	2 TQ4500	
2182175	Newhaven	Tide Mi Kingfisher	Schedule 1 species, amber listed	01/12/2013	1 TQ4500	Seen well from bridge at west end of Mill Cre
1869056	Newhaven	Tide Mi Hoopoe	Schedule 1 species	23/09/1965	1 TQ4500	(Migrant)
575259	Newhaven	Tide Mi Wryneck	Schedule 1 species	27/08/2002	1 TQ4500	
3615571	Newhaven	Tide Mi Great Spotted Woodpecker		22/01/2017	1 TQ4500	
3615571	Newhaven	Tide Mi Green Woodpecker		22/01/2017	1 TQ4500	(13:15-16:30)

3760395	Newhaven	Tide	Mi Kestrel	Amber listed	16/05/2017	TQ4500	(18:00-20:00)
1042520	Newhaven	Tide	Mi Merlin	Schedule 1 species, red listed	03/09/2007	1 TQ458003	(Migrant) fem
1041833	Newhaven	Tide	Mi Hobby	Schedule 1 species	05/05/2007	1 TQ4500	(Migrant) ad on beach
2293512	Newhaven	Tide	Mi Peregrine	Schedule 1 species	03/05/2014	1 TQ4500	
3334772	Newhaven	Red-backed Shrike		Schedule 1 species, red listed	02/10/2016	1 TQ455003	This vegetated shingle; coastal grassland; scrub
1982977	Newhaven	Tide	Mi Jay		07/10/2012	3 TQ4500	
3629939	Newhaven	Tide	Mi Magpie		22/01/2017	2 TQ4500	(10:30-12:30)
3793040	Newhaven	Tide	Mi Jackdaw		16/05/2017	TQ4500	(18:00-20:00)
3631627	Newhaven	Tide	Mi Rook		22/01/2017	TQ4500	(13:15-16:30)
3794714	Newhaven	Tide	Mi Carrion Crow		16/05/2017	TQ4500	(18:00-20:00)
1191865	Newhaven	Tide	Mi Raven		14/02/2008	1 TQ4500	In off the sea; rested on eastern harbour arm;
1029264	Newhaven	Tide	Mi Coal Tit		16/09/2007	3 TQ4500	
3627421	Newhaven	Tide	Mi Blue Tit		04/03/2017	TQ4500	(09:55-11:59)
3628483	Newhaven	Tide	Mi Great Tit		04/03/2017	TQ4500	(09:55-11:59)
2589906	Newhaven	Tide	Mi Bearded Tit	Schedule 1 species	30/12/2010	3 TQ4500	
3498528	Newhaven	Tide	Mi Skylark	Red listed	18/05/2016	2 TQ457003	TQ457003
1234099	Newhaven	Tide	Mi Short-toed Lark		10/05/2008	1 TQ4500	Migrant
2494874	Newhaven	Tide	Mi Sand Martin	Amber listed	15/04/2014	1 TQ4500	(08:35-10:05) Migrant In off the sea 1;
575282	Newhaven	Tide	Mi Barn Swallow	Amber listed	15/06/2002	2 TQ4500	breeding prs under bridge
2283286	Newhaven	Tide	Mi House Martin	Amber listed	12/10/2014	25 TQ4500	
3555276	Newhaven	Tide	Mi Cetti's Warbler	Schedule 1 species	11/05/2016	1 TQ4500	Singing
1613556	Newhaven	Tide	Mi Long-tailed Tit		10/09/2011	6 TQ4500	
1975304	Newhaven	Tide	Mi Willow Warbler	Amber listed	26/08/2012	1 TQ4500	
3420829	Newhaven	Tide	Mi Chiffchaff		17/01/2016	1 TQ4500	
3783212	Newhaven	Tide	Mi Sedge Warbler		16/05/2017	TQ4500	(18:00-20:00)
3783500	Newhaven	Tide	Mi Reed Warbler		16/05/2017	TQ4500	(18:00-20:00)
93389	Newhaven	Tide	Mi Marsh Warbler	Red listed	01/06/1986	1 TQ454008	
67532	Newhaven	Tide	Mi Grasshopper Warbler	Red listed	26/09/1992	1 TQ457004	
3424359	Newhaven	Tide	Mi Blackcap		24/09/2016	1 TQ4500	(14:40-16:40) Male seen feeding in brambles
1283427	Newhaven	Tide	Mi Garden Warbler		13/09/2009	2 TQ4500	
845203	Newhaven	Tide	Mi Barred Warbler		04/09/2005	1 TQ453007	
3099325	Newhaven	Tide	Mi Lesser Whitethroat		26/04/2015	6 TQ4500	
3324598	Newhaven	Tide	Mi Common Whitethroat	Amber listed	11/11/2015	2 TQ4500	

637219	Newhaven	Tide	Mi Dartford Warbler	Schedule 1 species, amber listed	02/01/2004	1	TQ4500	scrub nr E Pier
3625490	Newhaven	Tide	Mi Firecrest	Schedule 1 species	23/01/2017		TQ4500	(14:05-14:05)
3407439	Newhaven	Tide	Mi Goldcrest		13/01/2016	3	TQ4500	
3638682	Newhaven	Tide	Mi Wren		11/02/2017		TQ4500	(14:25-15:44)
3432852	Newhaven	Tide	Mi Common Starling	Red listed	26/09/2016	20	TQ4500	
2500108	Newhaven	Tide	Mi Ring Ouzel	Red listed	16/10/2014	1	TQ4500	(13:10-13:59)
3621920	Newhaven	Tide	Mi Blackbird		24/01/2017	10	TQ4500	(10:00-12:00)
2502295	Newhaven	Tide	Mi Redwing		30/12/2014	1	TQ4500	(14:45-16:00)
3623334	Newhaven	Tide	Mi Song Thrush	Red listed	24/01/2017	1	TQ4500	(10:00-12:00)
3010872	Newhaven	Tide	Mi Mistle Thrush	Red listed	18/02/2015	1	TQ4500	
844796	Newhaven	Tide	Mi Spotted Flycatcher	Red listed	06/09/2005	2	TQ4500	
3302533	Newhaven	Tide	Mi Robin		30/01/2016	1	TQ452002	within the reptile translocation area inland f
67516	Newhaven	Tide	Mi Common Nightingale	Red listed	31/08/1992	1	TQ457004	
926991	Newhaven	Tide	Mi Pied Flycatcher	Red listed	01/09/2006	1	TQ4500	1 ju/fem {arb. date}
3443077	Newhaven	Tide	Mi Black Redstart	Schedule 1 species, red listed	06/03/2016	1	TQ4500	(There are 196 records of Black Redstart)(14:
1221772	Newhaven	Tide	Mi Common Redstart	Amber listed	04/09/2008	1	TQ452007	Mill Creek
2499723	Newhaven	Tide	Mi Whinchat	Red listed	12/10/2014	1	TQ455006	TQ455006
3336503	Newhaven	Tide	Mi Eurasian Stonechat		21/06/2016	6	TQ4500	Two pairs of Stonechat at Newhaven Tide Mil
1926513	Newhaven	Tide	Mi Northern Wheatear	Amber listed	08/05/2012	8	TQ454003	TQ454003
3334778	Newhaven		House Sparrow	Red listed	02/10/2016	10	TQ455003	This vegetated shingle; coastal grassland; scr
927964	Newhaven	Tide	Mi Tree Sparrow		29/10/2006	2		
3302532	Newhaven	Tide	Mi Dunnock	Amber listed	30/01/2016	1	TQ452002	within the reptile translocation area inland f
1926308	Newhaven	Tide	Mi Yellow Wagtail	Red listed	08/05/2012	1	TQ454003	TQ454003
3302551	Newhaven	Tide	Mi Grey Wagtail	Red listed	14/02/2016	1	TQ459002	adult
3337616	Newhaven	Tide	Mi Pied Wagtail		14/02/2016	1	TQ453003	
452730	Newhaven	West	Pi White Wagtail		02/05/2000	1	TQ457004	(Grid ref indicates site is Tide Mills not West F
3099581	Newhaven	Tide	Mi Richard's Pipit		20/03/2015	1	TQ4500	(09:00-09:30)
2529532	Newhaven	Tide	Mi Tawny Pipit		10/10/2014	1	TQ4500	showing well on the open ground (photograp
3334770	Newhaven		Meadow Pipit	Amber listed	02/10/2016	1	TQ455003	This vegetated shingle; coastal grassland; scr
79352	Newhaven	Tide	Mi Tree Pipit	Red listed	03/10/1992	1	TQ457004	
402090	Newhaven	Tide	Mi Water Pipit	Amber listed	01/03/1998	1	TQ457004	
2495699	Newhaven	Tide	Mi Rock Pipit		03/01/2014	1	TQ452001	(09:30-10:45) one at the base of Newhaven E;
3635233	Newhaven	Tide	Mi Chaffinch		24/01/2017	1	TQ4500	(10:00-12:00)

1042752	Newhaven Tide Mi Brambling	Schedule 1 species	27/11/2007	1	TQ4500	
1042797	Newhaven Tide Mi Hawfinch	Red listed	26/12/2007	1	TQ4500	male
926695	Newhaven Tide Mi Bullfinch	Amber listed	02/02/2006	2	TQ4500	pair also 8/2
3636160	Newhaven Tide Mi Greenfinch		19/02/2017	2	TQ4500	(15:15-17:00)
402233	Newhaven Tide Mi Twite	Red listed	17/12/1998	1	TQ4500	
3498624	Newhaven Tide Mi Linnet	Red listed	18/05/2016	4	TQ457003	TQ457003
1210306	Newhaven Tide Mi Lesser Redpoll	Red listed	08/10/2008	7	TQ4500	also 7 on 27/10
3334777	Newhaven Goldfinch		02/10/2016	8	TQ455003	This vegetated shingle; coastal grassland; scrub
3635899	Newhaven Tide Mi Serin	Schedule 1 species	22/01/2017	1	TQ4500	(10:30-12:30) Long staying male bird seen w/
3099684	Newhaven Tide Mi Siskin		12/03/2015	1	TQ4500	
1998963	Newhaven Tide Mi Corn Bunting	Schedule 1 species, amber listed	23/11/2012	2	TQ4500	
3498640	Newhaven Tide Mi Yellowhammer	Red listed	01/10/2016		TQ4500	(11:00-13:30)
656757	Newhaven Tide Mi Reed Bunting	Amber listed	04/01/2004	1	TQ4500	side of concrete path to beach
2294778	Newhaven Tide Mi Snow Bunting	Schedule 1 species	08/12/2014	1	TQ4500	

Representation ID: REP/007/RG01
--

Representor Details:

Representor ID:	REP/007
Name:	Karen Crowhurst
Organisation:	Ringmer Parish Council
Consultation Body:	Specific
Stakeholder Type:	Parish Council

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	clerk.ringmerparishcouncil@btconnect.com
Address:	Parish Office Ringmer Village Hall, Lewes Road Ringmer East Sussex BN8 5QH

Representation:

Policy/Section:	RG01 - Caburn Field
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	Yes
Representation: The Local Plan part 2 proposes in section 2 development of about 90 new homes at Caburn Field/Anchor Field (paras.2-5-2.11 & 2.118-2.129). The principle of the development of 40 new homes at Caburn Field , subject to the replacement of the existing football field and Rifle Club facilities at alternative locations, has long been established [2003 Local Plan] and has always been supported by	

Ringmer Parish Council. It has also long been recognised that this development is very likely to be capable of delivery of more than 40 homes - 60 seems reasonable if the site of the Caburn Pavilion is also included.

Additionally the Ringmer Neighbourhood Plan has allocated two small nearby sites east and west of Anchor Field for redevelopment for 8 homes [site RES3]. One site is a vacant plot where the Ringmer Youth Club formerly stood and the other a largely redundant garage court. Both of these vacant small sites are owned by Lewes District Council.

However, the new proposal seeks to increase the development to 90 homes, incorporating Ringmer Neighbourhood Plan site RES3, but achieved largely by building the additional homes and providing their car parking on a well-used public open space that is currently used for informal football and accommodates the well-used Ringmer skatepark and some children's play facilities. We are concerned that there is no recognition of the inclusion of this valued public open space, protected by Ringmer Neighbourhood Plan policy 7.2, in the proposals, and no evident requirement for the re-provision of these facilities elsewhere as a condition of development on this scale.

We draw to your attention that the housing total calculations para.2.11 and table 5 are incorrect, because of the double counting between this proposal and Ringmer Neighbourhood Plan allocation RES3.

We also note that the very high development density proposed exceeds that considered suitable for village development in the Lewes District Joint Core Strategy and by Ringmer Neighbourhood Plan policy 9.2.

We would also draw to your attention that the explanation in para 2.120 of the discrepancy between the Ringmer Housing totals in the Lewes District Joint Core Strategy and the Ringmer Neighbourhood Plan is factually incorrect. The late addition to the Ringmer total in the Lewes District Joint Core Strategy was made contrary to the Inspector's recommendation, not because of it.

Sustainability Appraisal of new housing at Caburn Field, Ringmer

At para.9.49 of the Sustainability Appraisal three alternative sizes of residential development at Caburn Field are considered: development for 40 units, 60 units and 90 units. The results are shown in Table 27 [and utilised at several other subsequent locations]. Unfortunately this appraisal is flawed.

Under objective 1 the appraisal correctly concludes that as the larger-scale development will deliver more housing it is reasonable to provide a more strongly positive score for this objective for the larger development.

Under objective 4 (community) all three options are appraised as 0?, presumably because a community meeting place will be lost at Caburn Pavilion (a central location) but re-provided in a somewhat different (arguably improved) form at an alternative, less central, location. This would occur under all three options. However, under the 90 unit option only, the best-used Ringmer public open space on the south side of the B2192 (where most village housing is) would be greatly reduced in size and attractiveness. The

Ringmer skatepark, a well-used informal football field and some children's play facilities would all be lost. The other two options would retain these important village facilities. The 90 unit option must therefore be scored more negatively against this objective. The 90 unit development would also have a substantially more negative impact on neighbours than the smaller options.

We also note that all three options are appraised neutrally against objective 3 (travel), objective 12 (carbon dioxide emissions) and objective 13 (air quality). However, it is evident from the data available on the East Sussex in Figures website that car ownership by Ringmer residents is 50% higher than in Lewes town, and that there is an even greater difference in commuting to work or to access services by private car, despite the two communities having very similar median household incomes. Despite Ringmer having a relatively good bus service, the travel patterns are very similar to those of other less-well-served Low Weald villages, and out-commuting by private car even more prevalent (because there is relatively little local employment). Thus any housing development in Ringmer (or other villages) must be scored more negatively under objective 3 than new housing at more sustainable urban locations. The consequent additional private car use by locating new housing in villages must also be reflected in objective 12 (carbon dioxide generation). As much of the additional commuting by new Ringmer residents is likely to pass through areas of Lewes where air quality caused by traffic congestion is a particular issue, this should also be reflected in objective 13. In both cases the larger development must be accepted as likely to have a larger negative impact against these objectives, just as it has a larger positive impact against objective 1.

The conclusion from table 27 that option C is the most sustainable option is thus unsound.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public? No

Why do you feel it is necessary to participate at the Examination in Public?

Representation ID: REP/007/ESA

Representor Details:

Representor ID:	REP/007
Name:	Karen Crowhurst
Organisation:	Ringmer Parish Council
Consultation Body:	Specific
Stakeholder Type:	Parish Council

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	clerk.ringmerparishcouncil@btconnect.com
Address:	Parish Office Ringmer Village Hall, Lewes Road Ringmer East Sussex BN8 5QH

Representation:

Policy/Section:	Employment Site Allocations
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	Yes
Representation: We are disappointed that there is no reference in this section to the additional rural employment allocations made in the employment-led Ringmer Neighbourhood Plan (adopted in 2016), and to the successful new developments already achieved that demonstrate the viability of additional rural employment in the District. We regard additional local employment as central to a flourishing rural economy, which we hope will	

increase sustainability by increasing local employment options.

While we support policies DM9, DM10 & DM11, we would wish to see a much more strongly proactive approach to rural employment opportunities in section 3.

Policies DM15 & DM16 Outdoor & Children's Playing Space

While we are pleased that standards are set for the provision of outdoor recreational space in Policy DM15, we are concerned that there is no matching analysis of the extent to which these standards are or are not met in the different communities in the District.

We believe there to be a shortage of sports pitches in Ringmer, so are concerned to see that saved policy RG3 is proposed for abolition in Appendix 2, when we believe this site is still very much needed.

We also believe Ringmer to have a particular shortage of accessible countryside, and are concerned that there is no recognition of this need anywhere in the Local Plan part 2.

We consider that policy DM16 is far too prescriptive. There is no need to provide formal children's play space on developments as small as 20 homes, if they are within range of better play facilities provided centrally by the local community. The regular inspection and safe maintenance of such facilities is likely to be beyond the skills of, and unreasonably burdensome to, small residents' associations. We recently experienced a ridiculous situation where a large (110-unit) Ringmer development that was within a few yards of the main children's play area on Ringmer Green was required by officers to provide its own separate play area, that would have been accessible to the whole community but maintained only by the new residents. This would have been a recipe for neighbourhood disputes and a potential source of danger to children. As an absolute minimum this policy should permit a developer to negotiate a contribution to the local community facilities as an alternative to direct provision.

Proposals map for Ringmer

The new Broyleside planning boundary drawn on the proposals map appears to be intended to follow the outline of the new allocations for development at Lower Lodge Farm made in the Ringmer Neighbourhood Plan (adopted 2016). However, the outline of the proposed boundary does not appear to follow that of the actual allocations made in the adopted Neighbourhood Plan.

In most places the proposed new planning boundary around Ringmer village follows the actual boundary of the village housing, including approved new housing. The south-eastern and western boundaries of Ringmer village are also the boundary of the South Downs National Park. However, there are some anomalies and we propose that the boundary should be amended to remove these. We propose that the existing housing at 'Culverden', Norlington Lane; Norlington Fields; and the houses on the south side of Gote Lane and Rushey Green should be included within the new planning boundary.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public?	No
Why do you feel it is necessary to participate at the Examination in Public?	

Representation ID: REP/008/E1Representor Details:

Representor ID:	REP/008
Name:	Johnny Denis
Organisation:	Lewes District Council
Consultation Body:	General
Stakeholder Type:	Councillor

Agent Details:

Name:
Organisation:

Contact Details:

Email Address:	johnny.denis@lewes.gov.uk
Address:	

Representation:

Policy/Section:	E1 - Land at East Quay, Newhaven Port
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	
Representation: I'd like to submit that new policy E1 in Newhaven replaces locally designated green space and has replaced this with a development area. This is undesirable. It opens up the west of the shingle beach and wildlife rich hinterland to further development contrary to popular hopes and aspirations and the will of both Seaford and Newhaven Town Councils. This wasn't on the original consultation and the process here seems to be unfair that representations from ESCC and Newhaven Ports can override the will of local people.	
What changes do you suggest to make the document legally compliant or sound?	

Do you consider it necessary to participate at the Examination in Public?
Why do you feel it is necessary to participate at the Examination in Public?

Thea Davis

From: Cllr Johnny Denis
Sent: 31 October 2018 13:46
To: ldf
Subject: Consultation


Categories: LPP2 comment to code - stakeholder details have been added

I'd like to submit that new policy E1 in Newhaven replaces locally designated green space and has replaced this with a development area. This is undesirable. It opens up the west of the shingle beach and wildlife rich hinterland to further development contrary to popular hopes and aspirations and the will of both Seaford and Newhaven Town Councils.

This wasn't on the original consultation and the process here seems to be unfair that representations from ESCC and Newhaven Ports can override the will of local people.

Thanks
Johnny

Councillor Johnny Denis


Ouse Valley & Ringmer
Lewes District Council
[Green Party - For the Common Good](#)

Representation ID: REP/009/NH01Representor Details:

Representor ID:	REP/009
Name:	Chris Flavin
Organisation:	East Sussex County Council
Consultation Body:	Specific
Stakeholder Type:	Infrastructure/service provider

Agent Details:

Name:
Organisation:

Contact Details:

Email Address:	Chris.Flavin@eastsussex.gov.uk
Address:	

Representation:

Policy/Section:	NH01 - South of Valley Road
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	
Representation: The County Council, as Highway Authority, has very significant concerns with the proposed access arrangements for the proposed allocation on this site. We are not aware of any evidence existing, including anything submitted by the site proponent, that addresses our concerns. Therefore, as it stands, we do not consider that the deliverability of this proposed allocation has been demonstrated. In turn, it is considered that this policy is 'unsound', due to it not being effective. The policy stipulates that access to the site will be from Valley Road. The proposed use of Valley Road to and from the east of the site (and links to the C7 'Lewes Road') is problematic; primarily due to the multiple ownerships of Valley Road and the adjoining	

land, but also because of the classification of Valley Road as a Restricted Byway and its current condition as a narrow track which is unsuitable for serving additional vehicular traffic.

As a Restricted Byway [11d] the road allows for cyclists, pedestrians and horse-riders but not for motor propelled vehicles unless it can be proved that the site had historic vehicular rights prior to the Natural Environment for Rural Communities Act of 2006 extinguishing these rights (in a previous planning application on the site this proof was not provided).

Even if vehicular rights can be proven, the narrow width and the surface of Valley Road between the proposed site and the eastern end of the Restricted Byway (the point at which the adopted road starts -close to the Breakwater Academy School) is unsuitable to serve additional vehicular traffic. Any new development here would therefore need to improve/widen Valley Road to cater for a two way flow of traffic, with a separate footway on the northern side together with a proper turning head. This improved section of Valley Road would then need to be formally adopted in view of its status as a restricted byway to enable access by all motor propelled vehicles.

The multiple ownership of Valley Road complicates matters as each owner would need to be party to any agreement in order to allow these improvement works to take place and secure the adoption of the road as highway; something which was previously highlighted with the previous planning application on part of the proposed site (planning ref. LW/15/0881).

An alternative access route which could be used is via the residential developments off The Fairway to the west/south-west of the site. 'The Fairway' includes The Fairway, Brazen Close and Rothwell Close and does not form part of the adopted public highway. However, the residential roads off The Fairway are privately owned and are unlikely to be adopted due to various longstanding issues including drainage.

Any developer of the proposed Policy NH01 site would require agreement from the owners of these roads [we believe that this is currently Persimmon Homes] to gain access to this proposed site.

Another obstacle is that there is no simple way of connecting the proposal site to The Fairway, Brazen Close or Rothwell Close. There are a number of complications with each possible option but the main issue is that the proposal site owner doesn't have any control (or own) any of the surrounding land.

Another obstacle is that in order to connect the site access to The Fairway, Brazen Close or Rothwell Close, the access route would still have to go across or along part of Valley Road.

We would not wish to see vehicular access direct onto Brighton Road. The existing house on the site 'Jace' is served by a steep and narrow access onto the A259 which is not suitable to serve any further development. The site is within 40mph speed limit and therefore visibility splays that would need to be provided are 2.4m x 120m in both directions. These splays do not appear to be achievable unless third party land was

acquired. Furthermore, as the land here falls away steeply, it is unlikely that suitable gradients would be achievable which would also affect the visibility for vehicular egress. Assessment of the increase in trips onto the A259 at this point would be required with consideration given to the adjacent controlled crossing.

In conclusion, as it stands the access to the proposed allocation is unlikely to be deliverable from Valley Road [via the C7] or from any of the other alternatives such as The Fairway due to the problems involving third party land.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public?

Why do you feel it is necessary to participate at the Examination in Public?

Representation ID: REP/009/RG01
--

Representor Details:

Representor ID:	REP/009
Name:	Chris Flavin
Organisation:	East Sussex County Council
Consultation Body:	Specific
Stakeholder Type:	Infrastructure/service provider

Agent Details:

Name:
Organisation:

Contact Details:

Email Address:	Chris.Flavin@eastsussex.gov.uk
Address:	

Representation:

Policy/Section:	RG01 - Caburn Field
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	
Representation: The County Council is content with the proposed policy and supporting text for this proposed allocation.	
What changes do you suggest to make the document legally compliant or sound?	
Do you consider it necessary to participate at the Examination in Public?	
Why do you feel it is necessary to participate at the Examination in Public?	

--

Representation ID: REP/009/E1

Representor Details:

Representor ID:	REP/009
Name:	Chris Flavin
Organisation:	East Sussex County Council
Consultation Body:	Specific
Stakeholder Type:	Infrastructure/service provider

Agent Details:

Name:
Organisation:

Contact Details:

Email Address:	Chris.Flavin@eastsussex.gov.uk
Address:	

Representation:

Policy/Section:	E1 - Land at East Quay, Newhaven Port
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	
Representation: <p>In responding to the previous iteration of the plan, the County Council expressed concern that the absence of specific policies for Newhaven Port could create ambiguity for decision-makers in relation to proposals within the Port area. In turn, we suggested that the Port area is defined and some policy framework is provided to aid in future decision making. In light of these previous comments, we welcome the inclusion of such a policy (Policy E1) along with the supporting text.</p>	
What changes do you suggest to make the document legally compliant or sound?	

Do you consider it necessary to participate at the Examination in Public?
Why do you feel it is necessary to participate at the Examination in Public?

Representation ID: REP/009/DM27
--

Representor Details:

Representor ID:	REP/009
Name:	Chris Flavin
Organisation:	East Sussex County Council
Consultation Body:	Specific
Stakeholder Type:	Infrastructure/service provider

Agent Details:

Name:
Organisation:

Contact Details:

Email Address:	Chris.Flavin@eastsussex.gov.uk
Address:	

Representation:

Policy/Section:	DM27: Landscape Design
<p><i>Do you consider the document to be:</i></p> <p>Legally Compliant:</p> <p>Sound:</p>	
<p>Representation:</p> <p>It is noted that previous comments on this policy do not appear to have been incorporated into the Plan. The LPA is encouraged to reconsider this and incorporate them as a minor modification to the Plan.</p> <p>Previous comment: Whilst Policy DM27 (4) on Landscape design is supported ("where practicable, use material excavated from the site for re-contouring, infilling and top-soiling, ensuring that any land re-modelling respects the local topographic character"), it would be preferable for the Plan to make reference to the other requirements of Policy WMP 3d of the Waste and Minerals Plan 2013 to minimise/manage waste during construction, demolition and excavation.</p>	

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public?
--

Why do you feel it is necessary to participate at the Examination in Public?

Representation ID: REP/009/GEN/B

Representor Details:

Representor ID:	REP/009
Name:	Chris Flavin
Organisation:	East Sussex County Council
Consultation Body:	Specific
Stakeholder Type:	Infrastructure/service provider

Agent Details:

Name:
Organisation:

Contact Details:

Email Address:	Chris.Flavin@eastsussex.gov.uk
Address:	

Representation:

Policy/Section:	General
<p><i>Do you consider the document to be:</i></p> <p>Legally Compliant:</p> <p>Sound:</p>	
<p>Representation:</p> <p>Minerals and Waste Planning Policy</p> <p>The Minerals and Waste Planning Authority does not wish to challenge the legal compliance or soundness of the Plan. However some changes are suggested which the Council is encouraged to pursue.</p> <p>Lewes District Policies Map</p> <p>The Lewes District Policies Map does not appear to make reference to or show the adopted Waste and Minerals Local Plan Policies Map. It is, therefore, requested that reference is made to the Waste and Minerals Local Plan Policies Map on the Lewes District Policies map and if possible is incorporated into the map itself. A copy of the</p>	

electronic GIS data is available on data.gov.uk or can be provided on request.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public?

Why do you feel it is necessary to participate at the Examination in Public?

Representation ID: REP/009/INT/A

Representor Details:

Representor ID:	REP/009
Name:	Chris Flavin
Organisation:	East Sussex County Council
Consultation Body:	Specific
Stakeholder Type:	Infrastructure/service provider

Agent Details:

Name:
Organisation:

Contact Details:

Email Address:	Chris.Flavin@eastsussex.gov.uk
Address:	

Representation:

Policy/Section:	Electric Vehicle Charging Points
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	
Representation:	<p>We accept that you have chosen not to follow our previous recommendation to include a specific planning policy on Electric Vehicle Charging Points but we would urge you to help raise the profile of EVCP's by making reference to the Technical Guidance note on EVCP's within the Plan and providing a web link to the document. It is particularly important to highlight the valuable contribution that new housing developments need to make in providing charging points which encourage and facilitate the uptake of Electrical Vehicles and ultimately contribute towards improvements in air quality.</p> <p>We note that Lewes DC is currently conducting a public survey regarding electric vehicle charging points and we hope that this will help support the implementation of a planning</p>

policy on EVCP's at some point in the future.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public?

Why do you feel it is necessary to participate at the Examination in Public?

Representation ID: REP/009/HSARepresentor Details:

Representor ID:	REP/009
Name:	Chris Flavin
Organisation:	East Sussex County Council
Consultation Body:	Specific
Stakeholder Type:	Infrastructure/service provider

Agent Details:

Name:
Organisation:

Contact Details:

Email Address:	Chris.Flavin@eastsussex.gov.uk
Address:	

Representation:

Policy/Section:	Housing Site Allocations
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	
Representation: The County Council, in its role as the Lead Local Flood Authority, had previously requested that the Local Plan Part 2 was supported by an up-to-date Strategic Flood Risk Assessment. It is now recognised that as the Local Plan Part 2 does not set the strategic planning policies for the District (para 156 of the NPPF states "Strategic policies should be informed by a Strategic Flood Risk Assessment") that such a piece of evidence is not strictly necessary. Nevertheless, local flood risk does need to be appropriately addressed in the Local Plan Part 2, in particular with the proposed allocations. Core Policy 12 of the Joint Core Strategy sets a number of policy criteria that should	

ensure that local flood risk and drainage are appropriately addressed in any proposals that are submitted in pursuant of the proposed allocations.

It is noted that some of the proposed allocations in the Local Plan Part 2 (e.g. BA02 and BA03) include the following policy criterion;

"Appropriate Flood Risk Assessment, surface water drainage strategy and mitigation is agreed with appropriate body and local planning authority and implemented accordingly;"

The rationale for why this policy criterion is included is contained within the supporting text for the policy. Whilst we do not wish to oppose these relevant policies, we would wish to emphasise that an appropriate drainage strategy needs to be agreed and implemented on all the proposed allocations in the plan. The District Council may wish to propose some minor modifications to the plan to address this matter.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public?

Why do you feel it is necessary to participate at the Examination in Public?

Tondra Thom, Planning Policy Lead
Lewes District Council
Southover House
Southover Road
Lewes
BN7 1AB

05 November 2018

Dear Tondra,

**East Sussex County Council Representations on the Proposed Submission
Lewes Local Plan Part 2: Site allocations and development management policies**

The County Council wish to make the following representations which seek modifications to make certain aspects of the Proposed Submission Local Plan sound. We also have some other comments and observations which relate to certain points that we raised at the draft consultation stage.

Highway Authority

Policy NH01 – South of Valley Road, Newhaven

The County Council, as Highway Authority, has very significant concerns with the proposed access arrangements for the proposed allocation on this site. We are not aware of any evidence existing, including anything submitted by the site proponent, that addresses our concerns. Therefore, as it stands, we do not consider that the deliverability of this proposed allocation has been demonstrated. In turn, it is considered that this policy is 'unsound', due to it not being effective.

The policy stipulates that access to the site will be from Valley Road. The proposed use of Valley Road to and from the east of the site (and links to the C7 'Lewes Road') is problematic; primarily due to the multiple ownerships of Valley Road and the adjoining land, but also because of the classification of Valley Road as a Restricted Byway and its current condition as a narrow track which is unsuitable for serving additional vehicular traffic.

As a Restricted Byway [11d] the road allows for cyclists, pedestrians and horse-riders but not for motor propelled vehicles unless it can be proved that the site had historic vehicular rights prior to the Natural Environment for Rural Communities Act of 2006 extinguishing these rights (in a previous planning application on the site this proof was not provided).

Even if vehicular rights can be proven, the narrow width and the surface of Valley Road between the proposed site and the eastern end of the Restricted Byway (the point at which the adopted road starts -close to the Breakwater Academy School) is unsuitable to serve additional vehicular traffic. Any new development here would therefore need to improve/widen Valley Road to cater for a two way flow of traffic, with a separate footway on the northern side together with a proper turning head. This improved section of Valley Road would then need to be formally adopted in view of its status as a restricted byway to enable access by all motor propelled vehicles.

The multiple ownership of Valley Road complicates matters as each owner would need to be party to any agreement in order to allow these improvement works to take place and secure the adoption of the road as highway; something which was previously highlighted with the previous planning application on part of the proposed site (planning ref. LW/15/0881).

An alternative access route which could be used is via the residential developments off The Fairway to the west/south-west of the site. 'The Fairway' includes The Fairway, Brazen Close and Rothwell Close and does not form part of the adopted public highway. However, the residential roads off The Fairway are privately owned and are unlikely to be adopted due to various longstanding issues including drainage. Any developer of the proposed Policy NH01 site would require agreement from the owners of these roads [we believe that this is currently Persimmon Homes] to gain access to this proposed site.

Another obstacle is that there is no simple way of connecting the proposal site to The Fairway, Brazen Close or Rothwell Close. There are a number of complications with each possible option but the main issue is that the proposal site owner doesn't have any control (or own) any of the surrounding land.

Another obstacle is that in order to connect the site access to The Fairway, Brazen Close or Rothwell Close, the access route would still have to go across or along part of Valley Road.

We would not wish to see vehicular access direct onto Brighton Road. The existing house on the site 'Jace' is served by a steep and narrow access onto the A259 which is not suitable to serve any further development. The site is within 40mph speed limit and therefore visibility splays that would need to be provided are 2.4m x 120m in both directions. These splays do not appear to be achievable unless third party land was acquired. Furthermore, as the land here falls away steeply, it is unlikely that suitable gradients would be achievable which would also affect the visibility for vehicular egress. Assessment of the increase in trips onto the A259 at this point would be required with consideration given to the adjacent controlled crossing.

In conclusion, as it stands the access to the proposed allocation is unlikely to be deliverable from Valley Road [via the C7] or from any of the other alternatives such as The Fairway due to the problems involving third party land.

Policy RG01 – Caburn Field, Ringmer

The County Council is content with the proposed policy and supporting text for this proposed allocation.

Electric Vehicle Charging Points

We accept that you have chosen not to follow our previous recommendation to include a specific planning policy on Electric Vehicle Charging Points but we would urge you to help raise the profile of EVCP's by making reference to the [Technical Guidance note on EVCP's](#) within the Plan and providing a web link to the document. It is particularly important to highlight the valuable contribution that new housing developments need to make in providing charging points which encourage and facilitate the uptake of Electrical Vehicles and ultimately contribute towards improvements in air quality.

We note that Lewes DC is currently conducting a public survey regarding electric vehicle charging points and we hope that this will help support the implementation of a planning policy on EVCP's at some point in the future.

Lead Local Flood Authority

The County Council, in its role as the Lead Local Flood Authority, had previously requested that the Local Plan Part 2 was supported by an up-to-date Strategic Flood Risk Assessment. It is now recognised that as the Local Plan Part 2 does not set the strategic planning policies for the District (para 156 of the NPPF states "Strategic policies should be informed by a Strategic Flood Risk Assessment") that such a piece of evidence is not strictly necessary. Nevertheless, local flood risk does need to be appropriately addressed in the Local Plan Part 2, in particular with the proposed allocations.

Core Policy 12 of the Joint Core Strategy sets a number of policy criteria that should ensure that local flood risk and drainage are appropriately addressed in any proposals that are submitted in pursuant of the proposed allocations.

It is noted that some of the proposed allocations in the Local Plan Part 2 (e.g. BA02 and BA03) include the following policy criterion;

"Appropriate Flood Risk Assessment, surface water drainage strategy and mitigation is agreed with appropriate body and local planning authority and implemented accordingly;"

The rationale for why this policy criterion is included is contained within the supporting text for the policy. Whilst we do not wish to oppose these relevant policies, we would wish to emphasise that an appropriate drainage strategy needs to be agreed and implemented on all the proposed allocations in the plan. The District Council may wish to propose some minor modifications to the plan to address this matter.

Minerals and Waste Planning Policy

The Minerals and Waste Planning Authority does not wish to challenge the legal compliance or soundness of the Plan. However some changes are suggested which the Council is encouraged to pursue.

Lewes District Policies Map

The Lewes District Policies Map does not appear to make reference to or show the adopted Waste and Minerals Local Plan Policies Map. It is, therefore, requested that reference is made to the Waste and Minerals Local Plan Policies Map on the Lewes District Policies map and if possible is incorporated into the map itself. A copy of the electronic GIS data is available on data.gov.uk or can be provided on request.

Policy E1: Land at East Quay, Newhaven Port

In responding to the previous iteration of the plan, the County Council expressed concern that the absence of specific policies for Newhaven Port could create ambiguity for decision-makers in relation to proposals within the Port area. In turn, we suggested that the Port area is defined and some policy framework is provided to aid in future decision making. In light of these previous comments, we welcome the inclusion of such a policy (Policy E1) along with the supporting text.

Policy DM27

It is noted that previous comments on this policy do not appear to have been incorporated into the Plan. The LPA is encouraged to reconsider this and incorporate them as a minor modification to the Plan.

Previous comment: *Whilst Policy DM27 (4) on Landscape design is supported ("where practicable, use material excavated from the site for re-contouring, infilling and top-soiling, ensuring that any land re-modelling respects the local topographic character"), it would be preferable for the Plan to make reference to the other requirements of Policy WMP 3d of the Waste and Minerals Plan 2013 to minimise/manage waste during construction, demolition and excavation.*

Should you require any further information on these points please do not hesitate to contact me.

Yours sincerely



Jon Wheeler

Team Manager, Strategic Economic Infrastructure

T: 01273 482212

E: jonathan.wheeler@eastsussex.gov.uk

Representation ID: REP/010/BH01
--

Representor Details:

Representor ID:	REP/010
Name:	Liz Gander
Organisation:	Wivelsfield Parish Council
Consultation Body:	Specific
Stakeholder Type:	Parish Council

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	clerk@wivelsfield.org.uk
Address:	Parish Council Office, The Cock Inn North Common Road Wivelsfield Green East Sussex RH17 7RH

Representation:

Policy/Section:	BH01 - Land at The Nuggets, Valebridge Road
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	
Representation:	<p>It has been disappointing to note that, despite our request to you in our letter of 25 January 2018 when you consulted on the Local Plan Part 2 previously, you persist in referring to western Wivelsfield as 'the edge of Burgess Hill, (within Wivelsfield Parish)'. Would you please alter this description in the numerous places it appears to read 'Western Wivelsfield (at the edge of Burgess Hill), to put the onus on the area belonging to our Parish first and foremost, with the geographical location being the afterthought (as</p>

opposed to the reverse which is currently the case). Whilst this may seem semantics to Officers, to those residents who live within this area of our Parish and identify with being a part of the Parish, this persistent determination to say they are part of Burgess Hill is upsetting.

Under the section on Areas of Established Character at 4.113 of the Plan, the final bullet point in the list of areas reads 'South of Wivelsfield Green Road, Wivelsfield Green'. The road is simply 'Green Road', so please remove the reference to 'Wivelsfield' at the start of it.

The Council is pleased to see the Plan acknowledge that the identified shortfall of five net additional units in western Wivelsfield 'cannot be currently met at the edge of Burgess Hill'.

However, in relation to the proposed development site of the Nuggets, it would reiterate its earlier comments regarding concerns about the speed of traffic and safe access onto Valebridge Road. Likewise, concerns remain about making sure that drainage systems are designed to ensure no adverse impact on existing properties.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public?

Why do you feel it is necessary to participate at the Examination in Public?



Planning Policy Team
Lewes District Council
Southover House
Southover Road
Lewes
BN7 1AB

5 November 2018

Dear Sir/Madam,

Local Plan Part 2 Consultation

Thank you for the opportunity to comment upon the Local Plan Part 2.

It has been disappointing to note that, despite our request to you in our letter of 25 January 2018 when you consulted on the Local Plan Part 2 previously, you persist in referring to western Wivelsfield as 'the edge of Burgess Hill, (within Wivelsfield Parish)'. Would you please alter this description in the numerous places it appears to read 'Western Wivelsfield (at the edge of Burgess Hill), to put the onus on the area belonging to our Parish first and foremost, with the geographical location being the afterthought (as opposed to the reverse which is currently the case). Whilst this may seem semantics to Officers, to those residents who live within this area of our Parish and identify with being a part of the Parish, this persistent determination to say they are part of Burgess Hill is upsetting.

Under the section on Areas of Established Character at 4.113 of the Plan, the final bullet point in the list of areas reads 'South of Wivelsfield Green Road, Wivelsfield Green'. The road is simply 'Green Road', so please remove the reference to 'Wivelsfield' at the start of it.

The Council is pleased to see the Plan acknowledge that the identified shortfall of five net additional units in western Wivelsfield 'cannot be currently met at the edge of Burgess Hill'.

However, in relation to the proposed development site of the Nuggets, it would reiterate its earlier comments regarding concerns about the speed of traffic and safe





access onto Valebridge Road. Likewise, concerns remain about making sure that drainage systems are designed to ensure no adverse impact on existing properties.

Yours faithfully,

Liz Gander

Clerk to Wivelsfield Parish Council



Representation ID: REP/011/E1Representor Details:

Representor ID:	REP/011
Name:	Mary Greenwood
Organisation:	CPRE Sussex
Consultation Body:	General
Stakeholder Type:	Local group or organisation

Agent Details:

Name:
Organisation:

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	E1 - Land at East Quay, Newhaven Port
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	No
Representation: CPRE Sussex is concerned that the proposed new employment site E1 intrudes into the existing Tide Mills shingle beach area, which has high value both for recreational and leisure use and as a distinctive wildlife area. We support the comments from Community Action Newhaven that the area of site E1 should be reduced and that it should not include any of the present shingle seafront beach.	

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public?	No
--	-----------

Why do you feel it is necessary to participate at the Examination in Public?

Representation ID: REP/011/DM6Representor Details:

Representor ID:	REP/011
Name:	Mary Greenwood
Organisation:	CPRE Sussex
Consultation Body:	General
Stakeholder Type:	Local group or organisation

Agent Details:

Name:
Organisation:

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	DM6: Equestrian Development
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	No
Representation: CPRE Sussex is concerned that policy DM6(5) is too weak. Light pollution from this source in dark rural areas should be avoided in the interests of protecting dark landscapes, nature conservation (particularly bat foraging) and local amenity. Our concerns could be met by deletion of the word 'unacceptable' from the policy. Such equestrian use is of insufficient importance to justify any adverse impact in currently dark countryside. The change we propose is necessary for the policy to be in accord with	

NPPF 2012 para.125 or NPPF 2018 para.180(c).

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public? No

Why do you feel it is necessary to participate at the Examination in Public?

Representation ID: REP/011/DM9

Representor Details:

Representor ID:	REP/011
Name:	Mary Greenwood
Organisation:	CPRE Sussex
Consultation Body:	General
Stakeholder Type:	Local group or organisation

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	DM9: Farm Diversification
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	No
Representation: CPRE Sussex supports the general intention of this policy. However, an additional condition about car parking is required. It is likely that effective farm diversification schemes will generate an additional requirement for such parking. Insensitive vehicle parking outside a farm curtilage can have a strongly negative urbanising impact on the rural landscape. It is essential to include an additional condition to ensure that vehicle parking is either confined within the farmyard concerned or otherwise effectively	

screened.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public?

No

Why do you feel it is necessary to participate at the Examination in Public?

Representation ID: REP/011/DM14
--

Representor Details:

Representor ID:	REP/011
Name:	Mary Greenwood
Organisation:	CPRE Sussex
Consultation Body:	General
Stakeholder Type:	Local group or organisation

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	DM14: Multi-functional Green Infrastructure
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	No
Representation: This policy is weak and generic. As written it does not meet the requirements of NPPF 2012 paras.113-114 or NPPF paras.170-171 & 181. It merely repeats them. It needs to be strengthened and made more specific. The first sentence of the draft policy is unfortunately phrased, and presumably is not intended to mean what it actually says. CPRE Sussex suggests that this policy should include a clear strategy that, as a minimum, gave a clear indication of the types of natural assets that contribute to the	

important ecological networks in the different parts of the District. They should include woodland, valuable trees, established hedgerows, ponds, ditches and streams. Specific locally-important habitats should be identified. The policy should require that these should be retained within new development. Where such assets are not pre-existing, they should be provided by new planting and provision. Domestic gardens can make an important contribution to biodiversity, but only if they are of reasonable extent and linked by appropriate green infrastructure to the surrounding countryside.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public? No

Why do you feel it is necessary to participate at the Examination in Public?

Representation ID: REP/011/DM15
--

Representor Details:

Representor ID:	REP/011
Name:	Mary Greenwood
Organisation:	CPRE Sussex
Consultation Body:	General
Stakeholder Type:	Local group or organisation

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	DM15: Provision for Outdoor Playing Space
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	No
Representation: CPRE Sussex welcomes this policy. However, it would be stronger, and clearer to developers, if accompanied by an indication of the current situation for the different communities in the District and/or an indication of where up-to-date information about this will be obtainable in the future. Such information will be necessary to enable developers to assess development viability at an early stage (e.g. prior to site purchase). Larger developments can reasonably be expected to make on-site provision, and this	

should be specified as a requirement. This will not be practicable for smaller sites.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public? No

Why do you feel it is necessary to participate at the Examination in Public?

Representation ID: REP/011/DM24
--

Representor Details:

Representor ID:	REP/011
Name:	Mary Greenwood
Organisation:	CPRE Sussex
Consultation Body:	General
Stakeholder Type:	Local group or organisation

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	DM24: Protection of Biodiversity and Geodiversity
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	No
Representation: CPRE Sussex is very concerned that an arbitrary 7 km distance from Ashdown Forest is not adequate or sufficient to discriminate whether or not an impact on a protected site may occur. The scale of the development obviously matters. A very small (e.g. single house) development at 6.9 km from the Forest is very unlikely to have any impact while a large development (e.g. 1,000 houses) at 7.1 km from the Forest should be of much greater concern, and an appropriate assessment should be required. We do not believe	

the policy as written to be sound.

CPRE Sussex recommends that to be sound paragraph 3 of policy DM24 should also require an additional condition that there is no suitable alternative site before a development with an adverse impact on an SSSI, NNR or MCZ is approved.

In paragraph 4 of policy DM24 the term 'irreplaceable habitat' should be defined in the glossary or more specific information should be included in the policy. We assume that, for example, that this term encompasses both ancient woodland and 'important' hedgerows.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public? No

Why do you feel it is necessary to participate at the Examination in Public?

Representation ID: REP/011/DM31Representor Details:

Representor ID:	REP/011
Name:	Mary Greenwood
Organisation:	CPRE Sussex
Consultation Body:	General
Stakeholder Type:	Local group or organisation

Agent Details:

Name:
Organisation:

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	DM31: Advertisements
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	No
Representation: CPRE Sussex believes that this policy should specify that advertisements in the countryside (outside planning boundaries) should not be illuminated.	
What changes do you suggest to make the document legally compliant or sound?	

Do you consider it necessary to participate at the Examination in Public?	No
Why do you feel it is necessary to participate at the Examination in Public?	

Representation ID: REP/011/DM36
--

Representor Details:

Representor ID:	REP/011
Name:	Mary Greenwood
Organisation:	CPRE Sussex
Consultation Body:	General
Stakeholder Type:	Local group or organisation

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	DM36: Station Parking
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	No
Representation: CPRE Sussex strongly supports the intention of protecting car parking provision at railway stations, to encourage sustainable travel. However, the term 'adjacent' has a specific meaning that is not appropriate here. For example, at Glynde railway station the 'adjacent' parking is extremely limited and much too small to encourage commuter use of the railway here. The important car park for rural car/rail commuters is about 200 metres away. To encourage railway use the wording needs to be revised to protect this	

car park too.	
What changes do you suggest to make the document legally compliant or sound?	
Do you consider it necessary to participate at the Examination in Public?	No
Why do you feel it is necessary to participate at the Examination in Public?	

Representation ID: REP/011/HPC/A

Representor Details:

Representor ID:	REP/011
Name:	Mary Greenwood
Organisation:	CPRE Sussex
Consultation Body:	General
Stakeholder Type:	Local group or organisation

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	Housing Policy Context
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	No
Representation: To be sound a Local Plan needs to plan to deliver not only an adequate number of new homes in the District, but it also needs to ensure that the types of new homes match the projected requirement (see NPPF 2018 para.61). To take an extreme example, a need for 6,900 new 1-2 bed homes for new small households of modest means would not be met by the delivery of 6,900 expensive market 4+ bed homes, nor would a requirement	

for 6,900 large family homes be met by the provision of 6,900 1-bed flats.

There is no policy in this Local Plan (or in the Lewes District Joint Core Strategy) to ensure that the new homes delivered are of the right type to meet the assessed housing need. The recently (September 2018) issued 2016-based ONS projections show that for England as a whole all the new households formed to 2041 will be headed by people aged over 55; that almost 90% of them will be headed by people over retirement age; and that a quarter of them will be headed by people aged over 85. A similar pattern could be deduced from the 2014-based household projections issued by ONS in 2016. It is extremely unlikely that this situation is not fully reflected in Lewes District, which has a significantly higher proportion of older residents than England as a whole.

No Local Plan that fails to include specific quantitative policies to deliver the types of housing they are likely to require can be considered sound. Policy SD27 of the emerging South Downs National Park Local Plan provides a model for a step in the right direction, but more specific policies to address the needs of older residents are also essential.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public? No

Why do you feel it is necessary to participate at the Examination in Public?

Representation ID: REP/011/HPC/B

Representor Details:

Representor ID:	REP/011
Name:	Mary Greenwood
Organisation:	CPRE Sussex
Consultation Body:	General
Stakeholder Type:	Local group or organisation

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	Housing Policy Context
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	No Not Effective
Representation: Comment on Housing Policy Context (paragraphs 2.1-2.11: pages 12-15) CPRE Sussex strongly disagrees with the conclusion in paragraph 2.1 and Table 1 that the Housing Requirement Figure for Lewes District from the adopted Lewes District Joint Core Strategy should be 6,926. The correct figure, approved by the Inspector and	

included in policy SP1, is 6,900 (345 per annum). This number is reiterated in the introduction to policy SP2.

'The fact that the sum total of the different allocations, categories and provisions in policy SP2 is 6,926, a very modest over-provision given the uncertainty of some supply categories at that time, is of no relevance. The starting number for line 1 of Table 1 should thus be 6,900, which represents 345 dwellings per annum.

'The basis of the division of the number that should be 345 dwellings per annum (6,900 total) between the part of Lewes District outside the South Downs National Park (covered in this draft Local Plan part 2) and that part of the District within the SDNP (to be covered in the emerging SDNP Local Plan) is not clear. The division proposed in paragraph 2.2 and Tables 1 & 2 is stated as if an agreed objective fact, but appears to CPRE Sussex to be unexplained and, apparently, arbitrary. The basis for this division, and whether it has been the subject of any consultation or examination, needs to be explained. It is important to appreciate in this context that the town of Lewes, which is entirely within the National Park, is nevertheless the best connected, and by some margin the most sustainable, location for new development within the District and offers a considerable number of brownfield redevelopment opportunities. Lewes town has an advanced Neighbourhood Plan that appears set to deliver a higher level of new housing (predominantly on brownfield sites) than was envisaged at the time that the Lewes District Joint Core Strategy was adopted.

'For this new draft Local Plan part 2 to be sound, it needs to deliver not only the correct numbers of new homes but also to deliver them at an appropriate development speed. Given that the evidence suggests that recent housing delivery in the District overall has been very close to the required annual rate, and the profile in the 2016 Lewes District Joint Core Strategy suggested high rates of delivery in the next few years, it is a matter of some concern that the 1 April 2018 assessment of the District's Housing Land Supply was that it had fallen slightly below 5 years. CPRE Sussex believes this assessment to be incorrect, and that the actual supply is significantly above 5 years. We have supplied detailed supporting evidence to the Council. To be sound this draft Local Plan part 2 needs to address the question of the profile of delivery, and in particular to demonstrate that it will deliver an adequate and secure supply of new homes over the coming 5-year period. It does not at present appear to address this important question.

'There is a small but not completely insignificant numerical error in Table 5. Table 3 indicates that the adopted Ringmer Neighbourhood Plan will provide 183 new homes, but that a further 32 are to be identified in LPP2 (para.2.118 et seq). Draft Policy RG01 then allocates a Ringmer site [an extended version of site RG1 in the 2003 Lewes Local Plan] for 90 homes, contributing an additional 50 new homes, against the Ringmer requirement for 32. Unfortunately Table 5 overlooks the fact that the extension of the 2003 site RG1 to create the new site RG01 in this Plan encompasses Ringmer Neighbourhood Plan site RES3, so to this extent there is a double-counting of the new homes to be delivered. The necessary correction takes the 'Units allocated in LPP2' in Table 5 from slightly above the 'Housing growth to be identified in LPP2' to slightly below it. However, the compensating correction that CPRE Sussex contends above should be

made to the starting total would, if made, restore a surplus over the requirement here.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public? No

Why do you feel it is necessary to participate at the Examination in Public?

Representation ID: REP/011/HSA

Representor Details:

Representor ID:	REP/011
Name:	Mary Greenwood
Organisation:	CPRE Sussex
Consultation Body:	General
Stakeholder Type:	Local group or organisation

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	Housing Site Allocations
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	No Not Effective
Representation:	
<p>Comment on the Sustainability Appraisal of new rural housing developments, as used throughout Section 2</p> <p>CPRE Sussex notes that when potential new housing sites are appraised for sustainability there are no differences between the appraisals of sustainably-located</p>	

urban sites and much less sustainable village sites against the objectives considering travel (objective 3) and carbon dioxide emissions (objective 12). If new homes are located in villages (particularly villages such as Barcombe with few local services and little or no public transport) then the lives of the new residents will inevitably be much more dependent on use of their private cars, and car ownership will be much higher, than if the same new homes had been more sustainably located in urban areas. East Sussex County Council has published detailed evidence on car ownership and use for commuting for the different urban and rural communities in Lewes District [eastsussexinfigures.org.uk]. The inspector examining part 1 of the Local Plan made this specific point, recommending that additional new housing should, in so far as is possible, be located in the District's towns. The principle is enshrined in Core Policy CP13 of the adopted Lewes District Joint Core Strategy. This should certainly have been reflected in the sustainability appraisals of new housing sites. It is not, even though in several cases it is specifically noted that the rural housing site appraised is likely to be car-dependent. Because the sustainability appraisals ignore this important factor, they cannot be considered sound.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public? No

Why do you feel it is necessary to participate at the Examination in Public?

Comments made by the Lewes District Branch of CPRE Sussex

Secretary: Mrs Mary Greenwood, [REDACTED]

Email: [REDACTED]

Telephone: [REDACTED]

Representing: CPRE Sussex, Brownings Farm, Blackboys, East Sussex, TN22 5HG

CPRE Sussex believes the sections of the draft Local Plan referred to below to be neither sound nor effective in their current forms, and in some cases not compliant with national legislation. In most cases appropriate modifications are suggested.

CPRE Sussex considers the most significant comments below to be comments 1, 2, 6, 8 & 11. We would welcome the opportunity to present more detailed evidence and argument at a later stage to assist the Inspector examining the draft Local Plan part 2.

1. Comment on Housing Policy Context (paragraphs 2.1-2.11: pages 12-15)

CPRE Sussex strongly disagrees with the conclusion in paragraph 2.1 and Table 1 that the Housing Requirement Figure for Lewes District from the adopted Lewes District Joint Core Strategy should be 6,926. The correct figure, approved by the Inspector and included in policy SP1, is 6,900 (345 per annum). This number is reiterated in the introduction to policy SP2.

The fact that the sum total of the different allocations, categories and provisions in policy SP2 is 6,926, a very modest over-provision given the uncertainty of some supply categories at that time, is of no relevance. The starting number for line 1 of Table 1 should thus be 6,900, which represents 345 dwellings per annum.

The basis of the division of the number that should be 345 dwellings per annum (6,900 total) between the part of Lewes District outside the South Downs National Park (covered in this draft Local Plan part 2) and that part of the District within the SDNP (to be covered in the emerging SDNP Local Plan) is not clear. The division proposed in paragraph 2.2 and Tables 1 & 2 is stated as if an agreed objective fact, but appears to CPRE Sussex to be unexplained and, apparently, arbitrary. The basis for this division, and whether it has been the subject of any consultation or examination, needs to be explained. It is important to appreciate in this context that the town of Lewes, which is entirely within the National Park, is nevertheless the best connected, and by some margin the most sustainable, location for new development within the District and offers a considerable number of brownfield redevelopment opportunities. Lewes town has an advanced Neighbourhood Plan that appears set to deliver a higher level of new housing (predominantly on brownfield sites) than was envisaged at the time that the Lewes District Joint Core Strategy was adopted.

For this new draft Local Plan part 2 to be sound, it needs to deliver not only the correct numbers of new homes but also to deliver them at an appropriate development speed. Given that the evidence suggests that recent housing delivery in the District overall has been very close to the required annual rate, and the profile in the 2016 Lewes District Joint Core Strategy suggested high rates of delivery in the next few years, it is a matter of some concern that the 1 April 2018 assessment of the District's Housing Land Supply was that it had fallen slightly below 5 years. CPRE Sussex believes this assessment to be incorrect, and that the actual supply is significantly above 5 years. We have supplied detailed supporting evidence to the Council. To be sound this draft Local Plan part 2 needs to address the question of the profile of delivery, and in particular to demonstrate that it will deliver

an adequate and secure supply of new homes over the coming 5-year period. It does not at present appear to address this important question.

There is a small but not completely insignificant numerical error in Table 5. Table 3 indicates that the adopted Ringmer Neighbourhood Plan will provide 183 new homes, but that a further 32 are to be identified in LPP2 (para.2.118 et seq). Draft Policy RG01 then allocates a Ringmer site [an extended version of site RG1 in the 2003 Lewes Local Plan] for 90 homes, contributing an additional 50 new homes, against the Ringmer requirement for 32. Unfortunately Table 5 overlooks the fact that the extension of the 2003 site RG1 to create the new site RG01 in this Plan encompasses Ringmer Neighbourhood Plan site RES3, so to this extent there is a double-counting of the new homes to be delivered. The necessary correction takes the 'Units allocated in LPP2' in Table 5 from slightly above the 'Housing growth to be identified in LPP2' to slightly below it. However, the compensating correction that CPRE Sussex contends above should be made to the starting total would, if made, restore a surplus over the requirement here.

2. Comment on the Sustainability Appraisal of new rural housing developments, as used throughout Section 2

CPRE Sussex notes that when potential new housing sites are appraised for sustainability there are no differences between the appraisals of sustainably-located urban sites and much less sustainable village sites against the objectives considering travel (objective 3) and carbon dioxide emissions (objective 12). If new homes are located in villages (particularly villages such as Barcombe with few local services and little or no public transport) then the lives of the new residents will inevitably be much more dependent on use of their private cars, and car ownership will be much higher, than if the same new homes had been more sustainably located in urban areas. East Sussex County Council has published detailed evidence on car ownership and use for commuting for the different urban and rural communities in Lewes District [eastsussexinfigures.org.uk]. The inspector examining part 1 of the Local Plan made this specific point, recommending that additional new housing should, in so far as is possible, be located in the District's towns. The principle is enshrined in Core Policy CP13 of the adopted Lewes District Joint Core Strategy. This should certainly have been reflected in the sustainability appraisals of new housing sites. It is not, even though in several cases it is specifically noted that the rural housing site appraised is likely to be car-dependent. Because the sustainability appraisals ignore this important factor, they cannot be considered sound.

3. Comment on Section 3, Employment (Policy E1, paragraphs 3.11-3.17)

CPRE Sussex is concerned that the proposed new employment site E1 intrudes into the existing Tide Mills shingle beach area, which has high value both for recreational and leisure use and as a distinctive wildlife area. We support the comments from Community Action Newhaven that the area of site E1 should be reduced and that it should not include any of the present shingle seafront beach.

4. Comment on Policy DM6(5). Light pollution from equestrian development

CPRE Sussex is concerned that policy DM6(5) is too weak. Light pollution from this source in dark rural areas should be avoided in the interests of protecting dark landscapes, nature conservation (particularly bat foraging) and local amenity. Our concerns could be met by deletion of the word 'unacceptable' from the policy. Such equestrian use is of insufficient importance to justify any adverse impact in currently dark countryside. The change we propose is necessary for the policy to be in accord with NPPF 2012 para.125 or NPPF 2018 para.180(c).

5. Comment on Policy DM9. Farm diversification

CPRE Sussex supports the general intention of this policy. However, an additional condition about car parking is required. It is likely that effective farm diversification schemes will generate an additional requirement for such parking. Insensitive vehicle parking outside a farm curtilage can have a strongly negative urbanising impact on the rural landscape. It is essential to include an additional condition to ensure that vehicle parking is either confined within the farmyard concerned or otherwise effectively screened.

6. Comment on Policy DM14. Multi-functional green infrastructure.

This policy is weak and generic. As written it does not meet the requirements of NPPF 2012 paras.113-114 or NPPF paras.170-171 & 181. It merely repeats them. It needs to be strengthened and made more specific. The first sentence of the draft policy is unfortunately phrased, and presumably is not intended to mean what it actually says. CPRE Sussex suggests that this policy should include a clear strategy that, as a minimum, gave a clear indication of the types of natural assets that contribute to the important ecological networks in the different parts of the District. They should include woodland, valuable trees, established hedgerows, ponds, ditches and streams. Specific locally-important habitats should be identified. The policy should require that these should be retained within new development. Where such assets are not pre-existing, they should be provided by new planting and provision. Domestic gardens can make an important contribution to biodiversity, but only if they are of reasonable extent and linked by appropriate green infrastructure to the surrounding countryside.

7. Comment on Policy DM15. Provision of outdoor playing space.

CPRE Sussex welcomes this policy. However, it would be stronger, and clearer to developers, if accompanied by an indication of the current situation for the different communities in the District and/or an indication of where up-to-date information about this will be obtainable in the future. Such information will be necessary to enable developers to assess development viability at an early stage (e.g. prior to site purchase). Larger developments can reasonably be expected to make on-site provision, and this should be specified as a requirement. This will not be practicable for smaller sites.

8. Comment on Policy DM24. Protection of biodiversity.

CPRE Sussex is very concerned that an arbitrary 7 km distance from Ashdown Forest is not adequate or sufficient to discriminate whether or not an impact on a protected site may occur. The scale of the development obviously matters. A very small (e.g. single house) development at 6.9 km from the Forest is very unlikely to have any impact while a large development (e.g. 1,000 houses) at 7.1 km from the Forest should be of much greater concern, and an appropriate assessment should be required. We do not believe the policy as written to be sound.

CPRE Sussex recommends that to be sound paragraph 3 of policy DM24 should also require an additional condition that there is no suitable alternative site before a development with an adverse impact on an SSSI, NNR or MCZ is approved.

In paragraph 4 of policy DM24 the term 'irreplaceable habitat' should be defined in the glossary or more specific information should be included in the policy. We assume that, for example, that this term encompasses both ancient woodland and 'important' hedgerows.

9. Comment on Policy DM31. Advertisements.

CPRE Sussex believes that this policy should specify that advertisements in the countryside (outside planning boundaries) should not be illuminated.

10. Comment on Policy DM36. Station Parking.

CPRE Sussex strongly supports the intention of protecting car parking provision at railway stations, to encourage sustainable travel. However, the term 'adjacent' has a specific meaning that is not appropriate here. For example, at Glynde railway station the 'adjacent' parking is extremely limited and much too small to encourage commuter use of the railway here. The important car park for rural car/rail commuters is about 200 metres away. To encourage railway use the wording needs to be revised to protect this car park too.

11. Comment on the need for an additional DM policy or policies, required but not currently included

To be sound a Local Plan needs to plan to deliver not only an adequate number of new homes in the District, but it also needs to ensure that the types of new homes match the projected requirement (see NPPF 2018 para.61). To take an extreme example, a need for 6,900 new 1-2 bed homes for new small households of modest means would not be met by the delivery of 6,900 expensive market 4+ bed homes, nor would a requirement for 6,900 large family homes be met by the provision of 6,900 1-bed flats.

There is no policy in this Local Plan (or in the Lewes District Joint Core Strategy) to ensure that the new homes delivered are of the right type to meet the assessed housing need. The recently (September 2018) issued 2016-based ONS projections show that for England as a whole all the new households formed to 2041 will be headed by people aged over 55; that almost 90% of them will be headed by people over retirement age; and that a quarter of them will be headed by people aged over 85. A similar pattern could be deduced from the 2014-based household projections issued by ONS in 2016. It is extremely unlikely that this situation is not fully reflected in Lewes District, which has a significantly higher proportion of older residents than England as a whole.

No Local Plan that fails to include specific quantitative policies to deliver the types of housing they are likely to require can be considered sound. Policy SD27 of the emerging South Downs National Park Local Plan provides a model for a step in the right direction, but more specific policies to address the needs of older residents are also essential.

Representation ID: REP/012/GT01Representor Details:

Representor ID:	REP/012
Name:	Lucy Howard
Organisation:	South Downs National Park Authority
Consultation Body:	Specific
Stakeholder Type:	Other Local Authority

Agent Details:

Name:
Organisation:

Contact Details:

Email Address:	Lucy.Howard@southdowns.gov.uk
Address:	South Downs Centre North Street Midhurst West Sussex GU29 9DH

Representation:

Policy/Section:	GT01 - Land south of The Plough
<i>Do you consider the document to be:</i> Legally Compliant: Sound:	
Representation: Welcome the proposal to allocate this site for five net additional permanent Gypsy and Traveller pitches, and the potential for meeting the assessed need for the Lewes District outside the SDNP.	
What changes do you suggest to make the document legally compliant or sound?	

Do you consider it necessary to participate at the Examination in Public?
Why do you feel it is necessary to participate at the Examination in Public?

Representation ID: REP/012/E1Representor Details:

Representor ID:	REP/012
Name:	Lucy Howard
Organisation:	South Downs National Park Authority
Consultation Body:	Specific
Stakeholder Type:	Other Local Authority

Agent Details:

Name:
Organisation:

Contact Details:

Email Address:	Lucy.Howard@southdowns.gov.uk
Address:	

Representation:

Policy/Section:	E1 - Land at East Quay, Newhaven Port
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	
Representation: The planned expansion of Newhaven Port is already committed to with permission granted for the building of a new road link and bridge that will come into the area allocated as site E1 and connecting to the scheme with planning consent for the redeveloped East Quay area to the south west of the allocation. Under the conditions of the planning permission for the redeveloped East Quay area is the agreed provision for an area of nature reserve immediately to the east of site E1 and adjacent to the SDNP boundary in the area of Tide Mills. Part of the Tide Mills area is within the SDNP to the east. Emerging SDLP Local Plan Policy SD18: The Open Coast describes the area of Tide	

Mills, up to the SDNP boundary adjacent to the proposed nature reserve, as the Zone of Undeveloped Coast as shown on Figure 5.6 relating to that policy. At the coast this zone extends from west of Seaford to the SDNP boundary and the edge of the agreed nature reserve. Paragraph 5.162 of the supporting text for emerging Policy SD18 asserts the landscape sensitivity of this coastal area and the need for a coordinated approach to development which recognizes the adjacent pressures on this vulnerable area.

Core Policy 10 (CP10) of the Joint Core Strategy (JCS), Lewes Local Plan Part 1 refers to the first purpose of the SDNP, to conserve and enhance the natural beauty, wildlife and cultural heritage of the area. CP10 also refers to appropriate mitigation and compensation where development impacts on the SDNP. The SDNP is in close proximity to site E1 and through the open nature of the coastline and the adjacent agreed nature reserve is visually connected to the allocated site. Therefore it is suggested Policy E1 cross-references policy CP10 and refers positively to the setting of the SDNP, and the need to respect the landscape character of this connected area with appropriate mitigation and compensation as required.

Also it is suggested the preamble paragraphs to the policy also make reference to the South Downs Integrated Landscape Character Assessment (SDILCA), specifically the Landscape Management and Development Considerations described in Appendix F, Landscape Type F: Major River Floodplains, and F2: Ouse Floodplain area <http://www.southdowns.gov.uk/wp-content/uploads/2015/03/ILCA-Appendix-F-Major-River-Floodplains.pdf> The wording should include the need for Visual and Landscape Character Assessment to be carried out on detailed proposals for site E1 using the SDILCA, due to the proximity of the SDNP and the setting it provides to the proposed allocated site.

It is suggested Policy E1 cross references Policy DM24: Protection of Biodiversity and Geodiversity, given the Local Nature Reserve and Local Wildlife Sites that are likely to be effected by development on site E1, especially the proximity to the east of the agreed nature reserve.

In addition it is suggested the policy contains wording on the protection of existing connectivity on non-motorised travel routes through site E1, including to the nearby area to the east in the SDNP. This reflects the intention in the JCS Core Policy Policy 13: Sustainable Travel, bullet point c, and the policy intention for the adjacent area of the National Park as covered by Strategic Policy SD20: Walking, Cycling and Equestrian Routes in the Submission SDLP.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public?

Why do you feel it is necessary to participate at the Examination in Public?

Representation ID: REP/012/E2Representor Details:

Representor ID:	REP/012
Name:	Lucy Howard
Organisation:	South Downs National Park Authority
Consultation Body:	Specific
Stakeholder Type:	Other Local Authority

Agent Details:

Name:
Organisation:

Contact Details:

Email Address:	Lucy.Howard@southdowns.gov.uk
Address:	

Representation:

Policy/Section:	E2 - Land adjacent to American Express Community Stadium, Village Way, Falmer
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	
Representation: The SDNPA supports the wording in paragraph 3.19 in the preamble to the policy regarding key views into the SDNP, the stadium and the setting of the SDNP, and in paragraph 3.20 that the stadium has been designed to sit within the natural curves of the downland. We strongly support the wording in paragraphs a) and b) of Policy E2. To be consistent with the SDNPA's response to the Brighton and Hove Draft City Plan Part 2 Consultation (Regulation 18), Policy SSA7 (site adjacent to E2) the following comments are made. We suggest adding to the preamble paragraphs that the site is also a gateway into the SDNP from the City of Brighton and Hove. We suggest adding to	

the policy the need to provide visual connectivity to the SDNP, and therefore consideration of the setting in proximity to the SDNP, in terms of the design of any proposed development. In the preamble paragraphs suggest adding wording referencing the proposal site as a gateway to the SDNP when exiting the City along a key transport route. Also suggest adding the need to use materials and design reflecting the setting of the SDNP and referencing the SDILCA, specifically the Landscape Management and Development Considerations described in Appendix A, Landscape Type A: Open Downland and A2: Adur to Ouse Open Downs area <http://www.southdowns.gov.uk/wp-content/uploads/2015/03/ILCA-Appendix-A-Open-Downland.pdf>

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public?

Why do you feel it is necessary to participate at the Examination in Public?

Representation ID: REP/012/HRA

Representor Details:

Representor ID:	REP/012
Name:	Lucy Howard
Organisation:	South Downs National Park Authority
Consultation Body:	Specific
Stakeholder Type:	Other Local Authority

Agent Details:

Name:
Organisation:

Contact Details:

Email Address:	Lucy.Howard@southdowns.gov.uk
Address:	

Representation:

Policy/Section:	Habitats Regulation Assessment
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	
Representation: The SDNPA overall supports the methodology and conclusions of the HRA in particular the use of the Joint Habitat Regulations Assessment Addendum which forms Appendix B of the Lewes Local Plan Part 2 HRA.	
What changes do you suggest to make the document legally compliant or sound?	
Do you consider it necessary to participate at the Examination in Public?	
Why do you feel it is necessary to participate at the Examination in Public?	

--

05 November 2018

Tondra Thom
Lewes District Council
Southover House
Southover Road
Lewes
BN7 1AB

Dear Tondra

Subject: SDNPA representation to Lewes Local Plan Part 2: Site Allocations and Development Management Pre-Submission Document consultation (Regulation 19)

Thank you for consulting the South Downs National Park Authority (SDNPA) on the Pre-Submission version of the Lewes Local Plan Part 2 (LLPP2).

The SDNPA and all relevant authorities are required to have regard to the purposes of the South Downs National Park (SDNP) as set out in Section 62 of the Environment Act 1995. The purposes are 'to conserve and enhance the natural beauty, wildlife and cultural heritage of the area' and 'to promote opportunities for the understanding and enjoyment of the special qualities of the national park by the public.'

Duty to Cooperate

The SDNPA has a set of six strategic cross-boundary priorities. I would like to take the opportunity to again highlight these which provide a framework for ongoing Duty to Cooperate discussions:

- Conserving and enhancing the natural beauty of the area.
- Conserving and enhancing the region's biodiversity (including green infrastructure issues).
- The delivery of new homes, including affordable homes and pitches for Gypsies, Travellers and Travelling Showpeople.
- The promotion of sustainable tourism.
- Development of the local economy.
- Improving the efficiency of transport networks by enhancing the proportion of travel by sustainable modes and promoting policies which reduce the need to travel.

Housing

The housing provision figures set out in the emerging LLPP2 and the South Downs Local Plan (SDLP) both flow from and need to be consistent with the Lewes Joint Core Strategy notwithstanding the quashing of Policies SP1 and SP2 of the JCS insofar as they relate to the SDLP. This set a figure of 6,900 net additional dwellings to be provided in the plan area, which is equivalent to approximately 345 net additional dwellings per annum. Table I of the

Statement of Common Ground between LDC and the SDNPA signed in March 2018, which I am attaching for your reference, sets out a SDLP housing provision figure of 1,307 for the plan period 2014-2033. Table 1 of the LLPP2 gives a housing figure of 1,432 for that part of Lewes District within the SDNP for the plan period 2010-2030. The difference of 125 is most likely due to the different plan periods. It would be good to meet and discuss the matter and consider whether a focused review of the Statement of Common Ground is needed.

Site Allocations

Policy GT01 – Land south of The Plough

Welcome the proposal to allocate this site for five net additional permanent Gypsy and Traveller pitches, and the potential for meeting the assessed need for the Lewes District outside the SDNP.

Policy EI: Land at East Quay, Newhaven Port

The planned expansion of Newhaven Port is already committed to with permission granted for the building of a new road link and bridge that will come into the area allocated as site EI and connecting to the scheme with planning consent for the redeveloped East Quay area to the south west of the allocation. Under the conditions of the planning permission for the redeveloped East Quay area is the agreed provision for an area of nature reserve immediately to the east of site EI and adjacent to the SDNP boundary in the area of Tide Mills. Part of the Tide Mills area is within the SDNP to the east.

Emerging SDLP Local Plan Policy SD18: The Open Coast describes the area of Tide Mills, up to the SDNP boundary adjacent to the proposed nature reserve, as the Zone of Undeveloped Coast as shown on Figure 5.6 relating to that policy. At the coast this zone extends from west of Seaford to the SDNP boundary and the edge of the agreed nature reserve. Paragraph 5.162 of the supporting text for emerging Policy SD18 asserts the landscape sensitivity of this coastal area and the need for a coordinated approach to development which recognizes the adjacent pressures on this vulnerable area.

Core Policy 10 (CP10) of the Joint Core Strategy (JCS), Lewes Local Plan Part 1 refers to the first purpose of the SDNP, to conserve and enhance the natural beauty, wildlife and cultural heritage of the area. CP10 also refers to appropriate mitigation and compensation where development impacts on the SDNP. The SDNP is in close proximity to site EI and through the open nature of the coastline and the adjacent agreed nature reserve is visually connected to the allocated site. Therefore it is suggested Policy EI cross-references policy CP10 and refers positively to the setting of the SDNP, and the need to respect the landscape character of this connected area with appropriate mitigation and compensation as required.

Also it is suggested the preamble paragraphs to the policy also make reference to the South Downs Integrated Landscape Character Assessment (SDILCA), specifically the Landscape Management and Development Considerations described in Appendix F, Landscape Type F: Major River Floodplains, and F2: Ouse Floodplain area <http://www.southdowns.gov.uk/wp-content/uploads/2015/03/ILCA-Appendix-F-Major-River-Floodplains.pdf> The wording should include the need for Visual and Landscape Character Assessment to be carried out on detailed proposals for site EI using the SDILCA, due to the proximity of the SDNP and the setting it provides to the proposed allocated site.

It is suggested Policy E1 cross references Policy DM24: Protection of Biodiversity and Geodiversity, given the Local Nature Reserve and Local Wildlife Sites that are likely to be effected by development on site E1, especially the proximity to the east of the agreed nature reserve.

In addition it is suggested the policy contains wording on the protection of existing connectivity on non-motorised travel routes through site E1, including to the nearby area to the east in the SDNP. This reflects the intention in the JCS Core Policy Policy 13: Sustainable Travel, bullet point c, and the policy intention for the adjacent area of the National Park as covered by Strategic Policy SD20: Walking, Cycling and Equestrian Routes in the Submission SDLP.

Policy E2: Land Adjacent to American Express Community Stadium, Village Way, Falmer

The SDNPA supports the wording in paragraph 3.19 in the preamble to the policy regarding key views into the SDNP, the stadium and the setting of the SDNP, and in paragraph 3.20 that the stadium has been designed to sit within the natural curves of the downland. We strongly support the wording in paragraphs a) and b) of Policy E2.

To be consistent with the SDNPA's response to the Brighton and Hove Draft City Plan Part 2 Consultation (Regulation 18), Policy SSA7 (site adjacent to E2) the following comments are made. We suggest adding to the preamble paragraphs that the site is also a gateway into the SDNP from the City of Brighton and Hove. We suggest adding to the policy the need to provide visual connectivity to the SDNP, and therefore consideration of the setting in proximity to the SDNP, in terms of the design of any proposed development. In the preamble paragraphs suggest adding wording referencing the proposal site as a gateway to the SDNP when exiting the City along a key transport route. Also suggest adding the need to use materials and design reflecting the setting of the SDNP and referencing the SDILCA, specifically the Landscape Management and Development Considerations described in Appendix A, Landscape Type A: Open Downland and A2: Adur to Ouse Open Downs area <http://www.southdowns.gov.uk/wp-content/uploads/2015/03/ILCA-Appendix-A-Open-Downland.pdf>

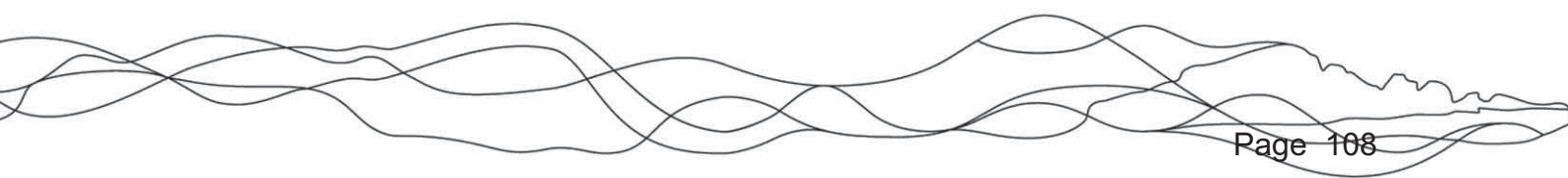
Lewes Local Plan Part 2 and Neighbourhood Plans Habitats Regulations Assessment (HRA)

The SDNPA overall supports the methodology and conclusions of the HRA in particular the use of the Joint Habitat Regulations Assessment Addendum which forms Appendix B of the Lewes Local Plan Part 2 HRA.

Yours sincerely



Lucy Howard
Planning Policy Manager
Lucy.howard@southdowns.gov.uk
01730 819284





Lewes District Council



South Downs

National Park Authority

DUTY TO COOPERATE STATEMENT OF COMMON GROUND

BETWEEN: Lewes District Council and the South Downs National Park Authority

DATE: 14 March

1. Introduction

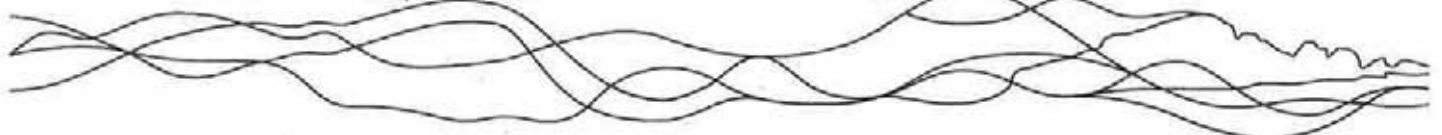
- 1.1 This Statement of Common Ground (SCG) is a jointly agreed statement between Lewes District Council (LDC) and the South Downs National Park Authority (SDNPA). It sets out the position and understanding with respect to key relevant duty to cooperate matters, and agreed actions to resolve outstanding matters. It is not binding on any party, but sets out a clear and positive direction to inform ongoing strategy and plan-making.

2. Context

- 2.1 Section 62 of the Environment Act 1995 requires all relevant authorities, including local authorities such as LDC, to have regard to the purposes of national parks. These are:
- To conserve and enhance the natural beauty, wildlife and cultural heritage of the area;
 - To promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public.
- 2.2 As a National Park Authority and Local Planning Authority, plan-making for the SDNPA is subject to the National Planning Policy Framework (NPPF) whereby Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless specific policies in the NPPF indicate development should be restricted. An example of such restrictions given in footnote 9 on page 4 of NPPF is policies relating to the development of sites within a National Park. Paragraph 115 of the NPPF states that great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty. The conservation of wildlife and cultural heritage are important considerations in all these areas, and should be given great weight in National Parks and the Broads.
- 2.3 Approximately 56% of the district of Lewes, and the whole of the town of Lewes, falls within the South Downs National Park. All statutory planning responsibilities within the National Park area of the district falls to the National Park Authority.
- 2.4 Part of both the South Downs National Park and Lewes District falls within the Sussex Coast Housing Market Area (HMA). Both the authorities work in partnership together to ensure that strategic planning issues are properly and holistically addressed.

3. Purpose and objectives

- 3.1 The SDNPA is preparing its first Local Plan – the South Downs Local Plan (SDLP). The SDLP is a landscape-led plan, with ecosystem services (the goods and services we get from



the natural environment) at its heart. The SDLP will provide a comprehensive development plan document to cover the whole of the National Park, and will include a policy to address all types of development, with the exception of minerals and waste.

- 3.2 The purpose of this SCG is to demonstrate clearly and concisely how strategic cross-boundary matters relevant to the SDLP, which are specific to both authorities, have been and will continue to be jointly addressed. These focus on the issue of addressing objectively assessed development needs, particularly housing needs, and on how points of disagreement between the parties are being positively resolved. Further detail is given in the South Downs National Park Duty to Cooperate Statement¹, and in the jointly prepared documents referred to below.

4. Addressing unmet housing need

- 4.1 It is agreed between the parties that the housing supply and objectively assessed need both within and outside of the South Downs National Park, is as set out in Table 1 below:

Table 1: Housing supply and need in the Lewes part of the South Downs National Park

	A	B	C	D	E	F	G	H
HMA / District area	SDLP housing provision (total) ¹	SDLP housing provision (A divided by 19 years)	OAN inside SDNP ²	Unmet need inside SDNP ³ (C minus B)	Local Authority Local Plan provision (area outside SDNP) ⁴	Local Authority OAN per annum (whole area) ⁵	Total annual over-supply by L.A./HMA ⁶ (B+E-F)	Total annual unmet need by L.A./HMA ⁶ (B+E-F)
Lewes	1307	69	114	45	276	520	-	175
Sussex Coast HMA ⁷	2971	156	274	112	2748	4481	-	1577

¹ SDLP & NDP housing allocations plus commitments plus windfall (to be provided over the Local Plan period 2014-33)

² South Downs HEDNA 2017 (Table 4)

³ The difference between SDNP OAN and SDNP annualised provision (previous two columns)

⁴ Lewes figure derived from total Lewes District Local Plan Part I Joint Core Strategy 2010-2030 annualised target (345) less annualised housing provision being delivered by SDLP (69).

⁵ The Lewes OAN reflects the Lewes Local Plan Part I Inspectors Report (para 22) and Inspectors Preliminary Findings (letter dated 10 February 2015) and is the upper end of the range identified in the Coastal West Sussex Duty to Cooperate Housing Study.

⁶ This is the difference between the total provision and the total OAN, for the whole area (both within and outside SDNP).

⁷ Sussex Coast HMA consists of the following lower tier/unitary authorities: Adur, Arun, Brighton & Hove, Chichester, Lewes, Worthing.

- 4.2 The housing figures in the South Downs Local Plan relating to that part of Lewes District within the National Park carry forward the scale of housing agreed in the Lewes Joint Core Strategy (JCS). The Inspector's report² on the JCS states that:

¹ South Downs National Park Duty to Cooperate Statement, 2017

² Report to Lewes District Council and the South Downs National Park Authority, by Nigel Payne BSc (Hons), Dip TP, MRTPI, MCMI, 22nd March 2016

Local Plan allocates five pitches in that part of Lewes District within the National Park. The Lewes District Local Plan Part 2 Site Allocations and Development Management Policies Draft Document published for Regulation 18 consultation in November 2017 does not allocate any Gypsy and Traveller sites due to a lack of availability of any suitable sites. Therefore there remains an unmet need for eight Gypsy and Traveller pitches across the District, five in Lewes District outside the National Park and three within the National Park. Whilst there is currently limited scope for meeting this need through allocation of sites, both parties consider that Lewes JCS Core Policy 3 and South Downs Local Plan Strategic Policy SD33 respectively set positive frameworks for bringing as-yet unidentified sites forward through the development management process.

5.2 LDC is currently investigating further how to meet the unmet need across the whole district.

6. Habitat Regulations Assessment - air quality impact assessment

6.1 It is agreed between the parties that there is a strategic cross boundary issue of how to assess air quality impacts on the Ashdown Forest Special Area of Conservation (SAC) and Lewes Downs SAC, predominantly arising from traffic associated with new development. The assessment methods are being considered through the Ashdown Forest Statement of Common Ground to which both authorities are signatories.

6.2 The LDC and SDNPA joint 2015 Habitat Regulations Assessment (HRA) Addendum on air quality impacts on the Lewes Downs SAC and the joint 2017 HRA Addendum on air quality impacts on the Ashdown Forest SAC both include robustly carried out, industry standard methodology. The assessments are in combination with other plans and programmes and both conclude no likely significant effect and/or no adverse effects on integrity on the SACs, a conclusion endorsed by Natural England.

Signed on behalf of Lewes District Council

Date: 21 March 2018

Position: Head of Planning

Signed on behalf of the South Downs National Park Authority

Date 24 April 2018.

Position Director

South Downs Centre, North Street,
Midhurst, West Sussex, GU29 9DH

T: 01730 814810

E: info@southdowns.gov.uk
www.southdowns.gov.uk

Chief Executive: Trevor Beattie

It is effectively common ground between the Councils, the HBF, the CPRE and others, including numerous Parish Councils and major house builders active in the locality, that the agreed OAN figures cannot be met in full in this district at present. This is so, even at the lowest end of the range identified, without unacceptable environmental consequences that would be contrary to the policies and guidance in the NPPF and PPG. This takes into account the constraints of the NP, the flood risks locally and other significant factors, including the capacity of the road network, notably on the A27 and A259, and coastal erosion, amongst other things, such as the two Special Areas of Conservation (SAC) and the Heritage Coast designation. As noted in respect of the DtC, there is no realistic prospect of any material help in achieving new housing delivery from nearby Councils in the near future, pending further work on a sub-regional basis and a potential plan review (paragraph 25)

4.3 The SDNPA and LDC agree that the objectively assessed housing needs in the district still cannot be met without unacceptable environmental consequences and that there continues to be an unmet housing need whereby paragraphs 179-181 of the National Planning Policy Framework is engaged. The parties to this agreement are addressing this as far as is consistent with the policies set out in the Framework, in the following ways:

- i) The study 'Defining the HMA and FEMA' (GL Hearn, 2017) prepared on behalf of the Greater Brighton and West Sussex Strategic Planning Board identifies that Lewes District falls primarily within the Brighton & East Sussex Housing Market Area (HMA). It is acknowledged that the South Downs National Park HEDNA nevertheless uses the previous, larger Coastal Sussex HMA which includes Lewes district.
- ii) A Coastal West Sussex and Greater Brighton Local Strategic Statement (LSS) was published in October 2013 and updated in January 2016.³ The Statement sets out a number of strategic priorities designed to maximize development potential, balanced against managing the many environmental assets and natural resources in the area. A Memorandum of Understanding has also been signed by all parties, which confirms an ongoing commitment to joint working across administrative boundaries.⁴

4.4 It is agreed by both parties that the continued joint work of the Coastal West Sussex and Greater Brighton Strategic Planning Board is the most appropriate mechanism for addressing unmet development needs in the Housing Market Area. The Board has now started work to address the challenge for the future of creating an approach which allows all the authorities in the Board to work collectively on developing a new high level plan known as LSS3. This will seek to address the 'larger than local' issues that are currently holding back the potential of the sub region, and each individual authority will be able to prepare their own plans from 2030 onwards to not only address their own local issues, but also set out how they intend to address the cross boundary issues set out in the LSS3. Further details are set out in the South Downs National Park Duty to Cooperate Statement.

5. Gypsies and Travellers

5.1 The East Sussex Joint Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment (GTAA) published in 2015⁵ covers all of Lewes District inside and outside the National Park. It identified a need for 13 net additional permanent pitches for the period 2016 to 2028. Core Policy 3 of the JCS sets a requirement for 13 net additional permanent pitches for Gypsies & Travellers across Lewes District. The South Downs

³ <https://coastalwestsussex.org.uk/wp-content/uploads/2016/05/FINAL-LSS-Refresh-Final-version-Jan-16-180416.pdf>

⁴ <https://coastalwestsussex.org.uk/wp-content/uploads/2014/02/FINAL-CWS-SPB-MoU-Feb-2014-Final-Signed.pdf>

⁵ East Sussex Joint Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment, January 2015, University of Salford

Representation ID: REP/013/BA01
--

Representor Details:

Representor ID:	REP/013
Name:	Laura Hutson
Organisation:	Sport England
Consultation Body:	Specific
Stakeholder Type:	National group or organisation

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	laura.hutson@sportengland.org
Address:	21 Bloomsbury Way London WC1B 3HF

Representation:

Policy/Section:	BA01 - Land at Hillside Nurseries, High Street
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	No
Representation: <p>In addition, Sport England is concerned with the changes to the housing allocation at Land at Hillside Nurseries, High Street (Policy BA01) as the allocation's boundary has extended to the boundary of the adjacent recreation field. Cricket is played on the adjacent site therefore positioning sensitive development, such as housing, close to the recreation field would increase the risk of ball strike. Any scheme submitted on this site should be subject to a ball strike assessment and the mitigation recommendations of that assessment should be included within any development of the site allocation. It is the developers responsibility to impose any mitigation in line with the 'Agent of Change</p>	

'principle. Sport England strongly advises that wording to this effect is inserted into Policy BA01. Please be aware that any scheme submitted that does not mitigate the potential of ball strike could receive a Sport England statutory objection until it is clear there are no safety risks.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public? No

Why do you feel it is necessary to participate at the Examination in Public?

Representation ID: REP/013/RG01/A
--

Representor Details:

Representor ID:	REP/013
Name:	Laura Hutson
Organisation:	Sport England
Consultation Body:	Specific
Stakeholder Type:	National group or organisation

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	laura.hutson@sportengland.org
Address:	21 Bloomsbury Way London WC1B 3HF

Representation:

Policy/Section:	RG01 - Caburn Field
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	No
Representation: Overall, however, Sport England still has significant concerns relating to the insufficient level of protection of sport facilities, the lack of an up-to-date and robust evidence base for indoor and outdoor sports facilities, the use of standards in Policy DM15, the loss of playing field (without a deliverable replacement site identified) within Policy RG01 and the increase in size of the Hillside Nurseries, High Street's site allocation. As a result, Sport England does not consider that the Local Plan is sound.	
What changes do you suggest to make the document legally compliant or sound?	

Do you consider it necessary to participate at the Examination in Public?	No
Why do you feel it is necessary to participate at the Examination in Public?	

Representation ID: REP/013/RG01/BRepresentor Details:

Representor ID:	REP/013
Name:	Laura Hutson
Organisation:	Sport England
Consultation Body:	Specific
Stakeholder Type:	National group or organisation

Agent Details:

Name:
Organisation:

Contact Details:

Email Address:	laura.hutson@sportengland.org
Address:	21 Bloomsbury Way London WC1B 3HF

Representation:

Policy/Section:	RG01 - Caburn Field
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	No
Representation: It is noted that it is proposed to redevelop this playing field as housing due to the fact that the football club currently on site wish to move on. Please note that Sport England objects to the loss of playing field unless it is proposed to replace the playing field with one of equal quality and quantity. Please note this cannot be achieved by using an existing playing field. Sport England objects to this and any other playing field being lost.	
What changes do you suggest to make the document legally compliant or sound?	

Do you consider it necessary to participate at the Examination in Public?	No
Why do you feel it is necessary to participate at the Examination in Public?	

Representation ID: REP/013/DM14
--

Representor Details:

Representor ID:	REP/013
Name:	Laura Hutson
Organisation:	Sport England
Consultation Body:	Specific
Stakeholder Type:	National group or organisation

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	laura.hutson@sportengland.org
Address:	21 Bloomsbury Way London WC1B 3HF

Representation:

Policy/Section:	DM14: Multi-functional Green Infrastructure
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	No
Representation:	
On a more positive note, Sport England does welcome that paragraph 4.47 encourages the use of Sport England's technical guidance.	
What changes do you suggest to make the document legally compliant or sound?	
Do you consider it necessary to participate at the Examination in Public? No	

Why do you feel it is necessary to participate at the Examination in Public?

Representation ID: REP/013/DM15/A
--

Representor Details:

Representor ID:	REP/013
Name:	Laura Hutson
Organisation:	Sport England
Consultation Body:	Specific
Stakeholder Type:	National group or organisation

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	laura.hutson@sportengland.org
Address:	21 Bloomsbury Way London WC1B 3HF

Representation:

Policy/Section:	DM15: Provision for Outdoor Playing Space
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	No
Representation: Overall, however, Sport England still has significant concerns relating to the insufficient level of protection of sport facilities, the lack of an up-to-date and robust evidence base for indoor and outdoor sports facilities, the use of standards in Policy DM15, the loss of playing field (without a deliverable replacement site identified) within Policy RG01 and the increase in size of the Hillside Nurseries, High Street's site allocation. As a result, Sport England does not consider that the Local Plan is sound.	
What changes do you suggest to make the document legally compliant or sound?	

Do you consider it necessary to participate at the Examination in Public?	No
Why do you feel it is necessary to participate at the Examination in Public?	

Representation ID: REP/013/DM15/B
--

Representor Details:

Representor ID:	REP/013
Name:	Laura Hutson
Organisation:	Sport England
Consultation Body:	Specific
Stakeholder Type:	National group or organisation

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	laura.hutson@sportengland.org
Address:	21 Bloomsbury Way London WC1B 3HF

Representation:

Policy/Section:	DM15: Provision for Outdoor Playing Space
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	No
Representation: <p>Objection to lack of policy to protect existing playing fields and sport facilities While policy DM18 protecting recreation on and around the River Ouse is welcomed, it is felt that a specific policy is required in order to protect existing playing fields and sport facilities. Paragraph 74 of the NPPF states that existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:• an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements• the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of</p>	

quantity and quality in a suitable location• the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss. Therefore in order to fully comply with the NPPF, a policy along these lines should be added to the local plan.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public?

No

Why do you feel it is necessary to participate at the Examination in Public?

Representation ID: REP/013/DM18
--

Representor Details:

Representor ID:	REP/013
Name:	Laura Hutson
Organisation:	Sport England
Consultation Body:	Specific
Stakeholder Type:	National group or organisation

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	laura.hutson@sportengland.org
Address:	21 Bloomsbury Way London WC1B 3HF

Representation:

Policy/Section:	DM18: Recreation and Rivers
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	No
Representation: While policy DM18 protecting recreation on and around the River Ouse is welcomed, it is felt that a specific policy is required in order to protect existing playing fields and sport facilities.	
What changes do you suggest to make the document legally compliant or sound? 	

Do you consider it necessary to participate at the Examination in Public?	No
Why do you feel it is necessary to participate at the Examination in Public?	

Representation ID: REP/013/DM25
--

Representor Details:

Representor ID:	REP/013
Name:	Laura Hutson
Organisation:	Sport England
Consultation Body:	Specific
Stakeholder Type:	National group or organisation

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	laura.hutson@sportengland.org
Address:	21 Bloomsbury Way London WC1B 3HF

Representation:

Policy/Section:	DM25: Design
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	No
Representation: <p>This policy states that major developments will promote permeable, accessible and easily understandable places by creating spaces that connect with each other, are easy to move through and have recognisable landmark features; this is welcomed and would be consistent with the local plan's strategic objectives and section 8 of the NPPF. We believe that this aim would be further strengthened by adding an additional section should be added to the policy which sets out the design principles that new development will be expected to accord with to enable/encourage healthy and active lifestyles. Sport England & Public Health England's Active Design guidance</p>	

<http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/active-design/> sets out Government endorsed guidance on how the design and layout of new developments can be planned to make communities more active and healthier and some of the principles in this guidance could be incorporated into a new section of the policy. The supporting text to the policy should refer to the Active Design guidance to signpost applicants to detailed advice.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public? No

Why do you feel it is necessary to participate at the Examination in Public?

Representation ID: REP/013/INT/A

Representor Details:

Representor ID:	REP/013
Name:	Laura Hutson
Organisation:	Sport England
Consultation Body:	Specific
Stakeholder Type:	National group or organisation

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	laura.hutson@sportengland.org
Address:	21 Bloomsbury Way London WC1B 3HF

Representation:

Policy/Section:	Evidence Base
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	No
Representation:	
Overall, however, Sport England still has significant concerns relating to the insufficient level of protection of sport facilities, the lack of an up-to-date and robust evidence base for indoor and outdoor sports facilities, the use of standards in Policy DM15, the loss of playing field (without a deliverable replacement site identified) within Policy RG01 and the increase in size of the Hillside Nurseries, High Street's site allocation. As a result, Sport England does not consider that the Local Plan is sound.	
What changes do you suggest to make the document legally compliant or sound?	

Do you consider it necessary to participate at the Examination in Public?	No
Why do you feel it is necessary to participate at the Examination in Public?	

Representation ID: REP/013/INT/B

Representor Details:

Representor ID:	REP/013
Name:	Laura Hutson
Organisation:	Sport England
Consultation Body:	Specific
Stakeholder Type:	National group or organisation

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	laura.hutson@sportengland.org
Address:	21 Bloomsbury Way London WC1B 3HF

Representation:

Policy/Section:	Evidence Base
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	No
Representation:	
<p>Objection to lack of evidence base for sport facilities</p> <p>The NPPF (above) refers to the need for an assessment of existing sport facilities in order to satisfy its criteria for the potential loss of playing field or sport facilities. Without this there is a significant concern that decisions about planning for meeting the current and future sports facility needs of the community will not be based on an up-to-date, and therefore robust, evidence base. A clear understanding of current and future community sports facility needs is essential for informing a local plan policy such as this which</p>	

covers the protection, enhancement and provision of these facilities. In relation to sports facilities, I am not aware of any current, up to date evidence base undertaken in partnership with Sport England.

Sport England's advice is that assessments of sports facility needs (both indoor and outdoor) should be prepared every three years to ensure that they remain up-to-date and robust (or every five years if supply and demand monitoring takes place on an annual basis). The reasons that assessments of need should be based on up-to-date data are as follows:

The supply of facilities changes significantly over time. As well as new facilities opening and existing ones closing, access to facilities can change (e.g. on school sites), the quality of facilities changes over time as facilities become older (which influences the ability of facilities to meet the expectations of the community) and the format of facilities can change (e.g. the number and type of pitches marked out on a grass playing field can change over time in response to needs).

The demand for facilities changes significantly over time. Demand for sports facilities is affected by a number of factors including population growth, sports participation changes (both general and sport specific), local sports club infrastructure and local sports development initiatives. The nature of the demand will also change over time (e.g. growth in participation by children, women and disabled groups) and the type of facilities required in response to changes in demand will have implications (e.g. the increase in demand for artificial grass pitches for football use for meeting competitive and training needs).

Earlier previous assessments of needs will not have accounted for the significant changes in supply and demand that will have taken place since any data was previously collected. Any previous assessment/strategy will also not have accounted for current projections of population and sports participation growth in the area which will have changed. I note that consultation at local level has suggested a deficiency of playing pitches however this data should be collected as part of an up to date assessment and strategy.

Since any previous assessments were prepared, it is also advised that the tools and guidance available for collecting data and undertaking assessments with respect to sports facilities has advanced considerably and Sport England has published a range of recent guidance to help local authorities. Detailed guidance on the importance of having robust and up-to-date assessments of sports facility needs for underpinning local plan policies is set out in Sport England's 'Planning for Sport - Forward Planning Guide' (2013) which can be downloaded from www.sportengland.org/facilities-planning/planning-for-sport/forward-planning/. This guidance advises that without a robust and up-to date evidence base for sport, local plans can be found unsound and explains the importance of having the evidence base in place for meeting the various tests of soundness. In particular, attention is drawn to paragraph 73 of the NPPF which specifically advises planning policies to be based on robust and up-to-date assessments of needs for open spaces, sports and recreation facilities and opportunities for new

provision.

Sport England's recent experience has shown that where local plans or LDF documents have not been supported by up-to-date and robust assessments of need for sports facilities, Inspectors have requested that this be an issue that requires discussion at the public examination of the plans. I would advise that many local planning authorities (including many in East and West Sussex) have prepared or are in the process or preparing up-to-date sports facility strategies (incorporating needs assessments) in advance of plans being considered at examination in order to ensure that the plans are sound. Furthermore, if the policy is used for determining planning applications, developers are likely to challenge the evidence base especially in the context of the need to protect existing facilities or provide for sport in new development through planning obligations or CIL.

To address these concerns, it is requested that the Council prepares an up-to-date sports facility strategy (indoor and outdoor sports) incorporating a comprehensive assessment of needs which will provide the robust evidence to support this policy (and policy SLP27) and which may also assist with delivering wider Council objectives e.g. assisting with the health and well-being agenda, reviewing the future of Council owned facilities, sports development, influencing investment on school sites, external funding bids etc. A robust evidence base for sport will also be needed to support the identification of strategic priority projects in the Council's Infrastructure Delivery Plan for CIL.

Following completion of a playing pitch strategy, the local plan should be reviewed to add any specific sports facility needs that provision should be made for (to add to the list of identified priorities for other facility types that are in the policy). Proposals for new facilities that are not consistent with the needs/priorities identified in the evidence base such as speculative proposals or proposals that would duplicate existing facilities or potentially compromise their sustainability would not therefore be supported in principle which is potentially how the policy could be interpreted in the absence of a robust evidence base. This approach would accord with the last sentence of paragraph 73 of the NPPF.

Detailed advice on the preparation of such strategies/assessments can be found on Sport England's website at www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/ and further advice can be provided upon request

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public? No

Why do you feel it is necessary to participate at the Examination in Public?

Thea Davis

From: Mark Furnish <Mark.Furnish@sportengland.org>
Sent: 01 November 2018 14:59
To: ldf
Cc: Laura Hutson
Subject: Lewes District Local Plan: Part 2 Site Allocations and Development Management Policies Pre-Submission Document
Attachments: Consultation draft local plan part 2
Categories: LPP2 comment to code - stakeholder details have been added

Dear Sir/Madam,

Thank you for consulting Sport England on the Local Plan: Part 2 Site Allocations and Development Management Policies Pre-Submission Document.

As highlighted in Sport England comments on the previous draft on 17th January 2018 (attached), Sport England has an established role within the planning system which includes providing advice and guidance and supporting local authorities in planning for sport. Further detail on Sport England's role within the Planning system, including its Planning Policy, can be found at <https://www.sportengland.org/facilities-planning/planning-for-sport/>.

Sport England has assessed the Pre-Submission document in line with its policy and the National Planning Policy Framework (NPPF) and does not consider that the current document has addressed the objections and concerns raised in its comments on the previous draft. In consequence, Sport England continues to object to the Local Plan Part 2 as set out in the attached comments (please note that the current NPPF has moved paragraphs 73 and 74 to paragraphs 96 and 97).

In addition, Sport England is concerned with the changes to the housing allocation at Land at Hillside Nurseries, High Street (Policy BA01) as the allocation's boundary has extended to the boundary of the adjacent recreation field. Cricket is played on the adjacent site therefore positioning sensitive development, such as housing, close to the recreation field would increase the risk of ball strike. Any scheme submitted on this site should be subject to a ball strike assessment and the mitigation recommendations of that assessment should be included within any development of the site allocation. It is the developers responsibility to impose any mitigation in line with the 'Agent of Change' principle. Sport England strongly advises that wording to this effect is inserted into Policy BA01. Please be aware that any scheme submitted that does not mitigate the potential of ball strike could receive a Sport England statutory objection until it is clear there are no safety risks.

On a more positive note, Sport England does welcome that paragraph 4.417 encourages the use of Sport England's technical guidance.

Overall, however, Sport England still has significant concerns relating to the insufficient level of protection of sport facilities, the lack of an up-to-date and robust evidence base for indoor and outdoor sports facilities, the use of standards in Policy DM15, the loss of playing field (without a deliverable replacement site identified) within Policy RG01 and the increase in size of the Hillside Nurseries, High Street's site allocation. As a result, Sport England does not consider that the Local Plan is sound.

I hope you find these comments helpful and am happy to discuss them further should you wish.

Yours Faithfully
Mark Furnish
Planning Manager

T: 020 7273 1631
M: 07920560435
F: 020 7273 1981
E: Mark.Furnish@sportengland.org



1st Floor, 21 Bloomsbury Street, London, WC1B 3HF



We have updated our Privacy Statement to reflect the recent changes to data protection law but rest assured, we will continue looking after your personal data just as carefully as we always have. Our Privacy Statement is published on our [website](#), and our Data Protection Officer can be contacted by emailing [Gail Laughlan](#)

The information contained in this e-mail may be subject to public disclosure under the Freedom of Information Act 2000. Additionally, this email and any attachment are confidential and intended solely for the use of the individual to whom they are addressed. If you are not the intended recipient, be advised that you have received this email and any attachment in error, and that any use, dissemination, forwarding, printing, or copying, is strictly prohibited. If you voluntarily provide personal data by email, Sport England will handle the data in accordance with its Privacy Statement. Sport England's Privacy Statement may be found here <https://www.sportengland.org/privacy-statement/> If you have any queries about Sport England's handling of personal data you can contact Sport England's Data Protection Officer directly by emailing gail.laughlan@sportengland.org

Representation ID: REP/014/GENRepresentor Details:

Representor ID:	REP/014
Name:	Nicky Jackman
Organisation:	Rottingdean Parish Council
Consultation Body:	Specific
Stakeholder Type:	Parish Council

Agent Details:

Name:
Organisation:

Contact Details:

Email Address:	nicky.jackman@rottingdean-pc.gov.uk
Address:	

Representation:

Policy/Section:	General
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	
Representation: Rottingdean Parish Councillors appreciate the opportunity to contribute alongside the East Sussex Strategic Planning Members Group and the Coastal West Sussex and Greater Brighton Strategic Planning Board. While (sadly) RPC does not routinely have a direct involvement, the parish council recognises the aim of the Strategic Planning Board for addressing unmet housing need across this part of the region through commissioning work to assess the options for provision of housing and especially infrastructure at the sub regional strategic scale. The concerns of Rottingdean Parish are the existing inadequate transportation and the risk that more homes will see increasing traffic volumes adding further to an already	

existing problem of congestion and unacceptable journey times.

In addition, there is risk of exacerbating the dangerously poor air quality that blights the Rottingdean Community.

The Parish Council highlighted this in responding to the consultation on LDCpart 1.

The draft document indicates that taking into account local plans for Newhaven, Peacehaven and Telscombe some 700 planned additional houses are foreseen.

RPC continues therefore to highlight pressing need for improved connectivity for the development sites being considered. Transport links from Peacehaven to the A26 or A27 and Lewes could unite housing communities plus potentially relieve Rottingdean of what seems an unsustainable burden of private road traffic and resulting pollution. There is also need seen for better public transport provision from Rottingdean to Lewes.

As recently heralded in the 'Big Petition' for action to address the problems of the A259, this coastal route already constrains economic activity, constrains the requirement for public service infrastructure, as well as affecting the productivity and health of several south-coast populations.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public?

Why do you feel it is necessary to participate at the Examination in Public?



www.rottingdean-pc.gov.uk

Comments from Rottingdean Parish Council

Lewes District Local Plan Part 2: Site Allocations and Development Management Policies DPD - Pre-Submission version - consultation

— <http://planningpolicyconsult.lewes-eastbourne.gov.uk/consult.ti>

Rottingdean Parish Councillors appreciate the opportunity to contribute alongside the East Sussex Strategic Planning Members Group and the Coastal West Sussex and Greater Brighton Strategic Planning Board.

While (sadly) RPC does not routinely have a direct involvement, the parish council recognises the aim of the Strategic Planning Board for addressing unmet housing need across this part of the region through commissioning work to assess the options for provision of housing **and especially infrastructure at the sub regional strategic scale.**

The concerns of Rottingdean Parish are the existing *inadequate transportation and the risk that more homes will see increasing traffic volumes adding further to an already existing problem of congestion and unacceptable journey times.*

In addition, there is risk of exacerbating the dangerously poor air quality that blights the Rottingdean Community.

The Parish Council highlighted this in responding to the consultation on LDC part 1.

The draft document indicates that taking into account local plans for Newhaven, Peacehaven and Telscombe some 700 planned *additional* houses are foreseen.

RPC continues therefore to highlight pressing need for improved connectivity for the development sites being considered. Transport links from Peacehaven to the A26 or A27 and Lewes could unite housing communities plus potentially relieve Rottingdean of what seems an unsustainable burden of private road traffic and resulting pollution. There is also need seen for better public transport provision from Rottingdean to Lewes.

As recently heralded in the 'Big Petition' for action to address the problems of the A259, this coastal route already constrains economic activity, constrains the requirement for public service infrastructure, as well as affecting the productivity and health of several south-coast populations.

Representation ID: REP/015/GT01
--

Representor Details:

Representor ID:	REP/015
Name:	Catherine Jackson
Organisation:	Plumpton Parish Council
Consultation Body:	Specific
Stakeholder Type:	Parish Council

Agent Details:

Name:
Organisation:

Contact Details:

Email Address:	catherine.jackson@plumptonpc.co.uk
Address:	

Representation:

Policy/Section:	GT01 - Land south of The Plough
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	
Representation:	<p>2. PPC has major comments on Policy GT01 – Land south of The Plough.</p> <p>2.1 PPC recognises LDC's obligations under the Government's national Planning Policy for Traveller Sites (PPTS). We note that paragraph 2.132 introduces this policy, but without reference to which version. Paragraph 2.142 explicitly refers to a 2012 version of this document. PPC understands that the current version is 2015, and our responses refer to that version of the PPTS.</p> <p>2.2 First, PPC comments that the PPTS explicitly states under Policy A: Using evidence to plan positively and manage development (paragraph 7):</p> <p>'In assembling the evidence base necessary to support their planning approach, local</p>

planning authorities should: pay particular attention to early and effective community engagement with both settled and traveller communities (including discussing travellers' accommodation needs with travellers themselves, their representative bodies and local support groups).

PPC has had a long, collaborative and successful relationship with LDC throughout the Neighbourhood Planning process. However, Policy GT01 was first communicated to PPC via a meeting on 05/09/18. This is not consistent with 'early and effective engagement' with the settled community; there has been very little time for quantitative assessment of Policy GT01 in a consultation period running from 24/09/18 to 04/11/18. It is not in accordance with the introductory aim of the PPTS (i) 'to reduce tensions between settled and traveller communities in plan-making and planning decisions' and suggests to us that either there was deliberate concealment of these plans or that the decision to allocate this site was made hastily, without due consideration, which we regard as inappropriate for such a sensitive proposal and when the village community is already having to come to terms with large-scale development within the settlement

3.0 Plumpton Neighbourhood Plan

With respect to planning policy, and in the spirit of localisation, comments hereafter are presented with reference to the made Plumpton Parish Neighbourhood Plan (PPNP), the Local Plan, NPPF and

PPTS incorporated into that framework, as relevant. With respect of the PPTS, comments are restricted to those relevant to Plan-making as enacted in the Part 2 Document. PPC has concerns about further information received from LDC in respect of PPTS Decision-taking, but these are not immediately relevant to this response.

While GT01 specifically addresses the needs of gypsies and travellers, the PPC response reflects the fact that the policy primarily represents an additional new development of five permanent dwellings.

With regard to the made Plumpton Neighbour Plan (PPNP), Policy GT01 is regarded as not in accordance with the following policies:

Policy 1: Spatial plan for the parish

Policy 2: New-build environment and design

Policy 3: Landscape and biodiversity

Policy 5: New housing

Policy 6: Local employment

Policy 7: Plumpton Green Village Centre

The consultation response will deal with these in policy order.

3.1 PPNP Policy 1: Spatial plan for the parish

PPNP Policy 1 states the primary objective:

'New development proposals within the planning boundary for Plumpton Green (see

Map C) will be supported, provided they accord with the other provisions of the PPNP and the development plan for the area.'

LDCretained Policy CT1 aims to resist development outside existing planning boundaries unless it meets certain criteria. Plumpton Green is the only settlement in the parish that has a planning boundary, and the land allocated in Policy GT01 is not within the Plumpton Green planning boundary, or indeed near that boundary (it lies approximately 650m to the north). The 'certain criteria' rider of Policy CT1 is covered in subsequent paragraphs.

While it is acknowledged that PPNP Policy 1 would ultimately have to include the Local Plan Part 2 once that is adopted, it was not envisaged that Part 2 would apply additional new development targets to Plumpton, and propose extension of the planning boundary to areas regarded as unsuitable for development in respect of Local Plan Part 1 policies.

The parish of Plumpton is rural, and comprises two distinct characteristics:

- * Plumpton Green – a Service Village where new development should be sited
- * Plumpton – a Hamlet where no development should be sited.

While some regard the hamlet as only existing to the south of the Parish, and largely within the South Downs National Park (SDNP), it is clearly identifiable on Policies Map Inset Map 8 Plumpton Green that the character of the parish to the northern boundary is very similar to that of the

3 southern hamlet, and that is reflected in PPNP Policy 1. We therefore regard this as an unsuitable area to site permanent dwellings, in which category we include static caravans. The choice of site also does not meet LDC Core Policy 3 – Gypsy and Traveller Accommodation, which sets the objectives:

'To deliver the homes and accommodation for the needs of the district and ensure the housing growth requirements are accommodated in the most sustainable way', and
'To maximise opportunities for re-using suitable previously developed land and to plan for new development in the highly sustainable locations without adversely affecting the character of the area.'

On the first objective, we do not regard the proposed site as sufficiently sustainable by virtue of its likely impact on local employment, discussed below under PPNP Policy 6. On the second objective, the proposed site is greenfield and we regard its development as adversely changing the character of the area by replacing arable land with residential development, in addition to the previously discussed spatial plan issues.

In addition, the site cannot be regarded as highly sustainable in respect of CP3 policy statement 2: 'The site is well related to, or has reasonable access to settlements with existing services and facilities such as schools, health services and shops.' Accordingly, the site would not score well under the sustainability assessment criteria applied under PPNP Policy 1 for the selection of sites (Soc/3: Promote walking and cycling and other forms of sustainable transport with the aim of reducing the need to travel by car), as it is approximately 650m outside the existing planning boundary (which represents the 800m

recommended maximum distance limit for walking), and completely lacks safe pedestrian access, as residents must walk along a national speed limit minor road to reach the village amenities, including the primary school and shop.

LDC asserts that this aspect of sustainability can be adequately met by providing a footpath north to the nearest bus stop at The Plough. This relies on a bus service that is currently under threat and therefore cannot be guaranteed in the near future (PPC is unsure whether the provisions of the Bus Services Act 2017 will provide any protection against the deficit in funding for ESCC and LDC).

Accordingly, the choice of site for GT01 also appears not to confidently address the responsibility within the PPTS under Policy B: Planning for travellers sites (13 c) to 'ensure that children can attend school on a regular basis'.

The proposed site is also in conflict with LDC Core Policy 10 – Natural Environment and Landscape Character. This states the Key Strategic Objectives as:

'To conserve and enhance the natural beauty, wildlife and cultural heritage of the area' and

'To conserve and enhance the high quality and character of the district's towns, villages, and rural environment by ensuring that all forms of new development are designed to a high standard and maintain and enhance the local vernacular and "sense of place" of individual settlements.'

The proposal is to erect a toilet block of unspecified dimensions, plus hardstanding for up to 10 caravans (static and mobile) plus cars for each pitch's residents. Accordingly, we consider the choice of site for GT01 does not adequately address the responsibility within the PPTS under Policy B: Planning for travellers sites (10 e) to 'protect local amenity and environment'.

Finally, the assessment in the 2018 SHLAA shows this site 03PL as 'Fails proximity Assessment' and regarded as undevelopable for residential development. LDC has subsequently documented (in its presentation to parishioners at the PPC meeting of 09/10/18) that the proximity criteria for residential development will need to be adapted to gypsy and traveller accommodation. At the same presentation, it was stated that the site is not regarded as suitable for traditional residential housing development and would be extremely unlikely to receive planning permission, even if GT01 was implemented.

PPC questions under what planning statute LDC is applying a different test of suitability. This appears contrary to PPTS Policy B: Planning for travellers sites (11), which states: 'Criteria based policies should be fair and should facilitate the traditional and nomadic life of travellers whilst respecting the interest of the settled community.' It appears potentially discriminatory, as a lower threshold would seem to apply to the proposed gypsy and traveller residents than to residents of permanent, brick built housing, especially when there is still uncertainty as to whether the site will be used for gypsies and travellers with protected characteristics under English law, or whether it is available to all travellers as under the definition of 'gypsies and travellers' under PPTS Annexe 1.

3.2 PPNP Policy 2: New-build environment and design

PPNP policy 2 states: 'New development should reflect the scale, density, massing, landscape design and material of surrounding buildings, having regard to the Plumpton Design Statement.'

Five permanent dwellings in the form of static caravans, together with five mobile caravans (as stated at the meeting with LDC of 09/10/18), are entirely out of keeping with the rural hamlet nature of the site.

3.3 PPNP Policy 3: Landscape and biodiversity

PPNP policy 3 states: 'Layout and landscape schemes of new development should be informed by the landscape character of the area.'

Principle 3 supports the retention and, where possible, enhancement of existing green corridors, ponds and other wildlife features. GT01 impinges on a prominent green corridor used by wildlife, including deer.

3.4 PPNP Policy 5: New housing

PPNP Policy 5 states: 'Residential development will be supported on the sites allocated in Neighbourhood Plan Policies 5.1 to 5.4 inclusive, and on suitable windfall sites within Plumpton Green.'

We do not regard the site proposed in GT01 as suitable as it would not qualify under PPNP Policy 1

(and LDC CT1, SP3 etc), as stated previously (para 3.1).

3.5 PPNP Policy 6: Local employment

PPNP Policy 6 states: 'New development proposals that result in the loss of an existing employment or business use will be resisted, unless it can be demonstrated that its continued use is no longer viable.' This policy conforms to NPPF paragraph 28 (especially bullet point 4) and aligns to the JCS policy E1 (point (i)), which reflects NPPF paragraphs 18–20 and is designed to secure the future of the existing employment uses within the parish and plan for their growth to serve parish needs. PPNP Policy 6 also records under paragraph 5.67: 'Comments made during the consultation events made it clear that parishioners wished to see existing businesses preserved as far as possible and that they had no wish to see Plumpton become a dormitory community.'

There are significant concerns regarding the direct and indirect employment implications of Policy

GT01. There are 3 major employers in the parish:

- * Plumpton College – an outstanding rural education centre covering 2500 acres, predominantly within the SDNP, specialising in land-based courses
- * Plumpton Racecourse – a National Hunt racecourse to the south of Plumpton Green that saw its first race in 1884
- * The Old Brickworks – a light industrial business park to the north of Plumpton Green and directly adjacent to the site proposed in GT01. Of the three, the Old Brickworks is

the only one in the northern section of the parish.

It comprises 21 businesses on what was formerly a brownfield site. These businesses between them employ in excess of 50 permanent employees, many of whom live in or locally to Plumpton. The businesses are categorised as 'quiet, non-industrial businesses', and the site is well respected and supported within the parish.

The Old Brickworks conforms to the principles of NPPF (July 2018): 'Supporting a prosperous rural economy', as set out in paragraph 84. It is outside existing settlements, and not well served by public transport, but is on previously developed land and is sensitive to its surroundings.

The businesses at the site contribute significantly to the local and regional economy through business rates, employment and use of local amenities and other businesses such as the village shop (and post office) and local public houses - the Plough immediately to north of the site proposed in GT01, the Fountain in Plumpton Green, and The Half Moon to the south of the parish. GT01 proposes to locate the site directly adjacent to the Old Brickworks, with no meaningful separation between the two. The businesses of the Old Brickworks have made it clear that they chose the site because of its quiet, rural location and existing 'soft security' and that their continued use of it is dependent on those conditions continuing. They have all stated that any kind of development adjacent to the boundary could result in re-location of their businesses elsewhere, at some cost and inconvenience. They are prompted by concerns about the [REDACTED] potential restriction on current and future operations due to their proximity to residential development.

Even if those businesses remain, or other businesses take their place, the presence of a residential development immediately adjacent to commercial activity is highly likely to result in [REDACTED]

[REDACTED] security lighting in what is 'dark skies' parish where 91% of respondents to one questionnaire informing the PPNP supported preservation dark skies as one of their primary valued aspects of current village life. Dark skies is also a policy of the SDNPA. The challenges of maintaining public houses in general, and rural ones in particular, is well documented. Plumpton Green has already lost one pub in the past five years.

3.6 PPNP Policy 7: Plumpton Green Village Centre

PPNP Policy 7 states: 'New development proposals requiring planning permission that result in the loss of existing shops or commercial units in the village centre and elsewhere in the parish will be resisted, unless it can be demonstrated that their continued use is no longer viable.'

It further states in paragraph 5.68: 'Over the past 25 years the centre of Plumpton Green has lost one general store, one public house and a garage to housing. The remaining businesses in the village centre, in particular the village shop/post office, are important to the community as a whole but especially to residents without their own transport, as public transport services are limited. Development proposals that might negatively affect

the remaining facilities and businesses will be resisted.'

While it is acknowledged that GT01 does not in itself mandate the loss of the businesses located at the Old Brickworks, the real threat of loss exists, based on the same concerns as under PPNP Policy 6 discussed above. The income arising from the occupants of the new development is unlikely to offset the likely loss in custom from the departing businesses.

Accordingly, the choice of site for GT01 does not appear to adequately address the wider responsibility within the PPTS under Policy B: Planning for travellers sites (13) to 'ensure that traveller sites are sustainable economically'.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public? Yes

Why do you feel it is necessary to participate at the Examination in Public?

Representation ID: REP/015/HSARepresentor Details:

Representor ID:	REP/015
Name:	Catherine Jackson
Organisation:	Plumpton Parish Council
Consultation Body:	Specific
Stakeholder Type:	Parish Council

Agent Details:

Name:
Organisation:

Contact Details:

Email Address:	catherine.jackson@plumptonpc.co.uk
Address:	

Representation:

Policy/Section:	Paragraph 2.117
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	
Representation: PPC has one minor comment, relating to paragraph 2.117: This paragraph reads: 'Any future planning applications, or potential review of the Newick Neighbourhood Plan which considers housing allocations, will need to take into consideration policies within the adopted development plan.' PPC presumes that the reference to 'Newick Neighbourhood Plan' is a typographical error and should read 'Plumpton Neighbourhood Plan'.	
What changes do you suggest to make the document legally compliant or sound?	

Do you consider it necessary to participate at the Examination in Public?	Yes
Why do you feel it is necessary to participate at the Examination in Public?	

Response to Lewes District Local Plan Part 2: Site Allocations and Development Management Policies DPD – Pre-Submission version

Plumpton Parish Council

15 October 2018

Plumpton Parish Council (PPC) offers the following consultation responses to Lewes District Local Plan Part 2: Site Allocations and Development Management Policies DPD – Pre-Submission version (the Part 2 Document):

1. PPC has one minor comment, relating to paragraph 2.117:

This paragraph reads: **‘Any future planning applications, or potential review of the Newick Neighbourhood Plan which considers housing allocations, will need to take into consideration policies within the adopted development plan.’**

PPC presumes that the reference to ‘Newick Neighbourhood Plan’ is a typographical error and should read ‘Plumpton Neighbourhood Plan’.

2. PPC has major comments on Policy GT01 – Land south of The Plough.

2.1 PPC recognises LDC’s obligations under the Government’s national Planning Policy for Traveller Sites (PPTS). We note that paragraph 2.132 introduces this policy, but without reference to which version. Paragraph 2.142 explicitly refers to a 2012 version of this document. PPC understands that the current version is 2015, and our responses refer to that version of the PPTS.

2.2 First, PPC comments that the PPTS explicitly states under Policy A: Using evidence to plan positively and manage development (paragraph 7):

‘In assembling the evidence base necessary to support their planning approach, local planning authorities should:

pay particular attention to early and effective community engagement with both settled and traveller communities (including discussing travellers’ accommodation needs with travellers themselves, their representative bodies and local support groups).’

PPC has had a long, collaborative and successful relationship with LDC throughout the Neighbourhood Planning process. However, Policy GT01 was first communicated to PPC via a meeting on 05/09/18. This is not consistent with ‘early and effective engagement’ with the settled community; there has been very little time for quantitative assessment of Policy GT01 in a consultation period running from 24/09/18 to 04/11/18. It is not in accordance with the introductory aim of the PPTS (i) ‘to reduce tensions between settled and traveller communities in plan-making and planning decisions’ and suggests to us that either there was deliberate concealment of these plans or that the decision to allocate this site was made hastily, without due consideration, which we regard as inappropriate for such a sensitive proposal and when the village community is already having to come to terms with large-scale development within the settlement.

3. Plumpton Neighbourhood Plan

With respect to planning policy, and in the spirit of localisation, comments hereafter are presented with reference to the made Plumpton Parish Neighbourhood Plan (PPNP), the Local Plan, NPPF and PPTS incorporated into that framework, as relevant.

With respect of the PPTS, comments are restricted to those relevant to **Plan-making** as enacted in the Part 2 Document. PPC has concerns about further information received from LDC in respect of PPTS **Decision-taking**, but these are not immediately relevant to this response.

While GT01 specifically addresses the needs of gypsies and travellers, the PPC response reflects the fact that the policy primarily represents an additional new development of five permanent dwellings.

With regard to the made Plumpton Neighbour Plan (PPNP), Policy GT01 is regarded as not in accordance with the following policies:

- Policy 1: Spatial plan for the parish
- Policy 2: New-build environment and design
- Policy 3: Landscape and biodiversity
- Policy 5: New housing
- Policy 6: Local employment
- Policy 7: Plumpton Green Village Centre

The consultation response will deal with these in policy order.

3.1 PPNP Policy 1: Spatial plan for the parish

PPNP Policy 1 states the primary objective:

‘New development proposals within the planning boundary for Plumpton Green (see Map C) will be supported, provided they accord with the other provisions of the PPNP and the development plan for the area.’

LDC retained Policy CT1 aims to resist development outside existing planning boundaries unless it meets certain criteria. Plumpton Green is the only settlement in the parish that has a planning boundary, and the land allocated in Policy GT01 is not within the Plumpton Green planning boundary, or indeed near that boundary (it lies approximately 650m to the north). The ‘certain criteria’ rider of Policy CT1 is covered in subsequent paragraphs.

While it is acknowledged that PPNP Policy 1 would ultimately have to include the Local Plan Part 2 once that is adopted, it was not envisaged that Part 2 would apply additional new development targets to Plumpton, and propose extension of the planning boundary to areas regarded as unsuitable for development in respect of Local Plan Part 1 policies.

The parish of Plumpton is rural, and comprises two distinct characteristics:

- Plumpton Green – a Service Village where new development should be sited
- Plumpton – a Hamlet where no development should be sited.

While some regard the hamlet as only existing to the south of the Parish, and largely within the South Downs National Park (SDNP), it is clearly identifiable on Policies Map Inset Map 8 Plumpton Green that the character of the parish to the northern boundary is very similar to that of the

southern hamlet, and that is reflected in PPNP Policy 1. We therefore regard this as an unsuitable area to site permanent dwellings, in which category we include static caravans.

The choice of site also does not meet LDC Core Policy 3 – Gypsy and Traveller Accommodation, which sets the objectives:

‘To deliver the homes and accommodation for the needs of the district and ensure the housing growth requirements are accommodated in the most sustainable way’, and

‘To maximise opportunities for re-using suitable previously developed land and to plan for new development in the highly sustainable locations without adversely affecting the character of the area.’

On the first objective, we do not regard the proposed site as sufficiently sustainable by virtue of its likely impact on local employment, discussed below under PPNP Policy 6.

On the second objective, the proposed site is greenfield and we regard its development as adversely changing the character of the area by replacing arable land with residential development, in addition to the previously discussed spatial plan issues.

In addition, the site cannot be regarded as highly sustainable in respect of CP3 policy statement 2:

‘The site is well related to, or has reasonable access to settlements with existing services and facilities such as schools, health services and shops.’

Accordingly, the site would not score well under the sustainability assessment criteria applied under PPNP Policy 1 for the selection of sites (Soc/3: Promote walking and cycling and other forms of sustainable transport with the aim of reducing the need to travel by car), as it is approximately 650m outside the existing planning boundary (which represents the 800m recommended maximum distance limit for walking), and completely lacks safe pedestrian access, as residents must walk along a national speed limit minor road to reach the village amenities, including the primary school and shop.

LDC asserts that this aspect of sustainability can be adequately met by providing a footpath north to the nearest bus stop at The Plough. This relies on a bus service that is currently under threat and therefore cannot be guaranteed in the near future (PPC is unsure whether the provisions of the Bus Services Act 2017 will provide any protection against the deficit in funding for ESCC and LDC).

Accordingly, the choice of site for GT01 also appears not to confidently address the responsibility within the PPTS under Policy B: Planning for travellers sites (13 c) to ‘ensure that children can attend school on a regular basis’.

The proposed site is also in conflict with LDC Core Policy 10 – Natural Environment and Landscape Character. This states the Key Strategic Objectives as:

‘To conserve and enhance the natural beauty, wildlife and cultural heritage of the area’ and

‘To conserve and enhance the high quality and character of the district’s towns, villages, and rural environment by ensuring that all forms of new development are designed to a high standard and maintain and enhance the local vernacular and “sense of place” of individual settlements.’

The proposal is to erect a toilet block of unspecified dimensions, plus hardstanding for up to 10 caravans (static and mobile) plus cars for each pitch's residents. Accordingly, we consider the choice of site for GT01 does not adequately address the responsibility within the PPTS under Policy B: Planning for travellers sites (10 e) to 'protect local amenity and environment'.

Finally, the assessment in the 2018 SHLAA shows this site 03PL as 'Fails proximity Assessment' and regarded as undevelopable for residential development. LDC has subsequently documented (in its presentation to parishioners at the PPC meeting of 09/10/18) that the proximity criteria for residential development will need to be adapted to gypsy and traveller accommodation. At the same presentation, it was stated that the site is not regarded as suitable for traditional residential housing development and would be extremely unlikely to receive planning permission, even if GT01 was implemented.

PPC questions under what planning statute LDC is applying a different test of suitability. This appears contrary to PPTS Policy B: Planning for travellers sites (11), which states: 'Criteria based policies should be fair and should facilitate the traditional and nomadic life of travellers whilst respecting the interest of the settled community.' It appears potentially discriminatory, as a lower threshold would seem to apply to the proposed gypsy and traveller residents than to residents of permanent, brick-built housing, especially when there is still uncertainty as to whether the site will be used for gypsies and travellers with protected characteristics under English law, or whether it is available to all travellers as under the definition of 'gypsies and travellers' under PPTS Annexe 1.

3.2 PPNP Policy 2: New-build environment and design

PPNP policy 2 states:

'New development should reflect the scale, density, massing, landscape design and material of surrounding buildings, having regard to the Plumpton Design Statement.'

Five permanent dwellings in the form of static caravans, together with five mobile caravans (as stated at the meeting with LDC of 09/10/18), are entirely out of keeping with the rural hamlet nature of the site.

3.3 PPNP Policy 3: Landscape and biodiversity

PPNP policy 3 states:

'Layout and landscape schemes of new development should be informed by the landscape character of the area.'

Principle 3 supports the retention and, where possible, enhancement of existing green corridors, ponds and other wildlife features. GT01 impinges on a prominent green corridor used by wildlife, including deer.

3.4 PPNP Policy 5: New housing

PPNP Policy 5 states:

'Residential development will be supported on the sites allocated in Neighbourhood Plan Policies 5.1 to 5.4 inclusive, and on suitable windfall sites within Plumpton Green.'

We do not regard the site proposed in GT01 as suitable as it would not qualify under PPNP Policy 1 (and LDC CT1, SP3 etc), as stated previously (para 3.1).

3.5 PPNP Policy 6: Local employment

PPNP Policy 6 states:

‘New development proposals that result in the loss of an existing employment or business use will be resisted, unless it can be demonstrated that its continued use is no longer viable.’

This policy conforms to NPPF paragraph 28 (especially bullet point 4) and aligns to the JCS policy E1 (point (i)), which reflects NPPF paragraphs 18–20 and is designed to secure the future of the existing employment uses within the parish and plan for their growth to serve parish needs.

PPNP Policy 6 also records under paragraph 5.67:

‘Comments made during the consultation events made it clear that parishioners wished to see existing businesses preserved as far as possible and that they had no wish to see Plumpton become a dormitory community.’

There are significant concerns regarding the direct and indirect employment implications of Policy GT01. There are 3 major employers in the parish:

- Plumpton College – an outstanding rural education centre covering 2500 acres, predominantly within the SDNP, specialising in land-based courses
- Plumpton Racecourse – a National Hunt racecourse to the south of Plumpton Green that saw its first race in 1884
- The Old Brickworks – a light industrial business park to the north of Plumpton Green and directly adjacent to the site proposed in GT01.

Of the three, the Old Brickworks is the only one in the northern section of the parish. It comprises 21 businesses on what was formerly a brownfield site. These businesses between them employ in excess of 50 permanent employees, many of whom live in or locally to Plumpton. The businesses are categorised as ‘quiet, non-industrial businesses’, and the site is well respected and supported within the parish.

The Old Brickworks conforms to the principles of NPPF (July 2018): ‘Supporting a prosperous rural economy’, as set out in paragraph 84. It is outside existing settlements, and not well served by public transport, but is on previously developed land and is sensitive to its surroundings.

The businesses at the site contribute significantly to the local and regional economy through business rates, employment and use of local amenities and other businesses such as the village shop (and post office) and local public houses - the Plough immediately to north of the site proposed in GT01, the Fountain in Plumpton Green, and The Half Moon to the south of the parish.

GT01 proposes to locate the site directly adjacent to the Old Brickworks, with no meaningful separation between the two. The businesses of the Old Brickworks have made it clear that they chose the site because of its quiet, rural location and existing ‘soft security’ and that their continued use of it is dependent on those conditions continuing. They have all stated that any kind of development adjacent to the boundary could result in re-location of their businesses elsewhere, at some cost and inconvenience. They are prompted by concerns about [REDACTED]

potential restriction on current and future operations due to their proximity to residential development.

Even if those businesses remain, or other businesses take their place, the presence of a residential development immediately adjacent to commercial activity is highly likely to result in

security lighting in what is 'dark skies' parish where 91% of respondents to one questionnaire informing the PPNP supported preservation dark skies as one of their primary valued aspects of current village life. Dark skies is also a policy of the SDNPA.

The challenges of maintaining public houses in general, and rural ones in particular, is well documented. Plumpton Green has already lost one pub in the past five years.

3.6 PPNP Policy 7: Plumpton Green Village Centre

PPNP Policy 7 states:

'New development proposals requiring planning permission that result in the loss of existing shops or commercial units in the village centre and elsewhere in the parish will be resisted, unless it can be demonstrated that their continued use is no longer viable.'

It further states in paragraph 5.68:

'Over the past 25 years the centre of Plumpton Green has lost one general store, one public house and a garage to housing. The remaining businesses in the village centre, in particular the village shop/post office, are important to the community as a whole but especially to residents without their own transport, as public transport services are limited. Development proposals that might negatively affect the remaining facilities and businesses will be resisted.'

While it is acknowledged that GT01 does not in itself mandate the loss of the businesses located at the Old Brickworks, the real threat of loss exists, based on the same concerns as under PPNP Policy 6 discussed above. The income arising from the occupants of the new development is unlikely to offset the likely loss in custom from the departing businesses.

Accordingly, the choice of site for GT01 does not appear to adequately address the wider responsibility within the PPTS under Policy B: Planning for travellers sites (13) to 'ensure that traveller sites are sustainable economically'.

Representation ID: REP/016/E1Representor Details:

Representor ID:	REP/016
Name:	Geoff Johnson
Organisation:	Seaford Town Council
Consultation Body:	Specific
Stakeholder Type:	Parish Council

Agent Details:

Name:
Organisation:

Contact Details:

Email Address:	planning@seafordtowncouncil.gov.uk
Address:	37 Church Street Seaford East Sussex BN25 1HG

Representation:

Policy/Section:	E1 - Land at East Quay, Newhaven Port
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	
Representation: Seaford Town Council objects to policy E1 in the Plan for the following reasons:- The area covered by the policy encroaches on the open green adjacent to Tidemills which is within the designated South Downs National Park and extends to the edge of the beach to the east of Newhaven Harbour. Any development on this 'greenfield' area is bound to have a significant adverse impact on its natural environment. Views across to the area from the Bishopstone area of	

Seaford and the sweeping views across Seaford Bay towards Newhaven Harbour which contribute so much to the quality of Seaford and its seafront will also be permanently scarred. E1 is therefore not consistent with the policies in the National Planning Policy Framework 2018 (para 172) relating to the protection of designated National Parks.

The Tidemills area is an area of historic importance which attracts many visitors and its protection is seen as a shared responsibility for the two adjoining towns. Any proposed development which threatens the special quality and the unique natural environment of that area in any way should be opposed.

The plan of the area within policy E1 does not show the line of the proposed Port Access Road (PAR). If the land to the east of the PAR were excluded from the policy this would at least ensure that the sensitive area of Tidemills and the SDNP should remain unspoilt. The PAR would form a defined boundary between the 'brownfield' land to the west and the 'greenfield' area to the east

The commentary in the Plan states that impact of policy E1 on the National Park would be minimised This acknowledges that there would inevitably be an adverse impact on the SDNP and it is difficult to see how this could be minimised other than by excluding this 'greenfield' area

The policy as it stands does not accord with the sustainability principles embedded in the draft Plan. It should not remain in the Plan other than in the suggested modified form.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public?

Why do you feel it is necessary to participate at the Examination in Public?

Thea Davis

From: Planning <planning@seafordtowncouncil.gov.uk>
Sent: 04 November 2018 20:08
To: ldf
Subject: Lewes Local Plan Pt 2 Consultation - Response from Seaford Town Council
Categories: Vanessa to deal with

Seaford Town Council objects to policy E1 in the Plan for the following reasons:-

The area covered by the policy encroaches on the open green adjacent to Tidemills which is within the designated South Downs National Park and extends to the edge of the beach to the east of Newhaven Harbour.

Any development on this 'greenfield' area is bound to have a significant adverse impact on its natural environment. Views across to the area from the Bishopstone area of Seaford and the sweeping views across Seaford Bay towards Newhaven Harbour which contribute so much to the quality of Seaford and its seafront will also be permanently scarred. E1 is therefore not consistent with the policies in the National Planning Policy Framework 2018 (para 172) relating to the protection of designated National Parks.

The Tidemills area is an area of historic importance which attracts many visitors and its protection is seen as a shared responsibility for the two adjoining towns. Any proposed development which threatens the special quality and the unique natural environment of that area in any way should be opposed.

The plan of the area within policy E1 does not show the line of the proposed Port Access Road (PAR). If the land to the east of the PAR were excluded from the policy this would at least ensure that the sensitive area of Tidemills and the SDNP should remain unspoilt. The PAR would form a defined boundary between the 'brownfield' land to the west and the 'greenfield' area to the east

The commentary in the Plan states that impact of policy E1 on the National Park would be minimised This acknowledges that there would inevitably be an adverse impact on the SDNP and it is difficult to see how this could be minimised other than by excluding this 'greenfield' area

The policy as it stands does not accord with the sustainability principles embedded in the draft Plan. It should not remain in the Plan other than in the suggested modified form.

James Corrigan

Town Clerk

Seaford Town Council 5th November 2018

Geoff Johnson
Planning Officer (6 Hours per week)
Seaford Town Council
37 Church Street, Seaford, East Sussex, BN25 1HG
Tel: 01323 894 870
Web: www.seafordtowncouncil.gov.uk

Representation ID: REP/017/NH02Representor Details:

Representor ID:	REP/017
Name:	Susie Mullins
Organisation:	Newhaven Town Council
Consultation Body:	Specific
Stakeholder Type:	Parish Council

Agent Details:

Name:
Organisation:

Contact Details:

Email Address:	susie.mullins@newhaventowncouncil.gov.uk
Address:	18 Fort Road Newhaven Newhaven BN9 9QE

Representation:

Policy/Section:	NH02 - Land at The Marina
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	
Representation: Following discussion at Newhaven Town Council's Full Council meeting on the 16th October regarding Lewes District Council's consultation of Local Plan Part 2, the town council is making the following comments: The reference in the Local Plan Part 2 to Neighbourhood Plans in general is welcome, and in particular to the emerging Newhaven Neighbourhood Plan that will shortly be submitted for consultation under Regulation 16.	

Policy NH02

In respect of Local Plan Policy NH02, land at the Marina at present supports mixed use including employment generating uses such as marine related manufacturing (supporting the local marine cluster referenced in the Newhaven Neighbourhood Plan at Policy E4). The policy and preamble makes no reference to such uses, although the retention of employment generating uses is supported in LDC's Core Policy 4 in the adopted Local Plan Part 1 and Newhaven Neighbourhood Plan.

Newhaven's Neighbourhood Plan at Policy E4 recognises that the value of the marine sector and seeks to retain land and premises used by them, with development needing to take into account their needs and operations. The site plan appears to include part of the slipway but makes no reference to its retention. The additional slipway at the southern section of the site is totally within the site boundary but not referred to. The loss of marine infrastructure including slipways in this part of Newhaven would be catastrophic to the marine industry and contrary to LDC's own policies and those of the Neighbourhood Plan.

Local Plan Part 2, Policy NH02 refers to the support of small-scale specialised retail/food and drink premises and leisure uses associated with The Marina activities. The policy appears to relate to the direct needs of the marina and not for the wider needs of tourism. The Marina in Newhaven (like all marinas), attracts visitors with the attraction of The Fort visitor centre adjacent, also being a pull. It seems reasonable for smaller scale retail and leisure uses that are not directly related to the marina to be supported and that the statement be included in the main body of the policy rather than an aside, bearing in mind the existing offer of the town as; a junction of continental, national, regional and local traffic, providing a gateway to the South Downs National Park and Egrets Way development providing a sustainable transport route between Lewes and Newhaven which will attract visitors in its own right.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public?

Why do you feel it is necessary to participate at the Examination in Public?

Representation ID: REP/017/E1Representor Details:

Representor ID:	REP/017
Name:	Susie Mullins
Organisation:	Newhaven Town Council
Consultation Body:	Specific
Stakeholder Type:	Parish Council

Agent Details:

Name:
Organisation:

Contact Details:

Email Address:	susie.mullins@newhaventowncouncil.gov.uk
Address:	18 Fort Road Newhaven Newhaven BN9 9QE

Representation:

Policy/Section:	E1 - Land at East Quay, Newhaven Port
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	
Representation: Following discussion at Newhaven Town Council's Full Council meeting on the 16th October regarding Lewes District Council's consultation of Local Plan Part 2, the town council is making the following comments: The reference in the Local Plan Part 2 to Neighbourhood Plans in general is welcome, and in particular to the emerging Newhaven Neighbourhood Plan that will shortly be submitted for consultation under Regulation 16.	

Policy E1

Local Plan Policy E1 seeks to bring up to date the earlier Policy NH20 allocated in the LDC Local Plan 2003. However, there have been demonstrable and fundamental changes to this land and the surrounding area which override the mere duplication of this policy in Local Plan Part 2. The Town Council strongly objects to this allocation on the following grounds:

a) Since the 2003 allocation, land to the north and east has been included in the South Downs National Park designation. The National Planning Policy Framework 2018 states that GREAT WEIGHT should be given to conserving and enhancing landscape and scenic beauty in National Parks. The National Park is at its nearest point some 75 metres from the allocation, therefore any allocation in this area should not have any 'material' impact on the National Park or its context. The Port Masterplan states that "National Park may be susceptible to visual impacts from any significant landscape changes the and as such sensitive planning regarding future development proposals will be required". It is considered that policy E1 has not been sensitively considered with the policy stating that development ensure that visual impact on the landscape and scenic beauty be 'minimised'. This is impossible to clearly define, intangible and therefore does not meet the requirement that planning policies be clear and unambiguous.

b) The site plan is not representative of what the site will look like by the time the Local Plan is adopted. The port access road which is under construction will cut through the centre of the site and this should be recognised in the text and map. Phase 1 of the Port Access Road provides a defensible boundary, which divides the urban fringe to the west and open undeveloped land to the east. This development approach should be repeated to the next phase of the Port Access Road to the south meaning that the site area of Policy E1 be reduced from the east, thereby reducing the impact of development on the National Park, reducing the impact on the character of the undeveloped bay and reducing the impact on recognised habitat and biodiversity of value, all of which are substantive considerations.

c) The original policy NH 20 sanctioned development on this land if it was wholly related to the upgrading and expansion of the port. The replacement policy no longer restricts development to just port related development but there is no justification qualifying the change of approach. The recent approval for the improved deep-water berth and port expansion, in addition to the building of the port access road supports the approach that this land be used in connection with port needs only. There is no evidence to suggest that Newhaven has any quantitative need for employment space and regeneration has as its key concept, the re-use of brownfield land, making the best use of land. Employment land reviews and updates qualify this, with the emphasis on improving the quality of existing employment provision rather than the quantity.

d) The site is outside of Newhaven's Enterprise Zone. Newhaven Enterprise Zone (EZ) plans an important part of Newhaven regeneration and its vision therefore should be captured by the aspirations for this local plan. The regeneration for Newhaven is predicated on a vision of 'sustainable development' via: 'clean, green and marine

technology sectors, including manufacturing and engineering industries linked to the maritime sector. "

In addition, this designation is having a 'luke warm' influence on inducing firms to move to Newhaven, despite the support to businesses it provides with large financial gains to them. This reinforces the conclusions drawn from studies that Newhaven already has enough general employment land to meet the need. Development east of the port access road will make a negligible addition to Newhaven's total offer of employment land but a significant material impact on the character of this unique and protected landscape. The Employment Land Review points out that implementation of the EZ will enable Newhaven to deliver a substantial increase of around 55,000 sq.m of new commercial floorspace, as well as refurbishing a further 15,000 sq.m. This is clearly more than adequate to meet the need identified up to 2030. As identified in the Employment land report, there are numerous vacant undeveloped sites within the EZ, including nearby Eastside North and Eastside South, two new industrial estates, both empty available for development, both within the EZ zone, and both on land which is far more suitable for development.

e) This undeveloped site forms part of the wide sweep of Seaford Bay, a long and exposed shingle beach with iconic views of both Seaford Head and Newhaven Fort SSSI. It is one of the few locations in the whole South Downs designation where the National Park meets the sea. It is widely used for leisure, recreation and tourism, and forms part of the UN designated Living Coast Biosphere. Development that interrupts the character of this open and wild area will create a significant detrimental visual impact, harmful to the setting and designation of the South Downs National Park.

f) It is designated as a local wildlife site and its internationally important habitat includes vegetated shingle and several red book species. The East Sussex Vegetated Shingle Management Plan (Tim Smith 2009) points out that Tide Mills (west) 'exhibits an extremely good example of a vegetated shingle habitat' and suggests possibilities for habitat expansion. The Habitat action plan for Sussex (HAP) contains the following objectives and targets, which this application fails to address:

- * Maintain and where possible improve the ecological integrity of coastal vegetated shingle in Sussex.

- * Maintain and expand the range of coastal vegetated shingle in Sussex.

- * Maintain the total extent of coastal vegetated shingle habitat in Sussex with no net loss, and the structures, sediment and coastal processes that support them.

g) The South Downs (draft) local plan has a vision of Newhaven based on sustainable tourism as the gateway to the South Downs. If this site is retained as a local wildlife site, crossed by footpaths, it represents is a key opportunity to realise that vision whereas the proposed employment use in E1 would work directly against it. Newhaven Neighbourhood Plan does not apply to this specific area, which is opted out, however as background it against sets out the vision of Newhaven as: 'a hub for the 'clean and green' sector.'

h) The Port Master Plan identifies the ecological importance and sensitivity of the site and notes that this area "has the potential to host a number of protected species 1 such as great crested newts, invertebrates and reptiles. Protected species surveys were undertaken during 2011 to determine the presence of such species and these surveys identified a variety of habitats of principal importance under the Natural Environment and Rural Communities Act 2006 including calcareous grassland, reedbeds, vegetated shingle (a UK Biodiversity Action Plan Priority Habitat) and hedgerows. The bird surveys identified some 86 species of birds of which 8 are of high conservation value". In terms of development the masterplan states that "any future developments at the port would need to be mindful of nesting periods and encouraging the breeding of these birds through provision of specific types and positioning of nesting boxes for the varying species of bird" and that "to the east of the port a Site of Nature Conservation Importance (SNCI) which, although it is not subject to statutory designation, has the potential to host a number of protected species such as great crested newts, invertebrates and reptiles".

The Port Master Plan outlines a clear vision of development based on expansion of freight/ passenger use, and in terms of development, on renewables and clean technology. It states "The vision for the Port of Newhaven is to create a thriving commercial and ferry port and tourism gateway, providing infrastructure for job-creating businesses in the new low carbon, leisure marine and fishing industries." There are five strategic objectives, of which objective 2 is to: (2) Invest in infrastructure to establish a clean technology and renewable energy business cluster, building on the success of existing local businesses and the current opportunities in offshore wind. The Local Plan policy makes no reference to this specialism.

i) Flood risks in the Employment Land Report are identified as an important barrier to commercial development, and the unstable ground, also identified as a barrier, is a particularly issue in this location. The nearby Rampion building, also on shingle, required foundations 60m deep. Shingle beaches themselves act as a flood barrier so development in this area could impact on flood risk on land nearby.

j) The Article 4 Direction for Newhaven will take effect in November 2018, withdrawing permitted development rights for changes of use from offices or light industrial to residential. This action has been taken to support Core Policy 4 (Economic Development and Regeneration) in terms of safeguarding existing employment sites from other competing uses. This designation further reduces the need for this site to be in employment use, as the sites identified lying within EZ are safeguarded under this policy.

k) Newhaven and the surrounding A26, A27 and A259 are already highly congested with bottlenecks including the town centre gyratory and an opening swing bridge. Part 1 of the Core plan focuses on relieving congestion and air quality issues faced in Newhaven, in particular Core Policy 9 which seeks to improve air quality. Reference is made to the need to consider cumulative impact and this is echoed by the Newhaven Air Quality Action Plan which states "Due to the large number of sites around Newhaven which have been identified for housing and the associated potential growth in traffic that this is

likely to generate, this action is critical to ensure not only that air quality improvements come to fruition, but that the status quo is maintained. Modelling of air quality using relatively crude assumptions relating to traffic growth have shown a potentially significant worsening of air quality around the Ring Road in future years in relation to the baseline scenario of no growth. It is therefore imperative that the planning system is utilised to ensure that new development can support the Air Quality Action Plan, rather than hinder its implementation."

The Local Plan policy makes no reference to the need to provide an environmental impact assessment or Traffic study to support air quality imperatives. The planning system is key to improving air quality and a key way where improvements can be secured.

I) Local Plan 2003 at NH20 sought to reduce and mitigate the impact of development at East Quay through environmental impact assessments, sustainable transport provision, lighting constraints and landscaping initiatives. This has not been repeated in the updated Local Plan policy which is silent on any mitigation on environmental impacts.

In conclusion, sustainable development lies at the heart of the planning process and is a key consideration in determining the robustness of development plans. NPPF 2012 states "plans should be prepared with the objective of contributing to the achievement of sustainable development" and that strategic policies should make provision for "conservation and enhancement of the natural, built and historic environment, including landscape and green infrastructure"

It is respectfully suggested that policy E1 is contrary to this government requirement with its impact on the elements as outlined above.

Concern has also been raised by the local community regarding the clarity of the plans. The overarching map for Newhaven on the consultation website (Policies Map - Inset Map 2 Newhaven) suggests E1 covers a much smaller area - i.e the key shows dark green but the majority of the E1 area is erroneously shown in dark pink.

The position of the Port Access Road on the map for the policy would also give clarity and substantiate the request that the site area be reduced, so that employment development be contained to the west of the Port Access Road with the highway creating a defensible boundary to the biodiverse rich and nationally designated land to the east.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public?

Why do you feel it is necessary to participate at the Examination in Public?

Newhaven Town Council's Representation on LDC Local Plan Part 2

Following discussion at Newhaven Town Council's Full Council meeting on the 16th October regarding Lewes District Council's consultation of Local Plan Part 2, the town council is making the following comments:

The reference in the Local Plan Part 2 to Neighbourhood Plans in general is welcome, and in particular to the emerging Newhaven Neighbourhood Plan that will shortly be submitted for consultation under Regulation 16.

Policy NH02

In respect of Local Plan Policy NH02, land at the Marina at present supports mixed use including employment generating uses such as marine related manufacturing (supporting the local marine cluster referenced in the Newhaven Neighbourhood Plan at Policy E4). The policy and preamble makes no reference to such uses, although the retention of employment generating uses is supported in LDC's Core Policy 4 in the adopted Local Plan Part 1 and Newhaven Neighbourhood Plan.

Newhaven's Neighbourhood Plan at Policy E4 recognises that the value of the marine sector and seeks to retain land and premises used by them, with development needing to take into account their needs and operations. The site plan appears to include part of the slipway but makes no reference to its retention. The additional slipway at the southern section of the site is totally within the site boundary but not referred to. The loss of marine infrastructure including slipways in this part of Newhaven would be catastrophic to the marine industry and contrary to LDC's own policies and those of the Neighbourhood Plan.

Local Plan Part 2, Policy NH02 refers to the support of small-scale specialised retail/food and drink premises and leisure uses associated with The Marina activities. The policy appears to relate to the direct needs of the marina and not for the wider needs of tourism. The Marina in Newhaven (like all marinas), attracts visitors with the attraction of The Fort visitor centre adjacent, also being a pull. It seems reasonable for smaller scale retail and leisure uses that are not directly related to the marina to be supported and that the statement be included in the main body of the policy rather than an aside, bearing in mind the existing offer of the town as; a junction of continental, national, regional and local traffic, providing a gateway to the South Downs National Park and Egrets Way development providing a sustainable transport route between Lewes and Newhaven which will attract visitors in its own right.

Policy E1

Local Plan Policy E1 seeks to bring up to date the earlier Policy NH20 allocated in the LDC Local Plan 2003. However, there have been demonstrable and fundamental changes to this land and the surrounding area which override the mere duplication of this policy in Local Plan Part 2. The Town Council strongly objects to this allocation on the following grounds:

- a) Since the 2003 allocation, land to the north and east has been included in the South Downs National Park designation. The National Planning Policy Framework 2018 states that GREAT WEIGHT should be given to conserving and enhancing landscape and scenic beauty in

National Parks. The National Park is at its nearest point some 75 metres from the allocation, therefore any allocation in this area should not have any 'material' impact on the National Park or its context. The Port Masterplan states that "*National Park may be susceptible to visual impacts from any significant landscape changes the and as such sensitive planning regarding future development proposals will be required*". It is considered that policy E1 has not been sensitively considered with the policy stating that development ensure that visual impact on the landscape and scenic beauty be 'minimised'. This is impossible to clearly define, intangible and therefore does not meet the requirement that planning policies be clear and unambiguous.

b) The site plan is not representative of what the site will look like by the time the Local Plan is adopted. The port access road which is under construction will cut through the centre of the site and this should be recognised in the text and map. Phase 1 of the Port Access Road provides a defensible boundary, which divides the urban fringe to the west and open undeveloped land to the east. This development approach should be repeated to the next phase of the Port Access Road to the south meaning that the site area of Policy E1 be reduced from the east, thereby reducing the impact of development on the National Park, reducing the impact on the character of the undeveloped bay and reducing the impact on recognised habitat and biodiversity of value, all of which are substantive considerations.

c) The original policy NH 20 sanctioned development on this land if it was wholly related to the upgrading and expansion of the port. The replacement policy no longer restricts development to just port related development but there is no justification qualifying the change of approach. The recent approval for the improved deep-water berth and port expansion, in addition to the building of the port access road supports the approach that this land be used in connection with port needs only. There is no evidence to suggest that Newhaven has any quantitative need for employment space and regeneration has as its key concept, the re-use of brownfield land, making the best use of land. Employment land reviews and updates qualify this, with the emphasis on improving the quality of existing employment provision rather than the quantity.

d) The site is outside of Newhaven's Enterprise Zone. Newhaven Enterprise Zone (EZ) plans an important part of Newhaven regeneration and its vision therefore should be captured by the aspirations for this local plan. The regeneration for Newhaven is predicated on a vision of 'sustainable development' via: 'clean, green and marine technology sectors, including manufacturing and engineering industries linked to the maritime sector. "

In addition, this designation is having a 'luke warm' influence on inducing firms to move to Newhaven, despite the support to businesses it provides with large financial gains to them. This reinforces the conclusions drawn from studies that Newhaven already has enough general employment land to meet the need. Development east of the port access road will make a negligible addition to Newhaven's total offer of employment land but a significant material impact on the character of this unique and protected landscape. The Employment Land Review points out that implementation of the EZ will enable Newhaven to deliver a substantial increase of around 55,000 sq.m of new commercial floorspace, as well as refurbishing a further 15,000 sq.m. This is clearly more than adequate to meet the need

identified up to 2030. As identified in the Employment land report, there are numerous vacant undeveloped sites within the EZ, including nearby Eastside North and Eastside South, two new industrial estates, both empty available for development, both within the EZ zone, and both on land which is far more suitable for development.

e) This undeveloped site forms part of the wide sweep of Seaford Bay, a long and exposed shingle beach with iconic views of both Seaford Head and Newhaven Fort SSSI. It is one of the few locations in the whole South Downs designation where the National Park meets the sea. It is widely used for leisure, recreation and tourism, and forms part of the UN designated Living Coast Biosphere. Development that interrupts the character of this open and wild area will create a significant detrimental visual impact, harmful to the setting and designation of the South Downs National Park.

f) It is designated as a local wildlife site and its internationally important habitat includes vegetated shingle and several red book species. The East Sussex Vegetated Shingle Management Plan (Tim Smith 2009) points out that Tide Mills (west) *'exhibits an extremely good example of a vegetated shingle habitat' and suggests possibilities for habitat expansion*. The Habitat action plan for Sussex (HAP) contains the following objectives and targets, which this application fails to address:

- Maintain and where possible improve the ecological integrity of coastal vegetated shingle in Sussex.
- Maintain and expand the range of coastal vegetated shingle in Sussex.
- Maintain the total extent of coastal vegetated shingle habitat in Sussex with no net loss, and the structures, sediment and coastal processes that support them.

g) The South Downs (draft) local plan has a vision of Newhaven based on sustainable tourism as the gateway to the South Downs. If this site is retained as a local wildlife site, crossed by footpaths, it represents is a key opportunity to realise that vision whereas the proposed employment use in E1 would work directly against it. Newhaven Neighbourhood Plan does not apply to this specific area, which is opted out, however as background it against sets out the vision of Newhaven as: 'a hub for the 'clean and green' sector.'

h) The Port Master Plan identifies the ecological importance and sensitivity of the site and notes that this area *"has the potential to host a number of protected species 1 such as great crested newts, invertebrates and reptiles. Protected species surveys were undertaken during 2011 to determine the presence of such species and these surveys identified a variety of habitats of principal importance under the Natural Environment and Rural Communities Act 2006 including calcareous grassland, reedbeds, vegetated shingle (a UK Biodiversity Action Plan Priority Habitat) and hedgerows. The bird surveys identified some 86 species of birds of which 8 are of high conservation value"*. In terms of development the masterplan states that *"any future developments at the port would need to be mindful of nesting periods and encouraging the breeding of these birds through provision of specific types and positioning of nesting boxes for the varying species of bird"* and that *"to the east of the port a Site of Nature Conservation Importance (SNCI) which, although it is not subject to statutory*

designation, has the potential to host a number of protected species such as great crested newts, invertebrates and reptiles”.

The Port Master Plan outlines a clear vision of development based on expansion of freight/passenger use, and in terms of development, on renewables and clean technology. It states *“The vision for the Port of Newhaven is to create a thriving commercial and ferry port and tourism gateway, providing infrastructure for job-creating businesses in the new low carbon, leisure marine and fishing industries.”* There are five strategic objectives, of which objective 2 is to: *(2) Invest in infrastructure to establish a clean technology and renewable energy business cluster, building on the success of existing local businesses and the current opportunities in offshore wind.* The Local Plan policy makes no reference to this specialism.

i) Flood risks in the Employment Land Report are identified as an important barrier to commercial development, and the unstable ground, also identified as a barrier, is a particularly issue in this location. The nearby Rampion building, also on shingle, required foundations 60m deep. Shingle beaches themselves act as a flood barrier so development in this area could impact on flood risk on land nearby.

j) The Article 4 Direction for Newhaven will take effect in November 2018, withdrawing permitted development rights for changes of use from offices or light industrial to residential. This action has been taken to support Core Policy 4 (Economic Development and Regeneration) in terms of safeguarding existing employment sites from other competing uses. This designation further reduces the need for this site to be in employment use, as the sites identified lying within EZ are safeguarded under this policy.

k) Newhaven and the surrounding A26, A27 and A259 are already highly congested with bottlenecks including the town centre gyratory and an opening swing bridge. Part 1 of the Core plan focuses on relieving congestion and air quality issues faced in Newhaven, in particular Core Policy 9 which seeks to improve air quality. Reference is made to the need to consider cumulative impact and this is echoed by the Newhaven Air Quality Action Plan which states *"Due to the large number of sites around Newhaven which have been identified for housing and the associated potential growth in traffic that this is likely to generate, this action is critical to ensure not only that air quality improvements come to fruition, but that the status quo is maintained. Modelling of air quality using relatively crude assumptions relating to traffic growth have shown a potentially significant worsening of air quality around the Ring Road in future years in relation to the baseline scenario of no growth. It is therefore imperative that the planning system is utilised to ensure that new development can support the Air Quality Action Plan, rather than hinder its implementation."*

The Local Plan policy makes no reference to the need to provide an environmental impact assessment or Traffic study to support air quality imperatives. The planning system is key to improving air quality and a key way where improvements can be secured.

l) Local Plan 2003 at NH20 sought to reduce and mitigate the impact of development at East Quay through environmental impact assessments, sustainable transport provision, lighting constraints and landscaping initiatives. This has not been repeated in the updated Local Plan policy which is silent on any mitigation on environmental impacts.

In conclusion, sustainable development lies at the heart of the planning process and is a key consideration in determining the robustness of development plans. NPPF 2012 states “plans should be prepared with the objective of contributing to the achievement of sustainable development” and that strategic policies should make provision for “conservation and enhancement of the natural, built and historic environment, including landscape and green infrastructure”

It is respectfully suggested that policy E1 is contrary to this government requirement with its impact on the elements as outlined above.

Concern has also been raised by the local community regarding the clarity of the plans. The overarching map for Newhaven on the consultation website (Policies Map - Inset Map 2 Newhaven) suggests E1 covers a much smaller area - i.e the key shows dark green but the majority of the E1 area is erroneously shown in dark pink.

The position of the Port Access Road on the map for the policy would also give clarity and substantiate the request that the site area be reduced, so that employment development be contained to the west of the Port Access Road with the highway creating a defensible boundary to the biodiverse rich and nationally designated land to the east.

Yours sincerely,

Newhaven Town Council

Representation ID: REP/018/GT01Representor Details:

Representor ID:	REP/018
Name:	Sarah Osborne
Organisation:	Lewes District Council
Consultation Body:	Specific
Stakeholder Type:	Parish Council

Agent Details:

Name:
Organisation:

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	GT01 - Land south of The Plough
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	
Representation: I would like to submit a comment re GT01 on LP2 as the Ward Councillor for Plumpton, Streat, East Chiltington and St John Without. I do not consider the site off Station Road Plumpton in GT01 suitable or sustainable as a Gypsy and Traveller site for the following reason; It will not be possible for those settled there to access by foot the amenities in the village, in particular the primary school, shop and train station as the road has no pavement and is too dangerous to walk along due to fast (60mph speed limit) and often heavy traffic.	
What changes do you suggest to make the document legally compliant or sound?	

Do you consider it necessary to participate at the Examination in Public?
Why do you feel it is necessary to participate at the Examination in Public?

Thea Davis

From: sarah osborne <[REDACTED]>
Sent: 25 September 2018 16:44
To: ldf
Subject: Comments on LP2 re GT01

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Outstanding - needs attention, Vanessa to deal with

I would like to submit a comment re GT01 on LP2 as the Ward Councillor for Plumpton, Streat, East Chilington and St John Without.

I do not consider the site off Station Road Plumpton in GT01 suitable or sustainable as a Gypsy and Traveller site for the following reason; It will not be possible for those settled there to access by foot the amenities in the village, in particular the primary school, shop and train station as the road has no pavement and is too dangerous to walk along due to fast (60mph speed limit) and often heavy traffic.

All the best

Sarah
[REDACTED]

Representation ID: REP/019/NH02
--

Representor Details:

Representor ID:	REP/019
Name:	Marguerite Oxley
Organisation:	Environment Agency
Consultation Body:	Specific
Stakeholder Type:	National group or organisation

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	marguerite.oxley@environment-agency.gov.uk
Address:	Guildbourne House Chatsworth Road Worthing West Sussex BN11 1LD

Representation:

Policy/Section:	NH02 - Land at The Marina
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	No Not Effective Not Consistent with national policy
Representation:	Policy d) refers to inclusion of an appropriate standard of flood protection including safe access to the site. In accordance with NPPF para 163 and the Planning Practice Guidance Notes para 057, we recommend that safe egress from the site is also referred

to in this policy.

Policy e) does not clearly explain the contaminated land investigation requirements for this site. The use of the term 'mitigation' does not represent the correct terminology for contaminated land and therefore may be misleading regarding the requirements for remediation.

Policy g). The geographical boundary of the allocation shows encroachment onto the foreshore. There is therefore the potential for this allocation to cause adverse impact to inter-tidal habitats. We therefore suggest that the wording of this policy be strengthened to ensure compliance with para 170 d) (minimising impacts on and providing net gains for biodiversity) of the NPPF 2018.

It is not clear whether this allocation would allow for additional berths (the previous planning application (LW/07/1475) did). If additional berths are to be provided at the site, they have the potential to impact on inter-tidal habitats and water quality. We therefore suggest that the wording of this policy be strengthened to ensure compliance with paras 170 d) (minimising impacts on and providing net gains for biodiversity) and 170 e) (preventing new and existing development from contributing tounacceptable levels of water pollution and and wherever possible should help to improve local environmental conditions such aswater quality) of the NPPF 2018.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public? No

Why do you feel it is necessary to participate at the Examination in Public?

As detailed in our response (22 January 2018) to the draft consultation, we suggest adding reference to 'egress' to policy d) as follows:

'd) New development must include an appropriate standard of flood protection (including safe access to and egress from to the site), and provision for future maintenance, to be agreed with the Environment Agency;'

As detailed in our response (22 January 2018) to the draft consultation, we suggest the following wording for policy e):

* 'Development will be required to submit a desk study, conceptual model, site investigation, risk assessment and Remedial Method Statement for contaminated land in line with best practice approaches and carried out by or under the direction of a suitably qualified competent person and in accordance with most recent guidance.' I refer to correspondence to the council on 12 June 2018 in which we detailed some proposed policy wording to address biodiversity and water quality issues for this allocation. We note that some of this wording has been included as supporting text, however to ensure that this allocation is able to 'minimise impacts on and providing net gains for biodiversity' and protect water quality in accordance with the NPPF 2018, we propose

that the following text is included as policy wording:

* 'There should be no net loss, and seek to provide a net gain to biodiversity, in particular to Habitats of Principal Importance (formerly known as BAP habitats). The indirect impacts of development, such as recreational disturbance, on designated nature conservation sites and other significant habitats must be considered. Appropriate mitigation must be identified, along with the means for its delivery and maintenance.'

* 'Where impacts on biodiversity cannot be avoided or mitigated, like-for-like compensatory habitat at or close to the development site will be required, taking account of an up-to-date ecological survey, subject to the agreement with the relevant authorities.'

* 'Where loss of habitat occurs due to construction of walkways, moorings or pontoons or from boats resting on intertidal habitat, creation of new like-for-like compensatory habitat will be required.'

* 'Where additional moorings are provided, consideration must be given to the management of additional waste and sewage arising. Appropriate services, such as toilets and pump out facilities, should be provided where appropriate to reduce the risk to water quality from recreational boating. The size of the pump out facility should be appropriate to that of the development and agreed by the local authority prior to construction.'

Representation ID: REP/019/GT01Representor Details:

Representor ID:	REP/019
Name:	Marguerite Oxley
Organisation:	Environment Agency
Consultation Body:	Specific
Stakeholder Type:	National group or organisation

Agent Details:

Name:
Organisation:

Contact Details:

Email Address:	marguerite.oxley@environment-agency.gov.uk
Address:	Guildbourne House Chatsworth Road Worthing West Sussex BN11 1LD

Representation:

Policy/Section:	GT01 - Land south of The Plough
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	No Not Effective
Representation: There is no reference in the policy as to how wastewater will be disposed of. There is the potential for the allocation to have an adverse impact on water quality. We therefore suggest that the wording of this policy be strengthened to take account of para 170 e) (preventing new and existing development from contributing tounacceptable levels of water pollution and and wherever possible should help to improve local	

environmental conditions such aswater quality) of the NPPF 2018.

What changes do you suggest to make the document legally compliant or sound?

This allocation has been added since the consultation draft and hence we have not had the opportunity to comment on this previously.

To be consistent with the other allocations within the plan and for clarification purposes, we would recommend that policy wording should added to explain the arrangements for wastewater treatment for the site. These arrangements should ensure protection of the water environment and ensure there will be no deterioration under the Water Framework Directive.

Do you consider it necessary to participate at the Examination in Public?

No

Why do you feel it is necessary to participate at the Examination in Public?

Representation ID: REP/019/E1

Representor Details:

Representor ID:	REP/019
Name:	Marguerite Oxley
Organisation:	Environment Agency
Consultation Body:	Specific
Stakeholder Type:	National group or organisation

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	marguerite.oxley@environment-agency.gov.uk
Address:	Guildbourne House Chatsworth Road Worthing West Sussex BN11 1LD

Representation:

Policy/Section:	E1 - Land at East Quay, Newhaven Port
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	No Not Consistent with national policy
Representation:	
Land at East Quay, Newhaven Port falls in Flood Zones 2 and 3 (an area of higher flood risk). In accordance with the NPPF 2018, we recommend the Sequential Test is undertaken when allocating sites to ensure development is directed to the areas of lowest flood risk. This should use evidence provided by an up to date Strategic Flood	

Risk Assessment. We cannot see evidence of this approach to date and we would have concerns if development is allocated in Flood Zones 2 and 3 without the Sequential Test being undertaken.

What changes do you suggest to make the document legally compliant or sound?

This allocation has been added since the consultation draft and hence we have not had the opportunity to comment on this previously.

We recommend that there should be evidence in the main document or the Sustainability Appraisal to show that the Sequential Test has been undertaken and satisfied.

Do you consider it necessary to participate at the Examination in Public? No

Why do you feel it is necessary to participate at the Examination in Public?

Representation ID: REP/020/BH01
--

Representor Details:

Representor ID:	REP/020
Name:	Lois Partridge
Organisation:	Mid Sussex District Council
Consultation Body:	Specific
Stakeholder Type:	Other Local Authority

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	lois.partridge@midsussex.gov.uk
Address:	Oaklands Road Haywards Heath E Sussex RH16 1ss

Representation:

Policy/Section:	BH01 - Land at The Nuggets, Valebridge Road
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	Yes
Representation: Policy BH01 allocates land at The Nuggets for 14 homes, which is proposed to be accessed through the property 'Woodreeves'. The site lies immediately adjacent to the border with Mid Sussex District, with the proposed access to the site from land in Mid Sussex District. In response to Lewes District Council's previous, Regulation 18 consultation on the draft Site Allocations and Development Management Policies document, MSDC noted that	

the policy should acknowledge the impact of the proposed development on services and facilities provided in Mid Sussex District, due to the proximity of the development to the district boundary. This is particularly relevant now, as there is a current planning application for 25 homes on this site, rather than the 14 units set out in the draft allocation.

It is disappointing to note that, while paragraph 2.47 of the supporting text to Policy BH01 notes that the proposed access for the site lies within the county of West Sussex, the text and the policy still do not acknowledge that the shops, services and public transport provision which will support the new residents of the development lie within Mid Sussex District.

As set out in our previous response, in line with the spatial strategy set out in our District Plan Burgess Hill is subject to a major growth programme for 5,000 new homes, and 25 hectares of employment land along with associated infrastructure. MSDC is working closely with service and infrastructure providers to ensure that the corresponding social, community and highways infrastructure is provided in a timely manner to support this strategic development.

MSDC will be responding to future Lewes District Council 'Community Infrastructure Levy Window for Bidding' to ensure that development on the border with Mid Sussex makes a proportional contribution to the impact that the development will have on local services and facilities.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public? No

Why do you feel it is necessary to participate at the Examination in Public?

Representation ID: REP/020/GT01Representor Details:

Representor ID:	REP/020
Name:	Lois Partridge
Organisation:	Mid Sussex District Council
Consultation Body:	Specific
Stakeholder Type:	Other Local Authority

Agent Details:

Name:
Organisation:

Contact Details:

Email Address:	lois.partridge@midsussex.gov.uk
Address:	Oaklands Road Haywards Heath E Sussex RH16 1ss

Representation:

Policy/Section:	GT01 - Land south of The Plough
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	Yes
Representation: MSDC welcomes the inclusion of the proposed allocation of Land south of the Plough for 5 additional permanent Gypsy and Traveller pitches in Policy GT01, and notes that this allocation meets the need identified in the Gypsy and Traveller Accommodation Assessment, 2015, for Lewes District outside of the National Park, over the Plan period.	
What changes do you suggest to make the document legally compliant or sound?	

Do you consider it necessary to participate at the Examination in Public?
Why do you feel it is necessary to participate at the Examination in Public?

Representation ID: REP/020/DM1
--

Representor Details:

Representor ID:	REP/020
Name:	Lois Partridge
Organisation:	Mid Sussex District Council
Consultation Body:	Specific
Stakeholder Type:	Other Local Authority

Agent Details:

Name:
Organisation:

Contact Details:

Email Address:	lois.partridge@midsussex.gov.uk
Address:	Oaklands Road Haywards Heath E Sussex RH16 1ss

Representation:

Policy/Section:	DM1: Planning Boundary
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	Yes
Representation:	
Policy DM1: Planning Boundary	
MSDC welcomes the fact that the Planning Boundary on the Plan's Policies Map, Inset Map 11 – Edge of Burgess Hill, has been amended since the previous consultation, to exclude land east of Valebridge Road, which is not allocated for development. This will help to ensure that this land is protected as open countryside, and will help to deter speculative development in this area.	

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public?
--

Why do you feel it is necessary to participate at the Examination in Public?

Representation ID: REP/020/HSARepresentor Details:

Representor ID:	REP/020
Name:	Lois Partridge
Organisation:	Mid Sussex District Council
Consultation Body:	Specific
Stakeholder Type:	Other Local Authority

Agent Details:

Name:
Organisation:

Contact Details:

Email Address:	lois.partridge@midsussex.gov.uk
Address:	Oaklands Road Haywards Heath E Sussex RH16 1ss

Representation:

Policy/Section:	Housing Site Allocations
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	Yes
Representation: Planned Housing Growth Spatial Policy 2 of the Joint Core Strategy Lewes District Local Plan Part 1 identified that provision would be made for 6,900 new homes in Lewes District between 2010 and 2030. Provision was made for 1,073 units through strategic allocations, with 2,216 units built or committed as at 1 April 2015, and supply from windfall and rural exceptions sites allowance of 545 units.	

MSDC notes that the residual housing requirement to be provided in the Plan is 1,660 units. However, the Plan only allocates sites to meet 432 units of that residual need, with the other 1,250 units to be delivered from made and emerging Neighbourhood Plans. MSDC has concerns with this approach.

Of the 1,250 homes identified in the Plan which are anticipated to be delivered from Neighbourhood Plans, a total of 865 units are identified in the Newhaven, Peacehaven and Telscombe and Seaford Neighbourhood Plans. These plans are still emerging, and are at a relatively early stage of their preparation.

Peacehaven and Telscombe have only this year carried out a Call for Sites, Seaford has not yet consulted on its Regulation 14 draft Plan, and Newhaven Town Council has not yet consulted on its Regulation 16 draft Plan. As such, the allocation of sites through these plans has not been tested through the Examination process, nor approved through a referendum.

It is acknowledged that Lewes District Council (LDC) commits to closely monitor the progress of the Neighbourhood Plans, and has set out a mechanism to review the Council's approach to Neighbourhood Planning, if any concerns arise regarding timings.

Paragraph 2.16 of the Plan notes that LDC will consider what, if any, measures are needed to resolve the issue. These might include LDC recovering the role of identifying allocations through a subsequent development plan document or a future review of the Local Plan.

This would have been a pragmatic approach, if all the Neighbourhood Plans were already 'made'. However, as several of the Neighbourhood Plans on which the Plan relies to deliver housing are not yet close to this stage, there is a significant risk that they may not deliver the required housing, and a further risk that if the housing does come forward, it will not be delivered by 2030, the end of the Plan period.

MSDC notes the requirements of the NPPF, paragraph 23 of which states that:

'Strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development. This should include planning for and allocating sufficient sites to deliver the strategic priorities of the area.'

MSDC questions whether the reliance on emerging Neighbourhood Plans represents a clear strategy for bringing sufficient land forward, to deliver the strategic priorities of the area.

Lewes District Council is therefore encouraged to identify further sites to allocate for housing through the Plan preparation process, to remove the uncertainty of delivery associated with as yet untested, draft Neighbourhood Plans. This approach will seek to ensure that there is minimum unmet need within Lewes District, and that neighbouring authorities are not asked to review whether they are able to meet this unmet need.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public?	No
Why do you feel it is necessary to participate at the Examination in Public?	

Representation ID: REP/020/BH02
--

Representor Details:

Representor ID:	REP/020
Name:	Lois Partridge
Organisation:	Mid Sussex District Council
Consultation Body:	Specific
Stakeholder Type:	Other Local Authority

Agent Details:

Name:
Organisation:

Contact Details:

Email Address:	lois.partridge@midsussex.gov.uk
Address:	Oaklands Road Haywards Heath E Sussex RH16 1ss

Representation:

Policy/Section:	Edge of Burgess Hill (within Wivelsfield Parish)
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	Yes
Representation:	
Mid Sussex District Council welcomes the removal of the draft allocation of Land at Oakfields, Theobalds Road, Burgess Hill which was in the previous version of the Plan.	
What changes do you suggest to make the document legally compliant or sound?	

Do you consider it necessary to participate at the Examination in Public?	No
Why do you feel it is necessary to participate at the Examination in Public?	

Representation ID: REP/020/HRA

Representor Details:

Representor ID:	REP/020
Name:	Lois Partridge
Organisation:	Mid Sussex District Council
Consultation Body:	Specific
Stakeholder Type:	Other Local Authority

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	lois.partridge@midsussex.gov.uk
Address:	Oaklands Road Haywards Heath E Sussex RH16 1ss

Representation:

Policy/Section:	Habitats Regulation Assessment
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	Yes
Representation: Lewes District Local Plan Part 2: Site Allocations and Development Management Policies Pre-Submission Document September 2018 Mid Sussex District Council (MSDC) welcomes the opportunity to comment on the Lewes District Plan Part 2 Pre-Submission document ('the Plan'). The Council has a number of comments it wishes to make. Habitats Regulations Assessment (HRA)	

The District Council remains committed to co-operating with the other affected local authorities through the Ashdown Forest Officer Working Group and looks forward to working in partnership to protect the Ashdown Forest SAC in an appropriate manner.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public?

Why do you feel it is necessary to participate at the Examination in Public?

Contact:

Councillor Andrew MacNaughton Tel: 01293 522817
email: andrew.macnaughton@midsussex.gov.uk

Your Ref:

Our Ref: AMN/LP

Date:

5th November 2018

BY EMAIL

Dear Sir/Madam,

**Lewes District Local Plan Part 2: Site Allocations and Development Management Policies
Pre-Submission Document September 2018**

Mid Sussex District Council (MSDC) welcomes the opportunity to comment on the Lewes District Plan Part 2 Pre-Submission document ('the Plan'). The Council has a number of comments it wishes to make.

Planned Housing Growth

Spatial Policy 2 of the Joint Core Strategy Lewes District Local Plan Part 1 identified that provision would be made for 6,900 new homes in Lewes District between 2010 and 2030. Provision was made for 1,073 units through strategic allocations, with 2,216 units built or committed as at 1 April 2015, and supply from windfall and rural exceptions sites allowance of 545 units.

MSDC notes that the residual housing requirement to be provided in the Plan is 1,660 units. However, the Plan only allocates sites to meet 432 units of that residual need, with the other 1,250 units to be delivered from made and emerging Neighbourhood Plans. MSDC has concerns with this approach.

Of the 1,250 homes identified in the Plan which are anticipated to be delivered from Neighbourhood Plans, a total of 865 units are identified in the Newhaven, Peacehaven and Telscombe and Seaford Neighbourhood Plans. These plans are still emerging, and are at a relatively early stage of their preparation.

Peacehaven and Telscombe have only this year carried out a Call for Sites, Seaford has not yet consulted on its Regulation 14 draft Plan, and Newhaven Town Council has not yet consulted on its Regulation 16 draft Plan. As such, the allocation of sites through these plans has not been tested through the Examination process, nor approved through a referendum.

It is acknowledged that Lewes District Council (LDC) commits to closely monitor the progress of the Neighbourhood Plans, and has set out a mechanism to review the Council's approach to Neighbourhood Planning, if any concerns arise regarding timings.

Paragraph 2.16 of the Plan notes that LDC will consider what, if any, measures are needed to resolve the issue. These might include LDC recovering the role of identifying allocations through a subsequent development plan document or a future review of the Local Plan.

Working together for a better Mid Sussex



This would have been a pragmatic approach, if all the Neighbourhood Plans were already 'made'. However, as several of the Neighbourhood Plans on which the Plan relies to deliver housing are not yet close to this stage, there is a significant risk that they may not deliver the required housing, and a further risk that if the housing does come forward, it will not be delivered by 2030, the end of the Plan period.

MSDC notes the requirements of the NPPF, paragraph 23 of which states that:

'Strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development. This should include planning for and allocating sufficient sites to deliver the strategic priorities of the area.'

MSDC questions whether the reliance on emerging Neighbourhood Plans represents a clear strategy for bringing sufficient land forward, to deliver the strategic priorities of the area.

Lewes District Council is therefore encouraged to identify further sites to allocate for housing through the Plan preparation process, to remove the uncertainty of delivery associated with as yet untested, draft Neighbourhood Plans. This approach will seek to ensure that there is minimum unmet need within Lewes District, and that neighbouring authorities are not asked to review whether they are able to meet this unmet need.

Policy BHO1 (Land at The Nuggets, Valebridge Road)

Policy BH01 allocates land at The Nuggets for 14 homes, which is proposed to be accessed through the property 'Woodreeves'. The site lies immediately adjacent to the border with Mid Sussex District, with the proposed access to the site from land in Mid Sussex District.

In response to Lewes District Council's previous, Regulation 18 consultation on the draft Site Allocations and Development Management Policies document, MSDC noted that the policy should acknowledge the impact of the proposed development on services and facilities provided in Mid Sussex District, due to the proximity of the development to the district boundary. This is particularly relevant now, as there is a current planning application for 25 homes on this site, rather than the 14 units set out in the draft allocation.

It is disappointing to note that, while paragraph 2.47 of the supporting text to Policy BH01 notes that the proposed access for the site lies within the county of West Sussex, the text and the policy still do not acknowledge that the shops, services and public transport provision which will support the new residents of the development lie within Mid Sussex District.

As set out in our previous response, in line with the spatial strategy set out in our District Plan Burgess Hill is subject to a major growth programme for 5,000 new homes, and 25 hectares of employment land along with associated infrastructure. MSDC is working closely with service and infrastructure providers to ensure that the corresponding social, community and highways infrastructure is provided in a timely manner to support this strategic development.

MSDC will be responding to future Lewes District Council 'Community Infrastructure Levy Window for Bidding' to ensure that development on the border with Mid Sussex makes a proportional contribution to the impact that the development will have on local services and facilities.

BH02 (Land at Oakfields, Theobalds Road)

Mid Sussex District Council welcomes the removal of the draft allocation of Land at Oakfields, Theobalds Road, Burgess Hill which was in the previous version of the Plan.

Gypsy and Traveller Provision

MSDC welcomes the inclusion of the proposed allocation of Land south of the Plough for 5 additional permanent Gypsy and Traveller pitches in Policy GT01, and notes that this allocation meets the need identified in the Gypsy and Traveller Accommodation Assessment, 2015, for Lewes District outside of the National Park, over the Plan period.

Policy DM1: Planning Boundary

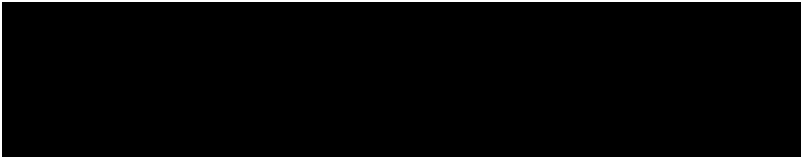
MSDC welcomes the fact that the Planning Boundary on the Plan's Policies Map, Inset Map 11 – Edge of Burgess Hill, has been amended since the previous consultation, to exclude land east of Valebridge Road, which is not allocated for development. This will help to ensure that this land is protected as open countryside, and will help to deter speculative development in this area.

Habitats Regulations Assessment (HRA)

The District Council remains committed to co-operating with the other affected local authorities through the Ashdown Forest Officer Working Group and looks forward to working in partnership to protect the Ashdown Forest SAC in an appropriate manner.

If you would like to discuss any of these comments, please contact Alice Henstock, Senior Planning Policy Officer, alice.henstock@midsussex.gov.uk

Yours sincerely,



Councillor Andrew MacNaughton
Cabinet Member for Housing and Planning

Representation ID: REP/021/NH01
--

Representor Details:

Representor ID:	REP/021
Name:	Rebecca Pearson
Organisation:	Natural England
Consultation Body:	Specific
Stakeholder Type:	National group or organisation

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	Rebecca.Pearson@naturalengland.org.uk
Address:	Guildbourne House Chatsworth Road Worthing West Sussex BN11 1LD

Representation:

Policy/Section:	NH01 - South of Valley Road
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	Yes
Representation:	
This allocation is close to the National Park boundary and we welcome the inclusion of the requirement to fully assess the impacts of views on any development here.	
What changes do you suggest to make the document legally compliant or sound?	

Do you consider it necessary to participate at the Examination in Public?	No
Why do you feel it is necessary to participate at the Examination in Public?	

Representation ID: REP/021/NH02
--

Representor Details:

Representor ID:	REP/021
Name:	Rebecca Pearson
Organisation:	Natural England
Consultation Body:	Specific
Stakeholder Type:	National group or organisation

Agent Details:

Name:
Organisation:

Contact Details:

Email Address:	Rebecca.Pearson@naturalengland.org.uk
Address:	Guildbourne House Chatsworth Road Worthing West Sussex BN11 1LD

Representation:

Policy/Section:	NH02 - Land at The Marina
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	Yes
Representation:	
We note that this allocation has the potential to impact on biodiversity. We advise that the allocation policy includes a requirement for a net gain in biodiversity in order to comply with the recently revised NPPF (further discussed in Policy DM24).	
What changes do you suggest to make the document legally compliant or sound?	

Do you consider it necessary to participate at the Examination in Public?	No
Why do you feel it is necessary to participate at the Examination in Public?	

Representation ID: REP/021/BH01
--

Representor Details:

Representor ID:	REP/021
Name:	Rebecca Pearson
Organisation:	Natural England
Consultation Body:	Specific
Stakeholder Type:	National group or organisation

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	Rebecca.Pearson@naturalengland.org.uk
Address:	Guildbourne House Chatsworth Road Worthing West Sussex BN11 1LD

Representation:

Policy/Section:	BH01 - Land at The Nuggets, Valebridge Road
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	Yes
Representation: This Site allocation is surrounded by ancient woodland and networks of natural Habitats. We welcome that this policy has been amended to include the irreplaceable nature of ancient woodland and note the additional information pertaining to this in the supporting text. Thank you for consulting Natural England on this matter. Again the development will need to demonstrate a net gain in biodiversity and we further	

advise that networks of natural habitats should be maintained and enhanced in order to provide a development which is sympathetic to its location and clearly biodiversity-lead. We advise this should be a key requirement to guide any development proposals.

We also advise re-iterate that the policy should state that impacts to ancient woodland should be avoided to echo to the recently updated NPPF as follows:

175 c) "development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused unless there are wholly exceptional reasons (footnote 58) and a suitable compensation strategy exists".

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public? No

Why do you feel it is necessary to participate at the Examination in Public?

Representation ID: REP/021/BA03
--

Representor Details:

Representor ID:	REP/021
Name:	Rebecca Pearson
Organisation:	Natural England
Consultation Body:	Specific
Stakeholder Type:	National group or organisation

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	Rebecca.Pearson@naturalengland.org.uk
Address:	Guildbourne House Chatsworth Road Worthing West Sussex BN11 1LD

Representation:

Policy/Section:	BA03 - Land at Bridgelands
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	Yes
Representation: We further advise that this policy includes the consideration of the use of SuDS. We welcome that it is included in the supporting text but it is not a requirement within the policy. We advise that well-designed SuDS have multiple benefits for wildlife and people, providing habitats and valuable ecosystems services such as, flood amelioration. A SuDS lead scheme would be welcome here.	

What changes do you suggest to make the document legally compliant or sound?	
Do you consider it necessary to participate at the Examination in Public?	No
Why do you feel it is necessary to participate at the Examination in Public?	

Representation ID: REP/021/CH01
--

Representor Details:

Representor ID:	REP/021
Name:	Rebecca Pearson
Organisation:	Natural England
Consultation Body:	Specific
Stakeholder Type:	National group or organisation

Agent Details:

Name:
Organisation:

Contact Details:

Email Address:	Rebecca.Pearson@naturalengland.org.uk
Address:	Guildbourne House Chatsworth Road Worthing West Sussex BN11 1LD

Representation:

Policy/Section:	CH01 - Glendene, Station Road
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	Yes
Representation: We note that ancient woodland lies adjacent to the site and would refer you to our Standing advice with regard to this matter. This includes a requirement for a buffer of at least 15m between the woodland and the development. We welcome that SuDS are cited for use here and we note that full ecological surveys to include protected species have and will be carried out.	

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public?	No
--	-----------

Why do you feel it is necessary to participate at the Examination in Public?

Representation ID: REP/021/CH02Representor Details:

Representor ID:	REP/021
Name:	Rebecca Pearson
Organisation:	Natural England
Consultation Body:	Specific
Stakeholder Type:	National group or organisation

Agent Details:

Name:
Organisation:

Contact Details:

Email Address:	Rebecca.Pearson@naturalengland.org.uk
Address:	Guildbourne House Chatsworth Road Worthing West Sussex BN11 1LD

Representation:

Policy/Section:	CH02 - Layden Hall, East Grinstead Road
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	Yes
Representation: This site lies adjacent to Chailey Common Site of Special Scientific Interest (SSSI). Chailey Common Site of Special Scientific Interest (SSSI) is afforded statutory protection under the Wildlife and Countryside Act 1981 (as amended). Thank you for consulting Natural England regarding this allocation policy which I note has been amended to include the SSSI. We have the following additional comments to make regarding the	

following:

An ecological impact assessment is undertaken and appropriate measures identified and implemented accordingly to mitigate potential adverse impacts on Chailey Common SSSI and the local biodiversity. Development allows for the protection of biodiversity and enhancement where possible; and

Again due to the nature and location of this site we advised that the term where possible was omitted as enhancement should be a requirement of new development (as for policy BH01). We had understood that this had been revised to reflect our advice. We further add that the need to demonstrate biodiversity net gain will be of key importance here. Consideration of this will also need to be made with regard to any tree felling on site.

We advise that the policy states that impacts to the SSSI must be avoided.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public?

No

Why do you feel it is necessary to participate at the Examination in Public?

Representation ID: REP/021/E1Representor Details:

Representor ID:	REP/021
Name:	Rebecca Pearson
Organisation:	Natural England
Consultation Body:	Specific
Stakeholder Type:	National group or organisation

Agent Details:

Name:
Organisation:

Contact Details:

Email Address:	Rebecca.Pearson@naturalengland.org.uk
Address:	Guildbourne House Chatsworth Road Worthing West Sussex BN11 1LD

Representation:

Policy/Section:	E1 - Land at East Quay, Newhaven Port
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	Yes
Representation: Natural England has serious concerns regarding this allocation. The allocation site is directly adjacent to and in the setting of, the South Downs National Park. There is therefore clear potential for a significant impacts on the Special Qualities of the South Downs National Park. The policy states that visual impacts will be minimised however, from the information supplied, the impact from the development of	

this land in both landscape and visual terms is likely to be significant. This allocation did not form part of previous iterations of the LLPP2 although we note that part of this land was included in the 2003 Local Plan. We are very concerned that it has been included at this late stage. We also note that the employment quota has already been fulfilled elsewhere within the Local Plan area. Due to the sensitive location of this site we therefore question the need for the inclusion of this site in the Plan. The site is located in an area of open coastline surrounded by a nature reserve.

Furthermore the allocation site contains valuable priority habitats of vegetated shingle and floodplain grazing marsh for example. The allocation boundary stretches down to the mean high water mark. This is of key concern to Natural England. The policy and supporting text make no mention of the biodiversity value of this site and this is of key concern to Natural England. We advise that this allocation site is removed from the LLPP2. We advise that you contact the South Downs National Park Authority for their advice on this matter. We will be also be happy to advise further on this matter.

We further advise that any obstruction to public rights of way and any intrusion of the England Coastal Path is avoided.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public? No

Why do you feel it is necessary to participate at the Examination in Public?

Representation ID: REP/021/E2Representor Details:

Representor ID:	REP/021
Name:	Rebecca Pearson
Organisation:	Natural England
Consultation Body:	Specific
Stakeholder Type:	National group or organisation

Agent Details:

Name:
Organisation:

Contact Details:

Email Address:	Rebecca.Pearson@naturalengland.org.uk
Address:	Guildbourne House Chatsworth Road Worthing West Sussex BN11 1LD

Representation:

Policy/Section:	E2 - Land adjacent to American Express Community Stadium, Village Way, Falmer
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	Yes
Representation:	
This allocation also lies in the setting of the South Downs National Park. We advise that they are consulted for their advice on this allocation site.	
What changes do you suggest to make the document legally compliant or sound?	

Do you consider it necessary to participate at the Examination in Public?	No
Why do you feel it is necessary to participate at the Examination in Public?	

Representation ID: REP/021/DM1Representor Details:

Representor ID:	REP/021
Name:	Rebecca Pearson
Organisation:	Natural England
Consultation Body:	Specific
Stakeholder Type:	National group or organisation

Agent Details:

Name:
Organisation:

Contact Details:

Email Address:	Rebecca.Pearson@naturalengland.org.uk
Address:	Guildbourne House Chatsworth Road Worthing West Sussex BN11 1LD

Representation:

Policy/Section:	DM1: Planning Boundary
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	Yes
Representation: We note Policy DM Planning Boundaries that states Development proposals that result in a net increase of one or more dwellings within 7km of the Ashdown Forest will only be permitted where they comply with Core Policy 10(3) of the Local Plan Part 1. As Newick falls within this zone we advise that it is worth noting that development will need to be commensurate with this specific DM Policy here.	

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public?	No
--	-----------

Why do you feel it is necessary to participate at the Examination in Public?

Representation ID: REP/021/DM14
--

Representor Details:

Representor ID:	REP/021
Name:	Rebecca Pearson
Organisation:	Natural England
Consultation Body:	Specific
Stakeholder Type:	National group or organisation

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	Rebecca.Pearson@naturalengland.org.uk
Address:	Guildbourne House Chatsworth Road Worthing West Sussex BN11 1LD

Representation:

Policy/Section:	DM14: Multi-functional Green Infrastructure
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	Yes
Representation: We welcome this policy which recognises the importance of the provision of multifunctional green infrastructure throughout new development. Multifunctional G.I provides a wealth of benefits for people and wildlife and provides a key role in the provision of ecosystems services. We fully support this policy. We note the following wording which we advise requires clarification:	

'G.I.) would be provided where justified by the character of the area or the need for outdoor playing space. We advise that Green Infrastructure, if well designed, should incorporate a multitude of functions as identified in the supporting text, and that accessible natural greenspace rather than outdoor playing (amenity) space should be a governing factor for this. We advise that the important role that Green Infrastructure has in contributing to biodiversity and environmental net gain should be highlighted here.

Strategic provision of GI

We advise that GI should be strategic in Nature. Planning for GI at a strategic scale based on a robust evidence base has clear benefits for people and wildlife. A well-designed G.I strategy can provide Natural Capital and secure Ecosystems services in a resilient way that safeguards resources for people and wildlife into the future. Links to wellbeing, health and climate change provision for example are clear. Natural England would welcome the opportunity to contribute to the formation of any future GI strategy. We attach a GI checklist in support of this.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public? No

Why do you feel it is necessary to participate at the Examination in Public?

Representation ID: REP/021/DM16Representor Details:

Representor ID:	REP/021
Name:	Rebecca Pearson
Organisation:	Natural England
Consultation Body:	Specific
Stakeholder Type:	National group or organisation

Agent Details:

Name:
Organisation:

Contact Details:

Email Address:	Rebecca.Pearson@naturalengland.org.uk
Address:	Guildbourne House Chatsworth Road Worthing West Sussex BN11 1LD

Representation:

Policy/Section:	DM16: Children's Play Space in New Housing Development
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	Yes
Representation:	
We fully support this policy. Interaction with the natural world has multiple benefits for	

people and linking this to G.I networks and cycle routes for example can enhance this.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public?

No

Why do you feel it is necessary to participate at the Examination in Public?

Representation ID: REP/021/DM18
--

Representor Details:

Representor ID:	REP/021
Name:	Rebecca Pearson
Organisation:	Natural England
Consultation Body:	Specific
Stakeholder Type:	National group or organisation

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	Rebecca.Pearson@naturalengland.org.uk
Address:	Guildbourne House Chatsworth Road Worthing West Sussex BN11 1LD

Representation:

Policy/Section:	DM18: Recreation and Rivers
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	Yes
Representation:	
We support this policy	
What changes do you suggest to make the document legally compliant or sound?	

Do you consider it necessary to participate at the Examination in Public?	No
Why do you feel it is necessary to participate at the Examination in Public?	

Representation ID: REP/021/DM24
--

Representor Details:

Representor ID:	REP/021
Name:	Rebecca Pearson
Organisation:	Natural England
Consultation Body:	Specific
Stakeholder Type:	National group or organisation

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	Rebecca.Pearson@naturalengland.org.uk
Address:	Guildbourne House Chatsworth Road Worthing West Sussex BN11 1LD

Representation:

Policy/Section:	DM24: Protection of Biodiversity and Geodiversity
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	Yes
Representation:	
<p>We note this policy ad have the following amendments to make:</p> <p>The protection pertaining to SSSIs is provided to mimic that of the NPPF but the wording provided lacks the strength of the NPPF in the following ways.</p> <p>Development which would be likely to adversely affect a Site of Special Scientific Interest (SSSI), National Nature Reserve (NNR), or a Marine Conservation Zone (MCZ)</p>	

will only be permitted where the benefits of the development, at this site, outweigh the damage to the nationally recognised special interest of the designated site and any adverse impacts on the wider network of SSSIs.

The NPPF states that:

175 c). "development on land within or outside a SSSI, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of SSSIs"

The phrases highlighted above provide a greater level of protection than those included in the Local Plan.

We advise that collaboration is required between the hierarchy of sites in order to reflect the NPPF as follows:

Outside of designated sites

Irreplaceable habitats

We advise that irreplaceable habitats be placed above local sites in the hierarchy of designations to reflect their national importance and complexity. Once lost these habitats are by their very nature, irreplaceable. The NPPF reflects this and has recently been revised to give greater weight to the protection of ancient woodland for example.

175 c) "development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused unless there are wholly exceptional reasons (footnote 58) and a suitable compensation strategy exists".

Priority habitats and species

These include species and habitats listed under S41 of the NERC Act 2006. This includes priority habitats and species and should be clearly referenced separately to protected species.

Section 40 of the NERC Act 2006 places a general duty on all public authorities, including local planning authorities, to conserve and enhance biodiversity. Further information on this duty is available in the Defra publication 'Guidance for Local Authorities on Implementing the Biodiversity Duty'.

We further advise that links to Green Infrastructure policies should be made.

We would re-iterate our advice in our letter of January 2018 that the policy includes networks of natural habitats and the consideration of biodiversity on a landscape- scale. Habitat networks are not only rich in biodiversity in their own right but also act as key stepping stones for species throughout the landscape. For example the provision interlinking habitats play an important role in enabling genetic exchange between populations within habitats throughout the landscape. They also act as flightlines and foraging areas for bats for example and provide migratory pathways through the

landscape.

I would refer you to the SDNP Local Plan Policy SD12 for an example of a Biodiversity Policy which encompasses these issues and which we fully support. The SDNP Local Plan also has an overarching requirement for net gain. We advise that net gain is included in this policy as an overarching requirement. The NPPF States the following:

170 d). Planning policies and decisions should contribute to and enhance the natural and local environment by" minimising impacts on and providing net gains for biodiversity...." 174 b) Plans should ".identify and pursue opportunities for securing measurable net gains for biodiversity"

118. Planning policies and decisions should: a) encourage multiple benefits from both urban and rural land, including through mixed use schemes and taking opportunities to achieve net environmental gains-such as developments that would enable habitat creation or improve public access to the countryside"

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public? No

Why do you feel it is necessary to participate at the Examination in Public?

Representation ID: REP/021/DM27
--

Representor Details:

Representor ID:	REP/021
Name:	Rebecca Pearson
Organisation:	Natural England
Consultation Body:	Specific
Stakeholder Type:	National group or organisation

Agent Details:

Name:
Organisation:

Contact Details:

Email Address:	Rebecca.Pearson@naturalengland.org.uk
Address:	Guildbourne House Chatsworth Road Worthing West Sussex BN11 1LD

Representation:

Policy/Section:	DM27: Landscape Design
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	Yes
Representation:	
"We advise that this policy includes the requirement to protect the Special Qualities of the South Downs National Park as future developments outside the National Park may nevertheless affect it's setting or views in or out of this nationally designated landscape	
What changes do you suggest to make the document legally compliant or sound?	

Do you consider it necessary to participate at the Examination in Public?	No
Why do you feel it is necessary to participate at the Examination in Public?	

Representation ID: REP/021/DM35
--

Representor Details:

Representor ID:	REP/021
Name:	Rebecca Pearson
Organisation:	Natural England
Consultation Body:	Specific
Stakeholder Type:	National group or organisation

Agent Details:

Name:
Organisation:

Contact Details:

Email Address:	Rebecca.Pearson@naturalengland.org.uk
Address:	Guildbourne House Chatsworth Road Worthing West Sussex BN11 1LD

Representation:

Policy/Section:	DM35: Footpath, Cycle and Bridleway Network
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	Yes
Representation:	
We advise that links to Green Infrastructure could be made in this policy.	
What changes do you suggest to make the document legally compliant or sound?	

Do you consider it necessary to participate at the Examination in Public?	No
Why do you feel it is necessary to participate at the Examination in Public?	

Representation ID: REP/021/HSARepresentor Details:

Representor ID:	REP/021
Name:	Rebecca Pearson
Organisation:	Natural England
Consultation Body:	Specific
Stakeholder Type:	National group or organisation

Agent Details:

Name:
Organisation:

Contact Details:

Email Address:	Rebecca.Pearson@naturalengland.org.uk
Address:	Guildbourne House Chatsworth Road Worthing West Sussex BN11 1LD

Representation:

Policy/Section:	Housing Site Allocations
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	Yes
Representation: Overarching advice-net gain Since the Publication of the Lewes Local Plan Part 2 The NPPF has been amended and contains a clear direction to ensure new development demonstrates a net gain in biodiversity. We welcome this approach. The various allocation sites will need to echo this direction stemming from a clear steer within Policy DM24 to include net gain as	

advised variously throughout our advice letter below:

The revised NPPF states the following:

170 d). Planning policies and decisions should contribute to and enhance the natural and local environment by "minimising impacts on and providing net gains for biodiversity...." 174 b) Plans should "....identify and pursue opportunities for securing measurable net gains for biodiversity"

118. Planning policies and decisions should: a) encourage multiple benefits from both urban and rural land, including through mixed use schemes and taking opportunities to achieve net environmental gains-such as developments that would enable habitat creation or improve public access to the countryside"

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public? No

Why do you feel it is necessary to participate at the Examination in Public?

Representation ID: REP/021/HRA

Representor Details:

Representor ID:	REP/021
Name:	Rebecca Pearson
Organisation:	Natural England
Consultation Body:	Specific
Stakeholder Type:	National group or organisation

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	Rebecca.Pearson@naturalengland.org.uk
Address:	Guildbourne House Chatsworth Road Worthing West Sussex BN11 1LD

Representation:

Policy/Section:	Habitats Regulation Assessment
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	Yes
Representation:	
Habitats Regulations Assessment-clarification required	
We advise that the Habitats Regulations Section presented in the Pre-Submission document does not concur with the findings of the accompanying Habitats Regulations Assessment for the Local Plan Part 2. Although Natural England agrees with the findings of the attached HRA, following the recent People Over Wind European Judgement,	

aspects of the HRA and its interpretation within the core document need to be amended as follows:

Conclusion of NSLE for the Plan

Natural England does not agree with the conclusion that the implementation of the Lewes Local Plan Part 1 or 2 will have no Likely Significant Effect as cited in the Lewes Local Plan Part 2 Document . We advise that this conclusion needs to be revised to concur with the published HRA and the recent People Over Wind European Judgement. Following this judgement competent authorities are no longer able to include mitigation for impacts to European Sites at the screening stage of an HRA. Therefore it is not appropriate to rely on ameliorative (mitigation) measures such as SANGS and SAMS and policies pertaining to these when determining any likely significant effects within Habitats Regulations Assessments. We advise that an appropriate assessment will be required if, in the absence of mitigation, the competent authority cannot conclude "no likely significant effect". However mitigation can be used at the appropriate assessment stage.

The HRA correctly interprets this judgement and sets out that any development within 7km of Ashdown Forest SPA and SAC (within the plan area) without the mitigation set out in Core Policy 10 of the Local Plan Part 1 could have an in-combination on the international site via recreational pressure; therefore concluding a likely significant effect cannot be ruled out. The HRA therefore takes this through to appropriate assessment as no likely significant effect cannot be concluded. We agree with this approach.

Including Air Pollution impacts in the Appropriate Assessment stage Page 2 of 6

We note the following statement:

3.39 states that In summary, the only impact pathway that requires consideration in the LPP2 HRA is recreational pressure upon Ashdown Forest SPA and SAC as this is the only impact pathway for which a conclusion of no likely significant effect or no adverse effect on integrity could not be reached for the growth in the Joint Core Strategy without mitigation.

We advise that air pollution also needs to be included here as an-in combination effect remains for this impact in the absence of mitigation. We recognise that the HRA has indeed taken this through to appropriate assessment, but for clarity and to ensure no misinterpretation is made we advise that the above sentence is revised to include air pollution.

Overall conclusion for the HRA

We agree with the following statement:

It is therefore be concluded that no adverse effect upon the integrity of Ashdown Forest SAC is expected to result from development provided by the South Downs Local Plan/Lewes JCS, even in- combination with other plans and projects.

However the audit pathways taken (through appropriate assessment ,where relevant) in order to reach this conclusion should be more clearly defined in the HRA as above and

importantly, accurately interpreted within the LLPP2 Submission Document.

Further advice

1.19 We advise that the following sentence should be re-worded

A Likely Significant Effect must be established both in terms of the individual plan and of the plan in combination with other policies and proposals,

We advise that this should read:

Any likely Significant Effect must be established both in terms of the individual plan and of the plan in combination with other policies and proposals

CLARIFICATION ADDED -

"You do not need to add air pollution as an impact pathway for which mitigation is needed. We are satisfied with the evidence provided for air pollution impacts and concur that no mitigation is required in order to conclude no likely significant effect."

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public?

No

Why do you feel it is necessary to participate at the Examination in Public?



Customer Services
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

BY EMAIL ONLY

Dear Sir/Madam

Planning consultation: Lewes District Local Plan Part 2 Site Allocations, Development Management Policies Pre-Submission Document and Habitats Regulations Assessment (HRA)

Thank you for your consultation on the above dated 05 December 2017 which was received by Natural England on the same day.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Please find our comments in relation to the Lewes District Local Plan Part 2 Site Allocations, Development Management Policies and Habitats Regulations Assessment (HRA)

Habitats Regulations Assessment-clarification required

We advise that the Habitats Regulations Section presented in the Pre-Submission document does not concur with the findings of the accompanying Habitats Regulations Assessment for the Local Plan Part 2. Although Natural England agrees with the findings of the attached HRA, following the recent *People Over Wind* European Judgement, aspects of the HRA and its interpretation within the core document need to be amended as follows:

Conclusion of NSLE for the Plan

Natural England does not agree with the conclusion that the implementation of the Lewes Local Plan Part 1 or 2 will have *no Likely Significant Effect* as cited in the Lewes Local Plan Part 2 Document. We advise that this conclusion needs to be revised to concur with the published HRA and the recent *People Over Wind* European Judgement. Following this judgement competent authorities are no longer able to include mitigation for impacts to European Sites at the screening stage of an HRA. Therefore it is not appropriate to rely on ameliorative (mitigation) measures such as SANGS and SAMS and policies pertaining to these when determining any likely significant effects within Habitats Regulations Assessments. We advise that an appropriate assessment will be required if, in the absence of mitigation, the competent authority cannot conclude "no likely significant effect". However mitigation can be used at the appropriate assessment stage.

The HRA correctly interprets this judgement and sets out that any development within 7km of Ashdown Forest SPA and SAC (within the plan area) without the mitigation set out in Core Policy 10 of the Local Plan Part 1 could have an in-combination on the international site via recreational pressure; therefore concluding a likely significant effect cannot be ruled out. The HRA therefore takes this through to appropriate assessment as no likely significant effect cannot be concluded. We agree with this approach.

Including Air Pollution impacts in the Appropriate Assessment stage

We note the following statement:

3.39 states that *In summary, the only impact pathway that requires consideration in the LPP2 HRA is recreational pressure upon Ashdown Forest SPA and SAC as **this is the only impact pathway for which a conclusion of no likely significant effect or no adverse effect on integrity could not be reached for the growth in the Joint Core Strategy without mitigation.***

We advise that air pollution also needs to be included here as an-in combination effect remains for this impact in the absence of mitigation. We recognise that the HRA has indeed taken this through to appropriate assessment, but for clarity and to ensure no misinterpretation is made we advise that the above sentence is revised to include air pollution.

Overall conclusion for the HRA

We agree with the following statement:

It is therefore be concluded that no adverse effect upon the integrity of Ashdown Forest SAC is expected to result from development provided by the South Downs Local Plan/Lewes JCS, even in- combination with other plans and projects.

However the audit pathways taken (through appropriate assessment ,where relevant) in order to reach this conclusion should be more clearly defined in the HRA as above and importantly, accurately interpreted within the LLPP2 Submission Document.

Further advice

1.19 We advise that the following sentence should be re-worded

A Likely Significant Effect must be established both in terms of the individual plan and of the plan in combination with other policies and proposals,

We advise that this should read:

Any likely Significant Effect must be established both in terms of the individual plan and of the plan in combination with other policies and proposals

Overarching advice-net gain

Since the Publication of the Lewes Local Plan Part 2 The NPPF has been amended and contains a clear direction to ensure new development demonstrates a net gain in biodiversity. We welcome this approach. The various allocation sites will need to echo this direction stemming from a clear steer within Policy DM24 to include net gain as advised variously throughout our advice letter below:

The revised NPPF states the following:

170 d). Planning policies and decisions should contribute to and enhance the natural and local environment by“minimising impacts on and providing net gains for biodiversity....” 174 b) Plans should “....identify and pursue opportunities for securing measurable net gains for biodiversity”

118. Planning policies and decisions should: a) encourage multiple benefits from both urban and rural land, including through mixed use schemes and taking opportunities to achieve net environmental gains-such as developments that would enable habitat creation or improve public access to the countryside”

Site Allocations

Policy NH01 - South of Valley Road

This allocation is close to the National Park boundary and we welcome the inclusion of the requirement to fully assess the impacts of views on any development here.

Policy NH02 - Land at The Marina

We note that this allocation has the potential to impact on biodiversity. We advise that the allocation policy includes a requirement for a net gain in biodiversity in order to comply with the recently revised NPPF (further discussed in Policy DM24).

Policy BH01 - Land at The Nuggets, Valebridge Road

This Site allocation is surrounded by ancient woodland and networks of natural Habitats. We welcome that this policy has been amended to include the irreplaceable nature of ancient woodland and note the additional information pertaining to this in the supporting text. Thank you for consulting Natural England on this matter.

Again the development will need to demonstrate a net gain in biodiversity and we further advise that networks of natural habitats should be maintained and enhanced in order to provide a development which is sympathetic to its location and clearly biodiversity-lead. We advise this should be a key requirement to guide any development proposals.

We also advise re-iterate that the policy should state that impacts to ancient woodland should be *avoided* to echo to the recently updated NPPF as follows:

175 c) “development *resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused unless there are wholly exceptional reasons (footnote 58) and a suitable compensation strategy exists*”.

Policy BA03 - Land at Bridgelands Barcombe Cross

We further advise that this policy includes the consideration of the use of SuDS. We welcome that it is included in the supporting text but it is not a requirement within the policy. We advise that well-designed SuDS have multiple benefits for wildlife and people, providing habitats and valuable ecosystems services such as, flood amelioration. A SuDS lead scheme would be welcome here.

Policy CH01 – Glendene, Station Road

We note that ancient woodland lies adjacent to the site and would refer you to our Standing advice with regard to this matter. This includes a requirement for a buffer of at least 15m between the woodland and the development. We welcome that SuDS are cited for use here and we note that full ecological surveys to include protected species have and will be carried out.

Policy CH02 – Layden Hall, East Grinstead Road

This site lies adjacent to Chailey Common Site of Special Scientific Interest (SSSI). Chailey Common Site of Special Scientific Interest (SSSI) is afforded statutory protection under the *Wildlife and Countryside Act 1981* (as amended). Thank you for consulting Natural England regarding this allocation policy which I note has been amended to include the SSSI. We have the following additional comments to make regarding the following:

An ecological impact assessment is undertaken and appropriate measures identified and implemented accordingly to mitigate potential adverse impacts on Chailey Common SSSI and the local biodiversity. Development allows for the protection of biodiversity and enhancement where possible; and

Again due to the nature and location of this site we advised that the term *where possible* was omitted as enhancement should be a requirement of new development (as for policy BH01). We had understood that this had been revised to reflect our advice. We further add that the need to demonstrate biodiversity net gain will be of key importance here. Consideration of this will also need to be made with regard to any tree felling on site.

We advise that the policy states that impacts to the SSSI must be *avoided*.

Newick

We note Policy DM Planning Boundaries that states Development proposals that result in a net increase of one or more dwellings within 7km of the Ashdown Forest will only be permitted where they comply with Core Policy 10(3) of the Local Plan Part 1. As Newick falls within this zone we

advise that it is worth noting that development will need to be commensurate with this specific DM Policy here.

Employment Site Allocations

Land at East Quay, Newhaven Port

Natural England has serious concerns regarding this allocation.

The allocation site is directly adjacent to and in the setting of, the South Downs National Park. There is therefore clear potential for a significant impacts on the Special Qualities of the South Downs National Park. The policy states that visual impacts will be minimised however, from the information supplied, the impact from the development of this land in both landscape and visual terms is likely to be significant. This allocation did not form part of previous iterations of the LLPP2 although we note that part of this land was included in the 2003 Local Plan. We are very concerned that it has been included at this late stage. We also note that the employment quota has already been fulfilled elsewhere within the Local Plan area. Due to the sensitive location of this site we therefore question the need for the inclusion of this site in the Plan. The site is located in an area of open coastline surrounded by a nature reserve.

Furthermore the allocation site contains valuable priority habitats of vegetated shingle and floodplain grazing marsh for example. The allocation boundary stretches down to the mean high water mark. This is of key concern to Natural England. The policy and supporting text make no mention of the biodiversity value of this site and this is of key concern to Natural England. We advise that this allocation site is removed from the LLPP2. We advise that you contact the South Downs National Park Authority for their advice on this matter. We will be also be happy to advise further on this matter.

We further advise that any obstruction to public rights of way and any intrusion of the England Coastal Path is avoided.

Policy E2: Land Adjacent to American Express Community Stadium, Village Way, Falmer

This allocation also lies in the setting of the South Downs National Park. We advise that they are consulted for their advice on this allocation site.

Policy DM 14: Multi-functional Green Infrastructure

We welcome this policy which recognises the importance of the provision of multifunctional green infrastructure throughout new development. Multifunctional G.I provides a wealth of benefits for people and wildlife and provides a key role in the provision of ecosystems services. We fully support this policy.

We note the following wording which we advise requires clarification:

(G.I) would be provided where justified by the character of the area or the need for outdoor playing space. We advise that Green Infrastructure, if well designed, should incorporate a multitude of functions as identified in the supporting text, and that accessible natural greenspace rather than outdoor playing (amenity) space should be a governing factor for this. We advise that the important role that Green Infrastructure has in contributing to biodiversity and environmental net gain should be highlighted here.

Strategic provision of GI

We advise that GI should be strategic in Nature. Planning for GI at a strategic scale based on a robust evidence base has clear benefits for people and wildlife. A well-designed G.I strategy can provide Natural Capital and secure Ecosystems services in a resilient way that safeguards resources for people and wildlife into the future. Links to wellbeing, health and climate change provision for example are clear. Natural England would welcome the opportunity to contribute to the formation of any future GI strategy. We attach a GI checklist in support of this.

Children's Playing Space

We fully support this policy. Interaction with the natural world has multiple benefits for people and linking this to G.I networks and cycle routes for example can enhance this.

Policy DM18: Recreation and Rivers

We support this policy

Policy DM24: Protection of Biodiversity and Geodiversity

We note this policy and have the following amendments to make:

The protection pertaining to SSSIs is provided to mimic that of the NPPF but the wording provided lacks the strength of the NPPF in the following ways.

Development which would be likely to adversely affect a Site of Special Scientific Interest (SSSI), National Nature Reserve (NNR), or a Marine Conservation Zone (MCZ) will only be permitted where the benefits of the development, at this site, outweigh the damage to the nationally recognised special interest of the designated site and any adverse impacts on the wider network of SSSIs.

The NPPF states that:

*175 c). "development on land within or outside a SSSI, and which is likely to have an adverse effect on it **(either individually or in combination with other developments)**, should not normally be permitted. **The only exception** is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of SSSIs"*

The phrases highlighted above provide a greater level of protection than those included in the Local Plan.

We advise that collaboration is required between the hierarchy of sites in order to reflect the NPPF as follows:

Outside of designated sites

Irreplaceable habitats

We advise that irreplaceable habitats be placed above local sites in the hierarchy of designations to reflect their national importance and complexity. Once lost these habitats are by their very nature, irreplaceable. The NPPF reflects this and has recently been revised to give greater weight to the protection of ancient woodland for example.

175 c) "development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused unless there are wholly exceptional reasons (footnote 58) and a suitable compensation strategy exists".

Priority habitats and species

These include species and habitats listed under S41 of the NERC Act 2006. This includes priority habitats and species and should be clearly referenced separately to protected species.

Section 40 of the NERC Act 2006 places a general duty on all public authorities, including local planning authorities, to conserve and enhance biodiversity. Further information on this duty is available in the Defra publication 'Guidance for Local Authorities on Implementing the Biodiversity Duty'.

We further advise that links to Green Infrastructure policies should be made.

We would re-iterate our advice in our letter of January 2018 that the policy includes networks of natural habitats and the consideration of biodiversity on a landscape- scale. Habitat networks are not only rich in biodiversity in their own right but also act as key stepping stones for species throughout the landscape. For example the provision interlinking habitats play an important role in enabling genetic exchange between populations within habitats throughout the landscape. They also act as flightlines and foraging areas for bats for example and provide migratory pathways through the landscape.

I would refer you to the SDNP Local Plan Policy SD12 for an example of a Biodiversity Policy which encompasses these issues and which we fully support. The SDNP Local Plan also has an overarching requirement for net gain. We advise that net gain is included in this policy as an overarching requirement. The NPPF States the following:

170 d). Planning policies and decisions should contribute to and enhance the natural and local environment by “ minimising impacts on and providing net gains for biodiversity....” 174 b) Plans should “.identify and pursue opportunities for securing measurable net gains for biodiversity”

118. Planning policies and decisions should: a) encourage multiple benefits from both urban and rural land, including through mixed use schemes and taking opportunities to achieve net environmental gains-such as developments that would enable habitat creation or improve public access to the countryside”

Policy DM27: Landscape Design

We advise that this policy includes the requirement to protect the Special Qualities of the South Downs National Park as future developments outside the National Park may nevertheless affect it’s setting or views in or out of this nationally designated landscape.

Policy DM35: Footpath, Cycle and Bridleway Network

We advise that links to Green Infrastructure could be made in this policy.

I hope the above is helpful and please do not hesitate to contact me should you wish to discuss this matter. Please send further correspondence, marked for my attention, to consultations@naturalengland.org.uk quoting our reference 259464

Yours sincerely

Rebecca Pearson
Lead Adviser
Sustainable Development

Thea Davis

From: Thom, Tondra
Sent: 06 November 2018 15:15
To: ldf
Subject: FW: Lewes Local Plan Part 2 Pre-Submission

Please see and add to NE rep the below clarification

From: Pearson, Rebecca (NE) [mailto:Rebecca.Pearson@naturalengland.org.uk]
Sent: 06 November 2018 14:56
To: Thom, Tondra
Subject: RE: Lewes Local Plan Part 2 Pre-Submission

Hi Tondra

You are absolutely right, the confusion was that the level of detail provided was an enhanced level but this did not of course mean that mitigation was required to concluded no likely significant effect!

So, in answer to your query

You do not need to add air pollution as an impact pathway for which mitigation is needed. We are satisfied with the evidence provided for air pollution impacts and concur that no mitigation is required in order to conclude no likely significant effect.

I hope this is helpful, please do get in touch should you wish further clarification.

Warmest wishes

Rebecca

From: Thom, Tondra [mailto:Tondra.Thom@lewes-eastbourne.gov.uk]
Sent: 06 November 2018 12:14
To: Pearson, Rebecca (NE)
Cc: ldf
Subject: RE: Lewes Local Plan Part 2 Pre-Submission

Hi Rebecca,

Thank you for the Natural England rep you submitted, I appreciate that you managed to submit this within the timeframe of the consultation period, that's most helpful. I accept that the People over Wind Judgement means we need to reword the LSE section as mitigation has to be applied through AA rather than at screening stage – this applies to the 7km recreation impact zone for Ashdown Forest.

I do have one query though, on which I would like some clarification on please. On page 2 of your rep under air pollution impacts heading, you state the following:

We note the following statement:

3.39 states that *In summary, the only impact pathway that requires consideration in the LPP2 HRA is recreational pressure upon Ashdown Forest SPA and SAC as **this is the only impact pathway for which a conclusion of no likely significant effect or no adverse effect on integrity could not be reached for the growth in the Joint Core Strategy without mitigation.*** (my emphasis)

We advise that air pollution also needs to be included here as an-in combination effect remains for this impact in the absence of mitigation. We recognise that the HRA has indeed taken this through to appropriate assessment, but for clarity and to ensure no misinterpretation is made we advise that the above sentence is revised to include air pollution. (my emphasis)

Whilst I agree that our work on air pollution did result in AA being undertaken - due to the scientific rigour of assessment it could hardly be considered screening and the ecological interpretation did result in conclusions regarding the integrity of the Forest; however at no point was it concluded that mitigation is required alone or in combination. To add air pollution to the sentence in bold would imply that mitigation is required.

I am concerned that your rep implies that mitigation is required for air quality impacts, when our conclusion in the HRA does not identify this requirement.

Could you please clarify that we do not need to add air pollution as an impact pathway to the above sentence and can you confirm that you agree with the conclusion of the HRA that no mitigation is required?

Thank you

Tondra

Tondra Thom

Planning Policy Manager

Lewes District and Eastbourne Borough Councils

Tel: 01273 085677 or 01323 415677

Mobile: 07824 596 985

E: tondra.thom@lewes-eastbourne.gov.uk

W: lewes-eastbourne.gov.uk

From: Pearson, Rebecca (NE) [<mailto:Rebecca.Pearson@naturalengland.org.uk>]

Sent: 05 November 2018 17:48

To: ldf

Subject: Lewes Local Plan Part 2 Pre-Submission

Dear Sir/Madam

Please find attached Natural England's comments on the above document.

Kind regards

Rebecca Pearson

Lead Adviser

Sustainable Development Team

Natural England

Guildbourne House, Chatsworth Road

Worthing BN11 1LD

Tel: 0300 060 4090 Mobile: 07810694335

I work part-time Monday to Wednesday.

www.gov.uk/natural-england

We are here to secure a healthy natural environment for people to enjoy, where wildlife is protected and England's traditional landscapes are safeguarded for future generations.

In an effort to reduce Natural England's carbon footprint, I will, wherever possible, avoid travelling to meetings and attend via audio, video or web conferencing.

Natural England is accredited to the Cabinet Office Customer Service Excellence Standard

This email and any attachments is intended for the named recipient only. If you have received it in error you have no authority to use, disclose, store or copy any of its contents and you should destroy it and inform the sender. Whilst this email and associated attachments will have been checked for known viruses whilst within the Natural England systems, we can accept no responsibility once it has left our systems.

Communications on Natural England systems may be monitored and/or recorded to secure the effective operation of the system and for other lawful purposes.

This email and any attachments is intended for the named recipient only. If you have received it in error you have no authority to use, disclose, store or copy any of its contents and you should destroy it and inform the sender. Whilst this email and associated attachments will have been checked for known viruses whilst within the Natural England systems, we can accept no responsibility once it has left our systems.

Communications on Natural England systems may be monitored and/or recorded to secure the effective operation of the system and for other lawful purposes.

Initial advice on providing GI strategies in Local Plans

Key principles

The National Planning Policy Framework (NPPF) states in paragraph 114 that local planning authorities should:

“set out a strategic approach in their Local Plans, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure;”

Supporting guidance to the NPPF is set out in the National Planning Practice Guidance at: <http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/biodiversity-ecosystems-and-green-infrastructure/>

GI is multifunctional and provides ecosystem services; if well-designed it encompasses linking habitat networks, climate change mitigation, flood management, health and wellbeing, alternative transport links, improved air quality, food production, and habitat creation for example. GI can also be effectively used to provide biodiversity net gain.

Stages of creating a GI Strategy

Use mapping tools (see below) to evaluate:

- 1) Evidence Base-Existing GI
 - a) Typology Mapping -What GI resources are already there? (for example woodland extent)
 - b) Functionality Mapping - What is the GI currently doing?
- 2) What is required in your Plan Area?
 - c) What are the functional needs of the area? Priority themes, local plan policy, how can the GI resource be improved?
 - d) Where are these needs? Spatial mapping.
- 3) Design The GI Strategy based on evidence from 1-4 above

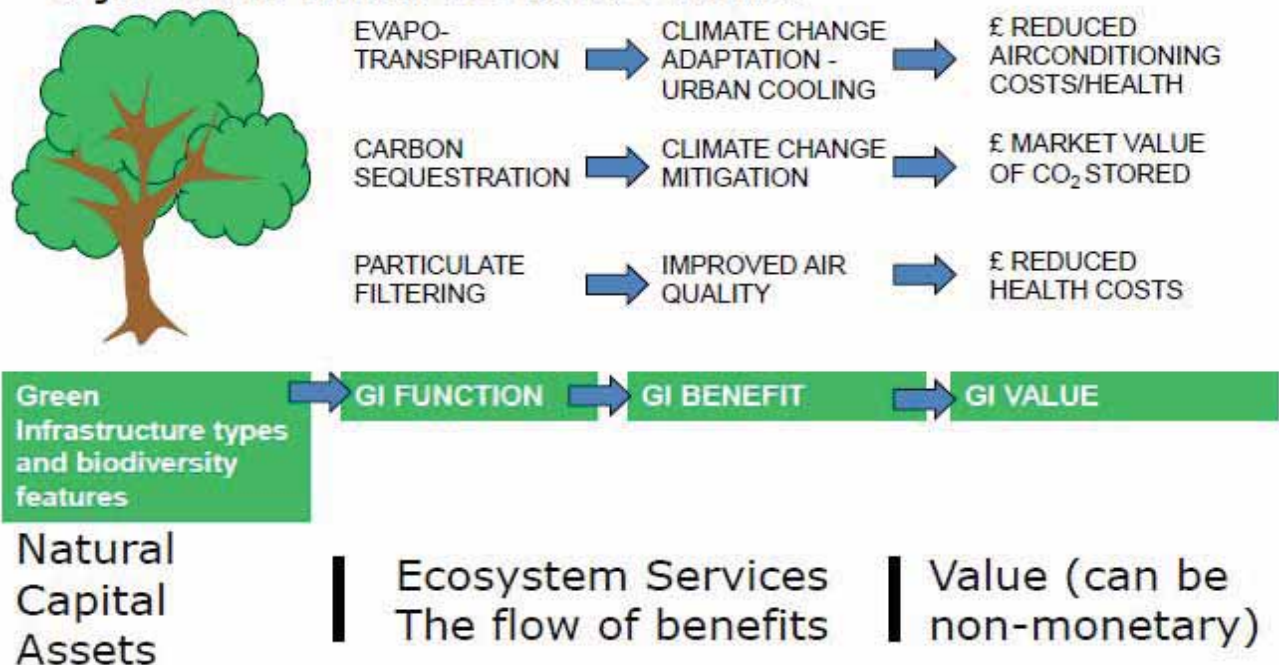
Evidence base-what tools are available to provide this?

There are a variety of tools available to provide the evidence base. The Ecosystems Knowledge Network <https://ecosystemsknowledge.net/> includes further information and range of tools available. The tool adopted will depend on local requirements.

Links between Natural Capital, GI and Ecosystems Services

GI Planning - Linking Natural Capital, Green Infrastructure and Ecosystem Services.

From biodiversity to value – the physical entity does a job from which we derive value.



Green Infrastructure, Natural capital and Ecosystems services are fundamentally linked as demonstrated above. Understanding these links is key to developing a GI Strategy.

A GI strategy can be used to:

- Inform development decisions and design .Ensure project-level interventions contribute to the strategy;
- Support the development of Green Infrastructure Policy and other policies in the Local Plan (for example biodiversity, health and wellbeing, climate change due to multifunctional nature) and support Local Plan reviews;
- Provide evidence to inform and guide other strategic actions and bids for resources (LEP/LNP for example);
- Provide a baseline for periodical review and monitoring.

Representation ID: REP/022/NH01
--

Representor Details:

Representor ID:	REP/022
Name:	Jess Price
Organisation:	Sussex Wildlife Trust
Consultation Body:	General
Stakeholder Type:	Local group or organisation

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	swtconservation@sussexwt.org.uk
Address:	Woods Mill Henfield West Sussex BN5 9SD

Representation:

Policy/Section:	NH01 - South of Valley Road
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	No
Representation: (SEE ATTACHED PDF) SWT are pleased to see that these policies all now include a requirement for an ecological impact assessment, however the wording of the relevant criterion is not consistent with national policy and therefore the policies are unsound In particular, the 2018NPPF is clear in paragraph 170 that planning policies and decisions should minimise impacts on and provide net gains for biodiversity. There is no	

longer the caveat of 'where possible' indicating that all development should achieve net gains. We do note that policy BH01 already does not contain the caveat.

Additionally, a principle of planning, which should contribute to achieving net gains, is the mitigation hierarchy of first avoiding harm, then mitigating for any residual harm, before, as a last resort, considering compensation (2012NPPF paragraph 118 and 2018NPPF paragraph 175). It is not acceptable permit through policy wording mitigation, before avoidance.

We therefore recommend the following amendments to the criteria in order to make the policies listed above consistent with national policy:

'...An ecological impact assessment is undertaken and appropriate measures identified and implemented accordingly to mitigate avoid potential adverse impacts on biodiversity. Where adverse impacts are unavoidable, appropriate mitigation and compensation measures must be employed, commensurate to the importance, the legal protection or other status of the species or habitat. Development allows for the protection of biodiversity and enhancement where possible; and... '

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public? No

Why do you feel it is necessary to participate at the Examination in Public?

Representation ID: REP/022/NH02
--

Representor Details:

Representor ID:	REP/022
Name:	Jess Price
Organisation:	Sussex Wildlife Trust
Consultation Body:	General
Stakeholder Type:	Local group or organisation

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	swtconservation@sussexwt.org.uk
Address:	Woods Mill Henfield West Sussex BN5 9SD

Representation:

Policy/Section:	NH02 - Land at The Marina
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	No
Representation: (SEE ATTACHED PDF) SWT are pleased to see that this policy now includes a requirement for an ecological impact assessment, however as stated for policies NH01, BA01, BA02, BA03, CH01, CH03, RG01 and GT01, we do not believe the wording is currently compliant with national policy. We also support the inclusion of paragraphs 2.35 to 2.37 which highlight the potential	

impacts of development on habitats of principle importance. However, in SWT's experience, supporting text does not carry the same weight as policy wording in planning decisions and is instead used to explain the reasoning of the policy wording. Indeed, the importance of policy wording in determining decisions is reflected in section 2.22 of the Lewes Local Plan Part 2 (pre submission), which states:

'Whilst the site allocations identified in this document establish the principle of development, planning permission must still be obtained through the planning application process. Planning applications will be determined in accordance with the development plan, including Core Policies of the Local Plan Part 1, Development Management (DM) and Site Allocation policies of the Local Plan Part 2, once adopted, and policies contained within neighbourhood plans where sufficient weight can be given. Other relevant plans, such as the East Sussex, South Downs and Brighton & Hove Waste and Minerals Plan, will also be 'given appropriate consideration at the time. '

It is significant that the supporting text to the policies is not referred to and therefore we request that the policy wording is strengthened. In particular we do not believe it is currently compliant with paragraphs 117 or 118 of the 2012NPPF or paragraphs 170, 174 or 175 of the 2018NPPF. SWT requests the following amendments:

'g) An ecological impact assessment is undertaken and appropriate measures identified and implemented accordingly to mitigate avoid potential adverse impacts on biodiversity, particularly priority habitats.

Where adverse impacts are unavoidable, appropriate mitigation and like for like compensation measures must be employed, commensurate to the importance, the legal protection or other status of the species or habitat. Development allows for the protection of biodiversity and enhancement where possible; and...'

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public? No

Why do you feel it is necessary to participate at the Examination in Public?

Representation ID: REP/022/BH01
--

Representor Details:

Representor ID:	REP/022
Name:	Jess Price
Organisation:	Sussex Wildlife Trust
Consultation Body:	General
Stakeholder Type:	Local group or organisation

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	swtconservation@sussexwt.org.uk
Address:	Woods Mill Henfield West Sussex BN5 9SD

Representation:

Policy/Section:	BH01 - Land at The Nuggets, Valebridge Road
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	Yes
Representation: SWT note that our regulation 18 comments have resulted in an amendment to the supporting text for this policy. However as stated above, in SWT's experience, supporting text does not carry the same weight as policy wording in planning decisions and is instead used to explain the reasoning of the policy wording. The importance of policy wording in determining decisions is reflected in section 2.22 of the Lewes Local Plan Part 2 (pre submission), which states:	

'Whilst the site allocations identified in this document establish the principle of development, planning permission must still be obtained through the planning application process. Planning applications will be determined in accordance with the development plan, including Core Policies of the Local Plan Part 1,

Development Management (DM) and Site Allocation policies of the Local Plan Part 2, once adopted, and policies contained within neighbourhood plans where sufficient weight can be given. Other relevant plans, such as the East Sussex, South Downs and Brighton & Hove Waste and Minerals Plan, will also be given appropriate consideration at the time. '

It is significant that the supporting text to the policies is not referred to and therefore we request that the policy wording is strengthened to include a requirement for at least a 15 metre buffer between the development and the ancient woodland. We note that policy CH01 does include a minimum figure for the buffer and we believe this is consistent with the national policy on irreplaceable habitats.

We also seek amendments to criteria d) and f) which currently does not comply with the principle of the mitigation hierarchy as stated paragraph 118 of the 2012NPPF and paragraph 175 of the 2018NPPF. In order to be made sound, SWT recommends that the following changes are made to policy BH01:

d) Tree surveys undertaken and appropriate measures, including proper buffers of at least 15 metres, are identified and implemented accordingly to mitigate avoid potential adverse impacts on the Tree Protection Order group and Ancient Woodland on and/or adjacent to site;

e) Development is subject to appropriate assessment and evaluation of archaeological potential and mitigation measures implemented accordingly;

f) An ecological impact assessment is undertaken and appropriate measures identified and implemented accordingly to mitigate avoid potential adverse impacts, either directly or indirectly on biodiversity, including irreplaceable habitats. Where adverse impacts are unavoidable, appropriate mitigation and compensation measures must be employed, commensurate to the importance, the legal protection or other status of the species or habitat. Development allows for the protection of biodiversity and enhancement;

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public? No

Why do you feel it is necessary to participate at the Examination in Public?

Representation ID: REP/022/BA01
--

Representor Details:

Representor ID:	REP/022
Name:	Jess Price
Organisation:	Sussex Wildlife Trust
Consultation Body:	General
Stakeholder Type:	Local group or organisation

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	swtconservation@sussexwt.org.uk
Address:	Woods Mill Henfield West Sussex BN5 9SD

Representation:

Policy/Section:	BA01 - Land at Hillside Nurseries, High Street
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	No
Representation: (SEE ATTACHED PDF) SWT are pleased to see that these policies all now include a requirement for an ecological impact assessment, however the wording of the relevant criterion is not consistent with national policy and therefore the policies are unsound. In particular, the 2018NPPF is clear in paragraph 170 that planning policies and decisions should minimise impacts on and provide net gains for biodiversity. There is no	

longer the caveat of 'where possible' indicating that all development should achieve net gains. We do note that policy BH01 already does not contain the caveat.

Additionally, a principle of planning, which should contribute to achieving net gains, is the mitigation hierarchy of first avoiding harm, then mitigating for any residual harm, before, as a last resort, considering compensation (2012NPPF paragraph 118 and 2018NPPF paragraph 175). It is not acceptable permit through policy wording mitigation, before avoidance.

We therefore recommend the following amendments to the criteria in order to make the policies listed above consistent with national policy:

"...An ecological impact assessment is undertaken and appropriate measures identified and implemented accordingly to mitigate avoid potential adverse impacts on biodiversity. Where adverse impacts are unavoidable, appropriate mitigation and compensation measures must be employed, commensurate to the importance, the legal protection or other status of the species or habitat. Development allows for the protection of biodiversity and enhancement where possible; and... "

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public? No

Why do you feel it is necessary to participate at the Examination in Public?

Representation ID: REP/022/BA02
--

Representor Details:

Representor ID:	REP/022
Name:	Jess Price
Organisation:	Sussex Wildlife Trust
Consultation Body:	General
Stakeholder Type:	Local group or organisation

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	swtconservation@sussexwt.org.uk
Address:	Woods Mill Henfield West Sussex BN5 9SD

Representation:

Policy/Section:	BA02 - Land adjacent to the High Street
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	No
Representation: (SEE ATTACHED PDF) SWT are pleased to see that these policies all now include a requirement for an ecological impact assessment, however the wording of the relevant criterion is not consistent with national policy and therefore the policies are unsound. In particular, the 2018NPPF is clear in paragraph 170 that planning policies and decisions should minimise impacts on and provide net gains for biodiversity. There is no	

longer the caveat of 'where possible' indicating that all development should achieve net gains. We do note that policy BH01 already does not contain the caveat.

Additionally, a principle of planning, which should contribute to achieving net gains, is the mitigation hierarchy of first avoiding harm, then mitigating for any residual harm, before, as a last resort, considering compensation (2012NPPF paragraph 118 and 2018NPPF paragraph 175). It is not acceptable permit through policy wording mitigation, before avoidance.

We therefore recommend the following amendments to the criteria in order to make the policies listed above consistent with national policy:

"...An ecological impact assessment is undertaken and appropriate measures identified and implemented accordingly to mitigate avoid potential adverse impacts on biodiversity. Where adverse impacts are unavoidable, appropriate mitigation and compensation measures must be employed, commensurate to the importance, the legal protection or other status of the species or habitat. Development allows for the protection of biodiversity and enhancement where possible; and... "

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public? No

Why do you feel it is necessary to participate at the Examination in Public?

Representation ID: REP/022/BA03
--

Representor Details:

Representor ID:	REP/022
Name:	Jess Price
Organisation:	Sussex Wildlife Trust
Consultation Body:	General
Stakeholder Type:	Local group or organisation

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	swtconservation@sussexwt.org.uk
Address:	Woods Mill Henfield West Sussex BN5 9SD

Representation:

Policy/Section:	BA03 - Land at Bridgelands
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	No
Representation: (SEE ATTACHED PDF) SWT are pleased to see that these policies all now include a requirement for an ecological impact assessment, however the wording of the relevant criterion is not consistent with national policy and therefore the policies are unsound. In particular, the 2018NPPF is clear in paragraph 170 that planning policies and decisions should minimise impacts on and provide net gains for biodiversity. There is no	

longer the caveat of 'where possible' indicating that all development should achieve net gains. We do note that policy BH01 already does not contain the caveat.

Additionally, a principle of planning, which should contribute to achieving net gains, is the mitigation hierarchy of first avoiding harm, then mitigating for any residual harm, before, as a last resort, considering compensation (2012NPPF paragraph 118 and 2018NPPF paragraph 175). It is not acceptable permit through policy wording mitigation, before avoidance.

We therefore recommend the following amendments to the criteria in order to make the policies listed above consistent with national policy:

"...An ecological impact assessment is undertaken and appropriate measures identified and implemented accordingly to mitigate avoid potential adverse impacts on biodiversity. Where adverse impacts are unavoidable, appropriate mitigation and compensation measures must be employed, commensurate to the importance, the legal protection or other status of the species or habitat. Development allows for the protection of biodiversity and enhancement where possible; and... "

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public?

No

Why do you feel it is necessary to participate at the Examination in Public?

Representation ID: REP/022/CH01
--

Representor Details:

Representor ID:	REP/022
Name:	Jess Price
Organisation:	Sussex Wildlife Trust
Consultation Body:	General
Stakeholder Type:	Local group or organisation

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	swtconservation@sussexwt.org.uk
Address:	Woods Mill Henfield West Sussex BN5 9SD

Representation:

Policy/Section:	CH01 - Glendene, Station Road
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	No
Representation: (SEE ATTACHED PDF) SWT are pleased to see that these policies all now include a requirement for an ecological impact assessment, however the wording of the relevant criterion is not consistent with national policy and therefore the policies are unsound. In particular, the 2018NPPF is clear in paragraph 170 that planning policies and decisions should minimise impacts on and provide net gains for biodiversity. There is no	

longer the caveat of 'where possible 'indicating that all development should achieve net gains. We do note that policy BH01 already does not contain the caveat.

Additionally, a principle of planning, which should contribute to achieving net gains, is the mitigation hierarchy of first avoiding harm, then mitigating for any residual harm, before, as a last resort, considering compensation (2012NPPF paragraph 118 and 2018NPPF paragraph 175). It is not acceptable permit through policy wording mitigation, before avoidance.

We therefore recommend the following amendments to the criteria in order to make the policies listed above consistent with national policy:

"...An ecological impact assessment is undertaken and appropriate measures identified and implemented accordingly to mitigate avoid potential adverse impacts on biodiversity. Where adverse impacts are unavoidable, appropriate mitigation and compensation measures must be employed, commensurate to the importance, the legal protection or other status of the species or habitat. Development allows for the protection of biodiversity and enhancement where possible; and... '

Policy CH01 - Glendene, Station Road

We strongly support the addition of 'at least 15m 'into criterion f. It is unclear why this requirement has not been added to other site allocations containing/adjacent to ancient woodland. Please see our comments above in relation to amendments required for criterion e).

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public? No

Why do you feel it is necessary to participate at the Examination in Public?

Representation ID: REP/022/CH02Representor Details:

Representor ID:	REP/022
Name:	Jess Price
Organisation:	Sussex Wildlife Trust
Consultation Body:	General
Stakeholder Type:	Local group or organisation

Agent Details:

Name:
Organisation:

Contact Details:

Email Address:	swtconservation@sussexwt.org.uk
Address:	Woods Mill Henfield West Sussex BN5 9SD

Representation:

Policy/Section:	CH02 - Layden Hall, East Grinstead Road
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	No
Representation: (SEE ATTACHED PDF) SWT does not believe that this policy is currently compliant with paragraph 118 of the 2012NPPF or paragraph 175 of the 2018NPPF. In particular there is a clear requirement to avoid adverse impacts to biodiversity before mitigation is considered. Additionally, given the proximity of the site to the SSSI, net gains to biodiversity should be required as per paragraph 170 of the 2018NPPF. We therefore recommend that criterion d) is	

amended as follows:

d) An ecological impact assessment is undertaken and appropriate measures identified and implemented accordingly to mitigate avoid potential adverse impacts on Chailey Common SSSI and the local biodiversity. Where adverse impacts are unavoidable, appropriate mitigation and compensation measures must be employed, commensurate to the importance, the legal protection or other status of the species or habitat. Development allows for the protection of biodiversity and enhancement where possible; and...'

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public? No

Why do you feel it is necessary to participate at the Examination in Public?

Representation ID: REP/022/GT01Representor Details:

Representor ID:	REP/022
Name:	Jess Price
Organisation:	Sussex Wildlife Trust
Consultation Body:	General
Stakeholder Type:	Local group or organisation

Agent Details:

Name:
Organisation:

Contact Details:

Email Address:	swtconservation@sussexwt.org.uk
Address:	Woods Mill Henfield West Sussex BN5 9SD

Representation:

Policy/Section:	GT01 - Land south of The Plough
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	No
Representation: (SEE ATTACHED PDF) SWT are pleased to see that these policies all now include a requirement for an ecological impact assessment, however the wording of the relevant criterion is not consistent with national policy and therefore the policies are unsound. In particular, the 2018NPPF is clear in paragraph 170 that planning policies and decisions should minimise impacts on and provide net gains for biodiversity. There is no	

longer the caveat of 'where possible' indicating that all development should achieve net gains. We do note that policy BH01 already does not contain the caveat.

Additionally, a principle of planning, which should contribute to achieving net gains, is the mitigation hierarchy of first avoiding harm, then mitigating for any residual harm, before, as a last resort, considering compensation (2012NPPF paragraph 118 and 2018NPPF paragraph 175). It is not acceptable permit through policy wording mitigation, before avoidance.

We therefore recommend the following amendments to the criteria in order to make the policies listed above consistent with national policy:

"...An ecological impact assessment is undertaken and appropriate measures identified and implemented accordingly to mitigate avoid potential adverse impacts on biodiversity. Where adverse impacts are unavoidable, appropriate mitigation and compensation measures must be employed, commensurate to the importance, the legal protection or other status of the species or habitat. Development allows for the protection of biodiversity and enhancement where possible; and... "

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public? No

Why do you feel it is necessary to participate at the Examination in Public?

Representation ID: REP/022/E1Representor Details:

Representor ID:	REP/022
Name:	Jess Price
Organisation:	Sussex Wildlife Trust
Consultation Body:	General
Stakeholder Type:	Local group or organisation

Agent Details:

Name:
Organisation:

Contact Details:

Email Address:	swtconservation@sussexwt.org.uk
Address:	Woods Mill Henfield West Sussex BN5 9SD

Representation:

Policy/Section:	E1 - Land at East Quay, Newhaven Port
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	No
Representation: (SEE ATTACHED PDF) SWT strongly objects to the inclusion of this policy and does not consider it to be sound as it is neither justified nor consistent with national policy. Whilst there is no acknowledgement of this in the policy or the supporting text, the whole of policy area E1 is designated as Tide Mills Local Wildlife Site (LWS), which is designated in particular for its importance as an area of feeding and breeding ground for	

a good number of waders and for its rare vegetated shingle habitat (a habitat of principle importance). A significant proportion of the LWS has already been destroyed through development and it is unacceptable for the LWS to be encroached on further.

Both paragraph 117 of the 2012NPPF and paragraph 171 of the 2018NPPF are clear that locally designated sites are key components of the local ecological network and that priority habitats, such as vegetated shingle, should be protected and restored through the planning process (paragraph 117 2012NPPF and paragraph 174 2018NPPF). However the ecological value of this site seems to have been disregarded.

SWT accepts that the LWS area to the east of policy area E1 has been lost through the expansion of the East Quay permitted in 2016. An additional area that is allocated to the Port Access Road (PAR) will also be lost and given that East Sussex County Council consider that they have planning permission for this, SWT do not see why this area has not also been removed from the policy area. The remaining area to the east and the south of the PAR route should be allocated as countryside and fall outside the development boundary for Newhaven.

It is stated in paragraph 3.5 that policy E1 is carrying forward saved policy NH20 'with appropriate amendments to bring it up to date'. Since 2003 there have been significant changes in Newhaven Port and in national policy and SWT do not consider that LDC have taken this into account. In particular, NH20 was part of an overarching policy to regenerate the port, however paragraph 3.13 states that the East Quay development, permitted in 2016, is anticipated to allow the port to remain competitive.

Similarly, paragraph 3.3 of the plan states that there is no requirement for additional employment space within the district. It should also be noted that policy area E1 also falls outside of the Newhaven Enterprise Zone which is the focus for sustainable regeneration of Newhaven and its shift towards a higher value economy.

Core Policy 10 states that 'the natural environment of the district, including landscape assets, biodiversity, geodiversity, priority habitats and species and statutory and locally designated sites, will be conserved and enhanced by:...

ii. Ensuring that new development will not harm nature conservation interest, unless the benefits of development at that location clearly outweigh the harm caused...'

The pre-submission Lewes Local Plan part 2 provides no rationale for why the allocation of a Local Wildlife Site is justified or how the benefits of development of this site, which have not been made clear, will outweigh the significant harm. Given that there is no objectively assessed need for additional employment space and that the NPPF requires that development is sustainable in terms of the economy, society and environment, and in particular achieves net gains to biodiversity, the destruction of a Local Wildlife Site is not acceptable.

SWT believe that this policy should be removed. Or if LDC would like a policy to cover the area for the PAR, then the policy area covered by E1 should be significantly reduced to exclude any of the LWS to the east or south of the PAR route.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public?	No
--	-----------

Why do you feel it is necessary to participate at the Examination in Public?

Representation ID: REP/022/DM4Representor Details:

Representor ID:	REP/022
Name:	Jess Price
Organisation:	Sussex Wildlife Trust
Consultation Body:	General
Stakeholder Type:	Local group or organisation

Agent Details:

Name:
Organisation:

Contact Details:

Email Address:	swtconservation@sussexwt.org.uk
Address:	Woods Mill Henfield West Sussex BN5 9SD

Representation:

Policy/Section:	DM4: Residential Conversions in the Countryside
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	No
Representation: (SEE ATTACHED PDF) SWT are encouraged to see that our comments from the regulation 18 consultation have been implemented, so that the supporting text for this policy talks more broadly than just habitat surveys and now includes wording related to Ecological Impact Assessments. However this wording is not reflected in policy DM4 itself and as such we do not believe the policy is compliant with national policy.	

In SWT's experience, supporting text does not carry the same weight as policy wording in planning decisions and is instead used to explain the reasoning of the policy wording. The importance of policy wording in determining decisions is reflected in section 2.22 of the Lewes Local Plan Part 2 (pre submission), which states:

'Whilst the site allocations identified in this document establish the principle of development, planning permission must still be obtained through the planning application process. Planning applications will be determined in accordance with the development plan, including Core Policies of the Local Plan Part 1, Development Management (DM) and Site Allocation policies of the Local Plan Part 2, once adopted, and policies contained within neighbourhood plans where sufficient weight can be given. Other relevant plans, such as the East Sussex, South Downs and Brighton & Hove Waste and Minerals Plan, will also be given appropriate consideration at the time. '

It is significant that the supporting text to the policies is not referred to and therefore we request that an additional criterion is added to policy DM4 to ensure it is in line with section 165 of the 2012NPPF:

(9) the proposal would not have an unacceptable impact on biodiversity, particularly protected species. The Council will normally require this to be demonstrated through the submission of an ecological assessment.

We acknowledge LDC's comments made within the Summary of Consultation on the Consultation Draft Document (30 November 2017 - 25 January 2018) in relation to SWT's proposed modification to this policy. We respect the council's approach to ensure the Local Plan Part 2 should be concise and should avoid undue repetition or duplication by using generic policies to set out principles that may be common to different types of development. However, neither Core Policy 10 in Lewes Local Part 1 or Draft Policy DM24 (Protection of Biodiversity and Geodiversity) capture the need for planning decisions to be informed by up to date environmental information. Therefore, if our modification is not accepted for this policy we will be seeking an amendment to policy DM24 to reflect the need for planning decisions to be informed by up to date ecological information to ensure the policy is compliant with section 165 of the 2012NPPF.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public? No

Why do you feel it is necessary to participate at the Examination in Public?

Representation ID: REP/022/DM6Representor Details:

Representor ID:	REP/022
Name:	Jess Price
Organisation:	Sussex Wildlife Trust
Consultation Body:	General
Stakeholder Type:	Local group or organisation

Agent Details:

Name:
Organisation:

Contact Details:

Email Address:	swtconservation@sussexwt.org.uk
Address:	Woods Mill Henfield West Sussex BN5 9SD

Representation:

Policy/Section:	DM6: Equestrian Development
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	No
Representation: (SEE ATTACHED PDF) SWT welcomes the inclusion of the bullet point which considers the cumulative impact on of equestrian developments on landscape character and biodiversity. However we are concerned the policy fails to refer to the importance of determining the value of the existing site for biodiversity and the need to deliver net gains to biodiversity via development.	

As said, in our previous representation on DM4, we respect LDC's approach to ensure the Local Plan Part 2 should be concise and should avoid undue repetition or duplication by using generic policies to set out principles that may be common to different types of development. However neither Core Policy 10 in Lewes Local Part 1 or Draft Policy DM24 (Protection of Biodiversity and Geodiversity) capture the need for decisions to be informed by up to date environmental information and as per paragraph 165 of the 2012NPPF. Due to our proposed modification not being accepted within this policy, we will be seeking an amendment to policy DM24 to reflect the need for decisions to be informed by up to date ecological information to ensure the policy is compliant with section 165 of the 2012NPPF.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public? No

Why do you feel it is necessary to participate at the Examination in Public?

Representation ID: REP/022/DM9Representor Details:

Representor ID:	REP/022
Name:	Jess Price
Organisation:	Sussex Wildlife Trust
Consultation Body:	General
Stakeholder Type:	Local group or organisation

Agent Details:

Name:
Organisation:

Contact Details:

Email Address:	swtconservation@sussexwt.org.uk
Address:	Woods Mill Henfield West Sussex BN5 9SD

Representation:

Policy/Section:	DM9: Farm Diversification
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	No
Representation: (SEE ATTACHED PDF) As stated in our regulation 18 response, SWT are supportive of bullet point (4). We also continue to acknowledge the need to create a concise plan that should avoid undue repetition or duplication by using generic policies to set out principles that may be common to different types of development. However, as we have stated previously we do not feel that the current Core Policy 10 in Lewes Local Part 1 or Draft Policy DM24	

(Protection of Biodiversity and Geodiversity) capture the need for decisions to be informed by up to date environmental information, as per paragraph 165 of the 2012NPPF.

Therefore, because our proposed modification has not been accepted for this policy, we will be seeking an amendment to policy DM24 to reflect the need for decisions to be informed by up to date ecological information to ensure the Lewes Local Plan part 2 complies national policy.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public? No

Why do you feel it is necessary to participate at the Examination in Public?

Representation ID: REP/022/DM10
--

Representor Details:

Representor ID:	REP/022
Name:	Jess Price
Organisation:	Sussex Wildlife Trust
Consultation Body:	General
Stakeholder Type:	Local group or organisation

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	swtconservation@sussexwt.org.uk
Address:	Woods Mill Henfield West Sussex BN5 9SD

Representation:

Policy/Section:	DM10: Employment Development in the Countryside
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	No
Representation: (SEE ATTACHED PDF) SWT are pleased to see that our recommendation for the reference to 'habitat surveys' in the previous consultation draft to be replaced with 'ecological surveys' has been delivered through the requirement for Ecological Impact Assessments in paragraph 4.39 of the pre-submission plan. However, as expressed previously in our response, in our experience supporting text does not carry the same weight as policy in planning	

decisions and is instead used to explain the reasoning of the policy wording. This is reflected in the wording in section 2.22 of the Lewes Local Plan part 2 (pre-submission), which states:

'Whilst the site allocations identified in this document establish the principle of development, planning permission must still be obtained through the planning application process. Planning applications will be determined in accordance with the development plan, including Core Policies of the Local Plan Part 1, Development Management (DM) and Site Allocation policies of the Local Plan Part 2, once adopted, and policies contained within neighbourhood plans where sufficient weight can be given. Other relevant plans, such as the East Sussex, South Downs and Brighton & Hove Waste and Minerals Plan, will also be given appropriate consideration at the time. '

We acknowledge the need to create concise plan that should avoid undue repetition or duplication by using generic policies to set out principles that may be common to different types of development.

However, as we have stated previously we do not feel that the current Core Policy 10 in Lewes Local Part 1 or Draft Policy DM24 (Protection of Biodiversity and Geodiversity) capture the need for decisions to be informed by up to date environmental information, as per section 165 of the 2012NPPF.

Therefore, because our modification as highlighted in our regulation 18 consultation response was not accepted for this policy, we will be seeking an amendment to policy DM24 to reflect the need for decisions to be informed by up to date ecological information.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public? No

Why do you feel it is necessary to participate at the Examination in Public?

Representation ID: REP/022/DM11
--

Representor Details:

Representor ID:	REP/022
Name:	Jess Price
Organisation:	Sussex Wildlife Trust
Consultation Body:	General
Stakeholder Type:	Local group or organisation

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	swtconservation@sussexwt.org.uk
Address:	Woods Mill Henfield West Sussex BN5 9SD

Representation:

Policy/Section:	DM11: Existing Employment Sites in the Countryside
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	No
Representation:	
(SEE ATTACHED PDF)	
We are encouraged to see the changes to the policy wording that acknowledge that landscape and biodiversity are not mutually exclusive.	
What changes do you suggest to make the document legally compliant or sound?	

Do you consider it necessary to participate at the Examination in Public?	No
Why do you feel it is necessary to participate at the Examination in Public?	

Representation ID: REP/022/DM14
--

Representor Details:

Representor ID:	REP/022
Name:	Jess Price
Organisation:	Sussex Wildlife Trust
Consultation Body:	General
Stakeholder Type:	Local group or organisation

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	swtconservation@sussexwt.org.uk
Address:	Woods Mill Henfield West Sussex BN5 9SD

Representation:

Policy/Section:	DM14: Multi-functional Green Infrastructure
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	No
Representation: (SEE ATTACHED PDF) Having re-examined our regulation 18 comments, SWT note that we supported the inclusion of the Green Infrastructure policy and highlighted the need for LDC to commit to undertake a Green Infrastructure (GI) Strategy. Producing a GI strategy would help LDC to meet the requirements of Core Policy 8 in the Lewes Local Plan Part 1 and ensure DM14 is deliverable.	

However, we are concerned that our comments have not been reflected in this way on page 34 of the Summary of Consultation on the Consultation Draft Document (30 November 2017 - 25 January 2018).

The document states:

The Sussex Wildlife Trust objects because the policy is called 'multi-functional green infrastructure' and should therefore relate to all types of GI.

SWT's actual comment stated:

Given the inclusion in the plan of a specific policy on Children's Play Space (DM16), we are unclear why it is singled out in DM14. This policy is called 'multi-functional green infrastructure' and therefore it should relate to all types of GI. We recommend the following changes to widen out the policy and make it more effective at achieving positive contributions to the GI network:

In relation to our comments, we remind the council that section 7.80 of Lewes Local Plan Part 1 covers a number of types of green spaces that are included in the LDC's GI network.

In our regulation 18 response we also sort specific changes to the policy wording so that it could reflect Core Policy 8. LDC has suggested that our proposed changing to wording is too vague in relation to the term 'need.'

Below highlights the proposed changes we suggested to the policy text in our regulation 18 consultation response:

'Development will be permitted where opportunities for the provision of additional green infrastructure have been identified, fully considered and would will be provided where justified by need the character of the area or the need for outdoor playing space. The additional provision should seek to enhance the district's existing green infrastructure network and should be multifunctional and creative in its approach.

Green infrastructure provided as part of new development should incorporate features to encourage biodiversity and retain or, where possible, enhance existing features of nature conservation value within and adjacent to the site. Existing ecological networks should be identified and ecological corridors should, where practical and appropriate, form an essential component of green infrastructure provision to ensure habitat connectivity.'

We suggested the term 'need' so that it could reflect the 'need' as identified in the evidence base for the allocation/application. The evidence base might be either a district Green Infrastructure Strategy (or equivalent) and/or an Ecological Impact Assessment of the site. The intention is not for the term to be vague but to deliver the 'need' as identified by the evidence base that informs the allocation/application, as aspired to in Core Policy 8 of the Lewes Local Plan Part 1.

In particular, Core Policy 8 states:

'The local planning authority will promote a connected network of multifunctional green infrastructure by protecting and enhancing the quantity, quality and accessibility of open

spaces throughout the district.

This will be achieved by:

1. Identifying in the Site Allocations and Development Management Policies DPD or SDNPA Local Plan areas where there is potential for the enhancement or restoration of existing green infrastructure and opportunities for the provision of new green space...'

We remind LDC of their obligations to ensure the local plan takes a strategic approach to maintaining and enhancing networks of habitats and green infrastructure, as per section 114 of the 2012NPPF and section 171 of the 2018NPPF. We therefore ask what evidence base has been used to ensure a consistent approach to the identification of GI provision and enhancements within the site allocations? In particular, we note that only policy E2 specifically refers to the provision and enhancement of Green Infrastructure being delivered through the development. This appears inconsistent with the Core Policy 8.

As demonstrated above, we do not believe that policy DM14 is currently consistent with national policy or the Lewes Local Plan Part 1. We again ask for the following amendments to ensure the policy is effective in delivering green infrastructure network enhancements as required in both the 2012 and 2018 NPPF:

'Development will be permitted where opportunities for the provision of additional green infrastructure have been identified, fully considered and would will be provided where justified by need the character of the area or the need for outdoor playing space. The additional provision should seek to enhance the district's existing green infrastructure network and should be multifunctional and creative in its approach.

Green infrastructure provided as part of new development should incorporate features to encourage biodiversity and retain or, where possible, enhance existing features of nature conservation value within and adjacent to the site. Existing ecological networks should be identified and ecological corridors should, where practical and appropriate, form an essential component of green infrastructure provision to ensure 'habitat connectivity. '

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public?

No

Why do you feel it is necessary to participate at the Examination in Public?

Representation ID: REP/022/DM17
--

Representor Details:

Representor ID:	REP/022
Name:	Jess Price
Organisation:	Sussex Wildlife Trust
Consultation Body:	General
Stakeholder Type:	Local group or organisation

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	swtconservation@sussexwt.org.uk
Address:	Woods Mill Henfield West Sussex BN5 9SD

Representation:

Policy/Section:	DM17: Former Lewes/Sheffield Park Railway Line
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	No
Representation: (SEE ATTACHED PDF) We are pleased to see that LDC have taken on board SWT's constructive comments in relation to this policy and have made amendments that help to reflect the importance of this route for biodiversity.	
What changes do you suggest to make the document legally compliant or sound?	

Do you consider it necessary to participate at the Examination in Public?	No
Why do you feel it is necessary to participate at the Examination in Public?	

Representation ID: REP/022/DM18
--

Representor Details:

Representor ID:	REP/022
Name:	Jess Price
Organisation:	Sussex Wildlife Trust
Consultation Body:	General
Stakeholder Type:	Local group or organisation

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	swtconservation@sussexwt.org.uk
Address:	Woods Mill Henfield West Sussex BN5 9SD

Representation:

Policy/Section:	DM18: Recreation and Rivers
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	No
Representation: (SEE ATTACHED PDF) SWT are encouraged to see that our comments relating to the natural functioning of the river and associated wetland are now reflected in the policy wording.	
What changes do you suggest to make the document legally compliant or sound?	

Do you consider it necessary to participate at the Examination in Public?	No
Why do you feel it is necessary to participate at the Examination in Public?	

Representation ID: REP/022/DM22
--

Representor Details:

Representor ID:	REP/022
Name:	Jess Price
Organisation:	Sussex Wildlife Trust
Consultation Body:	General
Stakeholder Type:	Local group or organisation

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	swtconservation@sussexwt.org.uk
Address:	Woods Mill Henfield West Sussex BN5 9SD

Representation:

Policy/Section:	DM22: Water Resources and Water Quality
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	No
Representation: (SEE ATTACHED PDF) SWT supports the adoption of our comment reflecting the importance of Chalk Streams in the supporting text of this policy.	
What changes do you suggest to make the document legally compliant or sound?	

Do you consider it necessary to participate at the Examination in Public?	No
Why do you feel it is necessary to participate at the Examination in Public?	

Representation ID: REP/022/DM24
--

Representor Details:

Representor ID:	REP/022
Name:	Jess Price
Organisation:	Sussex Wildlife Trust
Consultation Body:	General
Stakeholder Type:	Local group or organisation

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	swtconservation@sussexwt.org.uk
Address:	Woods Mill Henfield West Sussex BN5 9SD

Representation:

Policy/Section:	DM24: Protection of Biodiversity and Geodiversity
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	No
Representation: (SEE ATTACHED PDF) SWT acknowledge that some amendments have been made to this policy in light of comments and suggestions made by ourselves and Natural England. However, we remain concerned that this policy still fails to consider LDC's responsibility to the district's wider biodiversity assets. This is because neither Core Policy 10 in the Lewes Local Plan Part 1 or this pre-submission policy specifically stipulate the need for	

decisions to be based on up to date environmental information or for development to result in net gains to biodiversity.

We note LDC's response to our regulation 18 comments on this matter on page 42 of the Summary of Consultation on the Consultation Draft Document (30 November 2017 - 25 January 2018):

A policy requirement for all development proposals to submit information on biodiversity is considered to be unduly onerous and unlikely to be justified for the majority of planning applications. It would therefore fail to have regard to the NPPF and no amendment is proposed to Draft Policy DM24 in this respect.

In response to this, SWT would highlight that we recognised the need for a proportionate response to applications, but section 165 of the 2012NPPF states Planning policies and decisions should be based on up-to-date information about the natural environment and other characteristics of the area.....

Both the 2012 and 2018 NPPFs are clear that achieving sustainable development means pursuing opportunities to secure economic, social and environmental net gains in an interdependent way. SWT does not agree that requiring that ecological information is submitted with planning application is onerous. Indeed many other adopted

By incorporating wording into policy DM24 that stipulates the need for up-to-date environmental information and net gains this will enable LDC at development management stage to swiftly assess applications to ensure they are fulfilling their requirements to deliver net gains to biodiversity as per paragraph 109 of the 2012NPPF and paragraph 170 of the 2018NPPF.

We also refer back to comments made throughout the Summary of Consultation on the Consultation Draft Document (30 November 2017 - 25 January 2018) where LDC have resisted modifications to earlier policies that sought to seek policy wording to include the submission of ecological assessments.

LDC reasoning was that they wish to create concise plan that should avoid undue repetition or duplication by using generic policies to set out principles that may be common to different types of development. We understand this view point and therefore seek the modifications to draft policy DM24 to enable the plan to ensure it is consistent with national policy and deliver the responsibilities consistently and effectively. As it stands we do not believe this policy is sound.

Therefore, SWT seeks the following addition to ensure that the DM24 is consistent with national policy:

'All development proposals must provide adequate up-to-date information about the biodiversity which may be affected and any avoidance, mitigation and compensation measures required to ensure no net loss to biodiversity and ensure measurable net gains are delivered.

Development which would be likely to adversely affect a designated Ramsar site, designated or candidate 'Special Area of Conservation (SAC) or a classified or potential

Special Protection Area (SPA) will only

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public? No

Why do you feel it is necessary to participate at the Examination in Public?

Representation ID: REP/022/HSA/A

Representor Details:

Representor ID:	REP/022
Name:	Jess Price
Organisation:	Sussex Wildlife Trust
Consultation Body:	General
Stakeholder Type:	Local group or organisation

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	swtconservation@sussexwt.org.uk
Address:	Woods Mill Henfield West Sussex BN5 9SD

Representation:

Policy/Section:	Housing Site Allocations
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	No
Representation: SECTION 2 - RESIDENTIAL SITE ALLOCATIONS As SWT stated in our regulation 18 comments, the allocation of strategic areas for development and delivery policies should always be informed by evidence of the functioning of ecological networks at a landscape scale and underpinned by up-to-date, site specific data as per paragraphs 114 and 165 of the 2012NPPF and 31 and 174 of the 2018NPPF. We are still concerned that LDC has not taken this aspect	

of the NPPF into full consideration. In particular there appears to be little information of how the site allocations relate to the district's ecological and green infrastructure networks or what the current biodiversity value of the sites are.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public? No

Why do you feel it is necessary to participate at the Examination in Public?

Representation ID: REP/022/HSA/B

Representor Details:

Representor ID:	REP/022
Name:	Jess Price
Organisation:	Sussex Wildlife Trust
Consultation Body:	General
Stakeholder Type:	Local group or organisation

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	swtconservation@sussexwt.org.uk
Address:	Woods Mill Henfield West Sussex BN5 9SD

Representation:

Policy/Section:	Housing Site Allocations
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	No
Representation: (SEE ATTACHED PDF) SWT are pleased to see that these policies all now include a requirement for an ecological impact assessment, however the wording of the relevant criterion is not consistent with national policy and therefore the policies are unsound. In particular, the 2018NPPF is clear in paragraph 170 that planning policies and	

decisions should minimise impacts on and provide net gains for biodiversity. There is no longer the caveat of 'where possible' indicating that all development should achieve net gains. We do note that policy BH01 already does not contain the caveat.

Additionally, a principle of planning, which should contribute to achieving net gains, is the mitigation hierarchy of first avoiding harm, then mitigating for any residual harm, before, as a last resort, considering compensation (2012NPPF paragraph 118 and 2018NPPF paragraph 175). It is not acceptable permit through policy wording mitigation, before avoidance.

We therefore recommend the following amendments to the criteria in order to make the policies listed above consistent with national policy:

"...An ecological impact assessment is undertaken and appropriate measures identified and implemented accordingly to mitigate avoid potential adverse impacts on biodiversity. Where adverse impacts are unavoidable, appropriate mitigation and compensation measures must be employed, commensurate to the importance, the legal protection or other status of the species or habitat. Development allows for the protection of biodiversity and enhancement where possible; and... "

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public? No

Why do you feel it is necessary to participate at the Examination in Public?

By email only
ldf@lewes.gov.uk

Contact: Jess Price
Direct Dial: 01273 497511
E-mail: swtconservation@sussexwt.org.uk
Date: 5 November 18

Lewes District Local Plan Part 2: Site Allocations and Development Management Policies DPD Pre-Submission Version – November 2018

The Sussex Wildlife Trust (SWT) recognises the importance of a plan led system as opposed to a developer led process and supports Lewes District Council's (LDC) desire to produce a cohesive Site Allocations Local Plan. Therefore, we hope that our comments are used constructively to make certain that this pre-submission version properly plans for the natural capital needed within the district and ensures that any development is truly sustainable.

Where we are proposing a change to policy or the supporting text, recommended additions are highlighted in **bold** and deletions are ~~struck through~~.

We note that LDC's Guidance Notes for Making Representations states that it is anticipated that the Plan will be examined in the context of the 2012 National Planning Policy Framework (2012NPPF). However the timeline for the progression of this plan could slip and paragraph 213 of the 2018NPPF states that due weight should be given to policies according to their degree of consistency with the new Framework. SWT has therefore related its comments to both the 2012 and 2018 versions of the NPPF.

SECTION 2 – RESIDENTIAL SITE ALLOCATIONS

As SWT stated in our regulation 18 comments, the allocation of strategic areas for development and delivery policies should always be informed by evidence of the functioning of ecological networks at a landscape scale and underpinned by up-to-date, site specific data as per paragraphs 114 and 165 of the 2012NPPF and 31 and 174 of the 2018NPPF. We are still concerned that LDC has not taken this aspect of the NPPF into full consideration. In particular there appears to be little information of how the site allocations relate to the district's ecological and green infrastructure networks or what the current biodiversity value of the sites are.

Policies NH01, BA01, BA02, BA03, CH01, CH03, RG01 and GT01

SWT are pleased to see that these policies all now include a requirement for an ecological impact assessment, however the wording of the relevant criterion is not consistent with national policy and therefore the policies are unsound.

Woods Mill, Henfield, West Sussex, BN5 9SD
01273 492 630 | enquiries@sussexwt.org.uk | sussexwildlifetrust.org.uk

Chairman: Carole Nicholson | Chief Executive: Tor Lawrence

In particular, the 2018NPPF is clear in paragraph 170 that planning policies and decisions should minimise impacts on and provide net gains for biodiversity. There is no longer the caveat of 'where possible' indicating that all development should achieve net gains. We do note that policy BH01 already does not contain the caveat.

Additionally, a principle of planning, which should contribute to achieving net gains, is the mitigation hierarchy of first avoiding harm, then mitigating for any residual harm, before, as a last resort, considering compensation (2012NPPF paragraph 118 and 2018NPPF paragraph 175). It is not acceptable permit through policy wording mitigation, before avoidance.

We therefore recommend the following amendments to the criteria in order to make the policies listed above consistent with national policy:

'...An ecological impact assessment is undertaken and appropriate measures identified and implemented accordingly to ~~mitigate~~ **avoid** potential adverse impacts on biodiversity. **Where adverse impacts are unavoidable, appropriate mitigation and compensation measures must be employed, commensurate to the importance, the legal protection or other status of the species or habitat.** Development allows for the protection of biodiversity and enhancement ~~where possible~~; and...'

Policy NH02 – Land at the Marina

SWT are pleased to see that this policy now includes a requirement for an ecological impact assessment, however as stated for policies NH01, BA01, BA02, BA03, CH01, CH03, RG01 and GT01, we do not believe the wording is currently compliant with national policy.

We also support the inclusion of paragraphs 2.35 to 2.37 which highlight the potential impacts of development on habitats of principle importance. However, in SWT's experience, supporting text does not carry the same weight as policy wording in planning decisions and is instead used to explain the reasoning of the policy wording. Indeed, the importance of policy wording in determining decisions is reflected in section 2.22 of the Lewes Local Plan Part 2 (pre submission), which states:

'Whilst the site allocations identified in this document establish the principle of development, planning permission must still be obtained through the planning application process. Planning applications will be determined in accordance with the development plan, including Core Policies of the Local Plan Part 1, Development Management (DM) and Site Allocation policies of the Local Plan Part 2, once adopted, and policies contained within neighbourhood plans where sufficient weight can be given. Other relevant plans, such as the East Sussex, South Downs and Brighton & Hove Waste and Minerals Plan, will also be given appropriate consideration at the time.'

It is significant that the supporting text to the policies is not referred to and therefore we request that the policy wording is strengthened. In particular we do not believe it is currently compliant with paragraphs 117 or 118 of the 2012NPPF or paragraphs 170, 174 or 175 of the 2018NPPF. SWT requests the following amendments:

'g) An ecological impact assessment is undertaken and appropriate measures identified and implemented accordingly to ~~mitigate~~ **avoid** potential adverse impacts on biodiversity, **particularly priority habitats.** **Where adverse impacts are unavoidable, appropriate mitigation and like for like compensation measures must be employed, commensurate to the importance, the legal protection or other status of the species or habitat.** Development allows for the protection of biodiversity and enhancement ~~where possible~~; and...'

Policy BH01 – Land at the Nuggets, Valebridge Road

SWT note that our regulation 18 comments have resulted in an amendment to the supporting text for this policy. However as stated above, in SWT's experience, supporting text does not carry the same weight as policy wording in planning decisions and is instead used to explain the reasoning of the policy wording.

The importance of policy wording in determining decisions is reflected in section 2.22 of the Lewes Local Plan Part 2 (pre submission), which states:

'Whilst the site allocations identified in this document establish the principle of development, planning permission must still be obtained through the planning application process. Planning applications will be determined in accordance with the development plan, including Core Policies of the Local Plan Part 1, Development Management (DM) and Site Allocation policies of the Local Plan Part 2, once adopted, and policies contained within neighbourhood plans where sufficient weight can be given. Other relevant plans, such as the East Sussex, South Downs and Brighton & Hove Waste and Minerals Plan, will also be given appropriate consideration at the time.'

It is significant that the supporting text to the policies is not referred to and therefore we request that the policy wording is strengthened to include a requirement for at least a 15 metre buffer between the development and the ancient woodland. We note that policy CH01 does include a minimum figure for the buffer and we believe this is consistent with the national policy on irreplaceable habitats.

We also seek amendments to criteria d) and f) which currently does not comply with the principle of the mitigation hierarchy as stated paragraph 118 of the 2012NPPF and paragraph 175 of the 2018NPPF. In order to be made sound, SWT recommends that the following changes are made to policy BH01:

'd) Tree surveys undertaken and appropriate measures, including proper buffers **of at least 15 metres**, are identified and implemented accordingly to ~~mitigate~~ **avoid** potential adverse impacts on the Tree Protection Order group and Ancient Woodland on and/or adjacent to site;
e) Development is subject to appropriate assessment and evaluation of archaeological potential and mitigation measures implemented accordingly;
f) An ecological impact assessment is undertaken and appropriate measures identified and implemented accordingly to ~~mitigate~~ **avoid** potential adverse impacts, either directly or indirectly on biodiversity, including irreplaceable habitats. **Where adverse impacts are unavoidable, appropriate mitigation and compensation measures must be employed, commensurate to the importance, the legal protection or other status of the species or habitat.** Development allows for the protection of biodiversity and enhancement; and '

Policy CH01 – Glendene, Station Road

We strongly support the addition of 'at least 15m' into criterion f. It is unclear why this requirement has not been added to other site allocations containing/adjacent to ancient woodland. Please see our comments above in relation to amendments required for criterion e).

Policy CH02 – Layden Hall, East Grinstead Road

SWT does not believe that this policy is currently compliant with paragraph 118 of the 2012NPPF or paragraph 175 of the 2018NPPF. In particular there is a clear requirement to avoid adverse impacts to biodiversity before mitigation is considered. Additionally, given the proximity of the site to the SSSI, net gains to biodiversity should be required as per paragraph 170 of the 2018NPPF. We therefore recommend that criterion d) is amended as follows:

'd) An ecological impact assessment is undertaken and appropriate measures identified and implemented accordingly to ~~mitigate~~ **avoid** potential adverse impacts on Chailey Common SSSI and the local biodiversity. **Where adverse impacts are unavoidable, appropriate mitigation and compensation measures must be employed, commensurate to the importance, the legal protection or other status of the species or habitat.** Development allows for the protection of biodiversity and enhancement ~~where possible~~; and...'

SECTION 3 – EMPLOYMENT SITE ALLOCATIONS

Policy E1 – Land at East Quay, Newhaven Port

SWT strongly objects to the inclusion of this policy and does not consider it to be sound as it is neither justified nor consistent with national policy.

Whilst there is no acknowledgement of this in the policy or the supporting text, the whole of policy area E1 is designated as Tide Mills Local Wildlife Site (LWS), which is designated in particular for its importance as an area of feeding and breeding ground for a good number of waders and for its rare vegetated shingle habitat (a habitat of principle importance). A significant proportion of the LWS has already been destroyed through development and it is unacceptable for the LWS to be encroached on further.

Both paragraph 117 of the 2012NPPF and paragraph 171 of the 2018NPPF are clear that locally designated sites are key components of the local ecological network and that priority habitats, such as vegetated shingle, should be protected and restored through the planning process (paragraph 117 2012NPPF and paragraph 174 2018NPPF). However the ecological value of this site seems to have been disregarded.

SWT accepts that the LWS area to the east of policy area E1 has been lost through the expansion of the East Quay permitted in 2016. An additional area that is allocated to the Port Access Road (PAR) will also be lost and given that East Sussex County Council consider that they have planning permission for this, SWT do not see why this area has not also been removed from the policy area. The remaining area to the east and the south of the PAR route should be allocated as countryside and fall outside the development boundary for Newhaven.

It is stated in paragraph 3.5 that policy E1 is carrying forward saved policy NH20 'with appropriate amendments to bring it up to date'. Since 2003 there have been significant changes in Newhaven Port and in national policy and SWT do not consider that LDC have taken this into account. In particular, NH20 was part of an overarching policy to regenerate the port, however paragraph 3.13 states that the East Quay development, permitted in 2016, is anticipated to allow the port to remain competitive.

Similarly, paragraph 3.3 of the plan states that there is no requirement for additional employment space within the district. It should also be noted that policy area E1 also falls outside of the Newhaven Enterprise Zone which is the focus for sustainable regeneration of Newhaven and its shift towards a higher value economy.

Core Policy 10 states that '*the natural environment of the district, including landscape assets, biodiversity, geodiversity, priority habitats and species and statutory and locally designated sites, will be conserved and enhanced by...*

ii. Ensuring that new development will not harm nature conservation interest, unless the benefits of development at that location clearly outweigh the harm caused..'

The pre-submission Lewes Local Plan part 2 provides no rationale for why the allocation of a Local Wildlife Site is justified or how the benefits of development of this site, which have not been made clear, will outweigh the significant harm. Given that there is no objectively assessed need for additional employment space and that the NPPF requires that development is sustainable in terms of the economy, society and environment, and in particular achieves net gains to biodiversity, the destruction of a Local Wildlife Site is not acceptable.

SWT believe that this policy should be removed. Or if LDC would like a policy to cover the area for the PAR, then the policy area covered by E1 should be significantly reduced to exclude any of the LWS to the east or south of the PAR route.

SECTION 4 - DEVELOPMENT MANAGEMENT POLICIES

Policy DM4 – Residential Conversions in the Countryside

SWT are encouraged to see that our comments from the regulation 18 consultation have been implemented, so that the supporting text for this policy talks more broadly than just habitat surveys and now includes wording related to Ecological Impact Assessments. However this wording is not reflected in policy DM4 itself and as such we do not believe the policy is compliant with national policy.

In SWT's experience, supporting text does not carry the same weight as policy wording in planning decisions and is instead used to explain the reasoning of the policy wording. The importance of policy wording in determining decisions is reflected in section 2.22 of the Lewes Local Plan Part 2 (pre submission), which states:

'Whilst the site allocations identified in this document establish the principle of development, planning permission must still be obtained through the planning application process. Planning applications will be determined in accordance with the development plan, including Core Policies of the Local Plan Part 1, Development Management (DM) and Site Allocation policies of the Local Plan Part 2, once adopted, and policies contained within neighbourhood plans where sufficient weight can be given. Other relevant plans, such as the East Sussex, South Downs and Brighton & Hove Waste and Minerals Plan, will also be given appropriate consideration at the time.'

It is significant that the supporting text to the policies is not referred to and therefore we request that an additional criterion is added to policy DM4 to ensure it is in line with section 165 of the 2012NPPF:

'(9) the proposal would not have an unacceptable impact on biodiversity, particularly protected species. The Council will normally require this to be demonstrated through the submission of an ecological assessment.'

We acknowledge LDC's comments made within the Summary of Consultation on the Consultation Draft Document (30 November 2017 – 25 January 2018) in relation to SWT's proposed modification to this policy. We respect the council's approach to ensure the Local Plan Part 2 should be concise and should avoid undue repetition or duplication by using generic policies to set out principles that may be common to different types of development. However, neither Core Policy 10 in Lewes Local Part 1 or Draft Policy DM24 (Protection of Biodiversity and Geodiversity) capture the need for planning decisions to be informed by up to date environmental information. Therefore, if our modification is not accepted for this policy we will be seeking an amendment to policy DM24 to reflect the need for planning decisions to be informed by up to date ecological information to ensure the policy is compliant with section 165 of the 2012NPPF.

Policy DM6 – Equestrian Development

SWT welcomes the inclusion of the bullet point which considers the cumulative impact on of equestrian developments on landscape character and biodiversity. However we are concerned the policy fails to refer to the importance of determining the value of the existing site for biodiversity and the need to deliver net gains to biodiversity via development.

As said, in our previous representation on DM4, we respect LDC's approach to ensure the Local Plan Part 2 should be concise and should avoid undue repetition or duplication by using generic policies to set out principles that may be common to different types of development. However neither Core Policy 10 in Lewes Local Part 1 or Draft Policy DM24 (Protection of Biodiversity and Geodiversity) capture the need for decisions to be informed by up to date environmental information and as per paragraph 165 of the 2012NPPF.

Due to our proposed modification not being accepted within this policy, we will be seeking an amendment to policy DM24 to reflect the need for decisions to be informed by up to date ecological information to ensure the policy is compliant with section 165 of the 2012NPPF.

Policy DM9 – Farm Diversification.

As stated in our regulation 18 response, SWT are supportive of bullet point (4). We also continue to acknowledge the need to create a concise plan that should avoid undue repetition or duplication by using generic policies to set out principles that may be common to different types of development. However, as we have stated previously we do not feel that the current Core Policy 10 in Lewes Local Part 1 or Draft Policy DM24 (Protection of Biodiversity and Geodiversity) capture the need for decisions to be informed by up to date environmental information, as per paragraph 165 of the 2012NPPF.

Therefore, because our proposed modification has not been accepted for this policy, we will be seeking an amendment to policy DM24 to reflect the need for decisions to be informed by up to date ecological information to ensure the Lewes Local Plan part 2 complies national policy.

Policy DM10 – Employment Development in the Countryside

SWT are pleased to see that our recommendation for the reference to ‘habitat surveys’ in the previous consultation draft to be replaced with ‘ecological surveys’ has been delivered through the requirement for Ecological Impact Assessments in paragraph 4.39 of the pre-submission plan. However, as expressed previously in our response, in our experience supporting text does not carry the same weight as policy in planning decisions and is instead used to explain the reasoning of the policy wording. This is reflected in the wording in section 2.22 of the Lewes Local Plan part 2 (pre-submission), which states:

‘Whilst the site allocations identified in this document establish the principle of development, planning permission must still be obtained through the planning application process. Planning applications will be determined in accordance with the development plan, including Core Policies of the Local Plan Part 1, Development Management (DM) and Site Allocation policies of the Local Plan Part 2, once adopted, and policies contained within neighbourhood plans where sufficient weight can be given. Other relevant plans, such as the East Sussex, South Downs and Brighton & Hove Waste and Minerals Plan, will also be given appropriate consideration at the time.’

We acknowledge the need to create concise plan that should avoid undue repetition or duplication by using generic policies to set out principles that may be common to different types of development. However, as we have stated previously we do not feel that the current Core Policy 10 in Lewes Local Part 1 or Draft Policy DM24 (Protection of Biodiversity and Geodiversity) capture the need for decisions to be informed by up to date environmental information, as per section 165 of the 2012NPPF.

Therefore, because our modification as highlighted in our regulation 18 consultation response was not accepted for this policy, we will be seeking an amendment to policy DM24 to reflect the need for decisions to be informed by up to date ecological information.

Policy DM11 – Existing Employment Sites in the Countryside

We are encouraged to see the changes to the policy wording that acknowledge that landscape and biodiversity are not mutually exclusive.

Policy DM14 – Multi-functional Green Infrastructure.

Having re-examined our regulation 18 comments, SWT note that we supported the inclusion of the Green Infrastructure policy and highlighted the need for LDC to commit to undertake a Green Infrastructure (GI) Strategy. Producing a GI strategy would help LDC to meet the requirements of Core Policy 8 in the Lewes Local Plan Part 1 and ensure DM14 is deliverable.

However, we are concerned that our comments have not been reflected in this way on page 34 of the Summary of Consultation on the Consultation Draft Document (30 November 2017 – 25 January 2018). The document states:

The Sussex Wildlife Trust objects because the policy is called 'multi-functional green infrastructure' and should therefore relate to all types of GI.

SWT's actual comment stated:

Given the inclusion in the plan of a specific policy on Children's Play Space (DM16), we are unclear why it is singled out in DM14. This policy is called 'multi-functional green infrastructure' and therefore it should relate to all types of GI. We recommend the following changes to widen out the policy and make it more effective at achieving positive contributions to the GI network:

In relation to our comments, we remind the council that section 7.80 of Lewes Local Plan Part 1 covers a number of types of green spaces that are included in the LDC's GI network.

In our regulation 18 response we also sort specific changes to the policy wording so that it could reflect Core Policy 8. LDC has suggested that our proposed changing to wording is too vague in relation to the term 'need.'

Below highlights the proposed changes we suggested to the policy text in our regulation 18 consultation response:

Development will be permitted where opportunities for the provision of additional green infrastructure have been **identified**, fully considered and ~~would~~ **will** be provided where justified by ~~need the character of the area or the need for outdoor playing space.~~ **The additional provision should seek to enhance the district's existing green infrastructure network and should be multifunctional and creative in its approach.** Green infrastructure provided as part of new development should incorporate features to encourage biodiversity and retain or, where possible, enhance existing features of nature conservation value within **and adjacent to** the site. Existing ecological networks should be identified and ecological corridors should, where practical and appropriate, form an essential component of green infrastructure provision to ensure habitat connectivity.'

We suggested the term 'need' so that it could reflect the 'need' as identified in the evidence base for the allocation/application. The evidence base might be either a district Green Infrastructure Strategy (or equivalent) and/or an Ecological Impact Assessment of the site. The intention is not for the term to be vague but to deliver the 'need' as identified by the evidence base that informs the allocation/application, as aspired to in Core Policy 8 of the Lewes Local Plan Part 1.

In particular, Core Policy 8 states:

'The local planning authority will promote a connected network of multifunctional green infrastructure by protecting and enhancing the quantity, quality and accessibility of open spaces throughout the district. This will be achieved by:

- 1. Identifying in the Site Allocations and Development Management Policies DPD or SDNPA Local Plan areas where there is potential for the enhancement or restoration of existing green infrastructure and opportunities for the provision of new green space...'*

We remind LDC of their obligations to ensure the local plan takes a strategic approach to maintaining and enhancing networks of habitats and green infrastructure, as per section 114 of the 2012NPPF and section 171 of the 2018NPPF. We therefore ask what evidence base has been used to ensure a consistent approach to the identification of GI provision and enhancements within the site allocations? In particular, we note that only policy E2 specifically refers to the provision and enhancement of Green Infrastructure being delivered through the development. This appears inconsistent with the Core Policy 8.

As demonstrated above, we do not believe that policy DM14 is currently consistent with national policy or the Lewes Local Plan Part 1. We again ask for the following amendments to ensure the policy is effective in delivering green infrastructure network enhancements as required in both the 2012 and 2018 NPPF:

‘Development will be permitted where opportunities for the provision of additional green infrastructure have been **identified**, fully considered and ~~would~~ **will** be provided where justified by ~~need the character of the area or the need for outdoor playing space.~~ **The additional provision should seek to enhance the district’s existing green infrastructure network and should be multifunctional and creative in its approach.** Green infrastructure provided as part of new development should incorporate features to encourage biodiversity and retain or, where possible, enhance existing features of nature conservation value within **and adjacent to** the site. Existing ecological networks should be identified and ecological corridors should, where practical and appropriate, form an essential component of green infrastructure provision to ensure habitat connectivity.’

Policy DM17 – Former Lewes /Sheffield Park Railway Line

We are pleased to see that LDC have taken on board SWT’s constructive comments in relation to this policy and have made amendments that help to reflect the importance of this route for biodiversity.

Policy DM18 – Recreation and Rivers

SWT are encouraged to see that our comments relating to the natural functioning of the river and associated wetland are now reflected in the policy wording.

Policy DM22 – Water Resources and Water Quality

SWT supports the adoption of our comment reflecting the importance of Chalk Streams in the supporting text of this policy.

Policy DM24 – Protection of Biodiversity and Geodiversity

SWT acknowledge that some amendments have been made to this policy in light of comments and suggestions made by ourselves and Natural England. However, we remain concerned that this policy still fails to consider LDC’s responsibility to the district’s wider biodiversity assets. This is because neither Core Policy 10 in the Lewes Local Plan Part 1 or this pre-submission policy specifically stipulate the need for decisions to be based on up to date environmental information or for development to result in net gains to biodiversity.

We note LDC’s response to our regulation 18 comments on this matter on page 42 of the Summary of Consultation on the Consultation Draft Document (30 November 2017 – 25 January 2018):

A policy requirement for all development proposals to submit information on biodiversity is considered to be unduly onerous and unlikely to be justified for the majority of planning applications. It would therefore fail to have regard to the NPPF and no amendment is proposed to Draft Policy DM24 in this respect.

In response to this, SWT would highlight that we recognised the need for a proportionate response to applications, but section 165 of the 2012NPPF states *Planning policies and decisions should be based on up-to-date information about the natural environment and other characteristics of the area.....*

Both the 2012 and 2018 NPPFs are clear that achieving sustainable development means pursuing opportunities to secure economic, social and environmental net gains in an interdependent way. SWT does not agree that requiring that ecological information is submitted with planning application is onerous. Indeed many other adopted local plans include this requirement, for example in policy NE3 of the East Herts District Plan¹.

¹ <https://www.eastherts.gov.uk/districtplan>

By incorporating wording into policy DM24 that stipulates the need for up-to-date environmental information and net gains this will enable LDC at development management stage to swiftly assess applications to ensure they are fulfilling their requirements to deliver net gains to biodiversity as per paragraph 109 of the 2012NPPF and paragraph 170 of the 2018NPPF.

We also refer back to comments made throughout the Summary of Consultation on the Consultation Draft Document (30 November 2017 – 25 January 2018) where LDC have resisted modifications to earlier policies that sought to seek policy wording to include the submission of ecological assessments. LDC reasoning was that they wish to create concise plan that should avoid undue repetition or duplication by using generic policies to set out principles that may be common to different types of development. We understand this view point and therefore seek the modifications to draft policy DM24 to enable the plan to ensure it is consistent with national policy and deliver the responsibilities consistently and effectively. As it stands we do not believe this policy is sound.

Therefore, SWT seeks the following addition to ensure that the DM24 is consistent with national policy:

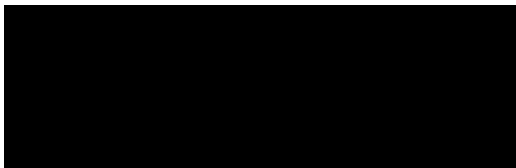
‘All development proposals must provide adequate up-to-date information about the biodiversity which may be affected and any avoidance, mitigation and compensation measures required to ensure no net loss to biodiversity and ensure measurable net gains are delivered.

Development which would be likely to adversely affect a designated Ramsar site, designated or candidate Special Area of Conservation (SAC) or a classified or potential Special Protection Area (SPA) will only be permitted where adverse likely significant effects can be avoided and/or mitigated against...’

We hope our recommendations are adopted to ensure that the policies within the Lewes Local Plan Part 2 are as robust and effective as possible. SWT would be happy to discuss any of the above points with LDC.

We do wish to attend the Examination in Public to ensure our views are given due consideration in light of any contrary comments that are received.

Yours sincerely,



Jess Price
Conservation Officer

Representation ID: REP/023/GT01
--

Representor Details:

Representor ID:	REP/023
Name:	Sandra Rogers
Organisation:	Brighton and Hove City Council
Consultation Body:	Specific
Stakeholder Type:	Other Local Authority

Agent Details:

Name:
Organisation:

Contact Details:

Email Address:	Sandra.Rogers@brighton-hove.gov.uk
Address:	

Representation:

Policy/Section:	GT01 - Land south of The Plough
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	Yes
Representation:	
The council welcome that the Pre-submission Local Plan now proposes a Gypsy and Traveller Site in order to fully meet the identified need for permanent gypsy and traveller pitch provision to serve the area of Lewes District outside the South Downs National	
What changes do you suggest to make the document legally compliant or sound?	
Do you consider it necessary to participate at the Examination in Public? No	
Why do you feel it is necessary to participate at the Examination in Public?	

--

Representation ID: REP/023/E1Representor Details:

Representor ID:	REP/023
Name:	Sandra Rogers
Organisation:	Brighton and Hove City Council
Consultation Body:	Specific
Stakeholder Type:	Other Local Authority

Agent Details:

Name:
Organisation:

Contact Details:

Email Address:	Sandra.Rogers@brighton-hove.gov.uk
Address:	

Representation:

Policy/Section:	E1 - Land at East Quay, Newhaven Port
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	Yes
Representation: The council welcomes the allocation of Land at East Quay, Newhaven Port for employment uses associated with the Port. Newhaven Port, and the enterprise zone) is identified in the Greater Brighton City Deal as one of several strategic growth centres for the sub region	
What changes do you suggest to make the document legally compliant or sound?	
Do you consider it necessary to participate at the Examination in Public? No	

Why do you feel it is necessary to participate at the Examination in Public?

Representation ID: REP/023/E2

Representor Details:

Representor ID:	REP/023
Name:	Sandra Rogers
Organisation:	Brighton and Hove City Council
Consultation Body:	Specific
Stakeholder Type:	Other Local Authority

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	Sandra.Rogers@brighton-hove.gov.uk
Address:	

Representation:

Policy/Section:	E2 - Land adjacent to American Express Community Stadium, Village Way, Falmer
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	Yes
Representation: <p>The council welcomes the allocation of the Land Adjacent to American Express Community Stadium Village Way, Falmer at Policy E1. This reflects the opportunity the site (located within the boundaries of both Lewes District Council and Brighton Hove City Council) has to enhance the stadium facilities by providing offices or health/education uses associated with stadium.</p> <p>'The policy wording reflects the policy wording in the Draft Brighton & Hove City Plan Part 2 and is therefore supported. It suggested that the wording in footnote 16 is amended to reflect the policy reference in the draft City Plan Part 1 is Policy SSA7: The</p>	

Brighton & Hove City Plan Part 2 is also proposing to allocate the part of the site within its administrative area for the uses set in Policy SSA7.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public? No

Why do you feel it is necessary to participate at the Examination in Public?

Representation ID: REP/023/DM8Representor Details:

Representor ID:	REP/023
Name:	Sandra Rogers
Organisation:	Brighton and Hove City Council
Consultation Body:	Specific
Stakeholder Type:	Other Local Authority

Agent Details:

Name:
Organisation:

Contact Details:

Email Address:	Sandra.Rogers@brighton-hove.gov.uk
Address:	

Representation:

Policy/Section:	DM8: Residential Sub-Divisions and Shared Housing
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	Yes
Representation: The council welcomes the clarification provided in response to previous comments that the principle of providing PBSA within Lewes District is supported through Policy DM8. It would be beneficial to make this clearer in the supporting text to this policy as the currently working focuses very much on market pressures, sub-divisions and conversions of C3 housing. The characteristics and market sui generis PBSA are somewhat different and it is not immediately obvious that this policy would be used to assess applications for this type of developments.	
What changes do you suggest to make the document legally compliant or sound?	

Do you consider it necessary to participate at the Examination in Public?	No
Why do you feel it is necessary to participate at the Examination in Public?	

Representation ID: REP/023/INTRepresentor Details:

Representor ID:	REP/023
Name:	Sandra Rogers
Organisation:	Brighton and Hove City Council
Consultation Body:	Specific
Stakeholder Type:	Other Local Authority

Agent Details:

Name:
Organisation:

Contact Details:

Email Address:	Sandra.Rogers@brighton-hove.gov.uk
Address:	

Representation:

Policy/Section:	What is the Lewes District Plan
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	Yes
Representation: The City Council welcomes the opportunity to comment on the Lewes District Local Plan Part 2 Pre-submission version. It I understood that strategic issues were addressed by the Local Plan Part One and that Part Two provides the site allocations necessary to deliver the planned level of development set out in Part One, together with development management policies and this is supported. The strong links between Brighton & Hove and Lewes are reflected in on going joint working between the two authorities, particularly through the West Sussex and Greater Brighton Strategic Planning Board and the Greater Brighton Economic Partnership. The City Council looks forward to continuing to work jointly with Lewes District and other	

members of Coastal West Sussex and Greater Brighton to address the strategic issues affecting the wider area, in particular narrowing the gap between the planned housing provision and the assessed needs of the wider area.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public? No

Why do you feel it is necessary to participate at the Examination in Public?

Representation ID: REP/024/BA01Representor Details:

Representor ID:	REP/024
Name:	Julia Shelley
Organisation:	Barcombe Parish Council
Consultation Body:	Specific
Stakeholder Type:	Parish Council

Agent Details:

Name:
Organisation:

Contact Details:

Email Address:	clerk@barcombepc.net
Address:	Upper Morgans Shortbridge Road Piltdown TN22 3XA

Representation:

Policy/Section:	BA01 - Land at Hillside Nurseries, High Street
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	
Representation: (SEE ATTACHED PDF) This document outlines our significant concerns regarding the Lewes District Local Plan Part 2: Site Allocations and Development Management Policies DPD - Pre-submission version, in particular to Policy BA01 - Land at Hillside Nurseries, High Street. We believe there is an unresolved ongoing shortfall of equipped play space in Barcombe Cross and that, whilst this policy specifically addresses this shortfall, it fails by a long way to meet	

the spatial requirements for play in the village that it purports to provide.

We have been campaigning for improvement and enlargement of play space provision in Barcombe Cross for three years and have undertaken much research, consulting with the LDC Specialist Advisor for Open Spaces, Christopher Bibb and a Chartered Surveyor. We have also held a public consultation event and distributed surveys to the community to ascertain public opinion and aspirations for play space in Barcombe Cross - the results of the survey confirmed that overall, playground users feel that the space is currently inadequate and far too small. At a site visit in 2016 Christopher Bibb advised us that the only suitable space for a playground of the required size, considering minimum safety and access requirements for play space, was on the site of policy BA01 on Land at Hillside Nurseries, High Street.

Due to the shortfall in the village's play space, the 2003 Lewes District Local Plan allocated approximately 0.4ha of the site at BA01 as an extension of the Recreation Ground (policy BA1), as referred to in paragraph 2.62.

Lewes District Council (LDC) Local Plan Part 2: Site Allocations and Development Management Policies DPD - Pre-submission version - policy BA01 stipulates that the 'development incorporates approximately 1600sqm of public amenity space along the northern boundary to allow for the provision of equipped and informal play space'. This provides only half of what is currently required to address the existing shortfall and therefore is inadequate.

It is noted that if the field is divided in line with the northern boundary, it leaves a strip of land that is approximately 20m wide by 80m in length. Planning of equipped play would be very limited by the width of the allocated land due to regulations requiring safety zones around each piece of equipment and may therefore require the provision of bespoke and potentially prohibitively expensive equipment. Equipment in the current village playground has not been replaced when broken due to inadequate safety zones around equipment (as identified by equipment suppliers), and the inadequate space around equipment is highlighted each year in the annual safety inspection report undertaken by LDC.

The Fields in Trust (FiT) benchmark guidelines that the Council has adopted (para. 4.51) require a 20m buffer zone between the play area and housing for a 'Local Equipped Area for Play' (LEAP). This would take 20m off the eastern boundary near the houses on the Grange, reducing the allocation of land for equipped play space to 20mx60m, or 1200sqm. If housing is situated close to the sites' northern boundary then this buffer zone could also reduce space for play further along the length of the allocated space. A line of protected trees along the boundary of the recreation ground may also inhibit installation of play equipment on such a narrow site.

There are three allocated sites for housing development in Barcombe. A financial contribution (i.e. through S106 or CIL) towards improvement of an existing equipped/designated play space may be sought in lieu of on-site provision for larger scale play spaces, or where existing play space lies within the FiT walking distance

guideline of a proposed development. We appeal to the Council to ensure that there is a cohesive, centralised and accessible equipped play space allocated in one area (BA01), rather than allowing a piecemeal approach from each of the 3 developers. BA01 is within walking distance of all 3 housing developments, as specified by FiT. Furthermore, BA01 is ideally positioned in a central village location, near the school (with no roads to cross), within walking distance for all housing in the village, and within eye-sight of recreation ground facilities, the school and car park.

We also ask that LDC clarify that the requirement for the allocation of BA01 is for 'equipped' play space, which is in shortfall, but remove the reference to provision of 'informal' play space, which is in surplus (as stated in paragraph 2.62).

Further, we ask that the language used in policy BA01 ensures that any developer is required to fulfil its obligation to provide the space allocated for play – the use of words such as 'approximately' and 'preferable' (2.63) should be amended to more definitive terms to ensure clarity and accountability.

It is important that the village secure the full BA01 site to deliver against its shortfall of equipped play space. If only half the land is developed, then this opportunity will be lost forever. The proposed housing site would erode onto land previously earmarked by the council for an extension of recreational space and therefore it is essential that the BA1 policy allocation is maintained in the final plan.

As stated in policy DM15 'In areas where there is deficiency of outdoor playing space in either quantitative or qualitative terms, the impact of the increase in population from new residential development will be mitigated either by on-site provision or by the use of the Community Infrastructure Levy to secure the provision of new, or the enhancement of existing, outdoor playing space and facilities'. Barcombe lacks adequate playing space both in quantitative and qualitative terms. We ask that LDC ensure that the issues above are taken in to account and addressed in the final Lewes District Local Plan Part 2: Site Allocations and Development Management Policies DPD - Pre-submission version document.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public?

Why do you feel it is necessary to participate at the Examination in Public?

Consultation response to Lewes District Council Local Plan Part 2 pre-submission document by Barcombe Playground Working Group on behalf of Barcombe Parish Council

28/10/18

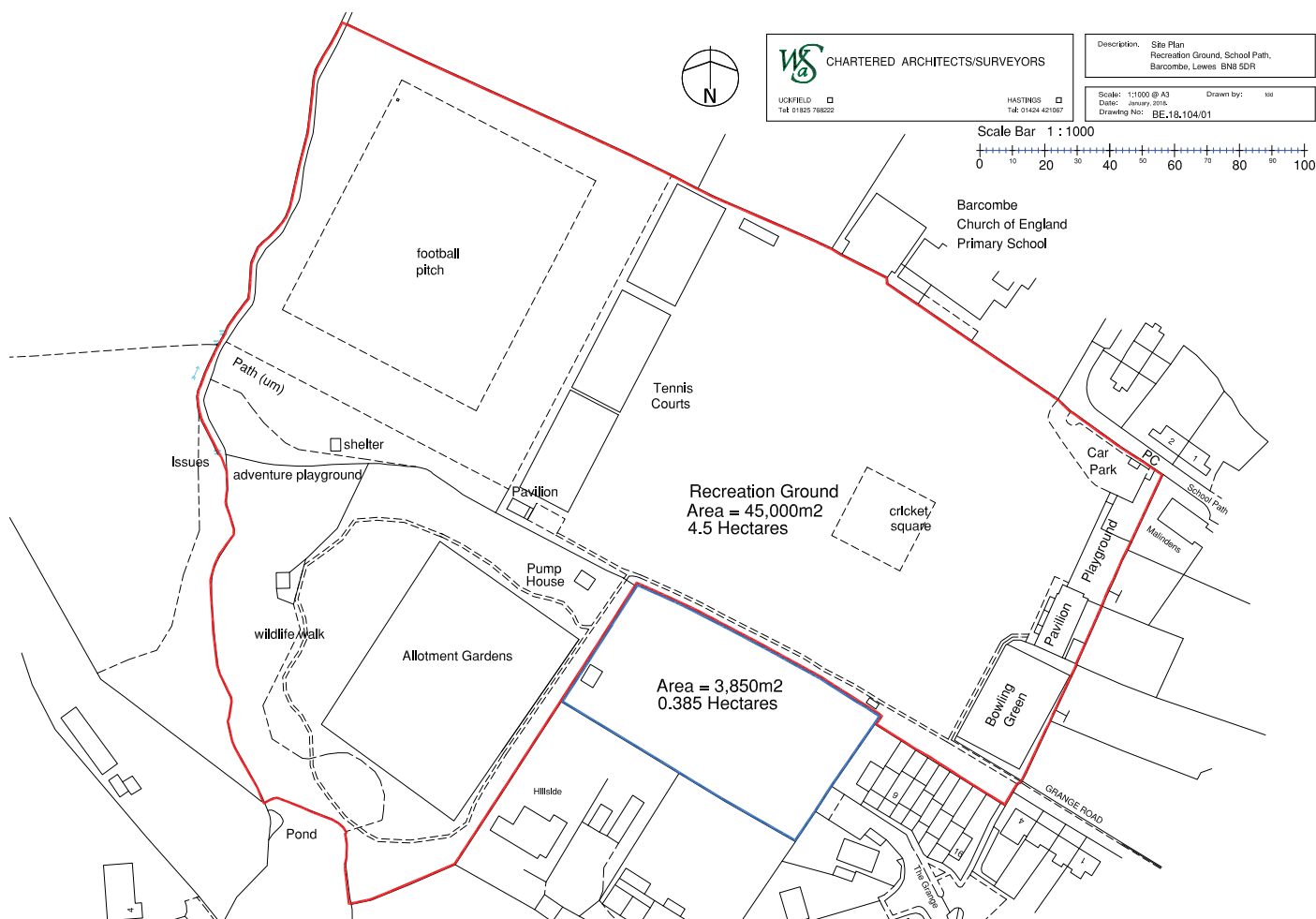
This document outlines our **significant concerns** regarding the Lewes District Local Plan Part 2: Site Allocations and Development Management Policies DPD - Pre-submission version, in particular to Policy BA01 - Land at Hillside Nurseries, High Street. We believe there is an unresolved ongoing shortfall of equipped play space in Barcombe Cross and that, whilst this policy specifically addresses this shortfall, it fails by a long way to meet the spatial requirements for play in the village that it purports to provide.

We have been campaigning for improvement and enlargement of play space provision in Barcombe Cross for three years and have undertaken much research, consulting with the LDC Specialist Advisor for Open Spaces, Christopher Bibb and a Chartered Surveyor. We have also held a public consultation event and distributed surveys to the community to ascertain public opinion and aspirations for play space in Barcombe Cross - the results of the survey confirmed that overall, playground users feel that the space is currently inadequate and far too small. At a site visit in 2016 Christopher Bibb advised us that the only suitable space for a playground of the required size, considering minimum safety and access requirements for play space, was on the site of policy BA01 on Land at Hillside Nurseries, High Street. Our findings regarding the spatial requirements for play in Barcombe Cross and the existing allocation of space in the village are set out below:



BARCOMBE PUBLIC SPACE IN FIGURES - The Barcombe Playground Working Group used Ordnance Survey data files and CAD software to calculate areas of public space by category. This information was presented to the Parish Council in April 2016.

WAS Architects were also employed by the Parish Council in 2018 as Chartered Surveyors to confirm areas identified by the playground working group.



It is assumed that WAS Architects used the same 'desk-based' survey techniques (not on-site measured survey). Both sets of figures correspond, with minor differences, perhaps due to rounding of numbers and according to individual assumptions by draughtspeople of boundaries between designated spaces. Figures from LDC also largely correspond, with differing designations of spaces. In figures below it is clear that LDC assumed that the 'Bottom Field' was an 'informal children's play space', which could be disputed by the Parish Council, as the space is currently an empty field with temporary football goalposts.

BARCOMBE RECREATIONAL SPACE	PLAYGROUND WORKING GROUP FIGURES, APRIL 2016	WAS ARCHITECTS FIGURES, FEBRUARY 2018	LEWES DISTRICT COUNCIL FIGURES, APRIL 2016
TOTAL PUBLIC RECREATION SPACE	4.48ha (44,870m ²)	4.5ha (45,000m ²)	3.2ha (32,000m ²) Rec, not including WAB?
PLAYGROUND (EQUIPPED PLAY)	0.044ha (440m ²)	0.043ha (430m ²)	0.06ha (600m ²)
WAB TOTAL	1.2ha (12,320m ²)	1.14ha (11,400m ²)	Not given
WAB (MINUS ALLOTMENTS)	0.85ha (8500m ²)	0.79ha (7900m ²)	Not given
WAB (INFORMAL CHILDREN'S PLAY)	0.62ha (6200m ²) Not inc. Orchard or paths	Not given	Not given
BIKE JUMPS	0.048ha (480m ²) Before improvements	0.167ha (1670m ²)	Not given
OUTDOOR SPORTS TOTAL	1.87ha (18,730m ²)	Not given	1.84ha (18,400m ²)
CRICKET FIELD/FOOTBALL PITCH	1.59ha (15,900m ²)	Not given	Not given
CRICKET PITCH (SQUARE)	0.09ha (900m ²)	Not given	Not given
TENNIS COURTS	0.2ha (2000m ²)	Not given	Not given
BOWLING GREEN	0.083ha (830m ²)	Not given	Not given
BOTTOM FIELD	1.2ha (12,000m ²)	Not given	1.3ha (13,000m ²) 'Informal Children's Play'?
BOTTOM FIELD USEABLE PITCH SPACE	0.73ha (7300m ²) approx.	Not given	Not given
HILLSIDE NUSERIES (FORMER BAI POLICY)	0.389ha (3890m ²)	Not given	Not given

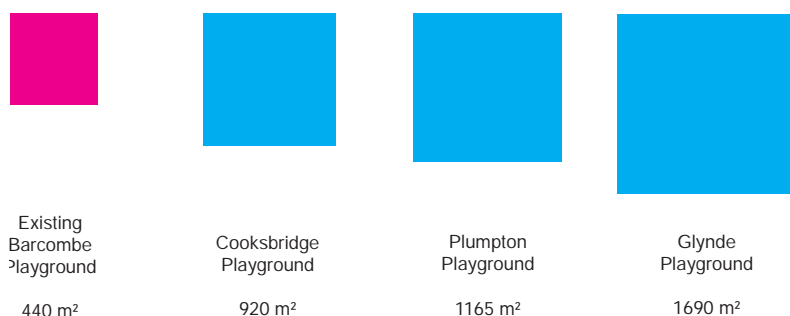
* 1 Hectare = 10,000m²

There is currently 440sqm (0.044ha) of equipped play space in Barcombe Cross. The required equipped play space for the size of the current population, based on Fields In Trust benchmark guidelines of 0.25 hectares per 1000 population, is 3,800sqm (0.38ha). The existing shortfall is 3,200sqm (0.32ha) representing a shortfall of 88%. This will rise to 3,500sqm (0.35ha) with the projected population of 1621 that expected new development will bring (LDC statistics).

The space needed for play in Barcombe Cross



Play provision in Barcombe Cross compared to other local villages by size



Due to the shortfall in the village's play space, the 2003 Lewes District Local Plan allocated approximately 0.4ha of the site at BA01 as an extension of the Recreation Ground (policy BA1), as referred to in paragraph 2.62.

Lewes District Council (LDC) Local Plan Part 2: Site Allocations and Development Management Policies DPD - Pre-submission version - policy BA01 stipulates that the 'development incorporates approximately 1600sqm of public amenity space along the northern boundary to allow for the provision of equipped and informal play space'. This provides only *half* of what is currently required to address the existing shortfall and therefore is inadequate.

It is noted that if the field is divided in line with the northern boundary, it leaves a strip of land that is approximately 20m wide by 80m in length. Planning of equipped play would be very limited by the width of the allocated land due to regulations requiring safety zones around each piece of equipment and may therefore require the provision of bespoke and potentially prohibitively expensive equipment. Equipment in the current village playground has not been replaced when broken due to inadequate safety zones around equipment (as identified by equipment suppliers), and the inadequate space around equipment is highlighted each year in the annual safety inspection report undertaken by LDC.

The Fields in Trust (FiT) benchmark guidelines that the Council has adopted (para. 4.51) require a 20m buffer zone between the play area and housing for a 'Local Equipped Area for Play' (LEAP). This would take 20m off the eastern boundary near the houses on the Grange, reducing the allocation of land for equipped play space to 20mx60m, or 1200sqm. If housing is situated close to the sites' northern boundary then this buffer zone could also reduce space for play further along the length of the allocated space. A line of protected trees along the boundary of the recreation ground may also inhibit installation of play equipment on such a narrow site.

There are three allocated sites for housing development in Barcombe. A financial contribution (i.e. through S106 or CIL) towards improvement of an existing equipped/designated play space may be sought in lieu of on-site provision for larger scale play spaces, or where existing play space lies within the FiT walking distance guideline of a proposed development. **We appeal to the Council to ensure that there is a cohesive, centralised and accessible equipped play space allocated in one area (BA01), rather than allowing a piecemeal approach from each of the 3 developers.** BA01 is within walking distance of all 3 housing developments, as specified by FiT. Furthermore, BA01 is ideally positioned in a central village location, near the school (with no roads to cross), within walking distance for all housing in the village, and within eye-sight of recreation ground facilities, the school and car park.

We also ask that LDC clarify that the requirement for the allocation of BA01 is for 'equipped' play space, which is in shortfall, but remove the reference to provision of 'informal' play space, which is in surplus (as stated in paragraph 2.62).

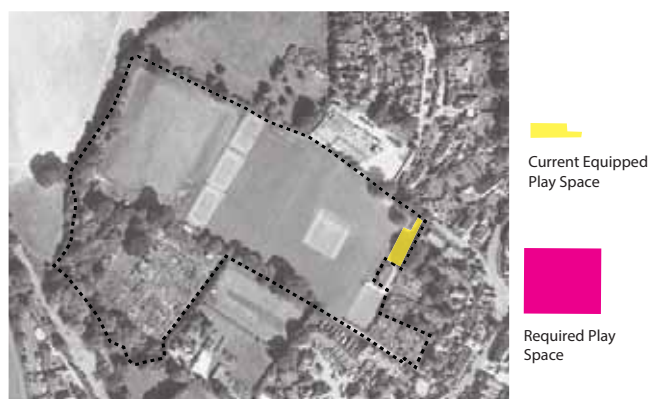
Further, we ask that the language used in policy BA01 ensures that any developer is required to fulfil its obligation to provide the space allocated for play – the use of words such as 'approximately' and 'preferable' (2.63) should be amended to more definitive terms to ensure clarity and accountability.

Finally, we would like it noted that we have explored all options to find an alternative site for equipped play space in the village that meets the existing shortfall of 3,200sqm, including having spoken to LDC's Specialist Adviser for Open Spaces.

OPTIONS FOR PROVISION OF REQUIRED PLAY SPACE IN BARCOMBE

Public space in Barcombe Cross

- including recreation ground, sports pitches and 'Wild About Barcombe'



Option 1 - Extend current playspace



Option 2 - Build playspace in lower field



Option 3 - Build playspace in BA01 field



It is important that the village secure the full BA01 site to deliver against its shortfall of equipped play space. If only half the land is developed, then this opportunity will be lost forever. The proposed housing site would erode onto land previously earmarked by the council for an extension of recreational space and therefore it is essential that the BA1 policy allocation is maintained in the final plan.

As stated in policy DM15 'In areas where there is deficiency of outdoor playing space in either quantitative or qualitative terms, the impact of the increase in population from new residential development will be mitigated either by on-site provision or by the use of the Community Infrastructure Levy to secure the provision of new, or the enhancement of existing, outdoor playing space and facilities'. Barcombe lacks adequate playing space both in quantitative and qualitative terms. **We ask that LDC ensure that the issues above are taken in to account and addressed in the final Lewes District Local Plan Part 2: Site Allocations and Development Management Policies DPD - Pre-submission version document.**

Representation ID: REP/025/CH01Representor Details:

Representor ID:	REP/025
Name:	Stephen Treharne
Organisation:	Chailey Parish Council
Consultation Body:	Specific
Stakeholder Type:	Parish Council

Agent Details:

Name:
Organisation:

Contact Details:

Email Address:	chaileypc@btconnect.com
Address:	

Representation:

Policy/Section:	CH01 - Glendene, Station Road
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	No
Representation: Chailey Parish Council has two submissions which are (1) the Draft Plan incorrectly treats Chailey as if it were two parishes called North Chailey and South Chailey when it is in fact and in law one parish, and (2) the Draft Plan makes no mention of the type of dwelling that is needed in Chailey. 1. Chailey is one parish and not two	

Whilst Chailey does have two principal settlements (which are referred to as North and South Chailey), Chailey is one Parish. The Draft Plan should, as it appears to do for most if not all other Parishes, reflect local government boundaries and Lewes DC's own recent Area Designation for the Neighbourhood Plan and treat Chailey as one parish and not two. Chailey Parish Council feels most strongly that the Draft Plan should characterise Chailey accurately as a unit embracing both North and South Chailey as well as the other settlements in the civil parish.

The Draft Plan, at pages 36 to 46 and paragraphs 2.81 to 2.109, divides Chailey into two distinct and separate areas, North and South Chailey. The wording under the headings North Chailey (starting on page 36) and South Chailey (starting on page 43) is in some respects confusing in that some refers to North or South Chailey and some to the whole of Chailey Parish. In addition, the artificial division of the parish into two parts results in repetitive wording and unnecessary paragraphs.

To correct the above, and to ensure that the Draft Plan reflects the true position and is consistent, the following changes should be made:

Page 36 Change the heading 'North Chailey' where it appears above paragraph 2.81 to 'Chailey'

Paragraph 2.81 Remove the full stop at the end and add 'and 10 additional dwellings within the settlement of South Chailey.'

Paragraph 2.81 Renumber as paragraph 2.83 and move

Paragraph 2.84 In lines 2 and 3 remove 'South Street.....to the south' and replace with 'North Chailey, South Chailey, Chailey Green and South Street'.

Paragraph 2.84 In line 3, remove the word 'North'

Paragraph 2.84 In line 4, after Haywards Heath, insert 'and Lewes'

Paragraph 2.84 In line 6, delete 'The village is classified as a Local Village' and replace with 'North and South Chailey are classified as Local Villages'

Paragraph 2.84 Renumber as paragraph 2.81 and move

Paragraph 2.83 In line 5, replace 'village' with 'settlement'

Paragraph 2.83 Renumber as paragraph 2.84 and move

Page 36/37 Above existing paragraph 2.83 (now renumbered to 2.84), insert new subheading in small bold letters 'North Chailey' Chailey Parish Council

Paragraph 2.86 In lines 4 and 5, replace 'is under construction' with 'construction is completed'

Paragraph 2.86 In line 6, replace 'will contribute' with 'contributes'

2. The nature of the dwellings needed in Chailey

The work done by the Council towards preparing a neighbourhood plan for Chailey ('the Draft NHP') has included determining the sort of housing that is needed in Chailey. The feedback/results from surveys carried out by the Council and other representations from

residents, and from a housing needs survey carried out on behalf of the Council by Lewes DC, are clear and consistent. Chailey is well provided with large multi bedroom dwellings and the need is for smaller more affordable and flexible accommodation.

The Draft NHP incorporates a number of housing policies, including a policy on housing mix. It is proposed that housing developments within the development boundary of Chailey will be permitted where they include a range of house types, including a proportion of one and three bedroom starter homes and sheltered and smaller units for the elderly. Housing developments will also be expected to include an element of single level dwellings and, where practicable, sheltered accommodation to meet the needs of the elderly and people with disabilities, thus enabling them to remain independent and within the community for as long as is possible.

To reflect the intended policy, the following changes should be made to the Draft Plan:

Paragraph 2.82 In line 2, delete 'at the early stages of' and replace with 'at an advance stage of'

Paragraph 2.82 In line 5, change 'at North Chailey' to 'in Chailey'.

Paragraph 2.82 Delete the final sentence 'Once the.....applications' and replace with:

'Although not allocating sites, the Chailey Neighbourhood Plan will include policies on housing for development within Chailey, and will include a policy on housing mix designed to ensure that any development provides the types of housing that are needed. The Parish Council has identified that there is a clear preference for a proportion of one and three bedroom starter homes and sheltered and smaller units for the elderly. Housing developments will also be expected to include an element of single level dwellings and, where practicable, sheltered accommodation to meet the needs of the elderly and people with disabilities'.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public? No

Why do you feel it is necessary to participate at the Examination in Public?

Representation ID: REP/025/CH02
--

Representor Details:

Representor ID:	REP/025
Name:	Stephen Treharne
Organisation:	Chailey Parish Council
Consultation Body:	Specific
Stakeholder Type:	Parish Council

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	chaileypc@btconnect.com
Address:	

Representation:

Policy/Section:	CH02 - Layden Hall, East Grinstead Road
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	No
Representation:	
Paragraph 2.96 In line 1 replace 'village' with 'settlement'	
What changes do you suggest to make the document legally compliant or sound?	
Do you consider it necessary to participate at the Examination in Public?	No
Why do you feel it is necessary to participate at the Examination in Public?	

Representation ID: REP/025/HSARepresentor Details:

Representor ID:	REP/025
Name:	Stephen Treharne
Organisation:	Chailey Parish Council
Consultation Body:	Specific
Stakeholder Type:	Parish Council

Agent Details:

Name:
Organisation:

Contact Details:

Email Address:	chaileypc@btconnect.com
Address:	

Representation:

Policy/Section:	South Chailey
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	No
Representation: Page 43 Change heading 'South Chailey' where it appears above paragraph 2.99 to a sub-heading in small bold letters Paragraph 2.99 Delete the entire paragraph Paragraph 2.100 Delete the entire paragraph Paragraph 2.101 In line 4, replace 'village' with 'settlement' Paragraph 2.102 Delete the entire paragraph Paragraph 2.103 In line 7, replace 'village' with 'settlement'	

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public?	No
--	-----------

Why do you feel it is necessary to participate at the Examination in Public?



Chailey Parish Council

Submissions by Chailey Parish Council by way of response to the consultation request by Lewes District Council on the Pre-Submission version of the Lewes District Local Plan Part 2 (“the Draft Plan”)

Chailey Parish Council has two submissions which are (1) the Draft Plan incorrectly treats Chailey as if it were two parishes called North Chailey and South Chailey when it is in fact and in law one parish, and (2) the Draft Plan makes no mention of the type of dwelling that is needed in Chailey.

1. Chailey is one parish and not two

Whilst Chailey does have two principal settlements (which are referred to as North and South Chailey), Chailey is one Parish. The Draft Plan should, as it appears to do for most if not all other Parishes, reflect local government boundaries and Lewes DC’s own recent Area Designation for the Neighbourhood Plan and treat Chailey as one parish and not two. Chailey Parish Council feels most strongly that the Draft Plan should characterise Chailey accurately as a unit embracing both North and South Chailey as well as the other settlements in the civil parish.

The Draft Plan, at pages 36 to 46 and paragraphs 2.81 to 2.109, divides Chailey into two distinct and separate areas, North and South Chailey. The wording under the headings North Chailey (starting on page 36) and South Chailey (starting on page 43) is in some respects confusing in that some refers to North or South Chailey and some to the whole of Chailey Parish. In addition, the artificial division of the parish into two parts results in repetitive wording and unnecessary paragraphs.

To correct the above, and to ensure that the Draft Plan reflects the true position and is consistent, the following changes should be made:

Existing reference	Proposed changes
Page 36	Change the heading “North Chailey” where it appears above paragraph 2.81 to “Chailey”
Paragraph 2.81	Remove the full stop at the end and add “and 10 additional dwellings within the settlement of South Chailey.”
Paragraph 2.81	Renumber as paragraph 2.83 and move
Paragraph 2.84	In lines 2 and 3 remove “South Street.....to the south” and replace with “North Chailey, South Chailey, Chailey Green and South Street”.
Paragraph 2.84	In line 3, remove the word “North”
Paragraph 2.84	In line 4, after Haywards Heath, insert “and Lewes”
Paragraph 2.84	In line 6, delete “The village is classified as a Local Village” and replace with “North and South Chailey are classified as Local Villages”
Paragraph 2.84	Renumber as paragraph 2.81 and move
Paragraph 2.83	In line 5, replace “village” with “settlement”
Paragraph 2.83	Renumber as paragraph 2.84 and move
Page 36/37	Above existing paragraph 2.83 (now renumbered to 2.84), insert new sub-heading in small bold letters “North Chailey”

Paragraph 2.86	In lines 4 and 5, replace “is under construction” with “construction is completed”
Paragraph 2.86	In line 6, replace “will contribute” with “contributes”
Paragraph 2.96	In line 1 replace “village” with “settlement”
Page 43	Change heading “South Chailey” where it appears above paragraph 2.99 to a sub-heading in small bold letters
Paragraph 2.99	Delete the entire paragraph
Paragraph 2.100	Delete the entire paragraph
Paragraph 2.101	In line 4, replace “village” with “settlement”
Paragraph 2.102	Delete the entire paragraph
Paragraph 2.103	In line 7, replace “village” with “settlement”

2. The nature of the dwellings needed in Chailey

The work done by the Council towards preparing a neighbourhood plan for Chailey (“the Draft NHP”) has included determining the sort of housing that is needed in Chailey. The feedback/results from surveys carried out by the Council and other representations from residents, and from a housing needs survey carried out on behalf of the Council by Lewes DC, are clear and consistent. Chailey is well provided with large multi bedroom dwellings and the need is for smaller more affordable and flexible accommodation.

The Draft NHP incorporates a number of housing policies, including a policy on housing mix. It is proposed that housing developments within the development boundary of Chailey will be permitted where they include a range of house types, including a proportion of one and three bedroom starter homes and sheltered and smaller units for the elderly. Housing developments will also be expected to include an element of single level dwellings and, where practicable, sheltered accommodation to meet the needs of the elderly and people with disabilities, thus enabling them to remain independent and within the community for as long as is possible.

To reflect the intended policy, the following changes should be made to the Draft Plan:

Existing reference	Proposed changes
Paragraph 2.82	In line 2, delete “at the early stages of” and replace with “at an advance stage of”
Paragraph 2.82	In line 5, change “at North Chailey” to “in Chailey”.
Paragraph 2.82	Delete the final sentence “Once the.....applications” and replace with: “Although not allocating sites, the Chailey Neighbourhood Plan will include policies on housing for development within Chailey, and will include a policy on housing mix designed to ensure that any development provides the types of housing that are needed. The Parish Council has identified that there is a clear preference for a proportion of one and three bedroom starter homes and sheltered and smaller units for the elderly. Housing developments will also be expected to include an element of single level dwellings and, where practicable, sheltered accommodation to meet the needs of the elderly and people with disabilities”.

2nd November 2018

Representation ID: REP/026/INTRepresentor Details:

Representor ID:	REP/026
Name:	Charlotte Mayall
Organisation:	Southern Water
Consultation Body:	Specific
Stakeholder Type:	Infrastructure/service provider

Agent Details:

Name:
Organisation:

Contact Details:

Email Address:	planning.policy@southernwater.co.uk
Address:	Southern Water Lewes Road Falmer East Sussex BN1 9EP

Representation:

Policy/Section:	What is the Lewes District Plan
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	Yes
Representation: Thank you for your email below, inviting Southern Water to participate in the consultation on the Lewes District Local Plan Part 2. I confirm we have reviewed the document and are pleased to note that our comments submitted in the previous consultation have been accommodated into the Pre-Submission version of the Plan. We therefore have no further to comments to make and	

look forward to being kept informed of progress.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public? No

Why do you feel it is necessary to participate at the Examination in Public?

Representation ID: REP/027/E1Representor Details:

Representor ID:	REP/027
Name:	Ann Schulte
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	E1 - Land at East Quay, Newhaven Port
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	
Representation:	
Biodiversity is imperative	
This would does not reflect sustainable development from the original plans.	
What changes do you suggest to make the document legally compliant or sound?	
Do you consider it necessary to participate at the Examination in Public?	
Why do you feel it is necessary to participate at the Examination in Public?	

--

Kemp, Emma

From: [REDACTED] >
Sent: 04 November 2018 23:20
To: ldf
Subject: STOP & protect
Categories: Vanessa to deal with

Biodiversity is imperative .
This would does not reflect sustainable development from the original plans.

A concerned citizen.
Ann

Representation ID: REP/028/E1Representor Details:

Representor ID:	REP/028
Name:	Dawn Thompson
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	E1 - Land at East Quay, Newhaven Port
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	
Representation: Surely it is just "common sense" as to why we want to save and protect the small area of local wildlife and beach!? Newhaven/Tide mills as you all know has become a dumping ground with now more permissions been given to allow aggregate Brett company to join in distributing the already BAD pollution - Quote from LDC action plans from a few years ago "2.2 Nitrogen dioxide: sources and potential effects on health All combustion processes in air produce oxides of nitrogen (NOx). Nitrogen dioxide (NO2) and nitric oxide (NO) are both oxides	

of nitrogen and together are referred to as NO_x. Road transport is the main source, followed by the electricity supply industry and other industrial and commercial sectors. In the atmosphere NO is converted to NO₂ via the reaction of chemically active species such as ozone. NO₂ is associated with adverse effects on human health, at high levels NO₂ causes inflammation of the airways, long term exposure may affect lung function and respiratory symptoms. NO₂ also enhances the response to allergens in sensitive individuals. High levels of NO_x can have an adverse effect on vegetation. Deposition of pollutants derived from NO_x emissions contribute to acidification and/or eutrophication of sensitive habitats leading to loss of biodiversity, often at locations far removed from the original emissions. NO_x also contributes to the formation of secondary particles and ground level ozone, both of which are associated with ill-health effects. Ozone also damages vegetation."

The pollution has gotten worse over the years not better!

Apart from causing chaos on the already extremely busy roads with a choking amount of air pollution, we as residents who live in newhaven experience all this on a daily basis.

WE NEED GREEN SPACE AND WILDLIFE ,we need to enrich newhaven/tide mills and surrounding areas! the space at tide mills is important for wild life such as all birds,animals,insects,plant life and microscopic organisms and ourselves to maintain a healthy ecological BALANCE, wildlife need these areas to find food, shelter and raise their youngs and the BIGGEST threat of this is DESTRUCTION OF HABITAT, it is also very important to conserve these grounds to prevent flooding, we need to purify our environment NOT demolish it,

Future that matters,

BBC article:

We extract billions of tonnes of sand and gravel each year to make concrete for the building industry, and this is having an increasing environmental impact as beaches and river beds are stripped, warn campaigners.

Alongside this environmental damage, the building industry is also a major contributor to greenhouse gases - cement manufacturing alone accounts for 7% of global CO₂ emissions.

In many countries, sand is often extracted illegally from beaches or river beds. But once sand is taken from a river, the water flow can become faster and more violent - and the water table alongside a river will fall, affecting farming along the river bank.

Dredging beaches for sand increases coastal communities' vulnerability to storm damage - because sandy beaches act as sponges absorbing a storm's excess energy - something that is increasingly likely because of climate change.

"The problem is that the demand for sand is outpacing what we know about the environmental impact of extraction," says Dr Aurora Torres of the German Centre for Integrative Biodiversity Research (iDiv).

[<http://science.sciencemag.org/content/357/6355/970>] "It is a hidden ecological disaster."

The world's deserts may be awash with sand but this is of no use for construction, because erosion means desert sand grains are too rounded and smooth to be useful. The best kind are the grittier, more angular sand grains found in riverbeds or beaches.

So far our appetite for sand and gravel shows no sign of slowing down. The OECD estimates we use 27 billion tonnes a year [<http://www.oecd.org/environment/raw-materials-use-to-double-by-2060-with-severe-environmental-consequences.htm>] in construction and that this will double to 55 billion tonnes by 2060.

Add in the sand and gravel used in land reclamation, coastal developments and roads - and the current annual consumption rises to 40 billion tonnes.

This is twice the yearly amount of sediment carried by the world's rivers. In other words, we're using up sand faster than nature is creating it.

So Government, perhaps take a visit to this area, please consider and take in the above and make the correct decision as to what effects this would have in our part of the world and its wildlife if you were to give the go ahead!! ITS common sense to save tidesmills beach

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public?

Why do you feel it is necessary to participate at the Examination in Public?

From: [REDACTED]
Sent: 29 October 2018 16:03
To: ldf
Subject: ref policy E1 Saving tide mills

Categories: LPP2 comment to code - stakeholder details have been added

Surely it is just "common sense" as to why we want to save and protect the small area of local wildlife and beach!?

Newhaven/Tide mills as you all know has become a dumping ground with now more permissions been given to allow aggregate Brett company to join in distributing the already BAD pollution - Quote from LDC action plans from a few years ago "2.2 Nitrogen dioxide: sources and potential effects on health All combustion processes in air produce oxides of nitrogen (NOx). Nitrogen dioxide (NO₂) and nitric oxide (NO) are both oxides of nitrogen and together are referred to as NOx. Road transport is the main source, followed by the electricity supply industry and other industrial and commercial sectors. In the atmosphere NO is converted to NO₂ via the reaction of chemically active species such as ozone. NO₂ is associated with adverse effects on human health, at high levels NO₂ causes inflammation of the airways, long term exposure may affect lung function and respiratory symptoms. NO₂ also enhances the response to allergens in sensitive individuals. High levels of NOx can have an adverse effect on vegetation. Deposition of pollutants derived from NOx emissions contribute to acidification and/or eutrophication of sensitive habitats leading to loss of biodiversity, often at locations far removed from the original emissions. NOx also contributes to the formation of secondary particles and ground level ozone, both of which are associated with ill-health effects. Ozone also damages vegetation."

The pollution has gotten worse over the years not better!

Apart from causing chaos on the already extremely busy roads with a choking amount of air pollution, we as residents who live in newhaven experience all this on a daily basis.

WE NEED GREEN SPACE AND WILDLIFE ,we need to enrich newhaven/tide mills and surrounding areas! the space at tide mills is important for wild life such as all birds,animals,insects,plant life and microscopic organisms **and ourselves** to maintain a healthy ecological **BALANCE**, wildlife need these areas to find food, shelter and raise their youngs and the **BIGGEST** threat of this is **DESTRUCTION OF HABITAT**, it is also very important to conserve these grounds to prevent flooding, we need to purify our environment **NOT** demolish it,
Future that matters,

BBC article:

We extract billions of tonnes of sand and gravel each year to make concrete for the building industry, and this is having an increasing environmental impact as beaches and river beds are stripped, warn campaigners.

Alongside this environmental damage, the building industry is also a major contributor to greenhouse gases - cement manufacturing alone accounts for 7% of global CO₂ emissions.

In many countries, sand is often extracted illegally from beaches or river beds. But once sand is taken from a river, the water flow can become faster and more violent - and the water table alongside a river will fall, affecting farming along the river bank.

Dredging beaches for sand increases coastal communities' vulnerability to storm damage - because sandy beaches act as sponges absorbing a storm's excess energy - something that is increasingly likely because of climate change.

"The problem is that the demand for sand is outpacing what we know about the environmental impact of extraction," says **Dr Aurora Torres of the German Centre for Integrative Biodiversity Research (iDiv)**. "It is a hidden ecological disaster."

The world's deserts may be awash with sand but this is of no use for construction, because erosion means desert sand grains are too rounded and smooth to be useful. The best kind are the grittier, more angular sand grains found in riverbeds or beaches.

So far our appetite for sand and gravel shows no sign of slowing down. **The OECD estimates we use 27 billion tonnes a year** in construction and that this will double to 55 billion tonnes by 2060.

Add in the sand and gravel used in land reclamation, coastal developments and roads - and the current annual consumption rises to 40 billion tonnes.

This is twice the yearly amount of sediment carried by the world's rivers. In other words, we're using up sand faster than nature is creating it.

So Government, perhaps take a visit to this area, please consider and take in the above and make the correct decision as to what effects this would have in our part of the world and its wildlife if you were to give the go ahead!! ITS common sense to save tidesmills beach

Thank you for reading my email

Dawn.

Resident

[REDACTED]

[REDACTED].

IMAGES

Representation ID: REP/029/E1

Representor Details:

Representor ID:	REP/029
Name:	Richard Hume
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	E1 - Land at East Quay, Newhaven Port
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	
Representation: Please don't develop the land to the side of E1. The site is an important wildlife habitat, and in a town where many struggle, the amenity value of the site is enormous. The site will be irrevocably destroyed.	
What changes do you suggest to make the document legally compliant or sound?	
Do you consider it necessary to participate at the Examination in Public?	

Why do you feel it is necessary to participate at the Examination in Public?

Thea Davis

From: [REDACTED]
Sent: 05 November 2018 20:58
To: ldf
Subject: Leave Newhaven alone

Categories: Vanessa to deal with

Hi,

Please don't develop the land to the side of E1.

The site is an important wildlife habitat, and in a town where many struggle, the amenity value of the site is enormous.

The site will be irrevocably destroyed.

Please think again.

Thanks.

Rich.

Representation ID: REP/030/E1

Representor Details:

Representor ID:	REP/030
Name:	Geoff King
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	E1 - Land at East Quay, Newhaven Port
<p><i>Do you consider the document to be:</i></p> <p>Legally Compliant:</p> <p>Sound:</p>	
<p>Representation:</p> <p>I wish to draw attention to the Sustainability Appraisal underpinning the allocation of Policy E1.</p> <p>The very first issue is the title, Land at East Quay, Newhaven Port.</p> <p>This title is incorrect as this land at Area E1 is not Land at East Quay, Newhaven Port. The land at Area E1 is not even within the Newhaven Enterprise Zone. The land at Area E1 is actually land at Tide Mills.</p> <p>In Table 36 on page 79 three candidate employment sites are compared. Para 9.82. states that Option C is currently a saved allocation from the 2003 Lewes District Council Local Plan. Core Policy 4 suggests retaining the unimplemented site allocations from the</p>	

2003 Lewes District Council Local Plan. As the site remains deliverable and suitable for employment development, its retention within the Pre-Submission Local Plan Part 2 is considered appropriate.

This retention of the saved allocation from the 2003 Lewes District Council Local Plan is challenged in that Policy E1 and the associated area of land at Area E1 is much larger than the original area of land allocated in 2003.

The key purpose of the Sustainability Appraisal is to show that there is more Green ratings than Red ratings and that the development is a "Sustainable development" within the terms of the National Planning Policy Framework.

However this is highly questionable in the case of Policy E1 and the associated Area E1 as any development of a Site of Nature Conservation Importance, now known as a Local Wildlife Site cannot sensibly be rated Amber and should be rated Red. The beach area of Area E1 is internationally recognised for its Vegetated Shingle and is part of the Brighton Biosphere recognised as part of the UNESCO World Biosphere.

Further to this, if the community is deprived of access to a valued beach or public footpath that should get a negative rating under objective 4 (Community).

The extra road traffic any development would create could be argued to endanger air quality in an area of environmental sensitivity and so should have an Amber rating if not a Red rating under objective 13. Air Quality.

Tide Mills is a tourist destination so removal of part of the present beach site will clearly have a potentially negative impact on tourism, see objective 18.

The above observations should create far more Red or Amber ratings and very little Green ratings and clearly make the development of a site that is a Site of Nature Conservation Importance, now known as a Local Wildlife Site viewed as "not sustainable development".

Only sustainable developments should be included in a Local Plan so the plan as it stands including unsustainable development at Area E1 would I respectfully suggest be "Unsound".

Given the current understanding that Newhaven Port and Properties have no interest in any development further east than the Port Access Road and Bridge onto Tide Mills there can be no justification for the large area of land allocated by Policy E1. There has been no development on the already completed section of Port Access Road and regarding that section of road, even ASDA pulled out of the proposals, so there can be no justification for allocating even more land.

The Port Access Road and Bridge onto Tide Mills will itself take up the north western and western sections of Area E1 which would leave an area of potential development land between the current Newhaven Harbour boundary and the Port Access Road and Bridge which would be far more in line with the 2003 allocation.

Given the above observations I would respectfully suggest that Policy E1 and the associated area of land at E1 is not sustainable and is unsound and that this large area

of land east of Port Access Road and Bridge should be removed from the Lewes District Council Local Plan Part 2 thus reducing the allocation of land on the Tide Mills Site of Nature Conservation Importance, now known as a Local Wildlife Site to the area of land between the existing Newhaven Harbour boundary and the Port Access Road and Bridge with no development east of the Port Access Road and Bridge or south to Seaford Bay beach.

As an aside, the rejected brownfield site at Balcombe Pit appears to be a very sensible site for employment development, and the Sustainability Appraisal Table 36 appears to show that it rates much higher than the land at Newhaven - Area E1. At present Balcombe Pit is an abandoned chalk pit that is level with the surrounding ground level, only one hundred yards from a railway station and a quarter of a mile from the main A27 trunk road.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public?

Why do you feel it is necessary to participate at the Examination in Public?

From: [REDACTED]
Sent: 01 November 2018 12:51
To: ldf
Subject: Lewes District Local Plan Part 2: Site Allocations and Development Management Policies DPD - Pre-Submission version

Importance: High

Categories: LPP2 comment to code - stakeholder details have been added

Lewes District Local Plan Part 2: Site Allocations and Development Management Policies DPD - Pre-Submission version

Land at East Quay, Newhaven Port

I wish to draw attention to the Sustainability Appraisal underpinning the allocation of Policy E1.

The very first issue is the title, Land at East Quay, Newhaven Port.

This title is incorrect as this land at Area E1 is not Land at East Quay, Newhaven Port. The land at Area E1 is not even within the Newhaven Enterprise Zone. The land at Area E1 is actually land at Tide Mills.

In Table 36 on page 79 three candidate employment sites are compared. Para 9.82. states that Option C is currently a saved allocation from the 2003 Lewes District Council Local Plan. Core Policy 4 suggests retaining the unimplemented site allocations from the 2003 Lewes District Council Local Plan. As the site remains deliverable and suitable for employment development, its retention within the Pre-Submission Local Plan Part 2 is considered appropriate.

This retention of the saved allocation from the 2003 Lewes District Council Local Plan is challenged in that Policy E1 and the associated area of land at Area E1 is much larger than the original area of land allocated in 2003.

The key purpose of the Sustainability Appraisal is to show that there is more Green ratings than Red ratings and that the development is a "Sustainable development" within the terms of the National Planning Policy Framework.

However this is highly questionable in the case of Policy E1 and the associated Area E1 as any development of a Site of Nature Conservation Importance, now known as a Local Wildlife Site cannot sensibly be rated Amber and should be rated Red. The beach area of Area E1 is internationally recognised for its Vegetated Shingle and is part of the Brighton Biosphere recognised as part of the UNESCO World Biosphere.

Further to this , if the community is deprived of access to a valued beach or public footpath that should get a negative rating under objective 4 (Community).

The extra road traffic any development would create could be argued to endanger air quality in an area of environmental sensitivity and so should have an Amber rating if not a Red rating under objective 13. Air Quality.

Tide Mills is a tourist destination so removal of part of the present beach site will clearly have a potentially negative impact on tourism, see objective 18.

The above observations should create far more Red or Amber ratings and very little Green ratings and clearly make the development of a site that is a Site of Nature Conservation Importance, now known as a Local Wildlife Site viewed as "not sustainable development".

Only sustainable developments should be included in a Local Plan so the plan as it stands including unsustainable development at Area E1 would I respectfully suggest be "Unsound".

Given the current understanding that Newhaven Port and Properties have no interest in any development further east than the Port Access Road and Bridge onto Tide Mills there can be no justification for the large area of land allocated by Policy E1. There has been no development on the already completed section of Port Access Road and regarding that section of road, even ASDA pulled out of the proposals, so there can be no justification for allocating even more land.

The Port Access Road and Bridge onto Tide Mills will itself take up the north western and western sections of Area E1 which would leave an area of potential development land between the current Newhaven Harbour boundary and the Port Access Road and Bridge which would be far more in line with the 2003 allocation.

Given the above observations I would respectfully suggest that Policy E1 and the associated area of land at E1 is not sustainable and is unsound and that this large area of land east of Port Access Road and Bridge should be removed from the Lewes District Council Local Plan Part 2 thus reducing the allocation of land on the Tide Mills Site of Nature Conservation Importance, now known as a Local Wildlife Site to the area of land between the existing Newhaven Harbour boundary and the Port Access Road and Bridge with no development east of the Port Access Road and Bridge or south to Seaford Bay beach.

As an aside, the rejected brownfield site at Balcombe Pit appears to be a very sensible site for employment development, and the Sustainability Appraisal Table 36 appears to show that it rates much higher than the land at Newhaven - Area E1. At present Balcombe Pit is an abandoned chalk pit that is level with the surrounding ground level, only one hundred yards from a railway station and a quarter of a mile from the main A27 trunk road.

Representation ID: REP/031/E1Representor Details:

Representor ID:	REP/031
Name:	John Adams
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	E1 - Land at East Quay, Newhaven Port
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	
Representation:	
<p>There has been public access to the beach for many many years. This should be maintained. As with public footpaths, ownership of the land is secondary.</p> <p>On the E1 site, light industry may be acceptable Heavy industry totally inappropriate.</p> <p>Consideration should be given to the road system - connecting the site to the A259 is insufficient for any but light traffic. The A259 is already at full capacity, and adding several hundred new homes to Newhaven is unlikely to help the situation.</p> <p>The "nature reserve" separating Seaford from Newhaven should be maintained and if possible expanded.</p>	

I hope these comments are seen as constructive - If I had known about this earlier I would probably have been able to give more detail.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public?

Why do you feel it is necessary to participate at the Examination in Public?

Hodgson, Lilly

From: [REDACTED]
Sent: 05 November 2018 16:23
To: ldf
Subject: Newhaven ref:Policy E1

Categories: Vanessa to deal with

I wish to make some comments:

There has been public access to the beach for many many years. This should be maintained. As with public footpaths, ownership of the land is secondary.

On the E1 site, light industry may be acceptable Heavy industry totally inappropriate.

Consideration should be given to the road system - connecting the site to the A259 is insufficient for any but light traffic. The A259 is already at full capacity, and adding several hundred new homes to Newhaven is unlikely to help the situation.

The "nature reserve" separating Seaford from Newhaven should be maintained and if possible expanded.

I hope these comments are seen as constructive - If I had known about this earlier I would probably have been able to give more detail.

Best wishes,

John Adams
[REDACTED]

Representation ID: REP/032/E1

Representor Details:

Representor ID:	REP/032
Name:	James Aiken
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:
Organisation:

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	E1 - Land at East Quay, Newhaven Port
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	
Representation:	<p>I oppose the plans of the devolvment of Policy E1.</p> <p>It does not contribute to sustainable development and will affect the biodiversity of the area</p>
What changes do you suggest to make the document legally compliant or sound?	
Do you consider it necessary to participate at the Examination in Public?	
Why do you feel it is necessary to participate at the Examination in Public?	

--

Hodgson, Lilly

From: [REDACTED]
Sent: 04 November 2018 19:35
To: ldf
Subject: Devolvment of Policy E1

Categories: Vanessa to deal with

I oppose the plans of the devolvment of Policy E1.

It does not contribute to sustainable development and will affect the biodiversity of the area

--

Regards

James Aiken

Representation ID: REP/033/GT01Representor Details:

Representor ID:	REP/033
Name:	Ian Airey
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	GT01 - Land south of The Plough
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	Yes
Representation: I write to oppose the installation of the above site Although understanding the government policy and consequent pressure exerted on Lewes District for the provision of sites for Gypsies and Travellers, this site fails in all respects other than it may have been made available at a price by the landowner. One of the problems fundamental to this project mentioned but not dealt with is the	

identification of tenants/licensees, how abuse will be controlled, particularly multiple occupation on one pitch and multiple occupation of pitches in different counties.

The proposed site was previously rejected for residential development and it is difficult to understand how it can be deemed acceptable for Gypsies and Travellers unless the council applies different standards. It may be similar standards to that expressed by a council officer at the recent meeting in Plumpton Village Hall who stated there would be no Irish. If this was a joke it was in very poor taste and says much about the standards of the other officers that this was not at once dismissed.

This site is flawed in several respects:

Site. The site will require levelling to form the pitches, car parking and turning areas. This will create an earth bank cut back into the hill also taking the spoil which will need to be stabilised to avoid collapse. It will also create a potential lake where the levelled areas are formed which will pose a flood problem without effective drainage.

Drainage. This subject was forbidden at the recent village meeting for reasons that were not made clear. However both rain water and foul water drainage and disposal will be necessary for which at present there appears to be no provision.

Access: Motor: Satisfactory access is not available however we were assured that this could be achieved but only by the purchase of more land.

Access pedestrian: We were assured that there was a bus stop at 200m. However as any one who has tried to walk on that verge will know the verge is rough and dangerous and would pose a threat to life for families, particularly for children and particularly at night. The suggestion by a council officer that a pedestrian footpath could be installed shows clearly that no one in the council has taken the trouble to examine this project. Walking these footpaths at dusk the other evening I was forced by opposing traffic to take refuge on the verge, stumbled on a disguised pothole and nearly fell into the path of a car. We will be creating a ghetto where families are trapped on the site.

Utilities: Electricity and water are or not provided. Will individual supplies be provided and metered at each pitch?

Boundaries/security. As the report states the site is secure on only two sides. The boundary between the industrial estate and the site would definitely need to be secured in the interest of all.

Employment. The existence of this camp site presents a threat to the security of the light industries on the Old Brickworks who may feel obliged to leave thus removing jobs from the village. If the owners of the businesses also leave this could have a deleterious affect on the village.

Cost. At the village meeting we were told that there was no idea of the price to be charged by the landowner and there is clearly no idea as to the cost of site formation. All the necessary works can be done but at what cost? If to be funded by council capital if such exists or if by loans, who will pay the cost of capital, the ratepayer or will it be included in the licence fee for the pitch?

Policing/Management. We were assured that the site would be inspected and managed on a regular basis but it is difficult to see how a family could be ejected for having one car too many or light industry on their pitch or too many children. We would be facing a policy similar to the one child policy in China.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public? Yes

Why do you feel it is necessary to participate at the Examination in Public?

To make my views known.

Representation ID: REP/034/E1Representor Details:

Representor ID:	REP/034
Name:	Michael Akehurst
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	E1 - Land at East Quay, Newhaven Port
<i>Do you consider the document to be:</i>	
Legally Compliant:	No
Sound:	No Not Justified
Representation:	
Newhaven is already being over developed with noisy ,dirty industries.	
What changes do you suggest to make the document legally compliant or sound?	
the natural habitats need to be left alone for wildlife ,too much of the green areas are being eroded needlessly .	

Do you consider it necessary to participate at the Examination in Public?	No
Why do you feel it is necessary to participate at the Examination in Public?	

Representation ID: REP/035/GT01
--

Representor Details:

Representor ID:	REP/035
Name:	Shan Allan
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	GT01 - Land south of The Plough
<i>Do you consider the document to be:</i>	
Legally Compliant:	No
Sound:	No
	Not Positively Prepared
	Not Justified
	Not Effective
	Not Consistent with national policy
Representation:	
The inclusion of the proposed site in the LDP is unsound because:	

- * it is more than 1km from a primary highways route;
- * it does not allow for required visibility splays at the site entrance (2012 site assessment);
- * it is out of keeping with the area and would fail to preserve the open space;
- * it is not included in the Plumpton Neighbourhood Plan which has been widely researched and consulted on and which already offers up more housing sites in the Parish than were asked for;
- * it is on a greenfield site close to residential properties;
- * it would open onto a fast road with no pedestrian access which is unsafe;
- * it is more than 1km from village amenities - school, shop etc.;
- * it would impact adversely on the neighbouring 'Old Brickworks' site. This is long established, provides employment and is a valuable contribution to the local economy. It is hard to see how businesses could satisfy insurance requirements [REDACTED] in a dark skies zone much valued by the local community and SDNP.

Consultation with the local community and elected representatives has also been woefully inadequate.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public? No

Why do you feel it is necessary to participate at the Examination in Public?

Representation ID: REP/036/HSARepresentor Details:

Representor ID:	REP/036
Name:	Mick Allen
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	Housing Site Allocations
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	
Representation: RE: Church Hill, Newhaven Following our telephone conversation and previous representation for the above site, I would like to confirm that my client has a signed option agreement in place to purchase the adjacent land (shown blue in the attached plan). Please can the number of units be increased (it was previously shown as 24 in the last document, but has since decreased to 12 in the latest).	
What changes do you suggest to make the document legally compliant or sound?	

Do you consider it necessary to participate at the Examination in Public?
Why do you feel it is necessary to participate at the Examination in Public?

Thea Davis

From: [REDACTED]
Sent: 31 October 2018 16:25
To: ldf; Carpenter, Natalie
Subject: FW: Church Hill, Newhaven - Joint Core Strategy Part 2
Attachments: 1668 Church Hill 1668.S01.pdf

Categories: LPP2 comment to code - stakeholder details have been added

From: [REDACTED]
Sent: 31 October 2018 16:08
To: 'ldf@lewes-eastbourne.gov.uk'; Natalie Carpenter (Natalie.Carpenter@lewes.gov.uk)
Cc: [REDACTED]
Subject: Church Hill, Newhaven - Joint Core Strategy Part 2

Dear Natalie,

Following our telephone conversation and previous representation for the above site, I would like to confirm that my client has a signed option agreement in place to purchase the adjacent land (shown blue in the attached plan).

Please can the number of units be increased (it was previously shown as 24 in the last document, but has since decreased to 12 in the latest).

Many thanks in advance.

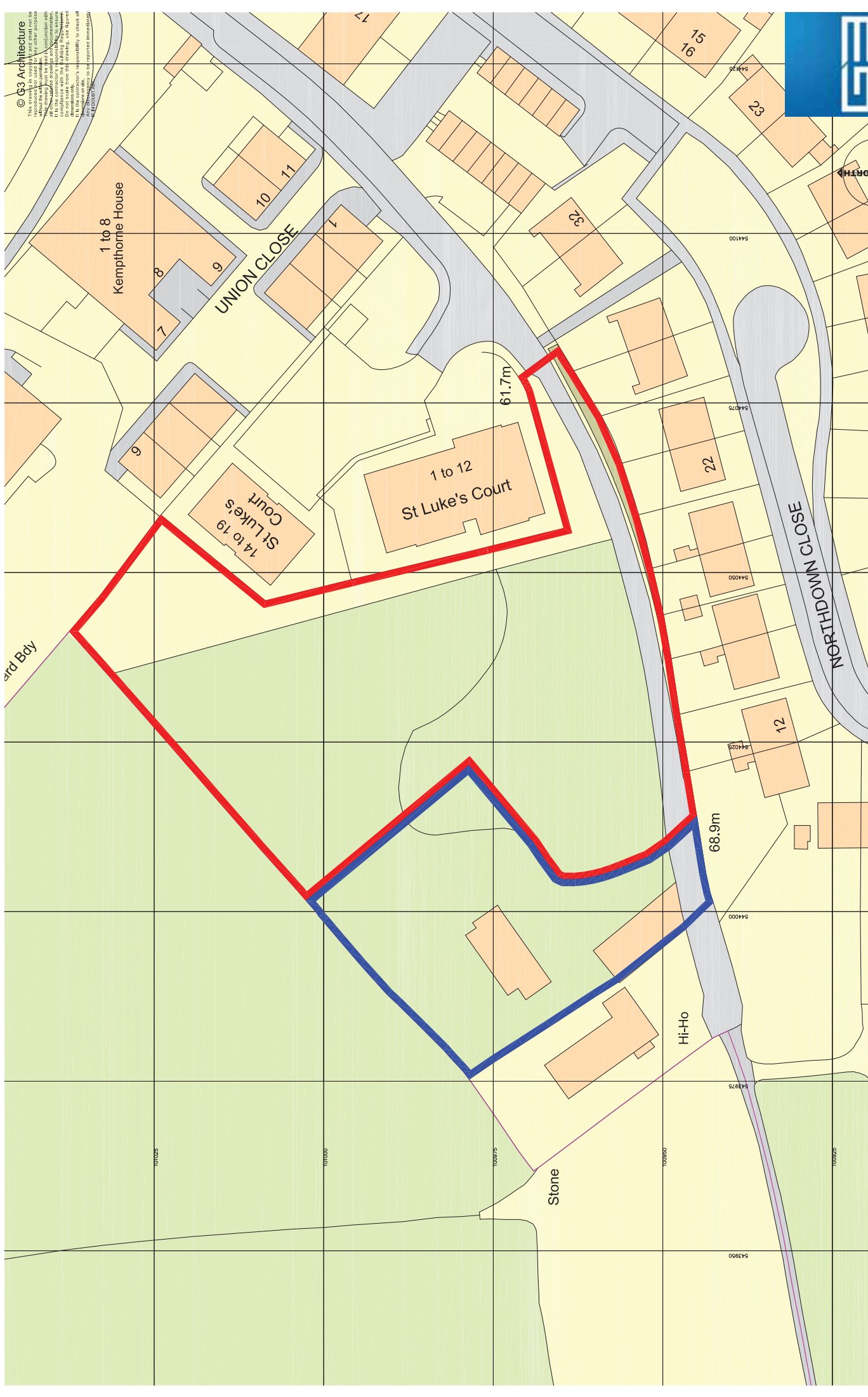
Kind Regards

[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]



G3 Architecture is a trading style of G3 Architecture Ltd
Registered Address: 22 Bromley Road, Seaford, East Sussex, BN25 3ES
Registered in England and Wales No: 09418154



© G3 Architecture
This drawing is for the use of the client only and is not to be reproduced for any other purpose without the written consent of G3 Architecture. It is the client's responsibility to ensure that the drawing is used for the intended purpose and that it is not used for any other purpose. Do not trade from this drawing. Use it for the client's responsibility to check all dimensions and areas. Any dimensions to be reported immediately.


location plan



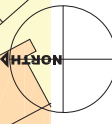
Ordnance Survey, (c) Crown Copyright 2016.
All rights reserved. Licence number 100022432

KEY
— Land in ownership
— Option agreement to purchase land

Notes + revisions	client + project	title	scale	number
	Broxdene	Land Adjacent Church Hill	1:500/1250 @ A3	1668.S01
	Newhaven	Newhaven	13.07.16	ORDNANCE SURVEY
		Location Plan		Page 357



G3 Architecture
155 Leamington Road, Newhaven
East Sussex BN9 6BW T 07783 247879
www.g3architecture.co.uk



Representation ID: REP/037/GT01Representor Details:

Representor ID:	REP/037
Name:	Gill Andersson
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	GT01 - Land south of The Plough
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	
Representation:	<p>I wish to oppose the proposed gypsy site in Plumpton Green on the following grounds:</p> <p>there is inadequate pedestrian access to the village, the only access being via a busy road</p> <p>the site will impact negatively on local businesses, already the 21 businesses at The Old Brickworks have informed the landlord that should the site be permitted they will feel</p>

forced to relocate. This would cause job losses and have a detrimental effect on the local economy both in Plumpton and the adjoining villages.

it is a green field site in a quiet location

the site will be extremely difficult to contain and manage

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public?

Why do you feel it is necessary to participate at the Examination in Public?

Hodgson, Lilly

From: [REDACTED]
Sent: 24 October 2018 20:23
To: ldf
Cc: [REDACTED]
Subject: Proposed gypsy site in Plumpton Green

Categories: LPP2 comment to code - stakeholder details have been added

Dear Sirs,

I wish to oppose the proposed gypsy site in Plumpton Green on the following grounds:

there is inadequate pedestrian access to the village, the only access being via a busy road

the site will impact negatively on local businesses, already the 21 businesses at The Old Brickworks have informed the landlord that should the site be permitted they will feel forced to relocate. This would cause job losses and have a detrimental effect on the local economy both in Plumpton and the adjoining villages.

it is a green field site in a quiet location with [REDACTED]
[REDACTED]

the site will be extremely difficult to contain and manage

Yours faithfully,

Gill Andersson
[REDACTED]

Representation ID: REP/038/GT01Representor Details:

Representor ID:	REP/038
Name:	Tosca Anstis
Organisation:	The Old Brickworks
Consultation Body:	General
Stakeholder Type:	Local Business / employer

Agent Details:

Name:
Organisation:

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	GT01 - Land south of The Plough
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	
Representation:	
I wish to notify you of my objection to the proposed gypsy and traveller site next to The Old Brickworks at Plumpton Green.	
I'm on the committee of The Old Brickworks business park. [REDACTED]	
[REDACTED]	
[REDACTED] - if the site goes ahead they will find somewhere else to take their business.	
Rightly or wrongly, there is a genuine fear of having this site so close to The Old Brickworks and whether I agree with them or not makes no difference. If they take their	

business elsewhere then the Business Park will not be able to survive and this will have a negative impact on the local economy.

I attended the meeting at Plumpton Village Hall on 9th October and learnt that this site had been previously proposed some years ago but had been discounted as unsuitable. As far as I can understand nothing about the site has changed and that it is only being reconsidered because there is no alternative. Surely it is better to find a site that is suitable rather than forcing an unsuitable site on the gypsy and traveller community and the population of Plumpton?

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public?

Why do you feel it is necessary to participate at the Examination in Public?

From: [REDACTED]
Sent: 14 October 2018 17:02
To: ldf
Subject: Proposed gypsy and traveller site, Plumpton Green

Categories: LPP2 comment to code - stakeholder details have been added

Dear Sir or Madam,

I wish to notify you of my objection to the proposed gypsy and traveller site next to The Old Brickworks at Plumpton Green.

I'm on the committee of The Old Brickworks business park. [REDACTED]
[REDACTED]
[REDACTED] if the site goes ahead they will find somewhere else to take their business.

Rightly or wrongly, there is a genuine fear of having this site so close to The Old Brickworks and whether I agree with them or not makes no difference. If they take their business elsewhere then the Business Park will not be able to survive and this will have a negative impact on the local economy.

I attended the meeting at Plumpton Village Hall on 9th October and learnt that this site had been previously proposed some years ago but had been discounted as unsuitable. As far as I can understand nothing about the site has changed and that it is only being reconsidered because there is no alternative. Surely it is better to find a site that is suitable rather than forcing an unsuitable site on the gypsy and traveller community and the population of Plumpton?

Thank you for taking my objections into consideration.

Yours faithfully,

Mrs Tosca Anstis

Representation ID: REP/039/HPC

Representor Details:

Representor ID:	REP/039
Name:	AGE, CFJ, G & P Appleton
Organisation:	Strutt & Parker
Consultation Body:	General
Stakeholder Type:	Planning Consultant

Agent Details:

Name:	Paul Carnell
Organisation:	Strutt & Parker

Contact Details:

Email Address:	Paul.Carnell@struttandparker.com
Address:	201 High Street Lewes East Sussex BN7 2NR

Representation:

Policy/Section:	Housing Policy Context
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	No Not Justified Not Effective Not Consistent with national policy
Representation:	
The Local Plan Part 2 (LPP2) relies too heavily on Neighbourhood Planning to deliver the residual housing need (1,660 units) identified in Table 2 (page 12).	
The District housing number included in the joint Lewes and South Downs National Park	

Core Strategy (Local Plan Part 1) is 6,900 (345 dwellings per annum). However, Spatial Policy 2 of the Core Strategy identifies 6,926 net dwellings to be delivered.

The National Park is now preparing its own Local Plan, leaving Lewes District to deliver 5,494 dwellings in the plan period (2010 – 2030) across those areas not within the National Park. LPP2 is required to deliver the housing numbers as set out in the Joint Core Strategy, and provide certainty that these will be delivered in the plan period. LPP2 sets out how the Council proposes to identify how this figure will be delivered (allowing for completions and commitments, strategic allocations, windfall and rural exceptions). LPP2 identifies Neighbourhood Planning as the key delivery mechanism to achieve the residual figure.

Table 3 (page 13 of LPP2) states that some 1,250 dwellings will be delivered through 'Made' or emerging Neighbourhood Plans. This is 75% of the total residual figure. The remaining 432 are to be delivered in LPP2.

There are four 'Made' plans within Lewes District which account for 385 dwellings (31%) of the 1,250 to be delivered by Neighbourhood Plans. This leaves 865 units to be delivered in areas where Neighbourhood Plans are still emerging (Newhaven, Peacehaven & Telscombe and Seaford).

Furthermore, Table 4 of LPP2 states that of the 432 to be allocated by Lewes District Council, 305 have already been delivered. This leaves only 127 units to be allocated. Therefore, of the residual need of 1,660 dwellings, Lewes District Council is seeking to allocate 127 units. This leaves merging Neighbourhood Plans to deliver 865 units, which is 52% of the total residual figure. There are no guarantees that Neighbourhood Plans will ever get 'Made'. Once an area is a designated local planning area, there is no obligation to bring a plan forward. It is noted that draft plans have been subject to consultation in Newhaven and Seaford. However, Peacehaven & Telscombe have not yet published any version of its plan, and the LPP2 notes this is not expected until "Late Summer 2019".

LPP2 requires Peacehaven & Telscombe to deliver some 30% of the 865 units required from emerging Neighbourhood Plans. With regard to emerging Neighbourhood Plans, LPP2 states "The Council will closely monitor the progress of the neighbourhood plans. Should any concerns arise regarding timings then the Council will consider what, if any, measures are needed to resolve the issue(s). These measures might include provision of additional support or the Council recovering the role of identifying allocations through a subsequent development plan document or a future review of the Local Plan."

This acknowledges that whilst LDC has an important role in facilitating Neighbourhood Plans, it does not have control over their production. Therefore, if LPP2 is adopted in its current form, the Council will not have control of the delivery of a significant proportion of its residual housing need. There is no currently available mechanism to speed up the delivery of Neighbourhood Plans, or any sanctions that could be put in place should a Neighbourhood Plan not be delivered in an appropriate timescale.

Committing to considering what further measures may be required at an unspecified time in the future does not provide any certainty that the Council can meet its housing

requirement, and maintain a five year supply of housing land.

The Ringmer Neighbourhood Plan is now 'Made', but was emerging at the same time the Lewes Cores Strategy was being prepared. A contingency allocation was suggested in emerging Core Strategy Policy text to take account of the possibility that the Ringmer Plan would fail or otherwise not pass referendum.

This acknowledged the proposals made by the Ringmer Neighbourhood Plan, but recognises that it is Lewes Councils responsibility to deliver housing for the District, and the contingency allocation allowed for the possibility that the Neighbourhood Plan would not be delivered.

Peacehaven & Telscombe is some way behind Newhaven and Seaford in plan preparation, but accounts for 255 new dwellings in Lewes (some 15% of the total residual figure). A similar contingency allocation should be made in Peacehaven & Telscombe (and be contemplated in Newhaven and Seaford) in order to reduce the over reliance on Neighbourhood Planning which otherwise would be a risk to the District's Housing Land Supply. The LPP2 represents the only opportunity to secure this contingency.

Leaving this to another as yet unspecified Development Plan Document, or a further review of the Local Plan, would likely take a further five years, and would not provide comfort that Lewes can meet its identified, and planned for housing need. If this is not done, the plan would not be considered justified or effective. Furthermore, it would not be seeking to meet the objectively assessed housing need in full, and therefore would not be consistent with national planning policy. In these circumstances the plan would be found unsound.

What changes do you suggest to make the document legally compliant or sound?

Consider allocation of contingency housing sites to meet the allocation (in part or in full) in Peacehaven & Telscombe should the Neighbourhood Plan not be delivered, or be significantly delayed. This would protect the District's five-year housing land supply.

Do you consider it necessary to participate at the Examination in Public? Yes

Why do you feel it is necessary to participate at the Examination in Public?

To discuss the implications of the representation as noted above.

Representation ID: REP/039/HSARepresentor Details:

Representor ID:	REP/039
Name:	AGE, CFJ, G & P Appleton
Organisation:	Strutt & Parker
Consultation Body:	General
Stakeholder Type:	Planning Consultant

Agent Details:

Name:	Paul Carnell
Organisation:	Strutt & Parker

Contact Details:

Email Address:	Paul.Carnell@struttandparker.com
Address:	201 High Street Lewes East Sussex BN7 2NR

Representation:

Policy/Section:	Housing Site Allocations
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	No Not Justified Not Effective
Representation: The Local Plan Part 2 (LPP2) relies too heavily on Neighbourhood Planning to deliver employment sites in the District.	

The Core Strategy allocates Lower Hoddern Farm for 450 dwellings at Peacehaven. The allocation followed the Local Plan Inspector requiring additional housing sites to meet the District's housing need. Development at this site was granted consent during 2018. The allocation of 450 units is the largest housing allocation in the Lewes Core Strategy.

The submission version local plan (2014) had proposed allocating a minimum of 660 dwellings, spread across Peacehaven and Telscombe. However, the allocation in the adopted Plan (and subsequent permission) at Lower Hoddern concentrates 450 dwellings on one site to the east of the town. The potential impact of this was not contemplated in the Core Strategy.

Transport infrastructure within Peacehaven is a recognised constraint. The housing allocation at Lower Hoddern Farm required a multi modal approach to mitigate impact on the A259. This was delivered in the planning permission, including through upgrades to bus infrastructure and frequency of routes.

It is noted that the second largest housing allocation in Lewes of 415 units at the North Street Quarter includes land for commercial uses including B1a and B1c.

The allocation of 450 dwellings on one site at Lower Hoddern should also be complemented by an increase in local employment opportunities through the allocation of land for economic and commercial uses. This should be done at District level, rather than leaving it to Neighbourhood Planning.

There are no guarantees that Neighbourhood Plans will ever get 'Made'. Once an area is a designated local planning area, there is no obligation to bring a plan forward.

Peacehaven & Telscombe, for example, has not yet published any version of its plan, and the LPP2 notes this is not expected until 'Late Summer 2019'.

LPP2 states 'The Council will closely monitor the progress of the neighbourhood plans. Should any concerns arise regarding timings then the Council will consider what, if any, measures are needed to resolve the issue(s). These measures might include provision of additional support or the Council recovering the role of identifying allocations through a subsequent development plan document or a future review of the Local Plan.' This acknowledges that whilst LDC has an important role in facilitating Neighbourhood Plans, it does not have control over their production.

The Council should therefore seek to support additional growth in Peacehaven by seeking to allocate employment land, including the site adjacent to the Lower Hoddern Farm allocation, previously identified in the Lewes Strategic Housing and Economic Land Availability Assessment (SHELAA) as Site 24PT. Without doing so, the plan cannot be considered justified or effective, and would therefore be found unsound.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public? Yes

Why do you feel it is necessary to participate at the Examination in Public?

To discuss the implications of the representation as noted above.

Representation ID: REP/040/GT01Representor Details:

Representor ID:	REP/040
Name:	Jason Aubrey
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:
Organisation:

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	GT01 - Land south of The Plough
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	
Representation: I have received notification of your proposal for 5 permanent caravan pitches adjacent to The Old Brickworks in Plumpton. As a resident of Plumpton Green with a young family, I wish to express my concerns to this proposal. Plumpton Green has existing plans for new housing and will therefor already have its amenities and council services under pressure. Plumpton Green is highly populated by the elderly and young families who are vulnerable. I am deeply concerned preservation of our beautiful village and its residents.	

Please receive this letter as my expressed Objection to your proposal.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public?

Why do you feel it is necessary to participate at the Examination in Public?

From: [REDACTED]
Sent: 24 September 2018 09:29
To: ldf
Subject: Proposed permanent Gypsy and Travellers site Plumpton Green

Categories: LPP2 comment to code - stakeholder details have been added, LLPP2 comment to put on Inovem

To whom this may concern

I have received notification of your proposal for 5 permanent caravan pitches adjacent to The Old Brickworks in Plumpton.

As a resident of Plumpton Green with a young family, I wish to express my concerns to this proposal.

Plumpton Green has existing plans for new housing and will therefor already have its amenities and council services under pressure. Plumpton Green is highly populated by the elderly and young families who are vulnerable. I am deeply concerned [REDACTED] preservation of our beautiful village and its residents.

Please receive this letter as my expressed Objection to your proposal.

Kind regards
Mr Jason D Aubrey

Representation ID: REP/041/GT01Representor Details:

Representor ID:	REP/041
Name:	Beverley Aubrey
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	GT01 - Land south of The Plough
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	
Representation: I have received notification of your proposal for 5 permanent caravan pitches adjacent to The Old Brickworks in Plumpton. As a resident of Plumpton Green with a young family, I wish to express my concerns to this proposal.	

Plumpton Green has existing plans for new housing and will therefor already have its amenities and council services under pressure. Plumpton Green is highly populated by the elderly and young families who are vulnerable. I am deeply concerned [REDACTED] [REDACTED] preservation of our beautiful village and its residents.

Please receive this letter as my expressed Objection to your proposal.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public?

Why do you feel it is necessary to participate at the Examination in Public?

From: [REDACTED]
Sent: 24 September 2018 09:27
To: ldf
Subject: Proposed permanent Gypsy and Travellers site Plumpton Green

Categories: LPP2 comment to code - stakeholder details have been added, LLPP2 comment to put on Inovem

To whom this may concern

I have received notification of your proposal for 5 permanent caravan pitches adjacent to The Old Brickworks in Plumpton.

As a resident of Plumpton Green with a young family, I wish to express my concerns to this proposal.

Plumpton Green has existing plans for new housing and will therefor already have its amenities and council services under pressure. Plumpton Green is highly populated by the elderly and young families who are vulnerable. I am deeply concerned [REDACTED] preservation of our beautiful village and its residents.

Please receive this letter as my expressed Objection to your proposal.

Kind regards
Mrs Beverley Jane Aubrey

Representation ID: REP/042/GT01Representor Details:

Representor ID:	REP/042
Name:	Mark Baker
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	GT01 - Land south of The Plough
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	No Not Justified Not Effective
Representation: I would like to log an objection to an aspect of the Lewes District Plan Part 2: Site Allocations and Development (p52-55 of PDF) for a proposed permanent travellers' site next to the 'Old Brickworks', Plumpton Green. My objection is based on the following:	

The proposed site is not included in the Plumpton Village Plan.

Insufficient scope and boundaries of the proposed site.

Inadequate access from the road with no pedestrian access.

Would undoubtedly adversely effect the village economy with 21 businesses at the Old brickworks to relocate if site is permitted.

The proposal would look to develop a 'green field' site in a rural location and would adversely effect the character of the village and fail to preserve the open and green spaces outside of residential development applications, of which there are many.

The site will be difficult to contain and manage.

Please could you consider my and related objections to the proposal.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public? No

Why do you feel it is necessary to participate at the Examination in Public?

Representation ID: REP/043/GT01Representor Details:

Representor ID:	REP/043
Name:	Peter and Kathy Baker
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	GT01 - Land south of The Plough
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	
Representation:	
<p>We wish to object to the proposal to put a permanent travellers'/gypsy site in the field next to the Plough Pub at Plumpton Green.</p> <p>We are not against travellers/gypsies and we understand it is necessary to find suitable permanent sites for them in the District. However this site, which has been ruled as unsuitable for housing by SHELAA, must also be unsuitable for providing a dwelling site</p>	

for travellers/gypsies. For housing it was ruled out 1. because it was beside a fast road without safe access and 2. because it was not easily accessible to school, shops and other village facilities ("failed the proximity assessment"). As a gypsy site it must therefore be ruled out for the same reasons. There is no footpath on either side of the road to walk either North or South from the site, confirming further that it is the wrong place to place dwellings for individuals or families.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public?

Why do you feel it is necessary to participate at the Examination in Public?

Hodgson, Lilly

From: [REDACTED] >
Sent: 25 October 2018 11:06
To: ldf
Subject: comment on PROPOSED GYPSY SITE IN PLUMPTON GREEN
Categories: LPP2 comment to code - stakeholder details have been added

Dear Sirs

We wish to object to the proposal to put a permanent travellers'/gypsy site in the field next to the Plough Pub at Plumpton Green.

We are not against travellers/gypsies and we understand it is necessary to find suitable permanent sites for them in the District. However this site, which has been ruled as unsuitable for housing by SHELAA, must also be unsuitable for providing a dwelling site for travellers/gypsies. For housing it was ruled out 1. because it was beside a fast road without safe access and 2. because it was not easily accessible to school, shops and other village facilities ("failed the proximity assessment"). As a gypsy site it must therefore be ruled out for the same reasons. There is no footpath on either side of the road to walk either North or South from the site, confirming further that it is the wrong place to place dwellings for individuals or families.

Peter & Kathy BAKER
[REDACTED]

Representation ID: REP/044/E1Representor Details:

Representor ID:	REP/044
Name:	Jenny Banks
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	E1 - Land at East Quay, Newhaven Port
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	
Representation:	
<p>I would like to severely object to planning permission on Tide Mills. I am outraged that the cement works managed to get the go ahead and can't believe that any more would be developed.</p> <p>Tide Mills is a place of natural beauty enjoyed by many local people and from also visitors further afield.</p> <p>We have rare plants and wildlife in this area which would be affected.</p> <p>It is a place of peace and tranquility which will be severely changed with more traffic and buildings which will obviously have a massive impact on the environment.</p>	

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public?
--

Why do you feel it is necessary to participate at the Examination in Public?

Hodgson, Lilly

From: [REDACTED]
Sent: 04 November 2018 19:23
To: ldf
Subject: Referee E1

Categories: LPP2 comment to code - stakeholder details have been added

I would like to severely object to planning permission on Tide Mills. I am outraged that the cement works managed to get the go ahead and can't believe that any more would be developed.

Tide Mills is a place of natural beauty enjoyed by many local people and from also visitors further afield.

We have rare plants and wildlife in this area which would be affected.

It is a place of peace and tranquility which will be severely changed with more traffic and buildings which will obviously have a massive impact on the environment.

Regards

Jenny Banks

[Sent from Yahoo Mail on Android](#)

Representation ID: REP/045/E1Representor Details:

Representor ID:	REP/045
Name:	Keith Banks
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:
Organisation:

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	E1 - Land at East Quay, Newhaven Port
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	
Representation: I am shocked & saddened to learn that it is proposed to develop yet more of 'tide mills ' . This is such a special natural area sandwiched between newhaven & seafood & the South Downs national park. It should be protected as it is a site of ssi & contains the habitats of many animals , birds , reptiles etc . Whenever I am down there , there are always bird watchers , naturalists & even school party's observing this beautiful area , an oasis ! Once these areas are built upon there will be no going back - they should be protected for future generations. Please do not open this area up for any more development.	

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public?
--

Why do you feel it is necessary to participate at the Examination in Public?

Hodgson, Lilly

From: [REDACTED]
Sent: 22 October 2018 11:03
To: ldf
Subject: 're tide mills development

Categories: LPP2 comment to code - stakeholder details have been added

Dear Sir,

I am shocked & saddened to learn that it is proposed to develop yet more of 'tide mills ' . This is such a special natural area sandwiched between newhaven & seafood & the South Downs national park. It should be protected as it is a site of ssi & contains the habitats of many animals , birds , reptiles etc . Whenever I am down there , there are always bird watchers , naturalists & even school party's observing this beautiful area , an oasis !

Once these areas are built upon there will be no going back - they should be protected for future generations.

Please do not open this area up for any more development.

Kind regards , Keith Banks

Sent from my Samsung Galaxy smartphone.

Representation ID: REP/046/E1Representor Details:

Representor ID:	REP/046
Name:	Philip Banks
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:
Organisation:

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	E1 - Land at East Quay, Newhaven Port
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	
Representation: I would like to object to planning permission on Tide Mills. I am outraged that the cement works managed to get the go ahead and can't believe that any further development would be considered. Tide Mills is a place of natural beauty enjoyed by many local people and from visitors further afield. They are rare plants and wildlife in this area which would be affected. It is a place of peace and tranquility. There will also be a negative impact on the environment of the wider surrounding area in Newhaven. It's road system can barely cope now. Increased traffic will be during development and on an ongoing basis to serve the site. Air quality will suffer further for	

residents, which can have severely detrimental effects on their health and wellbeing.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public?

Why do you feel it is necessary to participate at the Examination in Public?

Hodgson, Lilly

From: [REDACTED]
Sent: 04 November 2018 19:44
To: ldf
Subject: Reference E1

Categories: Vanessa to deal with

I would like to object to planning permission on Tide Mills. I am outraged that the cement works managed to get the go ahead and can't believe that any further development would be considered.

Tide Mills is a place of natural beauty enjoyed by many local people and from visitors further afield. They are rare plants and wildlife in this area which would be affected. It is a place of peace and tranquility.

There will also be a negative impact on the environment of the wider surrounding area in Newhaven. It's road system can barely cope now. Increased traffic will be during development and on an ongoing basis to serve the site. Air quality will suffer further for residents, which can have severely detrimental effects on their health and wellbeing.

Best regards,
Philip Banks
[REDACTED]

[Sent from Yahoo Mail on Android](#)

Representation ID: REP/047/GT01Representor Details:

Representor ID:	REP/047
Name:	Rob Banks
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	GT01 - Land south of The Plough
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	No Not Positively Prepared Not Consistent with national policy
Representation: I am writing with reference to Lewes District Council Local Plan Part 2: Site Allocations and Development Management Policies – Pre-Submission Document ("the Draft Plan") refers at paragraphs 2.132 to 2.142 to a proposal to provide 5 permanent pitches for	

Gypsy, Traveller and/or Travelling Showpeople at land south of the Plough in Plumpton Green ("the Site"). This proposal is termed "Policy GT01".

I live in Plumpton Green and wish to make representations in relation to proposed Policy GT01 on the basis that it is not "sound", and in particular in that it is not positively prepared or consistent with national policy.

I understand that Policy GT01 was first communicated to the Parish Council via a meeting on 05/09/18. This is not consistent with 'early and effective engagement' with the settled community; there has been very little time for quantitative assessment of Policy GT01 in a consultation period running from 24/09/18 to 04/11/18. It is not in accordance with the introductory aim of the PPTS (Planning Policy for Traveller Sites) (i) 'to reduce tensions between settled and traveller communities in plan-making and planning decisions' and the decision to include this site at the last minute has been made hastily, without due consideration, which I regard as inappropriate for this proposal and when the village community is already having to come to terms with large-scale development within the settlement.

The modification sought is the deletion of (1) the second two sentences of paragraph 2.135; and (2) all of the remainder of the relevant section (that is, the text from the end of paragraph 2.135 to the end of paragraph 2.142).

My comments below are a summary of the points that I wish to be taken into account in assessing the necessity to modify the relevant section of the Draft Plan. My postal and e mail addresses are at the top of my comments.

I have not annexed copies of documents referred to as they are either in the local planning authority's possession or are readily available to download from the internet. I would however be happy to provide PDF copies on request.

B: Policy Requirements Provision for traveller sites ought to comply with the requirements of the Department for Communities and Local Government "Planning Policy for traveller sites" dated August 2015 ("PPTS"). This accompanies the March 2012 National Planning Policy Framework and must be taken into consideration in preparing local plans and making planning decisions.

The government's overarching aim is stated to be "to ensure fair and equal treatment for travellers, in a way that facilitates the traditional and nomadic way of life of travellers while respecting the interests of the settled community".

A series of matters contributing towards the achievement of the overarching aim are listed at paragraph 3 PPTS, including at sub-paragraph 3(j):

"to enable provision of suitable accommodation from which travellers can access education, health, welfare and employment infrastructure". This aim is elaborated upon at paragraph 13 PPTS as follows:

"Local planning policies should ensure that traveller sites are sustainable economically, socially, and environmentally. Local planning authorities should therefore ensure that their policies:

* a) promote peaceful and integrated co-existence between the site and the local community b) promote, in collaboration with commissioners of health services, access to appropriate health services c) ensure that children can attend school on a regular basis d) provide a settled base that reduces both the need for long- distance travelling and possible environmental damage caused by unauthorised encampment e) provide for proper consideration of the effect of local environmental quality (such as noise and air quality) on the health and well being of any travellers that may locate there or on others as a result of new development f) avoid placing pressure on local infrastructure and services g) do not locate sites in areas at risk of high flooding, including functional floodplains, given the particular vulnerability of caravans h) reflect the extent to which traditional lifestyles (whereby some travellers live and work from the same location thereby omitting many travel to work journeys) can contribute to sustainability"

The use of the word "should" indicates that compliance by local planning authorities with these requirements is mandatory.

Paragraph 26 PPTS states that weight should be attached to inter alia "effective use of previously developed (brownfield) untidy or derelict land".

C:Gypsies and Travellers House of Commons Briefing Paper Number 08083 dated 8th May 2018, headed "Gypsies and Travellers" ("the Briefing Paper") details inter alia inequalities experienced by gypsies and travellers, including:

- (a) Poor health experiences compared with the general population, including low child immunisation levels, and a higher prevalence of anxiety and depression.
- (b) The lowest employment rates and highest level of economic inactivity of all ethnic groups, including 28% long term sick and disabled and 31% looking after the family.

Further:

- (a) The most common family household type was lone parent at 24%, compared with 11% of all households in England and Wales (paragraph 1.5).
- (b) 45% of Gypsy and Traveller households had dependent children in 2011, well above the average for the whole of England and Wales (29%) (paragraph 1.5).

The site also appears to be contrary to PPTS Policy B: Planning for travellers sites (11), which states: 'Criteria based policies should be fair and should facilitate the traditional and nomadic life of travellers whilst respecting the interest of the settled community.' It appears potentially discriminatory, as a lower threshold would seem to apply to the proposed gypsy and traveller residents than to residents of permanent, brickbuilt housing. I therefore consider the council could be also going against the Public Sector Equality Duty.

In addition, this site was rejected for housing in the 2018 Plumpton Parish Neighbourhood Plan, with concerns over sustainable transport a key consideration.

D: Planning History of the Site In December 2012, Lewes District Council and the South Downs National Park Authority produced a Gypsy and Traveller Site Assessment Addendum ("the Assessment").

This used an agreed set of criteria to score a long list of 14 sites in public ownership. One of the sites listed at Table 1 is "Land between the Plough and the Old Brickworks, Station Road, Plumpton". This is termed Site I.

At Table 3, this site was stated to be subject to a highway authority objection.

Details of Site I, and the relevant objection, are contained in Appendix 1, page 39ff. The site referred to within Policy GT01 is in the south east corner of Site I.

The commentary states as follows:

"ESCC Highway Authority assessed two potential access points, the first fronting St Helena Lane, west of the site, and the second from Station Road in the east, at an existing field entrance in the south east corner of the site.

..... The achievement of required visibility splays on Station Road is also a highway concern due to ... obstructions from a bus shelter, slight curve and uphill gradient of road to the north of the considered access point.

Due to the site's rural and isolated location it is over a kilometre from a Primary Route Network.

The village of Plumpton Green, as a local village, to the south of the site has some key services including primary school, convenience store and post office. Further services can be accessed via bus from within 800m of the site, or bus and train from Plumpton Green.

The main constraint to development of this site is the lack of suitable access as the required visibility splays are not considered achievable. The site is also considered isolated in terms of access to facilities".

E:Assessment of the Site

The site is isolated, and is over 0.5km from a local settlement (Plumpton Green). It has no pavement and is unlit, and traffic can go up to the national speed limit of 60 MPH.

There are also concerns about the impact on businesses at the Old Brickworks. Even if those businesses remain, the presence of a residential development (of whatever nature) immediately adjacent to commercial activity is highly likely to result in the need for additional security measures (notably, as a condition of insurance) that will be highly intrusive, such as security fencing and also security lighting in what is 'dark skies' parish where 91% of respondents to one questionnaire informing the Plumpton Parish Neighbourhood Plan supported preservation dark skies as one of their primary valued aspects of current village life. Dark skies is also a policy of the SDNPA.

E.1Transport The nearest bus stop is some distance away, along a busy road without pavements or lighting.

There is an irregular bus service on Route 166 and it only runs on weekdays. The earliest bus to Lewes departs at 07.22, and the latest at 18.53. Services to Haywards Heath also run at limited times, with the earliest departure being at 07.58 and the latest 18.13. And there is no guarantee that this bus route will continue to run in the future.

Plumpton train station is around 2.5km away, and the first 1km of that journey is again along a busy road without pavements or lighting. There is a pavement from the beginning of the main section of Plumpton Green, but there are no lights at all in the village.

E.2 Access to facilities As was acknowledged within the Assessment, the Site is isolated in terms of access to facilities.

Plumpton Green has limited facilities, namely a small village school and a convenience store/post office. Both are around 2km from the Site, with the first 1km of that journey again being along a busy road without pavements or lighting, and the balance along unlit pavements.

From late October to early February any journeys from Plumpton Village Primary School to the site in the afternoons would be carried out in twilight, or even darkness.

The village stores are too expensive for a large weekly shop for families on low budgets. The alternative means of access to Lewes would be the circa 2km walk to Plumpton train station, taking a train into Lewes, walking circa 0.5km from Lewes train station to the supermarket and then taking the same journey back carrying shopping.

E.3 Access to Healthcare and welfare facilities

The nearest surgery for the village is in South Chailey. That can only be reached by taking the train or bus into Lewes, and then catching a further bus to reach the surgery, there is no direct bus route.

Welfare facilities are not available in Plumpton Green and employment opportunities are very limited.

E.5 Flood Risk The Site is in an area with between a 1 in 30 and 1 in 100 year flood risk.

F: Why should the Policy GT01 be modified? In summary, I contend that the site outlined in Policy GT01 is not acceptable as:

(a) The Site does not provide suitable accommodation from which travellers can access education, health, welfare and employment infrastructure, in direct contravention of the overarching aim set out at sub-paragraph 3(j) of the PPTS (see paragraph 7 and Sections E.1 to E.4 above).

(b) The policy does not promote access to appropriate health services, in contravention of paragraph 13(b) of the PPTS (see paragraph 8 and Section E.3 above).

(c) The policy does not ensure that children can attend school on a regular basis, in contravention of paragraph 13(c) of the PPTS (see paragraph 8 and Section E.2 above).

(d) The Site is in an area at a risk of flooding, in contravention of paragraph 13(g) of the PPTS (see paragraph 8 and Section E.5 above).

(e) The policy does not ensure that the proposed traveller site is sustainable economically, socially and environmentally, in contravention of the first sentence of paragraph 13 of the PPTS (see paragraph 8 and Sections E.1 to E.5 above).

(f) The policy is not justified in that the Site cannot be utilised for the intended purpose

due to lack of suitable access and egress from the Site. See paragraph 19 above.

(g) The policy fails to consider adequately or at all the inequalities experienced by gypsies and travellers and/or the higher than usual prevalence of larger families and/or single parents, factors which render the Site unsuitable due to its isolated nature and lack of access to facilities. See Sections C, D and E above.

(h) The policy fails to comply with paragraph 25 PPTS, which states that strict limitations should be placed on new traveller site developments in open countryside, away from existing settlements or outside areas allocated in the development plan.

(i) The policy is not justified in that no or no adequate weight has been given to using previously developed (brownfield) land.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public?

Why do you feel it is necessary to participate at the Examination in Public?

From: [REDACTED]
Sent: 05 November 2018 16:21
To: ldf
Subject: Comments regarding Policy GT01 in the Lewes District Local Plan - Proposed traveller site, Plumpton Green

Categories: GT01, Vanessa to deal with

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Dear Sir/Madam,

I am writing with reference to Lewes District Council Local Plan Part 2: Site Allocations and Development Management Policies – Pre-Submission Document (“the Draft Plan”) refers at paragraphs 2.132 to 2.142 to a proposal to provide 5 permanent pitches for Gypsy, Traveller and/or Travelling Showpeople at land south of the Plough in Plumpton Green (“the Site”). This proposal is termed “Policy GT01”.

I live in Plumpton Green and wish to make representations in relation to proposed Policy GT01 on the basis that it is not “sound”, and in particular in that it is not positively prepared or consistent with national policy.

I understand that Policy GT01 was first communicated to the Parish Council via a meeting on 05/09/18. This is not consistent with ‘early and effective engagement’ with the settled community; there has been very little time for quantitative assessment of Policy GT01 in a consultation period running from 24/09/18 to 04/11/18. It is not in accordance with the introductory aim of the PPTS (Planning Policy for Traveller Sites) (i) ‘to reduce tensions between settled and traveller communities in plan-making and planning decisions’ and the decision to include this site at the last minute has been made hastily, without due consideration, which I regard as inappropriate for this proposal and when the village community is already having to come to terms with large-scale development within the settlement.

The modification sought is the deletion of (1) the second two sentences of paragraph 2.135; and (2) all of the remainder of the relevant section (that is, the text from the end of paragraph 2.135 to the end of paragraph 2.142).

My comments below are a summary of the points that I wish to be taken into account in assessing the necessity to modify the relevant section of the Draft Plan. My postal and e mail addresses are at the top of my comments.

I have not annexed copies of documents referred to as they are either in the local planning authority’s possession or are readily available to download from the internet. I would however be happy to provide PDF copies on request.

B: Policy Requirements

Provision for traveller sites ought to comply with the requirements of the Department for Communities and Local Government “Planning Policy for traveller sites” dated August 2015 (“PPTS”). This accompanies the March 2012 National Planning Policy Framework and must be taken into consideration in preparing local plans and making planning decisions.

The government’s overarching aim is stated to be “to ensure fair and equal treatment for travellers, in a way that facilitates the traditional and nomadic way of life of travellers while respecting the interests of the settled community”.

A series of matters contributing towards the achievement of the overarching aim are listed at paragraph 3 PPTS, including at sub-paragraph 3(j):

“to enable provision of suitable accommodation from which travellers can access education, health, welfare and employment infrastructure”. This aim is elaborated upon at paragraph 13 PPTS as follows:

“Local planning policies should ensure that traveller sites are sustainable economically, socially, and environmentally. Local planning authorities should therefore ensure that their policies:

- a) promote peaceful and integrated co-existence between the site and the local community
- b) promote, in collaboration with commissioners of health services, access to appropriate health services
- c) ensure that children can attend school on a regular basis
- d) provide a settled base that reduces both the need for long- distance travelling and possible environmental damage caused by unauthorised encampment
- e) provide for proper consideration of the effect of local environmental quality (such as noise and air quality) on the health and well being of any travellers that may locate there or on others as a result of new development
- f) avoid placing pressure on local infrastructure and services
- g) do not locate sites in areas at risk of high flooding, including functional floodplains, given the particular vulnerability of caravans
- h) reflect the extent to which traditional lifestyles (whereby some travellers live and work from the same location thereby omitting many travel to work journeys) can contribute to sustainability”

The use of the word “should” indicates that compliance by local planning authorities with these requirements is mandatory.

Paragraph 26 PPTS states that weight should be attached to inter alia “effective use of previously developed (brownfield) untidy or derelict land”.

C:Gypsies and Travellers

House of Commons Briefing Paper Number 08083 dated 8th May 2018, headed “Gypsies and Travellers” (“the Briefing Paper”) details inter alia inequalities experienced by gypsies and travellers, including:

- (a) Poor health experiences compared with the general population, including low child immunisation levels, and a higher prevalence of anxiety and depression.
- (b) The lowest employment rates and highest level of economic inactivity of all ethnic groups, including 28% long term sick and disabled and 31% looking after the family.

Further:

- (a) The most common family household type was lone parent at 24%, compared with 11% of all households in England and Wales (paragraph 1.5).
- (b) 45% of Gypsy and Traveller households had dependent children in 2011, well above the average for the whole of England and Wales (29%) (paragraph 1.5).

The site also appears to be contrary to PPTS Policy B: Planning for travellers sites (11), which states: ‘Criteria based policies should be fair and should facilitate the traditional and nomadic life of travellers whilst respecting the interest of the settled community.’ It appears potentially discriminatory, as a lower threshold would seem to apply to the proposed gypsy and traveller residents than to residents of permanent, brickbuilt housing. I therefore consider the council could be also going against the Public Sector Equality Duty.

In addition, this site was rejected for housing in the 2018 Plumpton Parish Neighbourhood Plan, with concerns over sustainable transport a key consideration.

D: Planning History of the Site

In December 2012, Lewes District Council and the South Downs National Park Authority produced a Gypsy and Traveller Site Assessment Addendum (“the Assessment”).

This used an agreed set of criteria to score a long list of 14 sites in public ownership. One of the sites listed at Table 1 is “Land between the Plough and the Old Brickworks, Station Road, Plumpton”. This is termed Site I.

At Table 3, this site was stated to be subject to a highway authority objection.

Details of Site I, and the relevant objection, are contained in Appendix 1, page 39ff. The site referred to within Policy GT01 is in the south east corner of Site I.

The commentary states as follows:

“ESCC Highway Authority assessed two potential access points, the first fronting St Helena Lane, west of the site, and the second from Station Road in the east, at an existing field entrance in the south east corner of the site.

..... The achievement of required visibility splays on Station Road is also a highway concern due to ... obstructions from a bus shelter, slight curve and uphill gradient of road to the north of the considered access point.

Due to the site’s rural and isolated location it is over a kilometre from a Primary Route Network.

The village of Plumpton Green, as a local village, to the south of the site has some key services including primary school, convenience store and post office. Further services can be accessed via bus from within 800m of the site, or bus and train from Plumpton Green.

.....

The main constraint to development of this site is the lack of suitable access as the required visibility splays are not considered achievable. The site is also considered isolated in terms of access to facilities”.

E:Assessment of the Site

The site is isolated, and is over 0.5km from a local settlement (Plumpton Green). It has no pavement and is unlit, and traffic can go up to the national speed limit of 60 MPH.

There are also concerns about the impact on businesses at the Old Brickworks. Even if those businesses remain, the presence of a residential development (of whatever nature) immediately adjacent to commercial activity is highly likely to result in the need for additional security measures (notably, as a condition of insurance) that will be highly intrusive, such as security fencing and also security lighting in what is ‘dark skies’ parish where 91% of respondents to one questionnaire informing the Plumpton Parish Neighbourhood Plan supported preservation dark skies as one of their primary valued aspects of current village life. Dark skies is also a policy of the SDNPA.

E.1Transport

The nearest bus stop is some distance away, along a busy road without pavements or lighting.

There is an irregular bus service on Route 166 and it only runs on weekdays. The earliest bus to Lewes departs at 07.22, and the latest at 18.53. Services to Haywards Heath also run at limited times, with the earliest departure being at 07.58 and the latest 18.13. And there is no guarantee that this bus route will continue to run in the future.

Plumpton train station is around 2.5km away, and the first 1km of that journey is again along a busy road without pavements or lighting. There is a pavement from the beginning of the main section of Plumpton Green, but there are no lights at all in the village.

E.2 Access to facilities

As was acknowledged within the Assessment, the Site is isolated in terms of access to facilities.

Plumpton Green has limited facilities, namely a small village school and a convenience store/post office. Both are around 2km from the Site, with the first 1km of that journey again being along a busy road without pavements or lighting, and the balance along unlit pavements.

From late October to early February any journeys from Plumpton Village Primary School to the site in the afternoons would be carried out in twilight, or even darkness.

The village stores are too expensive for a large weekly shop for families on low budgets. The alternative means of access to Lewes would be the circa 2km walk to Plumpton train station, taking a train into Lewes, walking circa 0.5km from Lewes train station to the supermarket and then taking the same journey back carrying shopping.

E.3Access to Healthcare and welfare facilities

The nearest surgery for the village is in South Chailey. That can only be reached by taking the train or bus into Lewes, and then catching a further bus to reach the surgery, there is no direct bus route.

Welfare facilities are not available in Plumpton Green and employment opportunities are very limited.

E.5Flood Risk

The Site is in an area with between a 1 in 30 and 1 in 100 year flood risk.

F: Why should the Policy GT01 be modified?

In summary, I contend that the site outlined in Policy GT01 is not acceptable as:

- (a) The Site does not provide suitable accommodation from which travellers can access education, health, welfare and employment infrastructure, in direct contravention of the overarching aim set out at sub-paragraph 3(j) of the PPTS (see paragraph 7 and Sections E.1 to E.4 above).
- (b) The policy does not promote access to appropriate health services, in contravention of paragraph 13(b) of the PPTS (see paragraph 8 and Section E.3 above).
- (c) The policy does not ensure that children can attend school on a regular basis, in contravention of paragraph 13(c) of the PPTS (see paragraph 8 and Section E.2 above).
- (d) The Site is in an area at a risk of flooding, in contravention of paragraph 13(g) of the PPTS (see paragraph 8 and Section E.5 above).

(e) The policy does not ensure that the proposed traveller site is sustainable economically, socially and environmentally, in contravention of the first sentence of paragraph 13 of the PPTS (see paragraph 8 and Sections E.1 to E.5 above).

(f) The policy is not justified in that the Site cannot be utilised for the intended purpose due to lack of suitable access and egress from the Site. See paragraph 19 above.

(g) The policy fails to consider adequately or at all the inequalities experienced by gypsies and travellers and/or the higher than usual prevalence of larger families and/or single parents, factors which render the Site unsuitable due to its isolated nature and lack of access to facilities. See Sections C, D and E above.

(h) The policy fails to comply with paragraph 25 PPTS, which states that strict limitations should be placed on new traveller site developments in open countryside, away from existing settlements or outside areas allocated in the development plan.

(i) The policy is not justified in that no or no adequate weight has been given to using previously developed (brownfield) land.

Yours Sincerely
Robert Banks

Representation ID: REP/048/GT01Representor Details:

Representor ID:	REP/048
Name:	W Banks
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	GT01 - Land south of The Plough
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	No
Representation: I would just like to say that we are happy about the proposed Gypsy site near the Plough and Brickworks. The whole village will be affected, worrying about the garden and sheds [REDACTED]. Also you say 5 units that will be the whole field will eventually be filled up what with drainage and [REDACTED]. No thank you we do not want [REDACTED].	
What changes do you suggest to make the document legally compliant or sound?	

Do you consider it necessary to participate at the Examination in Public?	No
Why do you feel it is necessary to participate at the Examination in Public?	

I would just like to say that
we are not happy about the
proposed Gully Site near the
Plough and Brickworks

The whole Village will be
affected regarding about the Garden
and Sheds

also you say 5 units
that will be the whole field
will eventually be filled up
what with drainage,

NO I HATE YOU WE

DO NOT WANT

RECEIVED
30 OCT 2018
MAILROOM

Representation ID: REP/049/E1Representor Details:

Representor ID:	REP/049
Name:	Esther Barnes
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	E1 - Land at East Quay, Newhaven Port
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	No Not Positively Prepared
Representation: Please think long and hard about further development at Tide Mills. It's a beautiful nature reserve, a welcome retreat from the industrial zones of Newhaven. It's enjoyed by residents and non-locals alike. Consider the clean, green marine vision of the enterprise zone - does this really fit with that? Is it necessary to have further development when so much has been done in that area already? The traffic, air quality and noise pollution in Newhaven is already heavy. We love to walk at tide mills to enjoy the peace, nature and	

clear waters. Please don't destroy that for greed. We've already lost one beach, don't ruin another.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public? No

Why do you feel it is necessary to participate at the Examination in Public?

Representation ID: REP/050/NH01
--

Representor Details:

Representor ID:	REP/050
Name:	Craig Barnes
Organisation:	Gladman Developments Ltd
Consultation Body:	General
Stakeholder Type:	Planning Consultant

Agent Details:

Name:
Organisation:

Contact Details:

Email Address:	Craig.Barnes@gladman.co.uk
Address:	

Representation:

Policy/Section:	NH01 - South of Valley Road
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	Yes
Representation: 5.3.1 Two previously saved allocations for housing within Newhaven are carried forward through the Local Plan Part 2. Both allocations form part of the committed supply within Newhaven, and as such make an important contribution in meeting the identified housing requirement in full. 5.3.2 In our previous representation to the Draft version of the Part 2 Local Plan, Gladman raised concerns relating to the deliverability of both sites. No evidence has been provided by the Council since the conclusion of this consultation which has satisfactorily addressed these concerns. NH01 - South of Valley Road	

5.3.3 NH01 is carried forward from the 2003 Local Plan and has a history which extends into the 1970s. Whilst parts of the site have come forward for development over this period, development of the site has been taken at a considerably slow pace, with a further capacity for 24 dwellings yet to be developed. Despite being available and suitable for development for a period of at least 35 years, this part of the Site has thus far not come forward for housing development. No evidence has been produced by the Council to confirm what has altered in the site conditions and market which means that this Site is now likely to be developed.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public? No

Why do you feel it is necessary to participate at the Examination in Public?

Representation ID: REP/050/NH02Representor Details:

Representor ID:	REP/050
Name:	Craig Barnes
Organisation:	Gladman Developments Ltd
Consultation Body:	General
Stakeholder Type:	Planning Consultant

Agent Details:

Name:
Organisation:

Contact Details:

Email Address:	Craig.Barnes@gladman.co.uk
Address:	

Representation:

Policy/Section:	NH02 - Land at The Marina
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	No
Representation: 5.3. NH02 is also a previously allocated site and has been subject to a previous and now lapsed planning consent for a mixed-use development which included some 331 dwellings (lapsed in May 2015). Beyond this lapsed planning permission, there is little evidence that the site could be developed for 300 dwellings during the plan period. The Site is subject to multiple constraints and planning issues such as its small area, proximity to heritage assets, active use as a marina, and site pollution issues. Whilst Gladman agrees that the potential exists for some development to come forward over the plan period at both NH01 and NH02, Gladman cannot conclude with any certainty on the extent and timing, which is particularly significant given the absence of	

flexibility within the wider plan. Gladman consider that this uncertainty further underlines the need for additional allocations and a relaxed policy position as previously set out in Section 5.1 of this representation.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public? No

Why do you feel it is necessary to participate at the Examination in Public?

Representation ID: REP/050/BA01
--

Representor Details:

Representor ID:	REP/050
Name:	Craig Barnes
Organisation:	Gladman Developments Ltd
Consultation Body:	General
Stakeholder Type:	Planning Consultant

Agent Details:

Name:
Organisation:

Contact Details:

Email Address:	Craig.Barnes@gladman.co.uk
Address:	

Representation:

Policy/Section:	BA01 - Land at Hillside Nurseries, High Street
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	No
Representation:	
5.4 Barcombe Cross: Policy BA01 and BA03	
5.4.1 Gladman welcome the Council's decision to allocate land at Barcombe Cross for housing development through the Part 2 Local Plan. This is consistent with Policy SP2 of the Part 1 Local Plan, which identifies the need for Barcombe Cross to accommodate new development within the plan period. Barcombe Cross is a sustainable settlement with a primary school, post office, shop, public house, village hall, and bus services. Further development is necessary to ensure that existing services remain viable and provide a response to the housing needs of the village and its rural hinterland.	
5.4.2 Whilst housing allocations at Barcombe Cross is supported, Gladman hold concern	

with the suitability of some of the sites identified by the Council for allocation for housing within the village through the Part 2 Local Plan. Gladman believe that there are more appropriate locations for growth at Barcombe Cross which should be explored first by the Council (see Section 6).

BA01 - Land at Hillside Nurseries, High Street

5.4.3 Site BA01 is known to experience access constraints which require third party land in order to be suitably addressed. The 2018 Housing Site Options Background Paper illustrates that there is currently disagreement about the availability of this land as providing the solution for safe and sufficient means of access to the Site. The Paper reveals a dispute on whether an agreement has been reached for this land to be used. The agent of this land disputes the claim that an agreement on this matter has now been reached. It is unclear, whether the Site could be developed without this third-party land.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public? No

Why do you feel it is necessary to participate at the Examination in Public?

Representation ID: REP/050/BA03
--

Representor Details:

Representor ID:	REP/050
Name:	Craig Barnes
Organisation:	Gladman Developments Ltd
Consultation Body:	General
Stakeholder Type:	Planning Consultant

Agent Details:

Name:
Organisation:

Contact Details:

Email Address:	Craig.Barnes@gladman.co.uk
Address:	

Representation:

Policy/Section:	BA03 - Land at Bridgelands
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	No
Representation: BA03 - Land at Bridgelands 5.4.4 This Site is known to experience surface water flooding issues and currently provides flood water capacity with features such as a pond and ditches. The development of this site may have an adverse effect for flood risk for off-site locations contrary to policy and will require further study before the developability of the Site can be confirmed. The Site is also located within a part of the village which is assessed to have a low capacity for change in landscape terms. As such, even a modest development of the Site could have significant adverse effects for local landscape quality contrary to national planning policy.	

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public?	No
--	-----------

Why do you feel it is necessary to participate at the Examination in Public?

Representation ID: REP/050/CH03Representor Details:

Representor ID:	REP/050
Name:	Craig Barnes
Organisation:	Gladman Developments Ltd
Consultation Body:	General
Stakeholder Type:	Planning Consultant

Agent Details:

Name:
Organisation:

Contact Details:

Email Address:	Craig.Barnes@gladman.co.uk
Address:	

Representation:

Policy/Section:	CH03 - Land adjacent to Mill Lane
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	No
Representation: 5.5.1 The Council state that a limited level of allocations is made in South Chailey on account of the limited range of services available within the village and the sensitivity of the landscape to development. Gladman dispute the Council's position with regard to the sustainability of the village and its capacity for further development. 5.5.2 Gladman consider South Chailey to be a sustainable settlement. The village benefits from various services and facilities such as Chailey School, a GP, church, a playground, and village a shop/post office. The village is served by the 121-bus service which links the village to the nearby higher order settlements of Newick and Lewes. The 121-bus services operates 6 days week (not Sunday) at 2 hourly intervals. The service	

provides access to both Newick and Lewes during rush hour, affording a viable alternative means of travel for accessing wider services and employment facilities available within these centres.

5.5.3 Gladman consider that there are alternative locations for development within South Chailey which are contained from wider long views which have not been explored by the Council (see section 6). Gladman believe that it is important that the Council explore all options available to secure sustainable development within the District, in order to maximise housing delivery in the context of significant housing need and in order to provide greater certainty that the minimum requirements of the Part 1 Local Plan.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public?

No

Why do you feel it is necessary to participate at the Examination in Public?

Representation ID: REP/050/RG01Representor Details:

Representor ID:	REP/050
Name:	Craig Barnes
Organisation:	Gladman Developments Ltd
Consultation Body:	General
Stakeholder Type:	Planning Consultant

Agent Details:

Name:
Organisation:

Contact Details:

Email Address:	Craig.Barnes@gladman.co.uk
Address:	

Representation:

Policy/Section:	RG01 - Caburn Field
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	No
Representation: 5.6.1 The Part 2 Local Plan seeks to role forward the allocation of Caburn Field for housing from the 2003 Local Plan. The Site is in active use as the home of Ringmer Football Club. The club's owners wish to relocate the club to an alternative site, however, despite being allocated for housing development within the previous local plan, the site has not yet come forward. 5.6.2 Policy RG01, like its predecessor, requires the relocation of the football club to an alternative site, ahead of permitting its development for housing. Gladman support this approach, however holds concerns about the deliverability of this when an alternative site has yet to be identified. Gladman is aware that land is identified for playing fields	

within the made Ringmer Neighbourhood Plan on a site to the east of Ringmer Community College (Site RG3). However, it is clear from the supporting text within the Neighbourhood Plan that this field is required in order to meet existing shortfalls in open space provision. It is unclear whether the football club could be accommodated at this site in addition to the needs identified in the Neighbourhood Plan.

5.6.3 Gladman consider that in order to heighten the certainty of this site coming forwards within the plan period, there is a need for the Council, in partnership with the Parish Council, to identify an alternative location for the football club. The demonstrated availability of a suitable alternative 'would alleviate Gladman's concerns regarding the deliverability of this site. Should this not prove possible, Gladman consider that further allocations and/or greater flexibility in decision making (as set out in Section 5.1 of this representation) should be provided by the Council in order to give greater certainty that the Plan's minimum development requirements will be met in full.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public? No

Why do you feel it is necessary to participate at the Examination in Public?

Representation ID: REP/050/DM1Representor Details:

Representor ID:	REP/050
Name:	Craig Barnes
Organisation:	Gladman Developments Ltd
Consultation Body:	General
Stakeholder Type:	Planning Consultant

Agent Details:

Name:
Organisation:

Contact Details:

Email Address:	Craig.Barnes@gladman.co.uk
Address:	

Representation:

Policy/Section:	DM1: Planning Boundary
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	No
Representation: 5.7.1 As set out in Section 5.1 of this representation, and further to the concerns raised relating to a number of proposed allocations, Gladman consider that there is a strong case for greater degree of flexibility for the types of development permissible within the open countryside. Policy HOU5 of the Ashford Local Plan (as quoted in Section 5.1), is considered by Gladman to provide an appropriate basis for the rewording of Policy DM1. This approach would secure the delivery of additional sustainable, proportionate development, which is consistent with the spatial strategy, and responsive to identified constraints and issues. 5.7.2 Gladman consider that the Policy should be applied to the settlements of	

Newhaven, Seaford, Peacehaven and Telscombe, Ringer and Broyle Side, Cooksbridge, Barcombe Cross, North and South Chailey, Newick, Plumpton Green, Wivlesfield Green, and areas adjacent to Burgess Hill.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public? No

Why do you feel it is necessary to participate at the Examination in Public?

Representation ID: REP/050/DM19
--

Representor Details:

Representor ID:	REP/050
Name:	Craig Barnes
Organisation:	Gladman Developments Ltd
Consultation Body:	General
Stakeholder Type:	Planning Consultant

Agent Details:

Name:
Organisation:

Contact Details:

Email Address:	Craig.Barnes@gladman.co.uk
Address:	

Representation:

Policy/Section:	DM19: Protection of Agricultural Land
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	No
Representation: 5.8.1 The policy adopts a sequential approach to the development of best and most versatile agricultural land. This represents a departure from national planning policy where no sequential approach is applied. No evidence is provided by the Council to justify the application of this strict approach. 5.8.2 Furthermore, it is unclear how an assessment of alternatives could be undertaken given that only indicative mapping of best and most versatile land is available, and accurate testing can only be undertaken following site investigation. It is also not clear on what basis the alternative assessment will be undertaken (settlement based? Parish based? District based? Etc). As drafted therefore, the policy could not be effectively	

implemented.

5.8.3 In response, Gladman consider that the policy should be reworded. The policy should set out that the development of Best and Most Versatile land should be avoided, and that proposals on best and most versatile land will need to demonstrate that the benefits of that proposal will significantly outweigh the adverse effects of its loss. This is consistent with the approach of the NPPF.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public? No

Why do you feel it is necessary to participate at the Examination in Public?

Representation ID: REP/050/DM33
--

Representor Details:

Representor ID:	REP/050
Name:	Craig Barnes
Organisation:	Gladman Developments Ltd
Consultation Body:	General
Stakeholder Type:	Planning Consultant

Agent Details:

Name:
Organisation:

Contact Details:

Email Address:	Craig.Barnes@gladman.co.uk
Address:	

Representation:

Policy/Section:	DM33: Heritage Assets
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	No
Representation: 5.9.1 The approach to protecting the historic built environment must fully reflect the guidance set out in NPPF2 paragraphs 184-201. 5.9.2 The Policy should ensure that a graded approach to assessing the weight applied to the conservation of the asset depending on the importance of that asset. 5.9.3 With reference to designated heritage assets, the Council should refer specifically to paragraphs 194 and 195 of NPPF2, which set out the need to assess the significance of a designated heritage assets and where there is less than substantial harm, this should be weighed against the public benefits of the proposal. Where there is deemed to be substantial harm, then the proposal would need to achieve substantial public benefits	

to outweigh that harm.

5.9.4 For non-designated assets, the policy must reflect the guidance set out within paragraph 197 of NPPF2. This states that the policy test that should be applied in these cases is that a balanced judgement should be reached having regard to the scale of any harm and the significance of the heritage asset.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public? No

Why do you feel it is necessary to participate at the Examination in Public?

Representation ID: REP/050/INTRepresentor Details:

Representor ID:	REP/050
Name:	Craig Barnes
Organisation:	Gladman Developments Ltd
Consultation Body:	General
Stakeholder Type:	Planning Consultant

Agent Details:

Name:
Organisation:

Contact Details:

Email Address:	Craig.Barnes@gladman.co.uk
Address:	

Representation:

Policy/Section:	What is the role of Neighbourhood Plans
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	No
Representation: 5.2.1 Great emphasis is placed by the Council on securing the delivery of the residual housing requirement through Neighbourhood Planning. Of the residual need for 1,660 dwellings, 1,250 dwellings are identified through the Neighbourhood Planning process (75%). Gladman notes the strong take up of Neighbourhood Plans within the plan area, with 'made 'neighbourhood plans in four areas and allocating sites sufficient to deliver 385 dwellings. A further three emerging Neighbourhood Plans would deliver 865 dwellings. 5.2.2 Whilst a positive start has been made in Lewes in relation to Neighbourhood Plan making, the Council must recognise the risk associated with reliance on Neighbourhood	

Plans in securing housing delivery. The Council will need to closely monitor the implementation of Neighbourhood Plans and ensure that the appropriate policy mechanisms are in place should allocated sites not come forward as and when envisaged within the Neighbourhood Plan

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public?

No

Why do you feel it is necessary to participate at the Examination in Public?

Representation ID: REP/050/HPCRepresentor Details:

Representor ID:	REP/050
Name:	Craig Barnes
Organisation:	Gladman Developments Ltd
Consultation Body:	General
Stakeholder Type:	Planning Consultant

Agent Details:

Name:
Organisation:

Contact Details:

Email Address:	Craig.Barnes@gladman.co.uk
Address:	

Representation:

Policy/Section:	Housing Policy Context
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	No
Representation: 2.1.1 Gladman Developments Limited (Gladman) specialise in the promotion of strategic land for residential development with associated community infrastructure. This submission provides Gladman Development's representations to the pre-submission version of the Lewes Local Plan Part 2 Site Allocations and Development Management Policies (the Part 2 Local Plan). 2.1.2 The Part 2 Local Plan is prepared in the context of the Lewes Core Strategy: Local Plan Part 1 (the Part 1 Local Plan) which was adopted by the Council in May 2016. The Part 1 Local Plan provides the strategic and spatial context for planning within the District. The Part 2 Local Plan must therefore be consistent with overall approach of the	

Part 1 Local Plan and seek to support its full and effective delivery.

2.1.3 Since the previous consultation, National Planning Policy has evolved. In July 2018, the Government published an updated National Planning Policy Framework (NPPF2). For plan making NPPF2 will apply for Local Plans submitted to the Secretary of State for examination following the 24th January 2019. Plans submitted ahead of this date will be assessed against the policies of the original NPPF (as published in March 2012). Even for these plans however, it is considered prudent for local planning authorities to take into account the revised policy framework provided by NPPF2 in order to future proof the development plan. In the case of Lewes District, the Part 2 Local Plan is being prepared during this transitional period, and as such, Gladman consider that the Council should have regard to both versions of the NPPF.

2.1.4 For the avoidance of doubt, Paragraph 85 of NPPF2 sets out four tests that must be met for Local Plans to be considered sound:

Positively Prepared - Providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;

Justified - an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;

Effective - deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and

Consistent with National Policy - the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

Gladman also notes the significant emphasis directed within NPPF2 to securing the sustainable and full delivery of housing requirements. Amongst other new policy requirements, NPPF2 introduces a new housing delivery test to monitor and measure housing delivery over the plan period, with specific measures outlined for those authorities unable to demonstrate sufficient levels of delivery.

The NPPF2 also redefines what sites are considered deliverable, and the level of evidence required to illustrate this.

3 FIXING OUR BROKEN HOUSING MARKET - WHITE PAPER

FEBRUARY 2017

3.1 Overview

3.1.1 The Government is in no doubt that the housing market in Britain is broken which, according to the Prime Minister, is one of the greatest barriers to progress in the country today.

3.1.2 Average house prices are almost eight times average earnings which is an all-time record and soaring prices and rising rents caused by a shortage of the right homes in

the right places has slammed the door of the housing market in the face of a whole generation.

3.1.3 The reason for this crisis is that the country is simply not building enough homes and has not done so for far too long. The consensus is that we need from 225,000 to 275,000 or more homes per year to keep up with population growth and to start to tackle years of under-supply.

3.1.4 Everyone involved in politics and the housing industry therefore has a moral duty to tackle this issue head on. The White Paper states quite unequivocally that 'the housing shortage isn't a looming crisis, a distant threat that will become a problem if we fail to act. We are already living in it.'

3.1.5 Tackling the housing shortage is not easy. It will inevitably require some tough decisions. The alternative, according to the White Paper, is a divided nation, with an unbridgeable and everwidening gap between the property haves and have-nots.

3.1.6 The challenge of increasing supply cannot be met by Government alone. It is vital to have local leadership and commitment from a wide range of stakeholders, including local authorities, private developers, housing associations, lenders and local communities.

3.1.7 The starting point is building more homes. This will slow the rise in housing costs so that more ordinary working families can afford to buy a home and it will also bring the cost of renting down. We need more land for homes where people want to live. All areas therefore need a plan to deal with the housing pressures they face.

3.1.8 At the stage at which the White Paper was published, it was identified that over 40 percent of local planning authorities did not have a plan in place to fully meet the projected growth in households in their area. All local authorities should therefore develop up-to-date plans with their communities that meet their housing requirement based upon an honest assessment of the need for new homes.

3.1.9 Local planning authorities have a responsibility to do all that they can to meet their housing requirements, even though not every area may be able to do so in full. The identified housing requirement should be accommodated in the Local Plan, unless there are policies elsewhere in the National Planning Policy Framework that provide strong reasons for restricting development, or the adverse impacts of meeting this requirement would significantly and demonstrably outweigh the benefits. Where an authority has demonstrated that it is unable to meet its entire housing requirement, it must be able to work constructively with neighbouring authorities to ensure that the remainder is met.

3.1.10 Plans should be reviewed regularly and are likely to require updating in whole or in part at least every five years. An authority will also need to update its plan if its existing housing target can no longer be justified against its objectively assessed housing requirement.

3.1.11 Policies in Local Plans should also allow a good mix of sites to come forward for development, so that there is choice for consumers, places can grow in ways that are sustainable, and there are opportunities for a diverse construction sector including

opportunities for SME housebuilders to deliver much needed housing.

3.1.12 In terms of rural areas, the Government expects local planning authorities to identify opportunities for villages to thrive, especially where this would support services and help meet the need to provide homes for local people who currently find it hard to afford to live where they grew up. It is clear that improving both the availability and affordability of homes in rural areas is vital for sustaining rural communities, alongside action to support jobs and services. There are opportunities to go further to support a good mix of sites and meet rural housing needs, especially where scope exists to expand settlements in a way which is sustainable and helps provide homes for local people. This is especially important in those rural areas where a high demand for homes makes the cost of housing a particular challenge for local people.

3.1.13 The Government has also made it clear through the White Paper that local planning authorities are expected to have clear policies for addressing the housing requirements of groups with particular needs, such as older and disabled people.

3.1.14 The White Paper is the cornerstone of future Government policy on fixing the broken housing market. It provides the direction of travel the Government is intending to take and is a clear statement that this Government is serious about the provision of the right number of houses in the right places. Local plans therefore need to consider these policy intentions now in order to ensure that they support the Government's agenda and provide the homes that local communities need in the right locations. The implementation of the White Paper has already been triggered through more recent government announcements and in particular the recent consultation on the proposals for a move towards a standardised methodology for calculating housing needs.

3.1.15 More recently, in October 2017, the Prime Minister reaffirmed the Government's commitment to addressing the broken housing market by bringing forward measures to boost home ownership and housing supply, stating:

"I will dedicate my premiership to fixing this problem - to restoring hope. To renewing the British Dream 'for a new generation of people. And that means fixing our broken housing market."

"For 30 or 40 years we simply haven't built enough homes. As a result, prices have risen so much that the average home now costs almost 8 times average earnings. And that's been a disaster for young people in particular."

3.1.16 Furthermore, in a message to housebuilders, the Prime Minister indicated that:

"We, the government, will make sure the land is available. We'll make sure our young people have the skills you need. In return, you must do your duty to Britain and build the homes our country needs."

7 CONCLUSION

7.1.1 This submission has provided Gladman Developments' written representations to the presubmission version of the Lewes Local Plan Part 2.

7.1.2 Gladman hold significant concerns that the approach adopted by the Council in its

allocation of housing land through the Part 2 Local Plan risks the deliverability of the housing requirement. The Council is reliant on the full delivery of committed and allocated sites, as well as other sources of land such as windfall development and rural exception housing to meet its housing requirement, with minimal flexibility provided. As such, there is a high degree of risk that the full minimum housing requirement as set out in the Part 1 Local Plan will not be achieved.

7.1.3 To address this, Gladman consider that further allocations are necessary. Gladman also consider that the Council should adopt a flexible approach to the determination of applications which are submitted on sites which are located beyond but adjacent to existing settlement boundaries. Gladman submit the wording of Policy HOU5 as amended within the emerging Ashford Local Plan as an exemplar policy for the Council's consideration. Gladman has also identified the settlements located within the plan area at which this policy could be sustainably implemented.

7.1.4 Gladman maintain their concerns regarding the deliverability of a number of allocations proposed through the Part 2 Local Plan which have not been addressed by the Council since the previous consultation. Gladman consider that the deliverability issues highlighted within this representation provides a further case for additional allocations to be made through the Part 2 Local Plan and for greater flexibility to be implemented by the Council in decision making as highlighted above.

7.1.5 In response, Gladman has submitted two sites for consideration as allocations for housing, at Barcombe Mills Road, Barcombe Cross and west of the A275, South Chailey. Both sites are considered by Gladman to provide for suitable locations for housing, and both are deliverable within the remaining plan period.

7.1.6 Beyond this, Gladman has concerns with the soundness of the proposed policy approach outlined in relation to Best and Most Versatile Land and Heritage and has suggested suitable amends to both policies

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public? No

Why do you feel it is necessary to participate at the Examination in Public?

Representation ID: REP/050/HSA

Representor Details:

Representor ID:	REP/050
Name:	Craig Barnes
Organisation:	Gladman Developments Ltd
Consultation Body:	General
Stakeholder Type:	Planning Consultant

Agent Details:

Name:
Organisation:

Contact Details:

Email Address:	Craig.Barnes@gladman.co.uk
Address:	

Representation:

Policy/Section:	Housing Site Allocations
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	No
Representation: <p>The strategic context for the distribution of housing in the Part 2 Local Plan is set out within policies SP1 and SP2 of the Part 1 Local Plan. Policy SP1 sets out the housing requirement for the plan area with 5,494 dwellings required between 2010 and 2030. Policy SP2 sets out the required distribution of this housing requirement within the Plan area and National Park. Taking into account completed and committed development, Policy SP2 identifies x6 strategic sites with a collective capacity for 1,728 dwellings. Beyond this, further non-strategic growth is identified at various named settlements within the plan area (all expressed as minimum requirements) the balance of which is to be met through the Part 2 Local Plan.</p>	

5.1.2 In order to meet the housing requirement of the Part 1 Local Plan in full, housing land capacity for a further 1,660 dwellings is identified by the Council as the starting point for the preparation of the Part 2 Local Plan. Further assessment of completions and committed development since April 2015, together with monitoring of provision for new housing outlined within locally prepared Neighbourhood Plans, reduces this residual need to 105 dwellings. In response to this context, the Council has sought to allocate sufficient land to deliver a further 132 dwellings. This provides for a marginal oversupply, however is responsive to the level of development which is required in order to meet each of the identified minimum housing requirements for each settlement as set out in Policy SP2 of the Part 1 Local Plan.

5.1.3 In broad terms Gladman welcome the Council's commitment to meet and respond to the minimum targets as identified through both Policy SP1 and SP2 of the Part 1 Local Plan. Ensuring sufficient supply on a settlement by settlement basis as set out in the Part 1 Local Plan, is critical in ensuring that the Part 2 Local Plan is consistent with the strategic approach of the adopted development plan. It will also ensure that housing supply is most responsive to local development needs and provides adequate support of settlement vitality and vibrancy consistent with the Council's spatial strategy.

5.1.4 Gladman however, do not believe that there is sufficient flexibility within the supply to ensure that the housing requirement of the plan area will be met in full. Capacity for only 27 dwellings in excess of the minimum housing requirement identified for the District (outside of the National Park) is proposed by the Council through the Part 2 Local Plan. This provides flexibility of just 0.5% in the context of the overall housing requirement. As a result, the Council is hugely reliant on full delivery of all identified and committed sites moving forwards over the plan period. This is inclusive of a windfall allowance of 600 dwellings and rural exceptions sites allowance of 125 dwellings over which the Council has limited influence over. As a result, Gladman conclude that there is a distinct possibility that the housing requirement will not be met in full, contrary to Policy SP1 of the Part 1

Local Plan.

5.1.5 The allocation of housing land within the Part 2 Local Plan is also made in the context of an acknowledged shortfall in the overall level of housing provision made within the Part 1 Local Plan against objectively assessed housing needs.

5.1.6 No means of meeting this shortfall have yet been identified by the Council, and a potential resolution to this shortfall will not occur until the commencement of a future Local Plan Review. In the interim Gladman consider that this context provides the Council with further cause to ensure that housing delivery is maximised through the Part 2 Local Plan.

5.1.7 Gladman believes that enhanced delivery within the plan area can be secured by adopting the following two measures.

5.1.8 First, is the need to allocate further land through the Part 2 Local Plan. Gladman consider that an additional supply of at least 10% (above the housing requirement) should be planned for (circa 550 dwellings). This approach will provide greater certainty

that the minimum requirements of the Local Plan can be met in full. It will also ensure that the Local Plan is more adaptable to change which may be experienced during the plan period. In response, Gladman submit two sites for consideration as allocations for housing through the Part 2 Local Plan (see Section 6 of this representation).

5.1.9 Secondly, the Council should adopt a flexible and positive policy framework for the determination of applications submitted on sites which are not allocated for development within the Local Plan. Such a policy would provide scope for proportionate and appropriately scaled development to come forward on sites which are located on unidentified sites beyond the settlement boundary, provided they are well related and adjacent to existing specified settlements, and subject to meeting other local and national planning policy requirements. The adoption of this approach would prove a boost to sustainable housing delivery.

5.1.10 Such a policy has been prepared relatively locally by Ashford Council through Policy HOU5 of the Ashford Local Plan 2030 (currently at examination). The policy text (as modified) reads:

"Proposals for residential development adjoining or close to the existing built up confines of [listed] settlements will be acceptable.. provided that each of the following criteria is met:

- a) The scale of development proposed is proportionate to the size of the settlement and the level, type and quality of day to day service provision currently available, and commensurate with the ability of those services to absorb the level of development in combination with any planned allocations in this Local Plan and committed development, in liaison with service providers;
- b) The site is within easy walking distance of basic day to day services in the nearest settlement, and/or has access to sustainable methods of transport to access a range of services;
- c) The development is able to be safely accessed from the local road network and the traffic generated can be accommodated on the local and wider road network without adversely affect the character of the surrounding area;
- d) The development is located where it is possible to maximise the use of public transport, cycling and walking to access services;
- e) Conserve and enhance the natural environment and preserve or enhance any heritage assets in the locality; and
- f) The development (and any associated infrastructure) is of a high-quality design and meets the following requirements:
 - i) It sits sympathetically within the wider landscape;
 - ii) It preserves or enhances the setting of the nearest settlement;
 - iii) It includes an appropriately sized and designed landscape buffer to the open countryside;

- iv) It is consistent with local character and built form, including scale, bulk, and the materials used;
- v) It does not adversely impact on neighbouring uses or a good standard of amenity for nearby residents;
- vi) It would conserve biodiversity interests on the site and/or adjoining area and not adversely affect the integrity of international and national protected sites in line with Policy ENV1.

5.1.11 Gladman consider that a similar policy should be implemented in the case of Lewes. Safeguards relating to size, location and impacts included within the policy would ensure that the overall spatial strategy as defined in the Part 1 Local Plan would be safeguarded and reflected in decision making when applying the policy. The policy would be beneficial in enabling additional development not otherwise provided by the development plan, ensuring that sustainable housing delivery in 'maximised within the District.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public? No

Why do you feel it is necessary to participate at the Examination in Public?

Representation ID: REP/050/SARepresentor Details:

Representor ID:	REP/050
Name:	Craig Barnes
Organisation:	Gladman Developments Ltd
Consultation Body:	General
Stakeholder Type:	Planning Consultant

Agent Details:

Name:
Organisation:

Contact Details:

Email Address:	Craig.Barnes@gladman.co.uk
Address:	

Representation:

Policy/Section:	Sustainability Appraisal
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	Yes
Representation: 4.1.1 In accordance with Section 19 of the 2004 Planning and Compulsory Purchase Act, policies that are set out in local plans must be the subject of a Sustainability Appraisal (SA). Incorporating the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004, SA is a systematic process that should be undertaken at each stage of the Plan's preparation, assessing the effects of the Local Plan's proposals on sustainable development when judged against all reasonable alternatives. 4.1.2 The Local Plan should ensure that the results of the SA process clearly justify any policy choices that are ultimately made, including the proposed site allocations (or any	

decision not to allocate sites) when considered against 'all reasonable alternatives'. In meeting the development needs of the area, it should be clear from the results of the assessment why some policy options have been progressed and others have been rejected. Undertaking a comparative and equal assessment of each reasonable alternative, the Council's decision making and scoring should be robust, justified and transparent.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public? No

Why do you feel it is necessary to participate at the Examination in Public?

**Lewes Local Plan Part 2: Site Allocations and Development
Management Policies Pre-submission Draft
Gladman Representations**



November 2018

CONTENTS

1	Executive Summary	2
2	Introduction	3
2.1	Context	3
3	Fixing our Broken Housing Market – White Paper February 2017.....	5
3.1	Overview	5
4	Sustainability Appraisal.....	8
5	Lewes Local Plan Part 2 Site Allocations and Development Management Policies	9
5.1	Site Allocations Overall Comments.....	9
5.2	Neighbourhood Plans.....	12
5.3	Newhaven: Policy NH01 and NH02	12
5.4	Barcombe Cross: Policy BA01 and BA03.....	13
5.5	South Chailey: Policy CH03	14
5.6	Ringmer: Policy RG01	14
5.7	Policy DM1: Planning Boundary	15
5.8	Policy DM19: Protection of Agricultural Land.....	15
5.9	Policy DM33: Heritage Assets.....	15
6	Site Submissions	17
6.1	Land at Barcombe Mills Road, Barcombe Cross.....	17
6.2	Land to the West of the A275, South Chailey	17
7	conclusion.....	18

Appendix 1 – Development Brief Land at Barcombe Mills Road, Barcombe Cross

Appendix 2 – Development Brief Land to the West of the A275, South Chailey

1 EXECUTIVE SUMMARY

- i. This submission provides Gladman Developments' written representations to the Pre-submission version of the Lewes Local Plan Part 2 Site Allocations and Development Management Policies Document.
- ii. Gladman specialise in the promotion of strategic land for residential development with associated community infrastructure.
- iii. This representation makes comments on the following matters:
 - a. Housing provision
 - b. Allocations in Newhaven (NH01/NH02), Barcombe Cross (BA01/BA03), South Chailey (CH03) and Ringmer (RG01)
 - c. Planning Boundary (Policy DM1)
 - d. Protection of Agricultural Land (Policy DM19)
 - e. Heritage Assets (Policy DM33)
 - f. Site Submissions

2 INTRODUCTION

2.1 Context

- 2.1.1 Gladman Developments Limited (Gladman) specialise in the promotion of strategic land for residential development with associated community infrastructure. This submission provides Gladman Development's representations to the pre-submission version of the Lewes Local Plan Part 2 Site Allocations and Development Management Policies (the Part 2 Local Plan).
- 2.1.2 The Part 2 Local Plan is prepared in the context of the Lewes Core Strategy: Local Plan Part 1 (the Part 1 Local Plan) which was adopted by the Council in May 2016. The Part 1 Local Plan provides the strategic and spatial context for planning within the District. The Part 2 Local Plan must therefore be consistent with overall approach of the Part 1 Local Plan and seek to support its full and effective delivery.
- 2.1.3 Since the previous consultation, National Planning Policy has evolved. In July 2018, the Government published an updated National Planning Policy Framework (NPPF2). For plan making NPPF2 will apply for Local Plans submitted to the Secretary of State for examination following the 24th January 2019. Plans submitted ahead of this date will be assessed against the policies of the original NPPF (as published in March 2012). Even for these plans however, it is considered prudent for local planning authorities to take into account the revised policy framework provided by NPPF2 in order to future proof the development plan. In the case of Lewes District, the Part 2 Local Plan is being prepared during this transitional period, and as such, Gladman consider that the Council should have regard to both versions of the NPPF.
- 2.1.4 For the avoidance of doubt, Paragraph 85 of NPPF2 sets out four tests that must be met for Local Plans to be considered sound:
- Positively Prepared – Providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
 - Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
 - Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
 - Consistent with National Policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

- 2.1.5 Gladman also notes the significant emphasis directed within NPPF2 to securing the sustainable and full delivery of housing requirements. Amongst other new policy requirements, NPPF2 introduces a new housing delivery test to monitor and measure housing delivery over the plan period, with specific measures outlined for those authorities unable to demonstrate sufficient levels of delivery. The NPPF2 also redefines what sites are considered deliverable, and the level of evidence required to illustrate this.

3 FIXING OUR BROKEN HOUSING MARKET – WHITE PAPER FEBRUARY 2017

3.1 Overview

- 3.1.1 The Government is in no doubt that the housing market in Britain is broken which, according to the Prime Minister, is one of the greatest barriers to progress in the country today.
- 3.1.2 Average house prices are almost eight times average earnings which is an all-time record and soaring prices and rising rents caused by a shortage of the right homes in the right places has slammed the door of the housing market in the face of a whole generation.
- 3.1.3 The reason for this crisis is that the country is simply not building enough homes and has not done so for far too long. The consensus is that we need from 225,000 to 275,000 or more homes per year to keep up with population growth and to start to tackle years of under-supply.
- 3.1.4 Everyone involved in politics and the housing industry therefore has a moral duty to tackle this issue head on. The White Paper states quite unequivocally that *‘the housing shortage isn’t a looming crisis, a distant threat that will become a problem if we fail to act. We are already living in it.’*
- 3.1.5 Tackling the housing shortage is not easy. It will inevitably require some tough decisions. The alternative, according to the White Paper, is a divided nation, with an unbridgeable and ever-widening gap between the property haves and have-nots.
- 3.1.6 The challenge of increasing supply cannot be met by Government alone. It is vital to have local leadership and commitment from a wide range of stakeholders, including local authorities, private developers, housing associations, lenders and local communities.
- 3.1.7 The starting point is building more homes. This will slow the rise in housing costs so that more ordinary working families can afford to buy a home and it will also bring the cost of renting down. We need more land for homes where people want to live. All areas therefore need a plan to deal with the housing pressures they face.
- 3.1.8 At the stage at which the White Paper was published, it was identified that over 40 percent of local planning authorities did not have a plan in place to fully meet the projected growth in households in their area. All local authorities should therefore develop up-to-date plans with their communities that meet their housing requirement based upon an honest assessment of the need for new homes.
- 3.1.9 Local planning authorities have a responsibility to do all that they can to meet their housing requirements, even though not every area may be able to do so in full. The identified housing requirement should be accommodated in the Local Plan, unless there are policies elsewhere in the National Planning Policy Framework that provide strong reasons for restricting development, or the adverse impacts of meeting this requirement would significantly and demonstrably outweigh the

benefits. Where an authority has demonstrated that it is unable to meet its entire housing requirement, it must be able to work constructively with neighbouring authorities to ensure that the remainder is met.

- 3.1.10 Plans should be reviewed regularly and are likely to require updating in whole or in part at least every five years. An authority will also need to update its plan if its existing housing target can no longer be justified against its objectively assessed housing requirement.
- 3.1.11 Policies in Local Plans should also allow a good mix of sites to come forward for development, so that there is choice for consumers, places can grow in ways that are sustainable, and there are opportunities for a diverse construction sector including opportunities for SME housebuilders to deliver much needed housing.
- 3.1.12 In terms of rural areas, the Government expects local planning authorities to identify opportunities for villages to thrive, especially where this would support services and help meet the need to provide homes for local people who currently find it hard to afford to live where they grew up. It is clear that improving both the availability and affordability of homes in rural areas is vital for sustaining rural communities, alongside action to support jobs and services. There are opportunities to go further to support a good mix of sites and meet rural housing needs, especially where scope exists to expand settlements in a way which is sustainable and helps provide homes for local people. This is especially important in those rural areas where a high demand for homes makes the cost of housing a particular challenge for local people.
- 3.1.13 The Government has also made it clear through the White Paper that local planning authorities are expected to have clear policies for addressing the housing requirements of groups with particular needs, such as older and disabled people.
- 3.1.14 The White Paper is the cornerstone of future Government policy on fixing the broken housing market. It provides the direction of travel the Government is intending to take and is a clear statement that this Government is serious about the provision of the right number of houses in the right places. Local plans therefore need to consider these policy intentions now in order to ensure that they support the Government's agenda and provide the homes that local communities need in the right locations. The implementation of the White Paper has already been triggered through more recent government announcements and in particular the recent consultation on the proposals for a move towards a standardised methodology for calculating housing needs.
- 3.1.15 More recently, in October 2017, the Prime Minister reaffirmed the Government's commitment to addressing the broken housing market by bringing forward measures to boost home ownership and housing supply, stating:

"I will dedicate my premiership to fixing this problem – to restoring hope. To renewing the British Dream for a new generation of people. And that means fixing our broken housing market."

“For 30 or 40 years we simply haven’t built enough homes. As a result, prices have risen so much that the average home now costs almost 8 times average earnings. And that’s been a disaster for young people in particular.”

3.1.16 Furthermore, in a message to housebuilders, the Prime Minister indicated that:

“We, the government, will make sure the land is available. We’ll make sure our young people have the skills you need. In return, you must do your duty to Britain and build the homes our country needs.”

4 SUSTAINABILITY APPRAISAL

- 4.1.1 In accordance with Section 19 of the 2004 Planning and Compulsory Purchase Act, policies that are set out in local plans must be the subject of a Sustainability Appraisal (SA). Incorporating the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004, SA is a systematic process that should be undertaken at each stage of the Plan's preparation, assessing the effects of the Local Plan's proposals on sustainable development when judged against all reasonable alternatives.
- 4.1.2 The Local Plan should ensure that the results of the SA process clearly justify any policy choices that are ultimately made, including the proposed site allocations (or any decision not to allocate sites) when considered against 'all reasonable alternatives'. In meeting the development needs of the area, it should be clear from the results of the assessment why some policy options have been progressed and others have been rejected. Undertaking a comparative and equal assessment of each reasonable alternative, the Council's decision making and scoring should be robust, justified and transparent.

5 LEWES LOCAL PLAN PART 2 SITE ALLOCATIONS AND DEVELOPMENT MANAGEMENT POLICIES

5.1 Site Allocations Overall Comments

- 5.1.1 The strategic context for the distribution of housing in the Part 2 Local Plan is set out within policies SP1 and SP2 of the Part 1 Local Plan. Policy SP1 sets out the housing requirement for the plan area with 5,494 dwellings required between 2010 and 2030. Policy SP2 sets out the required distribution of this housing requirement within the Plan area and National Park. Taking into account completed and committed development, Policy SP2 identifies x6 strategic sites with a collective capacity for 1,728 dwellings. Beyond this, further non-strategic growth is identified at various named settlements within the plan area (all expressed as minimum requirements) the balance of which is to be met through the Part 2 Local Plan.
- 5.1.2 In order to meet the housing requirement of the Part 1 Local Plan in full, housing land capacity for a further 1,660 dwellings is identified by the Council as the starting point for the preparation of the Part 2 Local Plan. Further assessment of completions and committed development since April 2015, together with monitoring of provision for new housing outlined within locally prepared Neighbourhood Plans, reduces this residual need to 105 dwellings. In response to this context, the Council has sought to allocate sufficient land to deliver a further 132 dwellings. This provides for a marginal oversupply, however is responsive to the level of development which is required in order to meet each of the identified minimum housing requirements for each settlement as set out in Policy SP2 of the Part 1 Local Plan.
- 5.1.3 In broad terms Gladman welcome the Council's commitment to meet and respond to the minimum targets as identified through both Policy SP1 and SP2 of the Part 1 Local Plan. Ensuring sufficient supply on a settlement by settlement basis as set out in the Part 1 Local Plan, is critical in ensuring that the Part 2 Local Plan is consistent with the strategic approach of the adopted development plan. It will also ensure that housing supply is most responsive to local development needs and provides adequate support of settlement vitality and vibrancy consistent with the Council's spatial strategy.
- 5.1.4 Gladman however, do not believe that there is sufficient flexibility within the supply to ensure that the housing requirement of the plan area will be met in full. Capacity for only 27 dwellings in excess of the minimum housing requirement identified for the District (outside of the National Park) is proposed by the Council through the Part 2 Local Plan. This provides flexibility of just 0.5% in the context of the overall housing requirement. As a result, the Council is hugely reliant on full delivery of all identified and committed sites moving forwards over the plan period. This is inclusive of a windfall allowance of 600 dwellings and rural exceptions sites allowance of 125 dwellings over which the Council has limited influence over. As a result, Gladman conclude that there is a distinct

- possibility that the housing requirement will not be met in full, contrary to Policy SP1 of the Part 1 Local Plan.
- 5.1.5 The allocation of housing land within the Part 2 Local Plan is also made in the context of an acknowledged shortfall in the overall level of housing provision made within the Part 1 Local Plan against objectively assessed housing needs.
- 5.1.6 No means of meeting this shortfall have yet been identified by the Council, and a potential resolution to this shortfall will not occur until the commencement of a future Local Plan Review. In the interim Gladman consider that this context provides the Council with further cause to ensure that housing delivery is maximised through the Part 2 Local Plan.
- 5.1.7 Gladman believes that enhanced delivery within the plan area can be secured by adopting the following two measures.
- 5.1.8 First, is the need to allocate further land through the Part 2 Local Plan. Gladman consider that an additional supply of at least 10% (above the housing requirement) should be planned for (circa 550 dwellings). This approach will provide greater certainty that the minimum requirements of the Local Plan can be met in full. It will also ensure that the Local Plan is more adaptable to change which may be experienced during the plan period. In response, Gladman submit two sites for consideration as allocations for housing through the Part 2 Local Plan (see Section 6 of this representation).
- 5.1.9 Secondly, the Council should adopt a flexible and positive policy framework for the determination of applications submitted on sites which are not allocated for development within the Local Plan. Such a policy would provide scope for proportionate and appropriately scaled development to come forward on sites which are located on unidentified sites beyond the settlement boundary, provided they are well related and adjacent to existing specified settlements, and subject to meeting other local and national planning policy requirements. The adoption of this approach would prove a boost to sustainable housing delivery.
- 5.1.10 Such a policy has been prepared relatively locally by Ashford Council through Policy HOU5 of the Ashford Local Plan 2030 (currently at examination). The policy text (as modified) reads:
- “Proposals for residential development adjoining or close to the existing built up confines of [listed] settlements will be acceptable.. provided that each of the following criteria is met:***
- a) The scale of development proposed is proportionate to the size of the settlement and the level, type and quality of day to day service provision currently available, and commensurate with the ability of those services to absorb the level of development in combination with any planned allocations in this Local Plan and committed development, in liaison with service providers;***

- b) The site is within easy walking distance of basic day to day services in the nearest settlement, and/or has access to sustainable methods of transport to access a range of services;***
- c) The development is able to be safely accessed from the local road network and the traffic generated can be accommodated on the local and wider road network without adversely affect the character of the surrounding area;***
- d) The development is located where it is possible to maximise the use of public transport, cycling and walking to access services;***
- e) Conserve and enhance the natural environment and preserve or enhance any heritage assets in the locality; and***
- f) The development (and any associated infrastructure) is of a high-quality design and meets the following requirements:***
 - i) It sits sympathetically within the wider landscape;***
 - ii) It preserves or enhances the setting of the nearest settlement;***
 - iii) It includes an appropriately sized and designed landscape buffer to the open countryside;***
 - iv) It is consistent with local character and built form, including scale, bulk, and the materials used;***
 - v) It does not adversely impact on neighbouring uses or a good standard of amenity for nearby residents;***
 - vi) It would conserve biodiversity interests on the site and/or adjoining area and not adversely affect the integrity of international and national protected sites in line with Policy ENV1.***

5.1.11 Gladman consider that a similar policy should be implemented in the case of Lewes. Safeguards relating to size, location and impacts included within the policy would ensure that the overall spatial strategy as defined in the Part 1 Local Plan would be safeguarded and reflected in decision making when applying the policy. The policy would be beneficial in enabling additional development not otherwise provided by the development plan, ensuring that sustainable housing delivery is maximised within the District.

5.2 Neighbourhood Plans

- 5.2.1 Great emphasis is placed by the Council on securing the delivery of the residual housing requirement through Neighbourhood Planning. Of the residual need for 1,660 dwellings, 1,250 dwellings are identified through the Neighbourhood Planning process (75%). Gladman notes the strong take up of Neighbourhood Plans within the plan area, with 'made' neighbourhood plans in four areas and allocating sites sufficient to deliver 385 dwellings. A further three emerging Neighbourhood Plans would deliver 865 dwellings.
- 5.2.2 Whilst a positive start has been made in Lewes in relation to Neighbourhood Plan making, the Council must recognise the risk associated with reliance on Neighbourhood Plans in securing housing delivery. The Council will need to closely monitor the implementation of Neighbourhood Plans and ensure that the appropriate policy mechanisms are in place should allocated sites not come forward as and when envisaged within the Neighbourhood Plan.

5.3 Newhaven: Policy NH01 and NH02

- 5.3.1 Two previously saved allocations for housing within Newhaven are carried forward through the Local Plan Part 2. Both allocations form part of the committed supply within Newhaven, and as such make an important contribution in meeting the identified housing requirement in full.
- 5.3.2 In our previous representation to the Draft version of the Part 2 Local Plan, Gladman raised concerns relating to the deliverability of both sites. No evidence has been provided by the Council since the conclusion of this consultation which has satisfactorily addressed these concerns.

NH01 – South of Valley Road

- 5.3.3 NH01 is carried forward from the 2003 Local Plan and has a history which extends into the 1970s. Whilst parts of the site have come forward for development over this period, development of the site has been taken at a considerably slow pace, with a further capacity for 24 dwellings yet to be developed. Despite being available and suitable for development for a period of at least 35 years, this part of the Site has thus far not come forward for housing development. No evidence has been produced by the Council to confirm what has altered in the site conditions and market which means that this Site is now likely to be developed.

NH02 - Land at the Marina

- 5.3.4 NH02 is also a previously allocated site and has been subject to a previous and now lapsed planning consent for a mixed-use development which included some 331 dwellings (lapsed in May 2015). Beyond this lapsed planning permission, there is little evidence that the site could be developed for 300 dwellings during the plan period. The Site is subject to multiple constraints and planning issues such as its small area, proximity to heritage assets, active use as a marina, and site pollution issues.

- 5.3.5 Whilst Gladman agrees that the potential exists for some development to come forward over the plan period at both NH01 and NH02, Gladman cannot conclude with any certainty on the extent and timing, which is particularly significant given the absence of flexibility within the wider plan. Gladman consider that this uncertainty further underlines the need for additional allocations and a relaxed policy position as previously set out in Section 5.1 of this representation.

5.4 Barcombe Cross: Policy BA01 and BA03

- 5.4.1 Gladman welcome the Council's decision to allocate land at Barcombe Cross for housing development through the Part 2 Local Plan. This is consistent with Policy SP2 of the Part 1 Local Plan, which identifies the need for Barcombe Cross to accommodate new development within the plan period. Barcombe Cross is a sustainable settlement with a primary school, post office, shop, public house, village hall, and bus services. Further development is necessary to ensure that existing services remain viable and provide a response to the housing needs of the village and its rural hinterland.
- 5.4.2 Whilst housing allocations at Barcombe Cross is supported, Gladman hold concern with the suitability of some of the sites identified by the Council for allocation for housing within the village through the Part 2 Local Plan. Gladman believe that there are more appropriate locations for growth at Barcombe Cross which should be explored first by the Council (see Section 6).

BA01 – Land at Hillside Nurseries, High Street

- 5.4.3 Site BA01 is known to experience access constraints which require third party land in order to be suitably addressed. The 2018 Housing Site Options Background Paper illustrates that there is currently disagreement about the availability of this land as providing the solution for safe and sufficient means of access to the Site. The Paper reveals a dispute on whether an agreement has been reached for this land to be used. The agent of this land disputes the claim that an agreement on this matter has now been reached. It is unclear, whether the Site could be developed without this third-party land.

BA03 – Land at Bridgelands

- 5.4.4 This Site is known to experience surface water flooding issues and currently provides flood water capacity with features such as a pond and ditches. The development of this site may have an adverse effect for flood risk for off-site locations contrary to policy and will require further study before the developability of the Site can be confirmed. The Site is also located within a part of the village which is assessed to have a low capacity for change in landscape terms. As such, even a modest development of the Site could have significant adverse effects for local landscape quality contrary to national planning policy.

5.5 South Chailey: Policy CH03

- 5.5.1 The Council state that a limited level of allocations is made in South Chailey on account of the limited range of services available within the village and the sensitivity of the landscape to development. Gladman dispute the Council's position with regard to the sustainability of the village and its capacity for further development.
- 5.5.2 Gladman consider South Chailey to be a sustainable settlement. The village benefits from various services and facilities such as Chailey School, a GP, church, a playground, and village a shop/post office. The village is served by the 121-bus service which links the village to the nearby higher order settlements of Newick and Lewes. The 121-bus services operates 6 days week (not Sunday) at 2 hourly intervals. The service provides access to both Newick and Lewes during rush hour, affording a viable alternative means of travel for accessing wider services and employment facilities available within these centres.
- 5.5.3 Gladman consider that there are alternative locations for development within South Chailey which are contained from wider long views which have not been explored by the Council (see section 6). Gladman believe that it is important that the Council explore all options available to secure sustainable development within the District, in order to maximise housing delivery in the context of significant housing need and in order to provide greater certainty that the minimum requirements of the Part 1 Local Plan.

5.6 Ringmer: Policy RG01

- 5.6.1 The Part 2 Local Plan seeks to role forward the allocation of Caburn Field for housing from the 2003 Local Plan. The Site is in active use as the home of Ringmer Football Club. The club's owners wish to relocate the club to an alternative site, however, despite being allocated for housing development within the previous local plan, the site has not yet come forward.
- 5.6.2 Policy RG01, like its predecessor, requires the relocation of the football club to an alternative site, ahead of permitting its development for housing. Gladman support this approach, however holds concerns about the deliverability of this when an alternative site has yet to be identified. Gladman is aware that land is identified for playing fields within the made Ringmer Neighbourhood Plan on a site to the east of Ringmer Community College (Site RG3). However, it is clear from the supporting text within the Neighbourhood Plan that this field is required in order to meet existing shortfalls in open space provision. It is unclear whether the football club could be accommodated at this site in addition to the needs identified in the Neighbourhood Plan.
- 5.6.3 Gladman consider that in order to heighten the certainty of this site coming forwards within the plan period, there is a need for the Council, in partnership with the Parish Council, to identify an alternative location for the football club. The demonstrated availability of a suitable alternative would alleviate Gladman's concerns regarding the deliverability of this site.

- 5.6.4 Should this not prove possible, Gladman consider that further allocations and/or greater flexibility in decision making (as set out in Section 5.1 of this representation) should be provided by the Council in order to give greater certainty that the Plan's minimum development requirements will be met in full.

5.7 Policy DM1: Planning Boundary

- 5.7.1 As set out in Section 5.1 of this representation, and further to the concerns raised relating to a number of proposed allocations, Gladman consider that there is a strong case for greater degree of flexibility for the types of development permissible within the open countryside. Policy HOU5 of the Ashford Local Plan (as quoted in Section 5.1), is considered by Gladman to provide an appropriate basis for the rewording of Policy DM1. This approach would secure the delivery of additional sustainable, proportionate development, which is consistent with the spatial strategy, and responsive to identified constraints and issues.
- 5.7.2 Gladman consider that the Policy should be applied to the settlements of Newhaven, Seaford, Peacehaven and Telscombe, Ringer and Broyle Side, Cooksbridge, Barcombe Cross, North and South Chailey, Newick, Plumpton Green, Wivlesfield Green, and areas adjacent to Burgess Hill.

5.8 Policy DM19: Protection of Agricultural Land

- 5.8.1 The policy adopts a sequential approach to the development of best and most versatile agricultural land. This represents a departure from national planning policy where no sequential approach is applied. No evidence is provided by the Council to justify the application of this strict approach.
- 5.8.2 Furthermore, it is unclear how an assessment of alternatives could be undertaken given that only indicative mapping of best and most versatile land is available, and accurate testing can only be undertaken following site investigation. It is also not clear on what basis the alternative assessment will be undertaken (settlement based? Parish based? District based? Etc). As drafted therefore, the policy could not be effectively implemented.
- 5.8.3 In response, Gladman consider that the policy should be reworded. The policy should set out that the development of Best and Most Versatile land should be avoided, and that proposals on best and most versatile land will need to demonstrate that the benefits of that proposal will significantly outweigh the adverse effects of its loss. This is consistent with the approach of the NPPF.

5.9 Policy DM33: Heritage Assets

- 5.9.1 The approach to protecting the historic built environment must fully reflect the guidance set out in NPPF2 paragraphs 184-201.
- 5.9.2 The Policy should ensure that a graded approach to assessing the weight applied to the conservation of the asset depending on the importance of that asset.

-
- 5.9.3 With reference to designated heritage assets, the Council should refer specifically to paragraphs 194 and 195 of NPPF2, which set out the need to assess the significance of a designated heritage assets and where there is less than substantial harm, this should be weighed against the public benefits of the proposal. Where there is deemed to be substantial harm, then the proposal would need to achieve substantial public benefits to outweigh that harm.
- 5.9.4 For non-designated assets, the policy must reflect the guidance set out within paragraph 197 of NPPF2. This states that the policy test that should be applied in these cases is that a balanced judgement should be reached having regard to the scale of any harm and the significance of the heritage asset.

6 SITE SUBMISSIONS

6.1 Land at Barcombe Mills Road, Barcombe Cross

- 6.1.1 Land at Barcombe Hills Road, Barcombe Cross extends to circa 3.7 hectares. The parcel of land is well related to the existing pattern of the settlement and its release for development would form a suitable, sustainable extension to Barcombe Cross. A significant amount of additional land is within the same ownership and has the potential to be used for additional community benefit.
- 6.1.2 The development brief for the Site is again submitted to the Council in Appendix 1. The development brief illustrates how the site could be developed, however this is not fixed, and Gladman is flexible to change subject to further discussion with the Council and the local community.
- 6.1.3 It is considered that this site has the capacity to deliver 50-70 dwellings and could provide for a mix of house types and needs. The scale of development is proportionate to the size of Barcombe Cross and could make an important contribution to the District's housing land supply.
- 6.1.4 Development in this location would be deliverable in the short term and increase the supply and choice of housing, including affordable housing, in Barcombe Cross and the wider area. In addition, it would contribute towards economic growth and have wider social benefits to the local community.

6.2 Land to the West of the A275, South Chailey

- 6.2.1 As set out in Section 5.5 of this representation, Gladman considers that South Chailey has a good level of services and facilities and as such forms a sustainable location for new development. Gladman propose that land to the west of the A275, South Chailey (see development brief at Appendix 2) is allocated for residential development.
- 6.2.2 The site extends to 2.6 hectares and is well related to the existing built environment of South Chailey, as well as being well contained by existing woodland and a public right of way. The site would be capable of delivering circa 55 dwellings as well as improvements to pedestrian links and a new play area.
- 6.2.3 This development, as proposed, clearly constitutes 'sustainable development', and is viable and deliverable and should be considered as a potential housing allocation.
- 6.2.4 This proposal would be deliverable in the short term and increase the supply and choice of housing, including affordable housing, in South Chailey and the wider area. In addition, it would contribute towards economic growth and have wider social benefits to the local community.
- 6.2.5 Gladman would welcome the opportunity to discuss the potential of the site further with both the District Council and the local community.

7 CONCLUSION

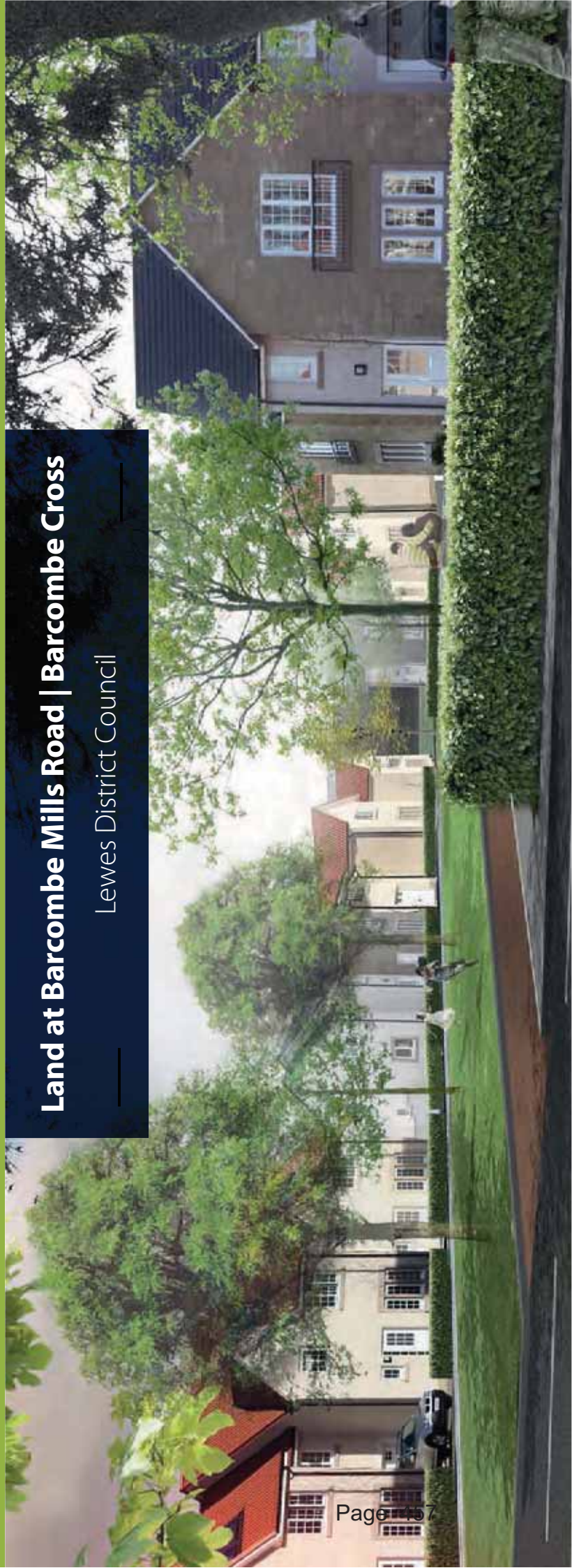
- 7.1.1 This submission has provided Gladman Developments' written representations to the pre-submission version of the Lewes Local Plan Part 2.
- 7.1.2 Gladman hold significant concerns that the approach adopted by the Council in its allocation of housing land through the Part 2 Local Plan risks the deliverability of the housing requirement. The Council is reliant on the full delivery of committed and allocated sites, as well as other sources of land such as windfall development and rural exception housing to meet its housing requirement, with minimal flexibility provided. As such, there is a high degree of risk that the full minimum housing requirement as set out in the Part 1 Local Plan will not being achieved.
- 7.1.3 To address this, Gladman consider that further allocations are necessary. Gladman also consider that the Council should adopt a flexible approach to the determination of applications which are submitted on sites which are located beyond but adjacent to existing settlement boundaries. Gladman submit the wording of Policy HOU5 as amended within the emerging Ashford Local Plan as an exemplar policy for the Council's consideration. Gladman has also identified the settlements located within the plan area at which this policy could be sustainably implemented.
- 7.1.4 Gladman maintain their concerns regarding the deliverability of a number of allocations proposed through the Part 2 Local Plan which have not been addressed by the Council since the previous consultation. Gladman consider that the deliverability issues highlighted within this representation provides a further case for additional allocations to be made through the Part 2 Local Plan and for greater flexibility to be implemented by the Council in decision making as highlighted above.
- 7.1.5 In response, Gladman has submitted two sites for consideration as allocations for housing, at Barcombe Mills Road, Barcombe Cross and west of the A275, South Chailey. Both sites are considered by Gladman to provide for suitable locations for housing, and both are deliverable within the remaining plan period.
- 7.1.6 Beyond this, Gladman has concerns with the soundness of the proposed policy approach outlined in relation to Best and Most Versatile Land and Heritage and has suggested suitable amends to both policies.

Appendix 1

Development Brief - Land at Barcombe Mills Road, Barcombe Cross

DEVELOPMENT BRIEF

Land at Barcombe Mills Road | Barcombe Cross
Lewes District Council



Introduction

Gladman Developments Ltd wishes to promote land at Barcombe Mills Road, Barcombe Cross for development. The 3.7 hectare proposed development site (identified by the red line boundary) presents an ideal opportunity to create a sustainable, high quality residential development situated in a sought-after location whilst responding to the existing landscape context and nearby heritage assets.

A new residential development on this site would incorporate both new market and affordable housing of a variety of types and tenures, to help meet the current and future housing needs of Barcombe Cross and the District.

This document includes an initial indicative framework plan, indicating how the site might accommodate a future residential development with high quality open space and landscaping. This will complement the site's surroundings to achieve seamless integration.

The indicative framework plan is, of course, just our first attempt at considering the development potential of the site. Gladman would welcome the opportunity to discuss the potential delivery of this site with you in more detail so it can be considered fully in the preparation of your emerging Local Plan Part 2.

Should you wish to further discuss our proposals, please contact:

Planner: Laura Tilston
Email: l.tilston@gladman.co.uk
Telephone: 01 260 288925



Site & Planning Context

Site & Surroundings

The village of Barcombe Cross is located approximately 3.5 miles north of Lewes town and 4.5 miles south west of Uckfield.

The site is located to the south of Barcombe Cross, to the west of Barcombe Mills Road and is approximately 3.7 hectares in size. The site is immediately adjacent to existing residential development on Monger's Mead to the north.

As can be seen on the aerial view of the site on the previous page, the land identified by the red line boundary is the proposed development site, with the remaining land under the landowner's control identified by the blue boundary, which will be retained as agricultural land. It is anticipated that the majority of the site would provide for residential development, with the remainder comprising green infrastructure and public open space.

A Vibrant Community

Barcombe Cross is a vibrant settlement with a population of 741 according to the 2011 Census.

Barcombe Cross is an active and successful community and provides residents with direct access to community facilities including:

- Barcombe Primary School
- Post Office and Store
- Royal Oak Public House
- Bus links to Cocksbridge and Lewes
- Village Hall

Barcombe Cross is well placed to host additional development to meet future housing need and support future economic growth. Spatial Policy 2 of the Core Strategy identifies that a minimum of 30 additional units are to come forward within the settlement across the plan period.

Principle of Development

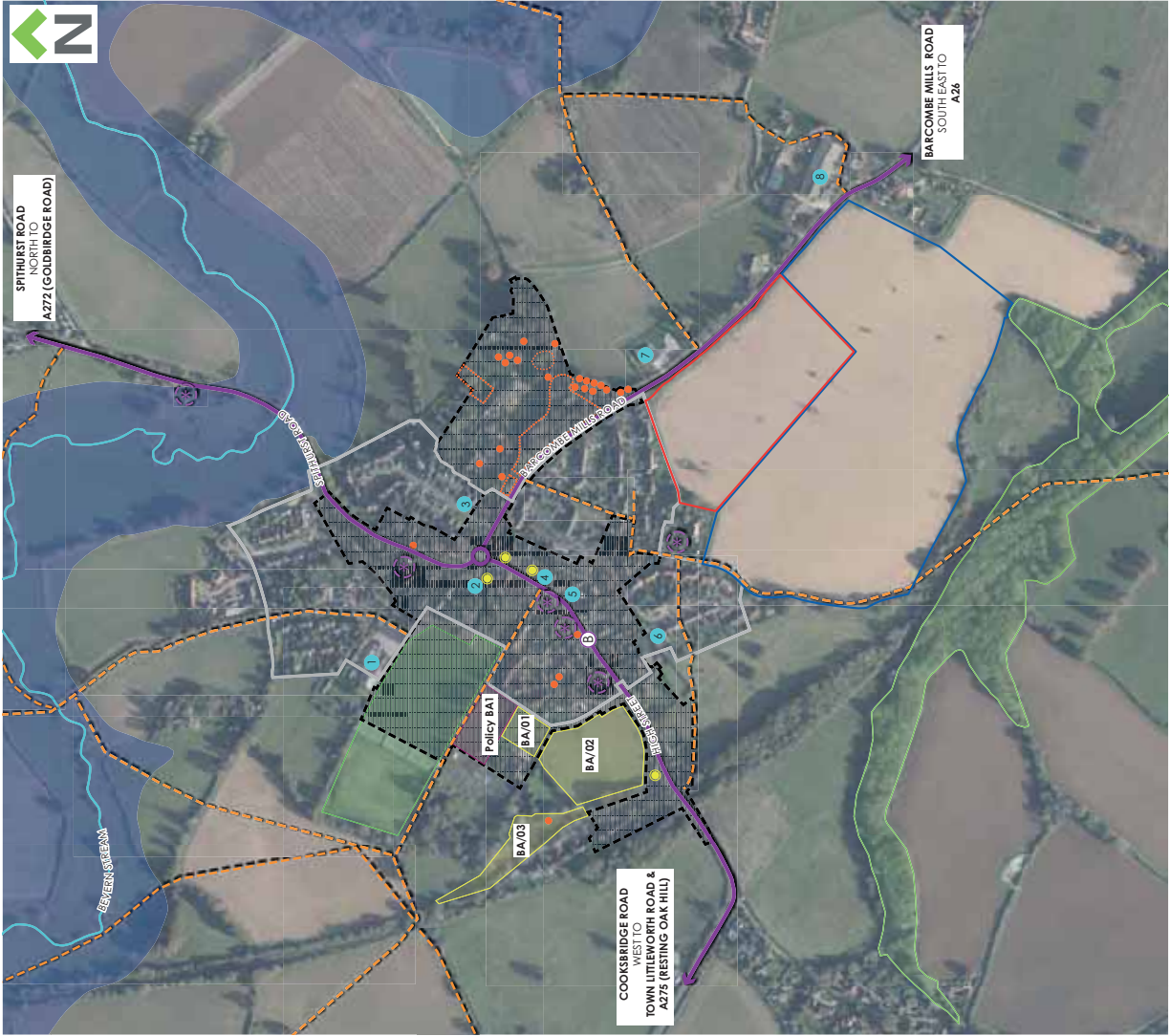
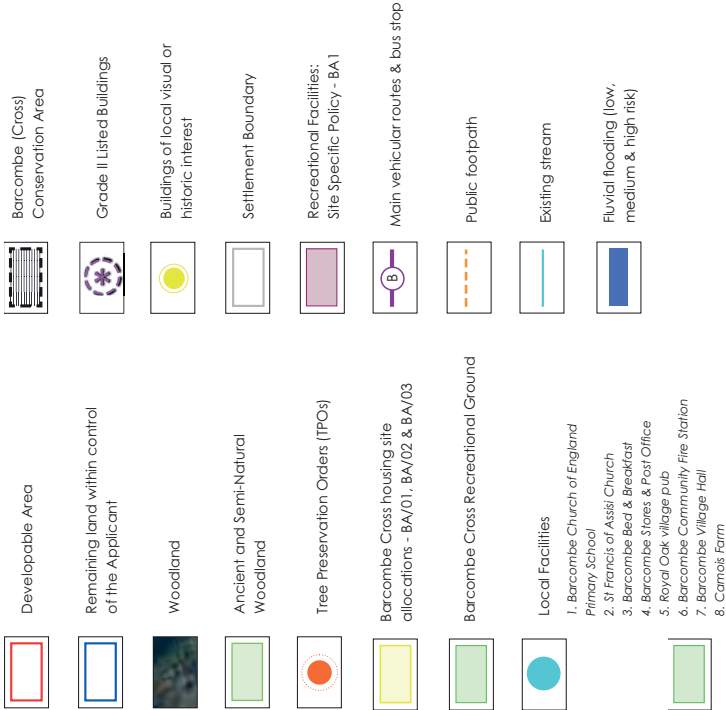
The Full Objectively Assessed Housing Need for Lewes District cannot be met due to constraints across the area such as the South Downs National Park. Therefore, further opportunities to deliver appropriate and sustainable sites for housing development will be very important for local people to meet existing housing need. Barcombe Cross is a settlement that is relatively free from constraints (such as the national park) and therefore is an appropriate location for housing growth.

The emerging Local Plan Part 2: Site Allocations and Development Management Policies proposes to allocate 3 sites for residential development in Barcombe Cross, providing 38 dwellings across the plan period. Gladman believe that Barcombe Cross is capable of supporting further growth beyond the amount currently proposed within the emerging Local Plan, and housing development need not be limited to this amount.

It must be noted that two of the proposed allocations for Barcombe Cross comprise developments of fewer than 11 dwellings. Therefore, the threshold for on-site affordable housing provision as set out in adopted Core Policy 1 will not apply and there will be no policy requirement for affordable housing on these sites. New residential development on land off Barcombe Mills Road will provide the full policy compliant amount of affordable housing on-site, which should be seen as a considerable benefit of the proposals.

Settlement Constraints Plan

This plan identifies the constraints to development across the settlement, including ancient and semi-natural woodland, tree preservation orders, the Barcombe Cross Conservation Area and listed buildings. As can be seen from the plan, the site itself is free from planning constraints.



Site Development Potential

This site offers a unique opportunity for Lewes District Council to plan, and more importantly deliver, a new development where people will genuinely want to live and choose to stay, whilst embracing the distinctive character of the surrounding area. This will be achieved by:

Housing Delivery



The site is capable of delivering approximately 50 dwellings of varying sizes, types and tenures (including affordable housing delivered in accordance with planning policy).

Delivery



Gladman considers that housing on this site is capable of being brought forward within the next 5 years.

Landscape Character



The site is not designated for its environmental value, and does not feature any landscape features which would elevate it above that of the open countryside in which it sits. The site can be developed in such a way to retain and positively manage any key landscape features and to provide substantial areas of structural planting to act as a landscape buffer, as identified on the indicative framework plan within this development brief.

The village hall on the opposite side of Barcombe Mills Road and the footpath connection to the existing residential area to the northwest would link the site to the existing fabric of Barcombe Cross. Through sensitive design, the development of the site can be absorbed into the wider landscape without causing any unacceptable landscape and visual harm.

Site Development Potential

Biodiversity, Green Infrastructure & Local Wildlife



The proposed development will aim to enhance the environment through the provision of green infrastructure, comprising new publically accessible greenspace and recreational paths increasing permeability to surrounding areas of interest and facilities.

Ecology surveys will be undertaken prior to the determination of the planning application and work will also be carried out to assess any impact on nearby ecological designations. The development proposals will provide adequate mitigation as required to ensure species are protected, with enhancement where possible.

Hydrology



The development proposal falls entirely within the Environment Agency Flood Risk Zone 1 i.e. land assessed as having a less than 1 in 1,000 annual probability of flooding. The site is also not within a surface water flood risk area.

Heritage



The site is located in close proximity to Monger's Farmhouse, a grade II listed building. Having sought advice from heritage consultants at Pegasus, we understand the immediate setting of the listed building and the converted barn to the south has changed considerably as they were once a farmstead set a little distance apart from Barcombe Cross, however recent residential development has joined the farmstead to the settlement to its west and north. Monger's Farm is no longer used for farming and its character has changed completely to residential with the former farmyard now being in use for parking and gardens. This change to character has diminished the contribution of the wider agricultural setting to its significance.

The proposed development is set back from the heritage asset in this area, and the site has been selected to retain agricultural land directly to the south to minimise any adverse impact to the setting of the listed building. The site is well screened from other listed buildings and the conservation area within the village and will be carefully designed to integrate with existing development.

Site Development Potential

Design



A design-led approach, informed by consultation with the District Council, key stakeholders and the local community, would inform plans for the site so that a future development responds sensitively to the site's village and landscape setting. The development would make a positive addition to Barcombe Cross, complementing the character of the surrounding area in terms of scale, density, character and quality.

Accessibility



Development in this location will provide quality pedestrian, cycle and public transport connections with Barcombe Cross and the wider highway and footpath / cycle network. The site fronts directly onto land in the adopted highway so a vehicular access is achievable. The nearest bus stop is located around 350m from the centre of the site and can be reached by an accessible footpath.

Topography



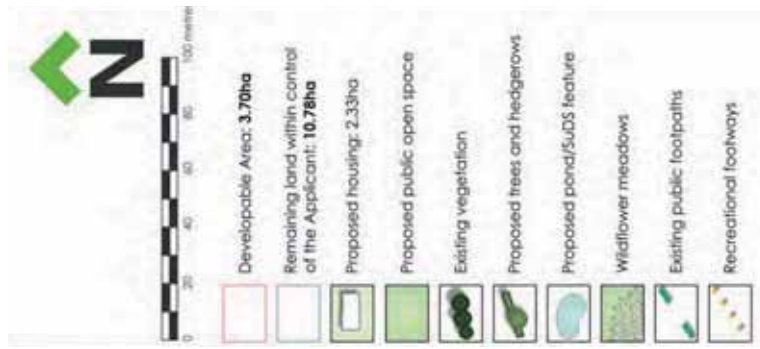
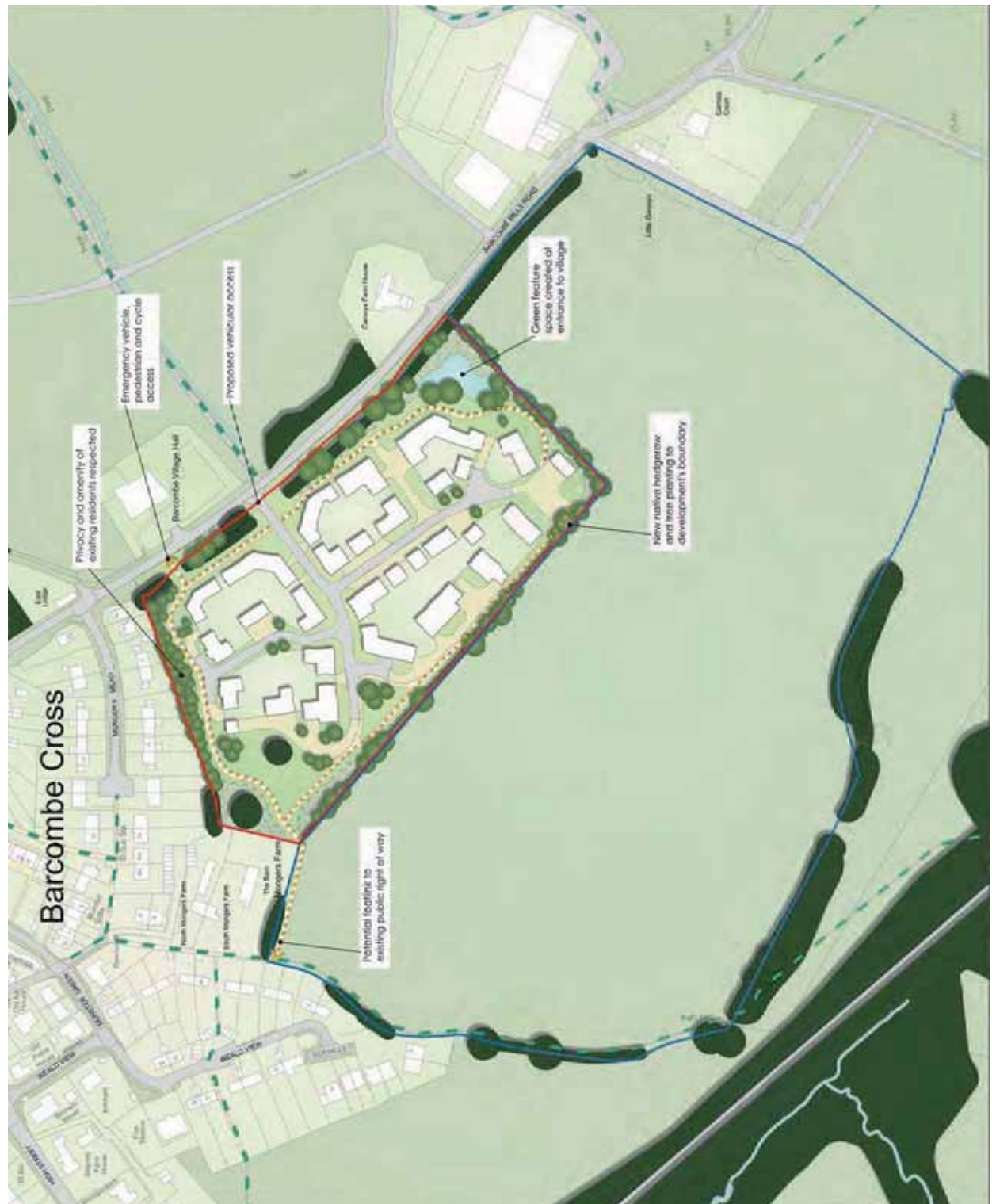
The land within the red line boundary is flat with no technical barriers to overcome in order to secure its development.

Socio-economic



Our preliminary research shows that the proposed development could lead to a significant boost in local spending and there is an indication that the gross spending power of the new residents could be in excess of £1.6 million each year, a proportion of which will be spent in the locality.

Site Plan With Indicative Framework Plan

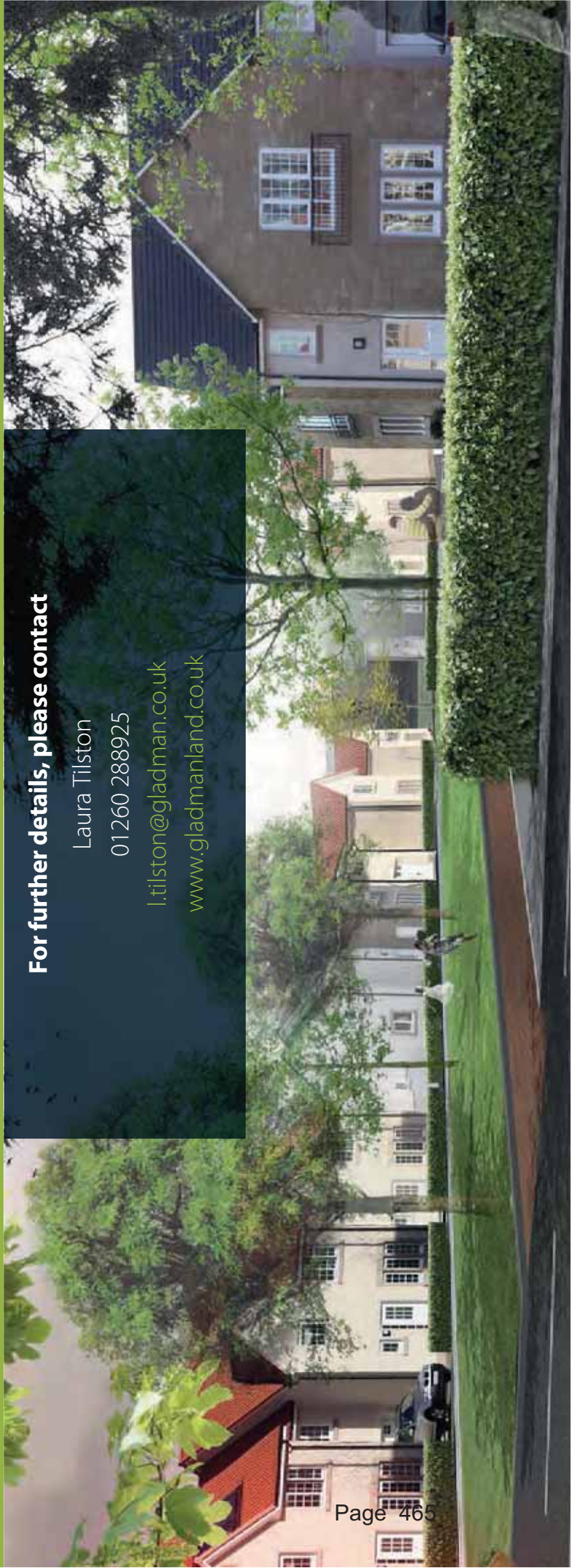




Gladman Land
Gladman House, Alexandria Way,
Congleton, CW12 1LB

For further details, please contact

Laura Tilston
01260 288925
l.tilston@gladman.co.uk
www.gladmanland.co.uk



Appendix 2

Development Brief - Land to the West of the A275, South Chailey

DEVELOPMENT BRIEF

Land to the West of the A275 | South Chailey
Lewes District Council



Introduction

Gladman Developments Ltd wishes to promote land west of the A275, South Chailey for development. The 2.5 hectare site can accommodate a sustainable, distinctive residential development situated in an attractive market location to ensure the delivery of high quality homes.

A residential development on the site would incorporate both new market and affordable housing (of a variety of types, from affordable rented properties to discounted sale properties to help key workers and first time house buyers) to help meet the current and future housing needs of both South Chailey and the District.

This document includes an initial illustrative development framework plan, indicating how the site might accommodate a future residential development with high quality open space and landscaping.

The illustrative framework plan is, of course, just our first attempt at considering the development potential of the site. Gladman would welcome the opportunity to discuss the potential delivery of this site with you in more detail so it can be considered fully in the preparation of your emerging Local Plan Part 2.

Should you wish to further discuss our proposals, please contact:

Planner: Laura Tilston
Email: l.tilston@gladman.co.uk
Telephone: 01260 288925



Site & Planning Context

Site & Surroundings

The site consists of 2 open fields and is situated at the southern end of South Chailey, immediately adjacent to existing development on the A275. The site is bound by the A275 and existing development to the east, hedge and woodland to the north and west, with a public footpath along a road forming the southern boundary. The site topography is relatively flat with a small rise of around 5 meters to the northern extent.

A Vibrant Community

South Chailey hosts a population in the region of 1,000 people providing access to community facilities including:

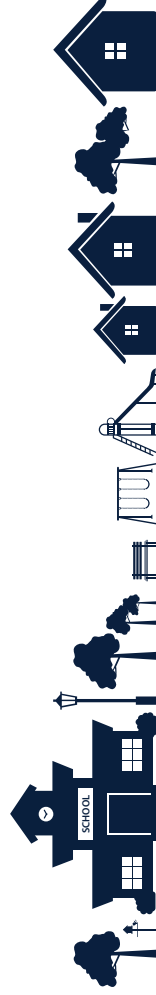
- Chailey School
- GP
- Church
- Bus links
- Shop and Post Office

South Chailey is well placed to host additional development to meet future housing need and support future economic growth.

Principle of Development

The Full Objectively Assessed Housing Need for Lewes District cannot be met due to constraints across the area such as the South Downs National Park. Therefore, further opportunities to deliver appropriate and sustainable sites for housing development will be very important for local people to meet existing housing need.

South Chailey is a settlement that can support development and is free of the national park constraint and it can therefore accommodate additional much needed homes in the District.



Site Development Potential

This site offers a unique opportunity for Lewes District Council to plan, and more importantly deliver, a new development where people will genuinely want to live and choose to stay, whilst embracing the distinctive character of the surrounding area. This will be achieved by:



Housing Delivery



The site is capable of delivering approximately 55 dwellings of varying sizes, types and tenures (including affordable housing delivered in accordance with planning policy). Gladman considers that housing on this site is capable of being brought forward within the next 5 years.

Landscape Character



The site is not designated for its environmental value, and its development can be sensitively designed to sit within the wider landscape without causing harm to local, nationally and internationally important designated assets.

Site Development Potential

Biodiversity, Green Infrastructure & Local Wildlife



The proposed development will aim to enhance the environment through the provision of green infrastructure, comprising new publically accessible greenspace and recreational paths increasing permeability to surrounding areas of interest and facilities.

Ecology surveys will be undertaken prior to the determination of the planning application. The development proposals will provide adequate mitigation as required to ensure species and habitats are protected, with enhancement where possible.

Market Appeal



The site is located near to the Swan Public House a grade II listed buildings, but the significance of the building is derived from its function as a community buildings in a village locations. The setting of the heritage asset is such that the development of the site for additional residential development in the village will have a neutral effect. The site is well screened from other heritage assets within the village and will be carefully designed to integrate with existing development.

Heritage



The site is located near to the Swan Public House a grade II listed buildings, but the significance of the building is derived from its function as a community buildings in a village locations. The setting of the heritage asset is such that the development of the site for additional residential development in the village will have a neutral effect. The site is well screened from other heritage assets within the village and will be carefully designed to integrate with existing development.

Hydrology



The development proposal falls entirely within the Environment Agency Flood Risk Zone 1 i.e. land assessed as having a less than 1 in 1,000 annual probability of flooding. The site is also not within a surface water flood risk area.

Site Development Potential

Design



A design-led approach, informed by consultation with the District Council, key stakeholders and the local community, would inform plans for the site so that a future development responds sensitively to the site's village and landscape setting. The development would make a positive addition to South Chailey, complementing the character of the surrounding area in terms of scale, density, character and quality.

Topography



The site is flat with no technical barriers to overcome in order to secure its development.

Accessibility



Development in this location will provide the quality pedestrian and cycle links into the settlement, as well as, public transport connections with adjacent developments and communities.



Site Plan With Indicative Framework Plan





Gladman Land
Gladman House, Alexandria Way,
Congleton, CW12 1LB

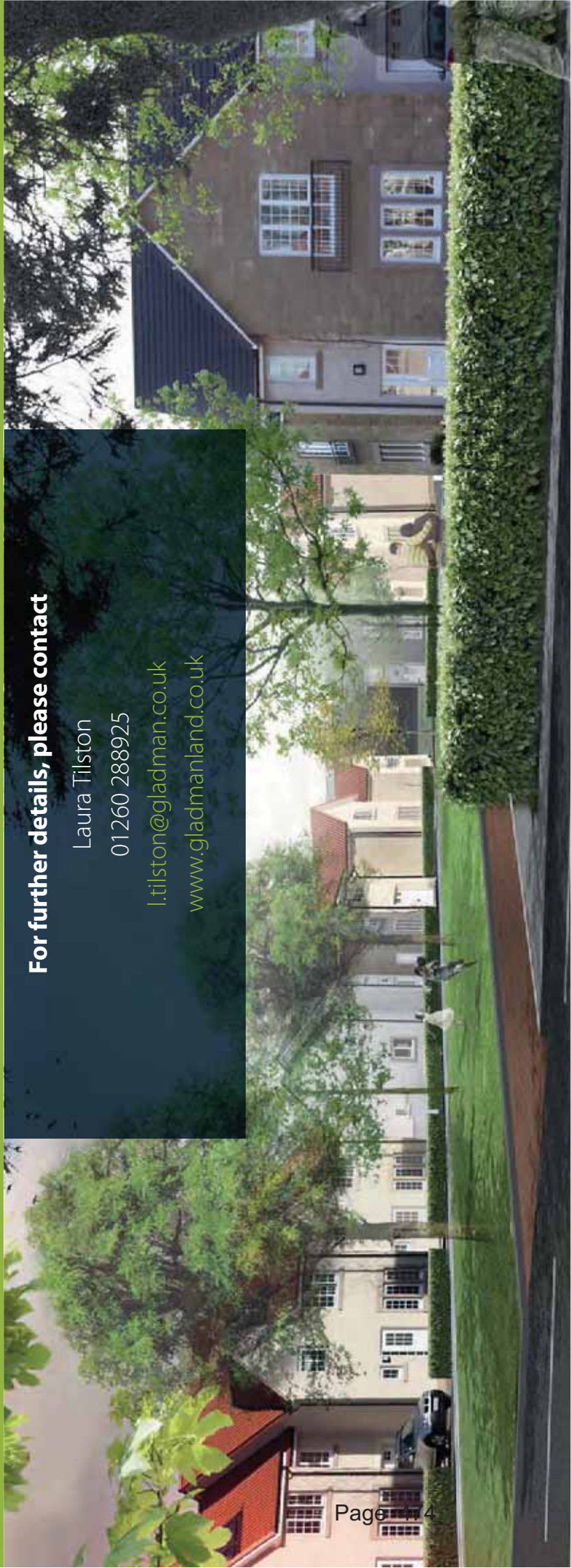
For further details, please contact

Laura Tilston

01260 288925

l.tilston@gladman.co.uk

www.gladmanland.co.uk



Representation ID: REP/051/E1

Representor Details:

Representor ID:	REP/051
Name:	Paul Barratt
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	E1 - Land at East Quay, Newhaven Port
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	No Not Consistent with national policy
Representation: The expansion of the industrial site into the area E1 will severely impact an important, popular and much valued leisure and natural resource. This is not consistent with two stated aims in the Lewes Local Plan, namely "PROTECTING AND ENHANCING THE DISTINCTIVE QUALITY OF THE ENVIRONMENT" and therefore also contrary to the aim of "CREATING HEALTHY,	

SUSTAINABLE COMMUNITIES" as the area will no longer be attractive to people wanting to exercise in and to enjoy.

What changes do you suggest to make the document legally compliant or sound?

This plan to expand into area E1 should be rejected for the reasons given above.

Do you consider it necessary to participate at the Examination in Public? No

Why do you feel it is necessary to participate at the Examination in Public?

Representation ID: REP/052/GT01Representor Details:

Representor ID:	REP/052
Name:	Daniel Barr-Richardson
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:
Organisation:

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	GT01 - Land south of The Plough
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	
Representation:	
<p>I wish to strongly object to the proposed travellers site currently being consulted on which is to be established in Plumpton Green.</p> <p>I am a resident of Plumpton Green.</p> <p>The reasons for my objection are as follows;</p> <ol style="list-style-type: none">1. The site is much larger than is necessary for the proposed 5 static and 5 mobile caravans and will inevitably lead to more caravans on the site either by extension of the site or by additional visitors.2. The industrial estate located next to the site will have to dramatically increase its	

security and their insurance premiums will increase which will lead to businesses moving out of the area which will reduce employment and damage the essential local economy.

3. There is no footpath access from the site to the local amenities which will encourage more people to walk down a road not suitable for pedestrians which could well lead to people getting hurt or worse.

4. The proposal conflicts with Plumpton Parish Council and Lewes District Council's policies for developments

5. It is out of keeping with all surrounding buildings and environment

Please do not grant planning permission for this site in this location

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public?

Why do you feel it is necessary to participate at the Examination in Public?

From: [REDACTED]
Sent: 04 November 2018 17:20
To: ldf
Subject: Objection to Travelers Site in Plumpton Green
Categories: LPP2 comment to code - stakeholder details have been added

Dear Sir,

I wish to strongly object to the proposed travellers site currently being consulted on which is to be established in Plumpton Green.

I am a resident of Plumpton Green.

The reasons for my objection are as follows;

1. The site is much larger than is necessary for the proposed 5 static and 5 mobile caravans and will inevitably lead to more caravans on the site either by extension of the site or by additional visitors.
2. The industrial estate located next to the site will have to dramatically increase its security and their insurance premiums will increase which will lead to businesses moving out of the area which will reduce employment and damage the essential local economy.
3. There is no footpath access from the site to the local amenities which will encourage more people to walk down a road not suitable for pedestrians which could well lead to people getting hurt or worse.
4. The proposal conflicts with Plumpton Parish Council and Lewes District Council's policies for developments
5. It is out of keeping with all surrounding buildings and environment

Please do not grant planning permission for this site in this location

Yours sincerely

DC Barr-Richardson FMAAT BA(Econ) Hons ACIB

Information contained in this email is intended for the use of the addressee only, and is confidential and may also be privileged. If you receive this message in error, please advise us immediately. If you are not the intended recipient(s) please note that any form of distribution, copying or use of this communication or the information in it is strictly prohibited and may be unlawful

Financial Director Services (Sussex) Ltd. Registered Address - The Manse, Station Road, Plumpton Green, Lewes East Sussex BN7 3BX. Registered in England and Wales. Registered Number 05036782. Association of Accounting Technicians Licence No. 1900.

Representation ID: REP/053/GT01Representor Details:

Representor ID:	REP/053
Name:	Milly Bassett
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	GT01 - Land south of The Plough
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	
Representation:	
<p>I am writing to object to the proposal of five permanent traveller pitches situated in the pretty dowland village of Plumpton Green between the Plough pub and the Old Brickworks.</p> <p>My first concern is that of safety for pedestrians, the proposed site is very close to the entrance of the village. Station Road is the main access road into Plumpton Green and as such can be an extremely dangerous and busy road. Heavy Goods Vehicles, buses, railway maintenance vehicles, farm machinery (tractors with trailers) and professional horse boxes for the race days at the racecourse and hunt days make this a hazardous</p>	

road to walk.

The risk of accidents to pedestrians and traveller vehicles entering and leaving the site would increase, traffic parked outside of the site entrance would cause accidents. The road is far too busy to accommodate the travellers site. It's just not safe!

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

The proposed site is for caravans, what happens to the natural production of grey water, this would be a very unhygienic site without proper amenities, especially if you consider the summer we have just enjoyed. There are no public loos in the village! How would the council deal with generated human waste and the extra domestic waste? The countryside is not a public toilet, what about our horses, herds and wildlife welfare?

[REDACTED]

[REDACTED]

[REDACTED]

In summary, it is my belief that Plumpton Green is not a suitable place for this site for the following reasons; road safety, lack of human amenities [REDACTED]

<div data-bbox="164 174 1374 259" style="background-color: black; width: 100%; height: 38px;"></div> <div data-bbox="159 215 1409 297" style="padding-left: 468px;">I must stand up for the countryside so others may enjoy it too without threat of harm to the environment and village life.</div>
What changes do you suggest to make the document legally compliant or sound?
Do you consider it necessary to participate at the Examination in Public?
Why do you feel it is necessary to participate at the Examination in Public?

From: [REDACTED]
Sent: 25 September 2018 13:25
To: ldf
Subject: Plumpton Green - Proposed Permanent Gypsy and Travellers Site
Categories: Vanessa to deal with

[REDACTED]
[REDACTED]

To whom it may concern,

I am writing to object to the proposal of five permanent traveller pitches situated in the pretty dowlund village of Plumpton Green between the Plough pub and the Old Brickworks.

My first concern is that of safety for pedestrians, the proposed site is very close to the entrance of the village. Station Road is the main access road into Plumpton Green and as such can be an extremely dangerous and busy road. Heavy Goods Vehicles, buses, railway maintenance vehicles, farm machinery (tractors with trailers) and professional horse boxes for the race days at the racecourse and hunt days make this a hazardous road to walk.

The risk of accidents to pedestrians and traveller vehicles entering and leaving the site would increase, traffic parked outside of the site entrance would cause accidents. The road is far too busy to accommodate the travellers site. It's just not safe!

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

The proposed site is for caravans, what happens to the natural production of grey water, this would be a very unhygienic site without proper amenities, especially if you consider the summer we have just enjoyed. There are no public loos in the village! How would the council deal with generated human waste and the extra domestic waste? The countryside is not a public toilet, what about our horses, herds and wildlife welfare? [REDACTED]

[REDACTED]

[REDACTED]

In summary, it is my belief that Plumpton Green is not a suitable place for this site for the following reasons; road safety, lack of human amenities [REDACTED] I must stand up for the countryside so others may enjoy it too without threat of harm to the environment and village life.

Regards,

Ms. Milly Bassett

Sent from my iPad

Representation ID: REP/054/GT01Representor Details:

Representor ID:	REP/054
Name:	Julie Bates
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	GT01 - Land south of The Plough
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	
Representation:	<p>I would like to strongly object to the proposed Gypsy/Traveller site in the land South of the Plough in Plumpton Green:</p> <ul style="list-style-type: none">* There is a lack of suitable access as the required visibility splays are not considered achievable as outlined by the Highway Authority.* The site is Isolated with a lack of access to facilities.* Increase in Traffic through the village resulting in extra pollution.

- * It would impossible to manage containment of this site.
- * It will result in local business leaving the village.
- * It will affect the whole marketability of properties within the village having a negative impact on all property prices.

* [REDACTED]

What benefits does a Gypsy site bring ? Can you explain this.... Is there not a more appropriate site outside of a small village where it won't have a negative impact on a whole village.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public?

Why do you feel it is necessary to participate at the Examination in Public?

From: [REDACTED]
Sent: 11 October 2018 12:24
To: ldf
Subject: Propsed Gypsy/Traveller site in Plumpton Green
Categories: LPP2 comment to code - stakeholder details have been added

Re Policy GT01 [REDACTED]



To Lewes District Council,

I would like to strongly object to the proposed Gypsy/Traveller site in the land South of the Plough in Plumpton Green:

1. There is a lack of suitable access as the required visibility splays are not considered achievable as outlined by the Highway Authority.
2. The site is Isolated with a lack of access to facilities.
3. Increase in Traffic through the village resulting in extra pollution.
4. It would impossible to manage containment of this site.
5. It will result in local business leaving the village.
6. It will affect the whole marketability of properties within the village having a negative impact on all property prices.
7. [REDACTED].

What benefits does a Gypsy site bring ? Can you explain this.... Is there not a more appropriate site outside of a small village where it won't have a negative impact on a whole village.

Yours sincerely
Julie Bates

The information in this message is confidential. It is intended solely for the addressee. Access to this message by anyone else is unauthorised. If you are not the intended recipient, any disclosure, copying, distribution or any action taken or omitted to be taken in reliance on it is prohibited and may be unlawful. We do not accept legal responsibility for the contents of this message and whilst any attachments to this message may have been checked for viruses, you should rely on your own virus checker and procedures. If you contact us by e-mail, we will store your name and address to facilitate communications. Any statements contained herein are those of the individual and not the organisation.

Representation ID: REP/055/GT01Representor Details:

Representor ID:	REP/055
Name:	Lynn Baxter
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	GT01 - Land south of The Plough
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	
Representation: I would like to register my comments and objections to the above proposed development. Firstly that this hardly constitutes an 'early and effective' community engagement with only six weeks for such an important issue. This shows total disregard of the need for due consideration and has been sprung upon the Parish Council and parishioners in a cavalier manner. The development goes against the criteria laid down by Lewes District Council in relation	

to the neighbourhood plan. This site is a rural greenfield site which is outside the village planning boundary and does not have reasonable access to existing services. The UNLIT road has the national speed limit, no pavements and extremely limited bus service which remains under threat of withdrawal. The walk to the school or into the village can only be described as dangerous and only for the foolhardy.

The site does not comply with Lewes District Council key strategic objectives "to conserve and enhance the natural beauty, wild life and cultural heritage of the area". The 2018 SHLAA regarding this site says this site is not suitable for residential development for many of the reasons already given here and yet you think it acceptable for Gypsy and Traveller community to accept lower standards. This is discriminatory.

A very well screened and unobtrusive business park has existed for some years on a former brownfield site which is immediately adjacent to the proposed camp. [REDACTED]

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public?

Why do you feel it is necessary to participate at the Examination in Public?

From: [REDACTED]
Sent: 29 October 2018 20:38
To: ldf
Subject: Lewes District Council Local Plan Part 2: Site allocation and development

Categories: LPP2 comment to code - stakeholder details have been added

Re: Consultation Gypsy and traveller site Plumpton Green

I would like to register my comments and objections to the above proposed development. Firstly that this hardly constitutes an 'early and effective' community engagement with only six weeks for such an important issue. This shows total disregard of the need for due consideration and has been sprung upon the Parish Council and parishioners in a cavalier manner.

The development goes against the criteria laid down by Lewes District Council in relation to the neighbourhood plan. This site is a rural greenfield site which is outside the village planning boundary and does not have reasonable access to existing services. The UNLIT road has the national speed limit, no pavements and extremely limited bus service which remains under threat of withdrawal. The walk to the school or into the village can only be described as dangerous and only for the foolhardy.

The site does not comply with Lewes District Council key strategic objectives "to conserve and enhance the natural beauty, wild life and cultural heritage of the area". The 2018 SHLAA regarding this site says this site is not suitable for residential development for many of the reasons already given here and yet you think it acceptable for Gypsy and Traveller community to accept lower standards. This is discriminatory.

A very well screened and unobtrusive business park has existed for some years on a former brownfield site which is immediately adjacent to the proposed camp. [REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Sent from Samsung tablet.

Representation ID: REP/056/E1Representor Details:

Representor ID:	REP/056
Name:	Rebecca Bearn
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	E1 - Land at East Quay, Newhaven Port
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	No Not Justified
Representation: Little regard for the effects on wildlife and the health of the population around the areas. Increased pollution and heavy road use on what are accident black spots already.	
What changes do you suggest to make the document legally compliant or sound?	

Do you consider it necessary to participate at the Examination in Public?	No
Why do you feel it is necessary to participate at the Examination in Public?	

Representation ID: REP/057/GT01Representor Details:

Representor ID:	REP/057
Name:	Polly Beaumont
Organisation:	1955
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:
Organisation:

Contact Details:

Email Address:	[REDACTED]
Address:	[REDACTED]

Representation:

Policy/Section:	GT01 - Land south of The Plough
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	No Not Consistent with national policy
Representation: I am a resident of Plumpton and wish to object to the Policy GT01 which proposes the building of 5 permanent pitches for Travellers and Gypsies on land South of the Plough in Plumpton Green. This is a greenfield site approximately 1km away from the Village centre. The site is not included in the Neighbourhood Plan which the village residents	

supported by a majority of 80% at the referendum in March 2018.

Residents were told at the public meeting on 9th October that planning permission to build traditional homes on this site would not be granted since the distance from the village centre makes it unsustainable. Yet use of this site for 5 permanent pitches would mean the building of a permanent structure to house the toilet block and the hard standing for 10 mobile homes (2 per pitch). The residents of these mobile homes would, it was confirmed, consider the site to be their home. It follows therefore that LDC are proposing 5 additional homes in excess of the 68 already allowed for in the Plumpton Parish Neighbourhood Plan. This policy blatantly ignores the wishes of residents as expressed by the 'made' Plumpton Parish Neighbourhood Plan.

This site is not suitable and would not provide Travellers with easy access to health care (none in Plumpton) or the local primary school. There is no pavement between this site and the village centre, the road is fast (national speed limit) and unlit. There is a bus stop 200m to the North but again there is no pavement to the bus stop, the route is unlit, the bus service is not regular and in any event the service's very existence is under threat. Therefore policy does not follow the provisions of the Planning policy for Traveller sites (August 2015) Policy B, paragraph 13 a) to d) .

LDC should look for a more economic and sustainable site by either developing brownfield sites or expanding existing Traveller sites.

What changes do you suggest to make the document legally compliant or sound?

This policy does not follow the provisions of the Planning policy for Traveller sites (August 2015) Policy B, paragraph 13 a) to d)

Policy GT01 should be deleted in its entirety from the Lewes District Local Plan Part 2.

Do you consider it necessary to participate at the Examination in Public?

No

Why do you feel it is necessary to participate at the Examination in Public?

Representation ID: REP/057/HSA

Representor Details:

Representor ID:	REP/057
Name:	Polly Beaumont
Organisation:	1955
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:
Organisation:

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	Plumpton Green
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	No Not Consistent with national policy
Representation: re: 2.117 - I do not understand how a review of Newick Neighbourhood Plan impacts the Plumpton Parish Plan. I fear this is an error	

What changes do you suggest to make the document legally compliant or sound?

delete policy GT01

Do you consider it necessary to participate at the Examination in Public?	No
--	-----------

Why do you feel it is necessary to participate at the Examination in Public?

Representation ID: REP/058/GT01Representor Details:

Representor ID:	REP/058
Name:	Nicholas Beaumont
Organisation:	1955
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:
Organisation:

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	GT01 - Land south of The Plough
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	No
Representation: I strongly object to the inclusion of GT01. I co-chaired the Steering Group of the Plumpton Parish Neighbourhood Plan (PPNP) from mid 2016 through to the successful referendum in March 2018. The process of creating the PPNP started in 2014 and we had a representative from Lewes District Council Planning department at most of the Steering Group meetings. The LDC	

contribution was very helpful and necessary to the process but at no point in the development of the plan was there any suggestion that we should make provision for Travellers. We were given guidance that sites should be sustainable and that sites away from the village centre could be deemed unsustainable in planning terms. Indeed at a public meeting on the 9th October 2018, representatives from the LDC Planning department confirmed that the GT01 site is not regarded as suitable for traditional housing development.

If a permanent traveller site were to be built, any future residents will consider the site to be their home (confirmed by the ESCC Traveller Team Manager, Jim Alexander at the public meeting on 9th October) just as any residents of traditional housing would. This proposal for a permanent traveller site is therefore no different from traditional housing and should be dismissed since, by the planning departments own criteria, the site is not suitable. In any event the PPNP allows for 68 homes, exceeding the allocated quota of homes (50), and to force the Parish to take even more is unacceptable and unnecessary.

The PPNP went to referendum on 8th March 2018 and was supported with an 80% majority. I was at the LDC meeting on 2nd May 2018 when the PPNP was made. Councillors expressed the view that Neighbourhood Plans and thus the wishes of local residents should be respected. This proposal for GT01 completely ignores the plan and proposes development on a site previously deemed unsustainable. I expect councillors to keep their word and protect the residents wishes.

GT01 is a greenfield site with no pavement access to the village centre and is on a straight section of Station Road where vehicles are permitted to travel at 60mph. ESCC highways have previously made their objections known on page 142 of the Sustainability Appraisal LPP2 Cabinet Version August 2018 it states

"Land between The Plough and the Old Brickworks, Station Road, Plumpton - ESCC Highway Authority objection - required visibility splays not considered achievable for proposed use. Showstopper. Possibility of land contamination due to previous uses on site."

Impact on local businesses - This is a greenfield site next to two light industrial parks (The Old Brickworks and Plumpton Green Studios) which between them employ in excess of 50 people. Owners of businesses at these sites have expressed grave concerns as to the future viability of their businesses should this proposal move forward.

The Plough public house and gardens, which borders the site to the North, is owned by Harveys Brewery. I am very concerned that this business would be closed should the proposal go ahead and hope the Harveys management have made their intentions known as part of this consultation.

There is already a Traveller site in Offham, 5 miles from Plumpton. I would have thought it unnecessary to propose another site in such close proximity.

What changes do you suggest to make the document legally compliant or sound?

Remove the policy GT01.

Respect the wishes of residents as expressed by the Plumpton Parish Neighbourhood Plan.

Existing sites should be expanded or alternative brownfield sites considered - for example at the old St Anne's School site in Lewes could be put to good use here. I assume this site is ignored in this document only because of the administrative boundaries but I would hope SDNP and LDC can work together to provide the best solution for all residents.

Do you consider it necessary to participate at the Examination in Public?

No

Why do you feel it is necessary to participate at the Examination in Public?

Representation ID: REP/058/HSARepresentor Details:

Representor ID:	REP/058
Name:	Nicholas Beaumont
Organisation:	1955
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:
Organisation:

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	Plumpton Green
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	No Not Positively Prepared Not Justified Not Consistent with national policy
Representation: The reference to Newick Neighbourhood Plan in paragraph 2.117 is, I assume, an error. The error suggests an attitude prevalent in policy GT01 which disregards the Plumpton Parish Neighbourhood Plan and is symptomatic of the haste and lack of thought given to	

the preparation of this document.

What changes do you suggest to make the document legally compliant or sound?

Remove policy GT01 which is badly flawed (see comments on Policy GT01) and respect the policies of the Plumpton Parish Neighbourhood Plan and respect the residents who supported the plan by a large majority on 8th March 2018.

Do you consider it necessary to participate at the Examination in Public?

No

Why do you feel it is necessary to participate at the Examination in Public?

Representation ID: REP/059/GT01Representor Details:

Representor ID:	REP/059
Name:	Sarah Beaumont
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	GT01 - Land south of The Plough
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	
Representation: I object strongly to the inclusion of GT01, a proposed permanent Traveller and Gypsy site in Plumpton Green. This proposal calls for permanent development on a greenfield site away from the village centre. The policy proposes permanent development on a site that is not included in the Plumpton Neighbourhood Plan. This is unacceptable, and I expect LDC to respect and protect the Neighbourhood plan which represents the wishes of the residents. The GT01 site is unsuitable, it is away from the village centre with no	

pedestrian access. Station Road at the point of suggested access, is straight and traffic moves quickly. The difficulty in providing a safe vehicular access here was deemed a "showstopper" for future development by ESCC Highways in the Sustainability Appraisal document. It appears the LDC planning policy team ignored this and are happy to bend the rules in favour of the Travelling community over the established settled community.

Similarly with the principle of development at that site, which LDC planning department were happy to tell us at the public meeting on 9th October that planning permission for traditional housing would be refused. Indeed the 2018 SHLAA document shows this site (03PL) as failing the proximity assessment yet the LDC planning policy team are prepared to ignore this criteria in favour of Travellers and Gypsy's over the established settled community.

It has also been suggested that a speed limit could be introduced at this end of the village - presumably the same speed limit that ESCC Highways wanted to charge the Parish £27,000 to install (ESCC doc: ABSL-0342 Feasibility Appraisal, March 2018). Now it seems this money is 'insignificant' and can be found from public funds. Again, it appears the LDC planning policy team are happy to bend the rules in favour of one section of society over the established settled community.

The factors above taken together could be interpreted as examples of discrimination against the settled community and certainly seems at odds with paragraph (B) 11 of the Planning Policy for Traveller sites August 2018 which states that "Criteria based policies should be fair and should facilitate the traditional and nomadic life of travellers whilst respecting the interest of the settled community". I suggest it is in the interests of the settled community that the LDC planning rules should apply equally to everyone.

I am also concerned for the businesses at the Old Brickworks where there are several businesses that operate heavy machinery right next to the proposed site. For health and safety reasons, and as a condition of insurance, security along this boundary would have to be upgraded at considerable cost. As a result, many business owners will have to consider moving their business out of the area. This Policy GT01 is therefore directly at odds with paragraphs 83 and 84 of the NPPF (2018) that call for planning policies to promote all types of rural business.

Policy GT01 should be deleted from the LPP2.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public?

Why do you feel it is necessary to participate at the Examination in Public?

From: [REDACTED]
Sent: 02 November 2018 17:37
To: ldf
Subject: Comments on LDC Local Plan Part2 - Policy GT01

Categories: LPP2 comment to code - stakeholder details have been added

Re: LDC Local Plan Part2

I object strongly to the inclusion of GT01, a proposed permanent Traveller and Gypsy site in Plumpton Green. This proposal calls for permanent development on a greenfield site away from the village centre. The policy proposes permanent development on a site that is not included in the Plumpton Neighbourhood Plan. This is unacceptable, and I expect LDC to respect and protect the Neighbourhood plan which represents the wishes of the residents. The GT01 site is unsuitable, it is away from the village centre with no pedestrian access. Station Road at the point of suggested access, is straight and traffic moves quickly. The difficulty in providing a safe vehicular access here was deemed a "showstopper" for future development by ESCC Highways in the Sustainability Appraisal document. It appears the LDC planning policy team ignored this and are happy to bend the rules in favour of the Travelling community over the established settled community.

Similarly with the principle of development at that site, which LDC planning department were happy to tell us at the public meeting on 9th October that planning permission for traditional housing would be refused. Indeed the 2018 SHLAA document shows this site (03PL) as failing the proximity assessment yet the LDC planning policy team are prepared to ignore this criteria in favour of Travellers and Gypsies over the established settled community.

It has also been suggested that a speed limit could be introduced at this end of the village - presumably the same speed limit that ESCC Highways wanted to charge the Parish £27,000 to install (ESCC doc: ABSL-0342 Feasibility Appraisal, March 2018). Now it seems this money is 'insignificant' and can be found from public funds. Again, it appears the LDC planning policy team are happy to bend the rules in favour of one section of society over the established settled community.

The factors above taken together could be interpreted as examples of discrimination against the settled community and certainly seems at odds with paragraph (B) 11 of the Planning Policy for Traveller sites August 2018 which states that "Criteria based policies should be fair and should facilitate the traditional and nomadic life of travellers whilst respecting the interest of the settled community". I suggest it is in the interests of the settled community that the LDC planning rules should apply equally to everyone.

I am also concerned for the businesses at the Old Brickworks where there are several businesses that operate heavy machinery right next to the proposed site. For health and safety reasons, and as a condition of insurance, security along this boundary would have to be upgraded at considerable cost. As a result, many business owners will have to consider moving their business out of the area. This Policy GT01 is therefore directly at odds with paragraphs 83 and 84 of the NPPF (2018) that call for planning policies to promote all types of rural business.

Policy GT01 should be deleted from the LPP2.

with regards

Sarah Beaumont



Representation ID: REP/060/GT01Representor Details:

Representor ID:	REP/060
Name:	Alice Beaumont
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	GT01 - Land south of The Plough
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	
Representation:	<p>I am a resident of Plumpton and registering my objection to the Policy GT01 which proposes the building of 5 permanent pitches for Travellers and Gypsies on land South of the Plough in Plumpton Green. This is a greenfield site approximately 1km away from the Village centre. The site is not included in the Neighbourhood Plan which the village residents supported by a majority of 80%.</p> <p>We were told at the public meeting on 9th October that planning permission to build traditional homes on this site would not be granted since the distance from the village centre makes it unsustainable. This is confirmed in the LDC 2018 SHLAA (ref 03PL). Yet use of this site for 5 permanent Traveller and Gypsy pitches would mean the building of</p>

a permanent structure to house the toilet block and the hard standing for 10 mobile homes (2 per pitch). The residents of these mobile homes would, it was confirmed at the public meeting on 9th October, consider the site to be their home. It follows therefore that LDC are proposing 5 additional homes in excess of the 68 already allowed for in the Plumpton Parish Neighbourhood Plan.

There is no pavement between this site and the village centre, the road is fast (national speed limit) and unlit. There is a bus stop 200m to the North but again there is no pavement to the bus stop, the route is unlit, the bus service is not regular and in any event the service's very existence is under threat.

This site is not suitable and would not provide Travellers with easy access to health care (there is no Doctors surgery or medical centre in Plumpton) or the local primary school. This policy GT01 should be deleted and LDC should look for a more economic and sustainable sites by either developing brownfield sites or expanding existing Traveller sites.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public?

Why do you feel it is necessary to participate at the Examination in Public?

Kemp, Emma

From: Alice Beaumont <[REDACTED]>
Sent: 03 November 2018 17:39
To: Idf
Subject: Consultation - Lewes District Local Plan Part 2 - Submission Version
Categories: LPP2 comment to code - stakeholder details have been added

Re: Lewes District Local Plan Part 2 – Pre Submission Version

I am a resident of Plumpton and registering my objection to the Policy GT01 which proposes the building of 5 permanent pitches for Travellers and Gypsies on land South of the Plough in Plumpton Green. This is a greenfield site approximately 1km away from the Village centre. The site is not included in the Neighbourhood Plan which the village residents supported by a majority of 80%.

We were told at the public meeting on 9th October that planning permission to build traditional homes on this site would not be granted since the distance from the village centre makes it unsustainable. This is confirmed in the LDC 2018 SHLAA (ref 03PL). Yet use of this site for 5 permanent Traveller and Gypsy pitches would mean the building of a permanent structure to house the toilet block and the hard standing for 10 mobile homes (2 per pitch). The residents of these mobile homes would, it was confirmed at the public meeting on 9th October, consider the site to be their home. It follows therefore that LDC are proposing 5 additional homes in excess of the 68 already allowed for in the Plumpton Parish Neighbourhood Plan.

There is no pavement between this site and the village centre, the road is fast (national speed limit) and unlit. There is a bus stop 200m to the North but again there is no pavement to the bus stop, the route is unlit, the bus service is not regular and in any event the service's very existence is under threat.

This site is not suitable and would not provide Travellers with easy access to health care (there is no Doctors surgery or medical centre in Plumpton) or the local primary school. This policy GT01 should be deleted and LDC should look for a more economic and sustainable sites by either developing brownfield sites or expanding existing Traveller sites.

Alice Beaumont

Representation ID: REP/061/E1Representor Details:

Representor ID:	REP/061
Name:	Alison Beech
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	E1 - Land at East Quay, Newhaven Port
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	
Representation:	<p>I am writing to object to Tidemills E1 being used for development, as a local resident. The area is the habitat for a number of rare species and should be kept to maintain biodiversity and provide a green lung. Tidemills is an important area for local people to exercise, get out in the fresh air, and relax, be that as a runner, dog walker, young parent with small children exploring nature or similar.</p>
What changes do you suggest to make the document legally compliant or sound?	

Do you consider it necessary to participate at the Examination in Public?
Why do you feel it is necessary to participate at the Examination in Public?

Kemp, Emma

From: Alison Beech <[REDACTED]>
Sent: 30 October 2018 21:47
To: Idf
Subject: E1
Categories: LPP2 comment to code - stakeholder details have been added

I am writing to object to Tide ills E1 being used for development, as a local resident. The area is the habitat for a number of rare species and should be kept to maintain biodiversity and provide a green lung. Tidemills is an important area for local people to exercise, get out in the fresh air, and relax, be that as a runner, dog walker, young parent with small children exploring nature or similar.

Yours sincerely

Alison Beech

Sent from my iPad

Representation ID: REP/062/GT01/A
--

Representor Details:

Representor ID:	REP/062
Name:	Daisy Bees
Organisation:	
Consultation Body:	General
Stakeholder Type:	Other group or organisation

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	GT01 - Land south of The Plough
<i>Do you consider the document to be:</i>	
Legally Compliant:	No
Sound:	No
	Not Positively Prepared
	Not Justified
	Not Effective
	Not Consistent with national policy
Representation:	
Proposal: Five pitches Hardstanding and a toilet block. Immediately not of the old	

brickworks Industrial area, On the west side of station rd.

I was needing to express my concern and desire some responses as to how this site will be managed.

My name is Daisy on the committee of the old brickworks plumpton my aunt and my mother own this site and it is my mothers full income. This Site was my Grandfathers Chicken Business. We have a huge amount of money and emotion invested in this site, Its not just something thats been built up in a day it's taken generations to create this site. I am hugely concerned about the proposed traveller site for several reasons and not just for our own purposes.

I am extremely fearful we will loose our tenants many have already voiced concern and are looking for other premises, this sets a scene of the amount of fear placed in this kind of development that is ingrained in the consciousness of society rightly or wrongly, If this happens and the old brickworks ceases to be financially viable my mother and my aunt will loose her income, and the remaining tenants their businesses and the Brickworks employees their jobs.

It is more than 0.5KM to the nearest settlement with services,

"Evidence provided to Select Committee 'Gypsy and Traveller families often wish to have small compact and well-managed sites located in areas where they have historically resided and have a network of local family support.

Response There is no evidence to suggest that there has been any gypsy family has historically resided at , or near the proposed site at Plumpton. There is no evidence that local family support existing in the vicinity of these sites.

Caution should be used when seeking locations for sites to ensure that they are based on need in a particular area.

To avoid disputes and provide defensible space, it is important to provide clear delineation of public communal areas eg play areas and private space, with boundaries that indicate clearly where individual pitches begin and end. It is recommended that communal areas without a clear usage are avoided in the design as they may attract vandalism, fly tipping or unauthorised caravans.

Response: This government 'statement of fact 're-enforces the fear that a degree of unlawful activity can be associated with some traveller sites, this does nothing to ensure community cohesion as it outlines particular behaviour traits that the established community are very much concerned about."

Taken from staffs moorlands letter

We will all be very concerned regarding how they intend to get in and out of the village with no walk way to the facilities in the local area, including getting children to school, hospital appointments, doctors appointments, receiving post. Where will they dispose of their refuse and waste products, and who will monitor resident activity and the amount of caravans and people residing here and future projects to build on the adjacent land once this has gone ahead, affecting the village. And how much will this cost the local

council.

Many thanks for taking the time to read my enquiry I look forward to your response in time.

What changes do you suggest to make the document legally compliant or sound?

The site was well down on the list of suitable sights, so the criteria was changed, and this site approved. This means this site is not suitable due to the type of land, and heritage of the site. The access for the town and distance to the Old Brickworks businesses. It will be too noisy and not a suitable place to live in a static caravan. The site needs to be scored again using reasonable thought into sustainability for the future of the residents of the site and the local community.

Do you consider it necessary to participate at the Examination in Public?

Why do you feel it is necessary to participate at the Examination in Public?

Representation ID: REP/062/GT01/BRepresentor Details:

Representor ID:	REP/062
Name:	Daisy Bees
Organisation:	
Consultation Body:	General
Stakeholder Type:	Other group or organisation

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	GT01 - Land south of The Plough
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	
Representation:	
Proposal: Five pitches Hardstanding and a toilet block. Immediately not of the old brickworks Industrial area, On the west side of station rd.	
I was needing to express my concern and desire some responses as to how this site will be managed.	
My name is Daisy on the committee of the old brickworks plumpton my aunt and my	

mother own this site and it is my mothers full income. This Site was my Grandfathers Chicken Business. We have a huge amount of money and emotion invested in this site, Its not just something thats been built up in a day it's taken generations to create this site. I am hugely concerned about the proposed traveller site for several reasons and not just for our own purposes.

I am extremely fearful we will loose our tenants many have already voiced concern and are looking for other premises, this sets a scene of the amount of fear placed in this kind of development that is ingrained in the consciousness of society rightly or wrongly, If this happens and the old brickworks ceases to be financially viable my mother and my aunt will loose her income, and the remaining tenants their businesses and the Brickworks employees their jobs.

It is more than 0.5KM to the nearest settlement with services,

"Evidence provided to Select Committee "Gypsy and Traveller families often wish to have small compact and well-managed sites located in areas where they have historically resided and have a network of local family support.

Response There is no evidence to suggest that there has been any gypsy family has historically resided at , or near the proposed site at Plumpton. There is no evidence that local family support existing in the vicinity of these sites.

Caution should be used when seeking locations for sites to ensure that they are based on need in a particular area.

To avoid disputes and provide defensible space, it is important to provide clear delineation of public communal areas eg play areas and private space, with boundaries that indicate clearly where individual pitches begin and end. It is recommended that communal areas without a clear usage are avoided in the design as they may attract vandalism, fly tipping or unauthorised caravans.

Response: This government 'statement of fact' re-enforces the fear that a degree of unlawful activity can be associated with some traveller sites, this does nothing to ensure community cohesion as it outlines particular behaviour traits that the established community are very much concerned about."

Taken fromstaffs moorlands letter

We will all be very concerned regarding how they intend to get in and out of the village with no walk way to the facilities in the local area, including getting children to school, hospital appointments, doctors appointments, receiving post. Where will they dispose of their refuse and waste products, and who will monitor resident activity and the amount of caravans and people residing here and future projects to build on the adjacent land once this has gone ahead, affecting the village. And how much will this cost the local council.

Many thanks for taking the time to read my enquiry I look forward to your response in time.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public?
Why do you feel it is necessary to participate at the Examination in Public?

From: [REDACTED] >
Sent: 14 October 2018 15:34
To: ldf
Subject: Proposed Traveller gypsy site in Plimpton

Categories: LPP2 comment to code - stakeholder details have been added

To Whom it may concern.

Proposal: Five pitches Hardstanding and a toilet block. Immediately not of the old brickworks Industrial area, On the west side of station rd.

I was needing to express my concern and desire some responses as to how this site will be managed.

My name is Daisy on the committee of the old brickworks plumpton my aunt and my mother own this site and it is my mothers full income. This Site was my Grandfathers Chicken Business. We have a huge amount of money and emotion invested in this site, Its not just something thats been built up in a day it's taken generations to create this site. I am hugely concerned about the proposed traveller site for several reasons and not just for our own purposes.

I am extremely fearful we will loose our tenants many have already voiced concern and are looking for other premises, this sets a scene of the amount of fear placed in this kind of development that is ingrained in the consciousness of society rightly or wrongly, If this happens and the old brickworks ceases to be financially viable my mother and my aunt will loose her income, and the remaining tenants their businesses and the Brickworks employees their jobs.

It is more than 0.5KM to the nearest settlement with services,

"Evidence provided to Select Committee "Gypsy and Traveller families often wish to have small compact and well-managed sites located in areas where they have historically resided and have a network of local family support.

Response There is no evidence to suggest that there has been any gypsy family has historically resided at , or near the proposed site at Plumpton. There is no evidence that local family support existing in the vicinity of these sites.

Caution should be used when seeking locations for sites to ensure that they are based on need in a particular area.

To avoid disputes and provide defensible space, it is important to provide clear delineation of public communal areas eg play areas and private space, with boundaries that indicate clearly where individual pitches begin and end. It is recommended that communal areas without a clear usage are avoided in the design as they may attract vandalism, fly tipping or unauthorised caravans.

Response: This government 'statement of fact' re-enforces the fear that a degree of unlawful activity can be associated with some traveller sites, this does nothing to ensure community cohesion as it outlines particular behaviour traits that the established community are very much concerned about."

Taken from

staffs moorlands letter

We will all be very concerned regarding how they intend to get in and out of the village with no walk way to the facilities in the local area, including getting children to school, hospital appointments, doctors appointments, receiving post. Where will they dispose of their refuse and waste products, and who will monitor resident activity and the amount of caravans and people residing here and future projects to build on the adjacent land once this has gone ahead, affecting the village. And how much will this cost the local council.

Many thanks for taking the time to read my enquiry I look forward to your response in time.

Yours Sincerely

Daisy Bees

[REDACTED]

[REDACTED]

[REDACTED]



[REDACTED]

Representation ID: REP/063/DM16
--

Representor Details:

Representor ID:	REP/063
Name:	Mark Behrendt
Organisation:	HBF
Consultation Body:	General
Stakeholder Type:	Other group or organisation

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	mark.behrendt@hbf.co.uk
Address:	27 Broadwall London SE1 9PL

Representation:

Policy/Section:	DM16: Children's Play Space in New Housing Development
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	No Not Justified
Representation: The National Planning Policy Framework and the planning practice guidance both establish the that local plans must be supported by up to date evidence to show that the cumulative impact of the policies in the plan will not make development unviable. The evidence provided by the Council in relation to viability would appear to be from 2011 and 2014 with little up to date evidence on viability provided with regard to development management policies in the part 2 local plan. Policy DM16 will require developers to	

provide outdoor space that will reduce the amount of developable land on a site and increase the cost to the developer. As such the Council should have undertaken an assessment as to whether this policy, in combination with other policies in the part 1 local plan and the CIL charging Schedule, could have a negative impact on the viability of development in the Borough. Without the necessary viability evidence to support this policy the Council cannot justify its inclusion in the part 2 local plan.

What changes do you suggest to make the document legally compliant or sound?

Evidence must be provided to support the inclusion of this policy with the part 2 local plan. Without this evidence the Council should delete this policy

Do you consider it necessary to participate at the Examination in Public? Yes

Why do you feel it is necessary to participate at the Examination in Public?

To outline our concerns regarding the evidence use dot support this policy.

Representation ID: REP/064/E1Representor Details:

Representor ID:	REP/064
Name:	Lauren Bergeron
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	E1 - Land at East Quay, Newhaven Port
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	
Representation:	<p>It has recently come to my attention that an aggregate industrial business expansion on the community beach in Newhaven could have negative effects on the biodiversity of this area. I am emailing to ask you to reconsider this choice as it does not appear to reflect sustainable development as per original plans. Thank you for your time and consideration of this very important issue.</p>
What changes do you suggest to make the document legally compliant or sound?	

Do you consider it necessary to participate at the Examination in Public?
Why do you feel it is necessary to participate at the Examination in Public?

Hodgson, Lilly

From: Lauren Bergeron [REDACTED]
Sent: 05 November 2018 14:42
To: ldf
Subject: Please Reconsider

Categories: Vanessa to deal with

To Whom It May Concern:

It has recently come to my attention that an aggregate industrial business expansion on the community beach in Newhaven could have negative effects on the biodiversity of this area. I am emailing to ask you to reconsider this choice as it does not appear to reflect sustainable development as per original plans. Thank you for your time and consideration of this very important issue.

Kind regards,

Lauren Bergeron
Committing to Kindness
Founder, Content Creator
[REDACTED]

Representation ID: REP/065/E1

Representor Details:

Representor ID:	REP/065
Name:	Timothy Berrett
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	E1 - Land at East Quay, Newhaven Port
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	No Not Justified
<p>Representation:</p> <p>Lewes District Council is gradually allowing the possible erosion/destruction of our coastline and the western end of Seaford Bay.</p> <p>I (and many others) care for our local environment and are trying to save our coastline and the western end of Seaford Bay for future generations.</p> <p>The local environment, coastline and Tide Mills is highly valued. I cannot see any justifiable reason for its destruction.</p>	

We are trying to save what will be left of Tide Mills after the harbour expansion works currently under way to the south of the harbour towards the East Arm and the East Sussex County Council plan for the Road and Bridge over the Railway Line and Mill Creek and onto Tide Mills. Any further loss of land at Tide Mills would have a catastrophic effect on the western end of Seaford Bay.

Allowing this development to happen would be the 'thin end of the wedge', with no doubt further applications submitted and being granted, thus destroying even more coastline and environmental features.

What changes do you suggest to make the document legally compliant or sound?

Do not proceed with this application.

Do you consider it necessary to participate at the Examination in Public? Yes

Why do you feel it is necessary to participate at the Examination in Public?

The public have a right to voice any opinions to the current proposal.

Representation ID: REP/066/E1Representor Details:

Representor ID:	REP/066
Name:	Joanna Best
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	E1 - Land at East Quay, Newhaven Port
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	No Not Justified
Representation: I am writing to object to the proposed plans to further develop Tide Mills. Any development there will be completely out of sync with the natural environment which is Tide Mills in its current state and will only lead to the degradation of the area as a whole. This would not be in the public's interest and does not embrace the "contribution to a sustainable development" which it should by law, and the loss of an important biological area and damage to the local environment cannot be underestimated. Tide Mills is	

currently an area of peaceful recreation and offers a natural habitat for wildlife and supports a large variety of birds.

In this day and age when we know so many animals are declining in number its hardly forward thinking to destroy such a local treasure. It is a much loved area!

As money and bringing wealth is what the point of this proposal is, surely keeping the area more scenic and encouraging tourism of these quiet spots is a better way forward in which to draw more money in.

Newhaven has fantastic transport links with the ferry from France, bus services from Eastbourne and Brighton, and trains also from Lewes and London. The town is at a turning point and with the Seven Sisters and the South Downs National Park next door it would be foolish to not want to regenerate and promote Newhaven as an attractive town, as the ferry brings people in from France and the continent the council should be doing its best to keep the tourists around the area not scaring people away with the ugliness it seems to be promoting. The town could be so different with tourism at its heart you only have to look at other seaside towns which have worked on the beauty around them and done their best to profit on this e.g. Whitstable

You have a choice promoting this area and looking after it will give a quality of life for your community including encouraging good mental and physical wellbeing, a diverse wildlife population, increased wealth through tourism which would make Newhaven a destination not the place to drive straight out of as quickly as possible as it does at the moment and therefore regenerating the town and its centre.

Or carrying on with the further destruction of what was once a pretty little coastal town with more polluting industry, heavy goods vehicles on our crumbling potholed roads, worsening the health of the community which will all eventually cost the community, council and government (Not the factory owners !) a lot of money in the future.

This plan certainly does not reflect the need for a clean green marine vision which falls under the Clean Enterprise Zone which is part of Newhaven's plan.

Certainly in this era of climate change building industrial sites on this large scale on this sensitive area can only add to the dangers associated with flood waters and the rise in sea levels, what will be the impact on flood prevention in Seaford and the costs?

I for one am against any further deterioration of this area would be intolerant and completely against public opinion and therefore wholeheartedly undemocratic.

I hope you will listen to public opinion and not to those that are only interested in making money in the short term from such a development.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public?

No

Why do you feel it is necessary to participate at the Examination in Public?

--

Representation ID: REP/067/GT01
--

Representor Details:

Representor ID:	REP/067
Name:	Joe Betts
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	GT01 - Land south of The Plough
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	No Not Justified Not Effective
Representation: I feel that placing a Gypsy Traveller site here in Plumpton is only going to cause avoidable tensions in the village with a large number of people highly opposed to the site for their own valid reasoning. [REDACTED] and the fact that it is avoidable by finding another site away from a village and away from local pubs which will suffer with poor business due to the high tensions and [REDACTED]. The feeling I am given is that no matter what points are made on here this site will go ahead. There was no prior consultation before the plan, no asking the villagers where we could accomodate a gypsy site, just "this is where they are going, here you can make	

comments online if you want to which won't make a difference to us".

The proposed site has not been allocated for in the Neighborhood plan, it has not been accounted for by the local pubs who will lose out on business - who is going to help them? The council... sure.

The site is not even an effective choice, the road nearby is busy and not accessible by foot with no footpaths. The only route down to the village is either by walking down that unsafe road (you can't suggest anyone living there should have to do that?) or by driving in to the village where there is already a significant parking problem with commuters using the village for its free railway parking.

I can't find any valid reason anywhere why Plumpton has been chosen to have a camp, other than the land was available. Is that really how the council works? "Well this land is available, lets use that" Does it matter that it is unsafe and not suitable? "Nah we'll let the villagers deal with that problem."

I would quite like to build a massive nightclub I think I will put it in my garden - under the planning rules that you have given yourself you must surely have to grant that - without checking that it is actually safe, practical or that anyone else wants it!

And what about the Old Brickworks?

[REDACTED] That is if it even remains as a business park considering a number of the businesses feel that if the site goes ahead they will be forced to relocate. The impact this site will have of the Plumpton economy is hugely negative and unjust.

I completely understand the need to provide pitches for Gypsy Travellers but not here in Plumpton on a green field site. This is a very quiet location. Building a site here would completely destroy the rural character of our village. I ask you to seriously reconsider this site and the way in which the council has imposed it upon Plumpton without due consideration.

What changes do you suggest to make the document legally compliant or sound?

Find a new site that will be much less difficult to contain and manage.

Do you consider it necessary to participate at the Examination in Public?

No

Why do you feel it is necessary to participate at the Examination in Public?

Representation ID: REP/068/E1

Representor Details:

Representor ID:	REP/068
Name:	Susannah Bishop
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	E1 - Land at East Quay, Newhaven Port
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	
Representation:	
Please protect the beach for future generations- we don't have enough to spare , don't take what we have !!	
What changes do you suggest to make the document legally compliant or sound?	
Do you consider it necessary to participate at the Examination in Public?	
Why do you feel it is necessary to participate at the Examination in Public?	

--

Hodgson, Lilly

From: [REDACTED]
Sent: 04 November 2018 22:01
To: ldf
Subject: Newhaven beach

Categories: Vanessa to deal with

Please protect the beach for future generations- we don't have enough to spare , don't take what we have !!

yours sincerely
Susannah Bishop

Representation ID: REP/069/E1Representor Details:

Representor ID:	REP/069
Name:	Jeremy Blakiston
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	E1 - Land at East Quay, Newhaven Port
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	
Representation: With reference to this "consultation ", I'd have had no idea it was happening if I hadn't seen the paper. I'm totally opposed to the despoiling of the beach at Newhaven	
What changes do you suggest to make the document legally compliant or sound?	
Do you consider it necessary to participate at the Examination in Public?	
Why do you feel it is necessary to participate at the Examination in Public?	

--

Hodgson, Lilly

From: ldf
To: jeremy blakiston
Subject: RE: Consultation E1

From: [REDACTED]
Sent: 05 November 2018 16:29
To: ldf
Subject: Consultation E1

With reference to this "consultation ", I'd have had no idea it was happening if I hadn't seen the paper.
I'm totally opposed to the despoiling of the beach at Newhaven
Regards
Jeremy Blakiston

Representation ID: REP/070/GT01Representor Details:

Representor ID:	REP/070
Name:	Gill Blanchard
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:
Organisation:

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	GT01 - Land south of The Plough
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	
Representation:	
<p>To my astonishment I read of the proposed Gypsy and Travellers site near the Old Brickworks and feel I must object due to my concerns.</p> <p>The position of the site is particularly dangerous as vehicles travel at some speed along that road. I know of several family pets who have been hit and killed at that particular stretch of road. A CHILD could be the next casualty, especially as there isn't a pavement in either direction and the grass verge is very uneven making stepping onto the highway the only option.</p> <p>The junction at The Plough is difficult to negotiate even at present with hidden dips/bends and limited vision of oncoming traffic. Many near accidents have occurred.</p>	

This will only exacerbate the problem with the extra vehicles involved.

The location is enjoyed by the villagers and the public as there is a footpath through the land and is used by ramblers/dog walkers etc due to the unspoilt countryside and pleasant views. This would be subsequently destroyed.

Therefore, I strongly object to the proposal. There are many far better locations in the county than this.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public?

Why do you feel it is necessary to participate at the Examination in Public?

Hodgson, Lilly

From: Gill Blanchard [REDACTED]
Sent: 02 October 2018 09:57
To: ldf
Subject: Gypsy and Travellers site at Plumpton Green
Categories: LPP2 comment to code - stakeholder details have been added

Dear Sirs,

To my astonishment I read of the proposed Gypsy and Travellers site near the Old Brickworks and feel I must object due to my concerns.

The position of the site is particularly dangerous as vehicles travel at some speed along that road. I know of several family pets who have been hit and killed at that particular stretch of road. A CHILD could be the next casualty, especially as there isn't a pavement in either direction and the grass verge is very uneven making stepping onto the highway the only option.

The junction at The Plough is difficult to negotiate even at present with hidden dips/bends and limited vision of oncoming traffic. Many near accidents have occurred. This will only exacerbate the problem with the extra vehicles involved.

The location is enjoyed by the villagers and the public as there is a footpath through the land and is used by ramblers/dog walkers etc due to the unspoilt countryside and pleasant views. This would be subsequently destroyed.

Therefore, I strongly object to the proposal. There are many far better locations in the county than this.

Yours faithfully,

G. Blanchard

Sent from my iPad

Representation ID: REP/071/E1

Representor Details:

Representor ID:	REP/071
Name:	Laura Boniface
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:
Organisation:

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	E1 - Land at East Quay, Newhaven Port
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	
Representation: Please do not allow any development on the land at Tidemills. It is a beautiful haven for wildlife and local community and should be protected not built on. I object to any proposal whatsoever to build on or near it.	
What changes do you suggest to make the document legally compliant or sound?	
Do you consider it necessary to participate at the Examination in Public?	
Why do you feel it is necessary to participate at the Examination in Public?	

--

Hodgson, Lilly

From: Laura Boniface <[REDACTED]>
Sent: 03 November 2018 20:52
To: ldf
Subject: E1

Categories: LPP2 comment to code - stakeholder details have been added

To whomever

Please do not allow any development on the land at Tidemills. It is a beautiful haven for wildlife and local community and should be protected not built on.

I object to any proposal whatsoever to build on or near it.

Laura Boniface


Representation ID: REP/072/GT01/ARepresentor Details:

Representor ID:	REP/072
Name:	Daniel Booth
Organisation:	Vista Partitions UK
Consultation Body:	General
Stakeholder Type:	Local Business / employer

Agent Details:

Name:
Organisation:

Contact Details:

Email Address:	Daniel@vistasystems.co
Address:	

Representation:

Policy/Section:	GT01 - Land south of The Plough
<i>Do you consider the document to be:</i>	
Legally Compliant:	No
Sound:	No Not Positively Prepared
Representation: As manager of Vista Partitions Ltd based at The Old Brickworks commercial site adjacent the proposed Policy GT01, I wish to submit our formal objection to Policy GT01 - Land south of The Plough' I am the UK sales manager for a successful partitions company, Vista Systems which	

we took from the UK to the United Arab Emirates (UAE) several years ago. Whilst in the UAE, we have developed and patented several innovative partitions products that have been extremely well received in the UAE and have the potential to revolutionise the partitions market worldwide. We are now looking further afield and when we took our products into Egypt they were extremely well received and quickly became established as the leading partitions systems.

We now wish to bring our innovative patented products back to the UK. After much research we selected The Old Brickworks in Plumpton Green as our sales centre and this is where we have registered our UK division "Vista Partitions Limited" (company number 11456768). We have strong environmental and sustainability policies and we feel that The Old Brickworks in Plumpton Green suits our ethical policies. It also suits the 'green' image that we wish to portray to our customers both in the UK and abroad of being sited amongst "England's pleasant pastures". This 'soft' commercial site is perfectly placed for us and there is even an attractive public house (The Plough) and a racetrack nearby where we could take our investors, customers and visitors both from the UK and abroad. Our business will employ local people and contribute substantially to the local economy, without making a huge impact on local resources.

If Policy GT01 were to go ahead we would have to look elsewhere, we would certainly not wish to base our business adjacent adjacent to the proposed gypsy and traveller site. The reasons for this are:

1. It would destroy the open 'greenfield' space immediately adjacent The Old Brickworks and change the rural character and setting of the immediate locality and we feel that this would not be conducive to our desired company image and needs as stated above.
2. We have assessed the current security at The Old Brickworks (in the absence of Policy GT01) to be suitable for our needs. Should Policy GT01 be approved, we feel that the current level of security would have to be increased [REDACTED] in order to provide reassurance for our insurers, workers, and investors. This would change the character of The Old Brickworks dramatically and would make it a much less attractive site for us.
3. When we assessed Plumpton Green as a viable base for our sales operations, we inspected the local Neighbourhood plan and there was no mention whatsoever of a local need, requirement or provision for a permanent Gypsy and Traveller site. This sudden proposed allocation at short notice by Lewes District Council was a surprise to us and does not appear to be in keeping with the wishes of the local community.
4. The dubious main reason for allocation of Policy GT01 appears to be that it is "the only available site" out of a list of many, and it was a rather mediocre choice - certainly not the best site on the list. Would it not be better to wait for a better site to be put forward so that it can be allocated on its own merit rather than being the "only available site"?
5. We feel that the allocation Policy GT01 paves the way for future expansion of the site to include more permanent gypsy and traveller pitches, which will cause even more damage. Given that it was chosen because it was "the only available site" rather than the best site for both the proposed occupants and the local community, we feel that

there is a very real danger that inclusion of Planning Policy GT01 will pave the way for future expansion on exactly the same basis. Bad planning on a smaller scale will pave the way for more bad planning on a large scale, with associated detrimental effect on the green belt and the local community and businesses - and the gypsy and traveller community itself.

Our business will not only bring many positive aspects to the local community but has the potential to bring employment to the Lewes and East Sussex area in general. Having spent so much time planning our launch, I do not wish to have further delays whilst we look for a new sales centre however will have no alternative if Policy GT01 - Land south of The Plough is approved. We feel that there is substantial potential for harm to the local character, setting, economy, and community of The Old Brickworks and Plumpton Green simply so that Lewes District Council can 'tick the box' and fulfil their five remaining permanent pitches.

For the above reasons we would urge Lewes District Council to remove "Policy GT01 - Land south of The Plough" from their Local Plan Part 2 and to wait until a more suitable site is available.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public? No

Why do you feel it is necessary to participate at the Examination in Public?


Representation ID: REP/072/GT01/BRepresentor Details:

Representor ID:	REP/072
Name:	Daniel Booth
Organisation:	Vista Partitions UK
Consultation Body:	General
Stakeholder Type:	Local Business / employer

Agent Details:

Name:
Organisation:

Contact Details:

Email Address:	Daniel@vistasystems.co
Address:	

Representation:

Policy/Section:	GT01 - Land south of The Plough
<i>Do you consider the document to be:</i> Legally Compliant: Sound:	
Representation: As manager of Vista Partitions Ltd based at The Old Brickworks commercial site adjacent the proposed Policy GT01, I wish to submit our formal objection to Policy GT01 - Land south of The Plough I am the UK sales manager for a successful partitions company, Vista Systems which we took from the UK to the United Arab Emirates (UAE) several years ago. Whilst in the	

UAE, we have developed and patented several innovative partitions products that have been extremely well received in the UAE and have the potential to revolutionise the partitions market worldwide. We are now looking further afield and when we took our products into Egypt they were extremely well received and quickly became established as the leading partitions systems.

We now wish to bring our innovative patented products back to the UK. After much research we selected The Old Brickworks in Plumpton Green as our sales centre and this is where we have registered our UK division "Vista Partitions Limited" (company number 11456768). We have strong environmental and sustainability policies and we feel that The Old Brickworks in Plumpton Green suits our ethical policies. It also suits the 'green' image that we wish to portray to our customers both in the UK and abroad of being sited amongst "England's pleasant pastures". This 'soft' commercial site is perfectly placed for us and there is even an attractive public house (The Plough) and a racetrack nearby where we could take our investors, customers and visitors both from the UK and abroad. Our business will employ local people and contribute substantially to the local economy, without making a huge impact on local resources.

If Policy GT01 were to go ahead we would have to look elsewhere, we would certainly not wish to base our business adjacent adjacent to the proposed gypsy and traveller site. The reasons for this are:

- * It would destroy the open 'greenfield' space immediately adjacent The Old Brickworks and change the rural character and setting of the immediate locality and we feel that this would not be conducive to our desired company image and needs as stated above.
- * We have assessed the current security at The Old Brickworks (in the absence of Policy GT01) to be suitable for our needs. Should Policy GT01 be approved, we feel that the current level of security would have to be increased [REDACTED] in order to provide reassurance for our insurers, workers, and investors. This would change the character of The Old Brickworks dramatically and would make it a much less attractive site for us.
- * When we assessed Plumpton Green as a viable base for our sales operations, we inspected the local Neighbourhood plan and there was no mention whatsoever of a local need, requirement or provision for a permanent Gypsy and Traveller site. This sudden proposed allocation at short notice by Lewes District Council was a surprise to us and does not appear to be in keeping with the wishes of the local community.
- * The dubious main reason for allocation of Policy GT01 appears to be that it is "the only available site" out of a list of many, and it was a rather mediocre choice - certainly not the best site on the list. Would it not be better to wait for a better site to be put forward so that it can be allocated on its own merit rather than being the "only available site"?
- * We feel that the allocation Policy GT01 paves the way for future expansion of the site to include more permanent gypsy and traveller pitches, which will cause even more damage. Given that it was chosen because it was "the only available site" rather than the best site for both the proposed occupants and the local community, we feel that there is a very real danger that inclusion of Planning Policy GT01 will pave the way for future expansion on exactly the same basis. Bad planning on a smaller scale will pave

the way for more bad planning on a large scale, with associated detrimental effect on the green belt and the local community and businesses - and the gypsy and traveller community itself.

Our business will not only bring many positive aspects to the local community but has the potential to bring employment to the Lewes and East Sussex area in general. Having spent so much time planning our launch, I do not wish to have further delays whilst we look for a new sales centre however will have no alternative if Policy GT01 - Land south of The Plough is approved. We feel that there is substantial potential for harm to the local character, setting, economy, and community of The Old Brickworks and Plumpton Green simply so that Lewes District Council can 'tick the box' and fulfil their five remaining permanent pitches.

For the above reasons we would urge Lewes District Council to remove "Policy GT01 - Land south of The Plough" from their Local Plan Part 2 and to wait until a more suitable site is available.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public?

Why do you feel it is necessary to participate at the Examination in Public?

From: daniel@vistasystems.co
Sent: 05 November 2018 14:25
To: ldf
Subject: Gypsy site at Plumpton Green

Categories: GT01, Vanessa to deal with

Subject: Lewes District Local Plan Part 2: Site Allocations and Development Management Policies DPD - Pre-Submission version - Comment on Policy GT01 - Land south of The Plough

As manager of Vista Partitions Ltd based at The Old Brickworks commercial site adjacent the proposed Policy GT01, I wish to submit our formal objection to Policy GT01 - Land south of The Plough

I am the UK sales manager for a successful partitions company, Vista Systems which we took from the UK to the United Arab Emirates (UAE) several years ago. Whilst in the UAE, we have developed and patented several innovative partitions products that have been extremely well received in the UAE and have the potential to revolutionise the partitions market worldwide. We are now looking further afield and when we took our products into Egypt they were extremely well received and quickly became established as the leading partitions systems.

We now wish to bring our innovative patented products back to the UK. After much research we selected The Old Brickworks in Plumpton Green as our sales centre and this is where we have registered our UK division "Vista Partitions Limited" (company number 11456768). We have strong environmental and sustainability policies and we feel that The Old Brickworks in Plumpton Green suits our ethical policies. It also suits the 'green' image that we wish to portray to our customers both in the UK and abroad of being sited amongst "England's pleasant pastures". This 'soft' commercial site is perfectly placed for us and there is even an attractive public house (The Plough) and a racetrack nearby where we could take our investors, customers and visitors both from the UK and abroad. Our business will employ local people and contribute substantially to the local economy, without making a huge impact on local resources.

If Policy GT01 were to go ahead we would have to look elsewhere, we would certainly not wish to base our business adjacent adjacent to the proposed gypsy and traveller site. The reasons for this are:

1. It would destroy the open 'greenfield' space immediately adjacent The Old Brickworks and change the rural character and setting of the immediate locality and we feel that this would not be conducive to our desired company image and needs as stated above.
2. We have assessed the current security at The Old Brickworks (in the absence of Policy GT01) to be suitable for our needs. Should Policy GT01 be approved, we feel that the current level of security would have to be increased [REDACTED] in order to provide reassurance for our insurers, workers, and investors. This would change the character of The Old Brickworks dramatically and would make it a much less attractive site for us.
3. When we assessed Plumpton Green as a viable base for our sales operations, we inspected the local Neighbourhood plan and there was no mention whatsoever of a local need, requirement or provision for a permanent Gypsy and Traveller site. This sudden proposed allocation at short notice by Lewes District Council was a surprise to us and does not appear to be in keeping with the wishes of the local community.
4. The dubious main reason for allocation of Policy GT01 appears to be that it is "the only available site" out of a list of many, and it was a rather mediocre choice - certainly not the best site on the list. Would it not

be better to wait for a better site to be put forward so that it can be allocated on its own merit rather than being the "only available site"?

5. We feel that the allocation Policy GT01 paves the way for future expansion of the site to include more permanent gypsy and traveller pitches, which will cause even more damage. Given that it was chosen because it was "the only available site" rather than the best site for both the proposed occupants and the local community, we feel that there is a very real danger that inclusion of Planning Policy GT01 will pave the way for future expansion on exactly the same basis. Bad planning on a smaller scale will pave the way for more bad planning on a large scale, with associated detrimental effect on the green belt and the local community and businesses - and the gypsy and traveller community itself.

Our business will not only bring many positive aspects to the local community but has the potential to bring employment to the Lewes and East Sussex area in general. Having spent so much time planning our launch, I do not wish to have further delays whilst we look for a new sales centre however will have no alternative if Policy GT01 - Land south of The Plough is approved. We feel that there is substantial potential for harm to the local character, setting, economy, and community of The Old Brickworks and Plumpton Green simply so that Lewes District Council can 'tick the box' and fulfil their five remaining permanent pitches.

For the above reasons we would urge Lewes District Council to remove "Policy GT01 - Land south of The Plough" from their Local Plan Part 2 and to wait until a more suitable site is available.

Regards,

Daniel Booth

Daniel Booth

UK Manager

Vista Systems UK Division

Vista Partitions Ltd

Unit 43, The Old Brickworks

Station Road

Plumpton Green

East Sussex

BN7 3DF

[REDACTED]

@:- daniel@vistasystems.co

Daniel Booth

UK Manager

Vista Partitions UK

[REDACTED]

@:- daniel@vistasystems.co

Representation ID: REP/073/E1Representor Details:

Representor ID:	REP/073
Name:	Clare Bount
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:
Organisation:

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	E1 - Land at East Quay, Newhaven Port
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	
Representation: I wish to register my objection to the proposed development planning ref E1, which, I believe, will have a profoundly negative effect on the stretch of coast between Newhaven and Seaford. Should this proposal go ahead, we will see the loss of a precious nature reserve, an area of natural beauty and community amenity. It goes against all development planning for Newhaven - is neither 'green nor clean', and a mere 30 new jobs are forecast. The impact on the local environment will be huge, including new piers for docking, sea defences to make it safer for the boats that will be waiting for the tide, a massive elevated escalator tracking for moving aggregate, an overpass for lorries costing over	

£20 million, are just a few examples.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public?

Why do you feel it is necessary to participate at the Examination in Public?

Hodgson, Lilly

From: clare blount [REDACTED]
Sent: 05 November 2018 18:34
To: ldf
Subject: Planning ref E1: Objection

Categories: Vanessa to deal with

Sirs,

I wish to register my objection to the proposed development planning ref E1, which, I believe, will have a profoundly negative effect on the stretch of coast between Newhaven and Seaford.

Should this proposal go ahead, we will see the loss of a precious nature reserve, an area of natural beauty and community amenity. It goes against all development planning for Newhaven - is neither 'green nor clean', and a mere 30 new jobs are forecast. The impact on the local environment will be huge, including new piers for docking, sea defences to make it safer for the boats that will be waiting for the tide, a massive elevated escalator tracking for moving aggregate, an overpass for lorries costing over £20 million, are just a few examples.

Yours faithfully

Clare Blount
Resident



Virus-free. www.avast.com

Representation ID: REP/074/BA01
--

Representor Details:

Representor ID:	REP/074
Name:	Teresa Brinkley
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	BA01 - Land at Hillside Nurseries, High Street
<p><i>Do you consider the document to be:</i></p> <p>Legally Compliant:</p> <p>Sound:</p>	
<p>Representation:</p> <p>I would like to raise my significant concerns and objections to the considerations for the development of site BA01.</p> <p>Barcombe village is one of the more populous villages in the Lewes district, a thriving community with an Outstanding school and commitment to further growth in line with the Lewes District Local Plan.</p> <p>It has wholly inadequate outside playspace, both in the current state and standard of equipment and the volume of space available at only 12% of recommended guidelines.</p> <p>The local villages surrounding Barcombe have significantly larger spaces with updated facilities. Barcombe Parish Council have committed to the funding and development of</p>	

updated playspace but require appropriate land to do so.

In my view it is the duty and responsibility of the council to ensure the health and wellbeing of the young population of Barcombe is catered for by upholding the BA1 policy and supporting the development of adequate, fully equipped outdoor play facilities to the scale appropriate to the population in this community on this BA01 site per the recommendations as made in the attached document.

Consultation response to Lewes District Council Local Plan Part 2 pre-submission document by Barcombe Playground Working Group on behalf of Barcombe Parish Council

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public?

Why do you feel it is necessary to participate at the Examination in Public?

Thea Davis

From: Teresa Brinkley <[REDACTED]>
Sent: 05 November 2018 20:03
To: ldf
Subject: Lewes District Council Local Plan Part 2 - BA01 BARCOMBE
Attachments: 181028_BPWG_response_draft_local_plan.pdf

Categories: Vanessa to deal with

To whom it may concern

RE: Lewes District Local Plan Part 2: Site Allocations and Development Management Policies DPD

I would like to raise my **significant concerns and objections** to the considerations for the development of site BA01.

Barcombe village is one of the more populous villages in the Lewes district, a thriving community with an Outstanding school and commitment to further growth in line with the Lewes District Local Plan.

It has **wholly inadequate outside playspace**, both in the current state and standard of equipment and the volume of space available at only 12% of recommended guidelines.

The local villages surrounding Barcombe have significantly larger spaces with updated facilities. Barcombe Parish Council have committed to the funding and development of updated playspace but require appropriate land to do so.

In my view it is the duty and responsibility of the council to ensure the health and wellbeing of the young population of Barcombe is catered for by upholding the BA1 policy and supporting the development of adequate, fully equipped outdoor play facilities to the scale appropriate to the population in this community on this BA01 site per the recommendations as made in the attached document.

Yours,
Teresa Brinkley

Resident of Barcombe
DOI: Vice Chair of the Skylark Federation of Schools (Barcombe, Hamsey, Plumpton)

Consultation response to Lewes District Council Local Plan Part 2 pre-submission document by Barcombe Playground Working Group on behalf of Barcombe Parish Council

28/10/18

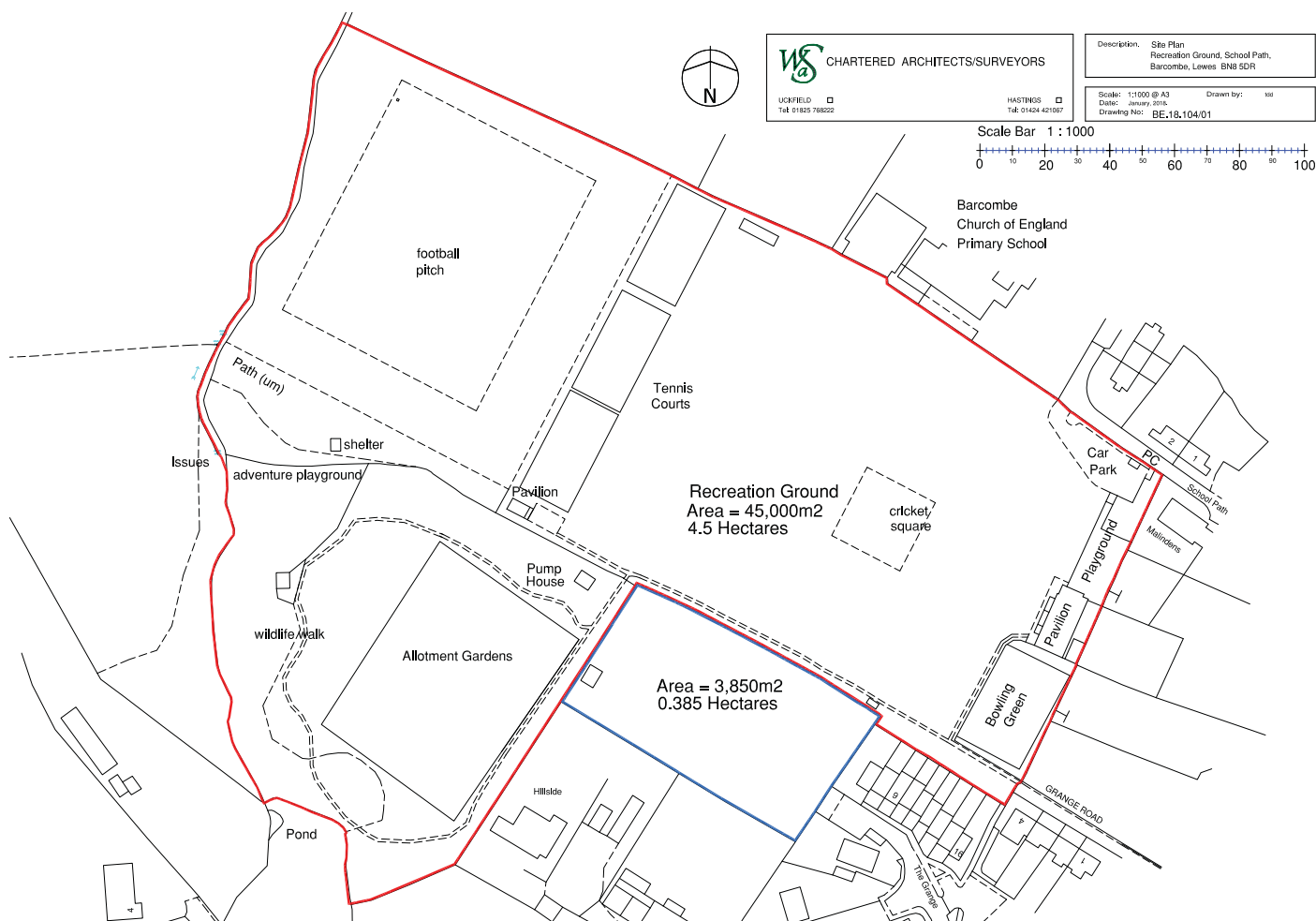
This document outlines our **significant concerns** regarding the Lewes District Local Plan Part 2: Site Allocations and Development Management Policies DPD - Pre-submission version, in particular to Policy BA01 - Land at Hillside Nurseries, High Street. We believe there is an unresolved ongoing shortfall of equipped play space in Barcombe Cross and that, whilst this policy specifically addresses this shortfall, it fails by a long way to meet the spatial requirements for play in the village that it purports to provide.

We have been campaigning for improvement and enlargement of play space provision in Barcombe Cross for three years and have undertaken much research, consulting with the LDC Specialist Advisor for Open Spaces, Christopher Bibb and a Chartered Surveyor. We have also held a public consultation event and distributed surveys to the community to ascertain public opinion and aspirations for play space in Barcombe Cross - the results of the survey confirmed that overall, playground users feel that the space is currently inadequate and far too small. At a site visit in 2016 Christopher Bibb advised us that the only suitable space for a playground of the required size, considering minimum safety and access requirements for play space, was on the site of policy BA01 on Land at Hillside Nurseries, High Street. Our findings regarding the spatial requirements for play in Barcombe Cross and the existing allocation of space in the village are set out below:



BARCOMBE PUBLIC SPACE IN FIGURES - The Barcombe Playground Working Group used Ordnance Survey data files and CAD software to calculate areas of public space by category. This information was presented to the Parish Council in April 2016.

WAS Architects were also employed by the Parish Council in 2018 as Chartered Surveyors to confirm areas identified by the playground working group.



It is assumed that WAS Architects used the same ‘desk-based’ survey techniques (not on-site measured survey). Both sets of figures correspond, with minor differences, perhaps due to rounding of numbers and according to individual assumptions by draughtspeople of boundaries between designated spaces. Figures from LDC also largely correspond, with differing designations of spaces. In figures below it is clear that LDC assumed that the ‘Bottom Field’ was an ‘informal children’s play space’, which could be disputed by the Parish Council, as the space is currently an empty field with temporary football goalposts.

BARCOMBE RECREATIONAL SPACE	PLAYGROUND WORKING GROUP FIGURES, APRIL 2016	WAS ARCHITECTS FIGURES, FEBRUARY 2018	LEWES DISTRICT COUNCIL FIGURES, APRIL 2016
TOTAL PUBLIC RECREATION SPACE	4.48ha (44,870m ²)	4.5ha (45,000m ²)	3.2ha (32,000m ²) Rec, not including WAB?
PLAYGROUND (EQUIPPED PLAY)	0.044ha (440m ²)	0.043ha (430m ²)	0.06ha (600m ²)
WAB TOTAL	1.2ha (12,320m ²)	1.14ha (11,400m ²)	Not given
WAB (MINUS ALLOTMENTS)	0.85ha (8500m ²)	0.79ha (7900m ²)	Not given
WAB (INFORMAL CHILDREN'S PLAY)	0.62ha (6200m ²) Not inc. Orchard or paths	Not given	Not given
BIKE JUMPS	0.048ha (480m ²) Before improvements	0.167ha (1670m ²)	Not given
OUTDOOR SPORTS TOTAL	1.87ha (18,730m ²)	Not given	1.84ha (18,400m ²)
CRICKET FIELD/FOOTBALL PITCH	1.59ha (15,900m ²)	Not given	Not given
CRICKET PITCH (SQUARE)	0.09ha (900m ²)	Not given	Not given
TENNIS COURTS	0.2ha (2000m ²)	Not given	Not given
BOWLING GREEN	0.083ha (830m ²)	Not given	Not given
BOTTOM FIELD	1.2ha (12,000m ²)	Not given	1.3ha (13,000m ²) 'Informal Children's Play'?
BOTTOM FIELD USEABLE PITCH SPACE	0.73ha (7300m ²) approx.	Not given	Not given
HILLSIDE NUSERIES (FORMER BAI POLICY)	0.389ha (3890m ²)	Not given	Not given

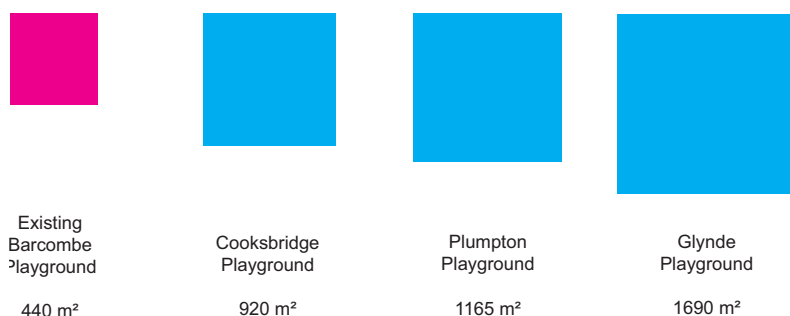
* 1 Hectare = 10,000m²

There is currently 440sqm (0.044ha) of equipped play space in Barcombe Cross. The required equipped play space for the size of the current population, based on Fields In Trust benchmark guidelines of 0.25 hectares per 1000 population, is 3,800sqm (0.38ha). The existing shortfall is 3,200sqm (0.32ha) representing a shortfall of 88%. This will rise to 3,500sqm (0.35ha) with the projected population of 1621 that expected new development will bring (LDC statistics).

The space needed for play in Barcombe Cross



Play provision in Barcombe Cross compared to other local villages by size



Due to the shortfall in the village's play space, the 2003 Lewes District Local Plan allocated approximately 0.4ha of the site at BA01 as an extension of the Recreation Ground (policy BA1), as referred to in paragraph 2.62.

Lewes District Council (LDC) Local Plan Part 2: Site Allocations and Development Management Policies DPD - Pre-submission version - policy BA01 stipulates that the 'development incorporates approximately 1600sqm of public amenity space along the northern boundary to allow for the provision of equipped and informal play space'. This provides only *half* of what is currently required to address the existing shortfall and therefore is inadequate.

It is noted that if the field is divided in line with the northern boundary, it leaves a strip of land that is approximately 20m wide by 80m in length. Planning of equipped play would be very limited by the width of the allocated land due to regulations requiring safety zones around each piece of equipment and may therefore require the provision of bespoke and potentially prohibitively expensive equipment. Equipment in the current village playground has not been replaced when broken due to inadequate safety zones around equipment (as identified by equipment suppliers), and the inadequate space around equipment is highlighted each year in the annual safety inspection report undertaken by LDC.

The Fields in Trust (FiT) benchmark guidelines that the Council has adopted (para. 4.51) require a 20m buffer zone between the play area and housing for a 'Local Equipped Area for Play' (LEAP). This would take 20m off the eastern boundary near the houses on the Grange, reducing the allocation of land for equipped play space to 20mx60m, or 1200sqm. If housing is situated close to the sites' northern boundary then this buffer zone could also reduce space for play further along the length of the allocated space. A line of protected trees along the boundary of the recreation ground may also inhibit installation of play equipment on such a narrow site.

There are three allocated sites for housing development in Barcombe. A financial contribution (i.e. through S106 or CIL) towards improvement of an existing equipped/designated play space may be sought in lieu of on-site provision for larger scale play spaces, or where existing play space lies within the FiT walking distance guideline of a proposed development. **We appeal to the Council to ensure that there is a cohesive, centralised and accessible equipped play space allocated in one area (BA01), rather than allowing a piecemeal approach from each of the 3 developers.** BA01 is within walking distance of all 3 housing developments, as specified by FiT. Furthermore, BA01 is ideally positioned in a central village location, near the school (with no roads to cross), within walking distance for all housing in the village, and within eye-sight of recreation ground facilities, the school and car park.

We also ask that LDC clarify that the requirement for the allocation of BA01 is for 'equipped' play space, which is in shortfall, but remove the reference to provision of 'informal' play space, which is in surplus (as stated in paragraph 2.62).

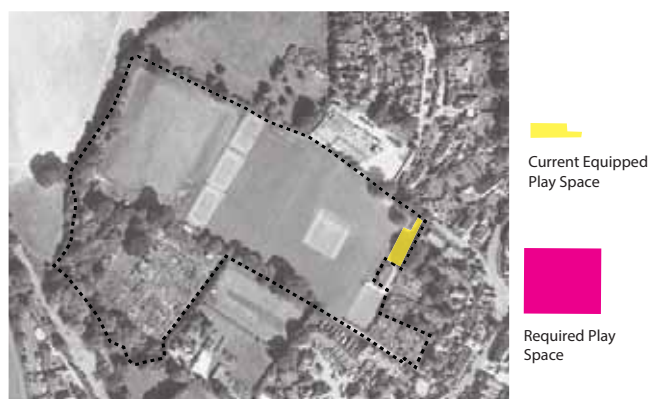
Further, we ask that the language used in policy BA01 ensures that any developer is required to fulfil its obligation to provide the space allocated for play – the use of words such as 'approximately' and 'preferable' (2.63) should be amended to more definitive terms to ensure clarity and accountability.

Finally, we would like it noted that we have explored all options to find an alternative site for equipped play space in the village that meets the existing shortfall of 3,200sqm, including having spoken to LDC's Specialist Adviser for Open Spaces.

OPTIONS FOR PROVISION OF REQUIRED PLAY SPACE IN BARCOMBE

Public space in Barcombe Cross
- including recreation ground, sports pitches and 'Wild About Barcombe'

Option 1 - Extend current playspace



Option 2 - Build playspace in lower field



Option 3 - Build playspace in BA01 field



It is important that the village secure the full BA01 site to deliver against its shortfall of equipped play space. If only half the land is developed, then this opportunity will be lost forever. The proposed housing site would erode onto land previously earmarked by the council for an extension of recreational space and therefore it is essential that the BA1 policy allocation is maintained in the final plan.

As stated in policy DM15 'In areas where there is deficiency of outdoor playing space in either quantitative or qualitative terms, the impact of the increase in population from new residential development will be mitigated either by on-site provision or by the use of the Community Infrastructure Levy to secure the provision of new, or the enhancement of existing, outdoor playing space and facilities'. Barcombe lacks adequate playing space both in quantitative and qualitative terms. **We ask that LDC ensure that the issues above are taken in to account and addressed in the final Lewes District Local Plan Part 2: Site Allocations and Development Management Policies DPD - Pre-submission version document.**

Representation ID: REP/075/E1

Representor Details:

Representor ID:	REP/075
Name:	Julia Brock
Organisation:	
Consultation Body:	General
Stakeholder Type:	Local group or organisation

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	E1 - Land at East Quay, Newhaven Port
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	No Not Consistent with national policy
Representation:	
<p>Green spaces for adult wellbeing are part of government plans.</p> <p>it is a crime to take a nature reserve and use it for industry. The bio diversity is lost for ever. It is too close to the areas of SSSI and the World heritage Biosphere of Brighton and the Downs, to be built on.</p> <p>What future is there for tourism in the local area if all that is seen is industrial estates on all sides.</p>	

Any development of the remaining areas of Tidemills is a truly dreadful idea.

What changes do you suggest to make the document legally compliant or sound?

See above re contradiction of government plans for green spaces.

Do you consider it necessary to participate at the Examination in Public?

No

Why do you feel it is necessary to participate at the Examination in Public?

Representation ID: REP/076/GT01Representor Details:

Representor ID:	REP/076
Name:	Rob Brown
Organisation:	
Consultation Body:	General
Stakeholder Type:	Local Business / employer

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	GT01 - Land south of The Plough
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	
Representation:	
<p>I'm writing to make my feelings known regarding the proposed travellers site in Plumpton.</p> <p>I have a business located on The Old Brickworks and have so for the last 4 years. One of the reasons I chose to base myself from Plumpton was the estates quiet nature located in the countryside. I like working on the estate because it's peaceful and very secure. For that reason, I OBJECT to any proposed site in Plumpton, especially next to our estate.</p> <p></p> <p>if it</p>	

does go ahead I will not be renewing my license, a view which is shared by many on the estate. [REDACTED]

I can't see any benefit for the people of Plumpton or the tenants of The Old Brickworks for a site being granted here therefore I'm objecting to planned site at Plumpton.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public?

Why do you feel it is necessary to participate at the Examination in Public?

Hodgson, Lilly

From: Juicytox [REDACTED]
Sent: 31 October 2018 15:33
To: ldf
Subject: Planned traveller site at Plumpton

Categories: LPP2 comment to code - stakeholder details have been added

Dear Sir/Madam,

I'm writing to make my feelings known regarding the proposed travellers site in Plumpton.

I have a business located on The Old Brickworks and have so for the last 4 years. One of the reasons I chose to base myself from Plumpton was the estates quiet nature located in the countryside. I like working on the estate because it's peaceful and very secure. For that reason, I OBJECT to any proposed site in Plumpton, especially next to our estate.

[REDACTED] if it does go ahead I will not be renewing my license, a view which is shared by many on the estate. [REDACTED]
[REDACTED]

I can't see any benefit for the people of Plumpton or the tenants of The Old Brickworks for a site being granted here therefore I'm objecting to planned site at Plumpton.

Kind regards,

Rob Brown

Representation ID: REP/077/GT01Representor Details:

Representor ID:	REP/077
Name:	Zoe Brown
Organisation:	The Old Brickworks
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:
Organisation:

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	GT01 - Land south of The Plough
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	
Representation:	
<p>My family has owned and worked at the Old Brickworks, Plumpton Green, immediately adjacent to the proposed 'Plough' site for the past 60 years and we are devastated, along with the other villagers of Plumpton that this is being considered a suitable site. It failed to be considered suitable previously.</p> <p>In what way is it suitable? The proposed plan was not allocated in the Neighbourhood Plan. It seems the 'goalposts' have been moved to include the Plough site which scored</p>	

badly before. 5 pitches are proposed but this is a greenfield site of perfectly good grazing land which slopes north to south and our property is on the south side. Unless the concreted pitch area has good provision for surface-water management other than the present inadequate ditch, then I fear that we shall get flooded in times of heavy rainfall. The ditch close to the road is known to flood most years in bad weather.

Whilst I have been told the proposed site would have its own sewage management plant, and given that Lewes District Council are so strapped for cash that by their own admission services have been 'cut to the bone', are the Council prepared for the ongoing costs associated with managing the sewage and the site.

The Old Brickworks is a community of 21 business units. It has been painstakingly landscaped and converted over many years, and with much investment, from a partially-derelict chicken farm into a smart and well-managed site which is compatible with its rural surroundings. There is also a bungalow which has been renovated and is rented to a couple and it is their home. It is screened as far as possible with mature trees, hedges and shrubs on the east, west and south sides but on the northern boundary there is a clear view of the proposed Plough field.

Our tenants are understandably alarmed about the proposed Gypsy and Traveller site and the impact it would have on their work and future. These are legal, legitimate businesses with local, hard-working, tax-paying people who are settled in Plumpton and who are considerate to the wider Plumpton community, employing local people and contribute to the local and wider economy. They have ALL said they will leave if the Gypsy and Traveller site goes ahead. It is no idle threat. It would involve them in the expense of moving and relocating. It is completely unacceptable to cause such upheaval and upset for the sake of 5 pitches. It would obviously adversely affect the vitality and viability of the Old Brickworks to operate as a business. OUR business. This would be a tragedy after so many years of hard work and investment by my family. Why should we all be driven out by Lewes District Council in this way? The two people who work for us there would lose their jobs.

Planning Law requires the National Planning Policy Framework to be taken into account. In planning for Traveller sites, LDC should seek to identify those which are sustainable economically, socially and environmentally. In light of the above the Plough site fails on all three counts. And how would Lewes District Council 'promote a peaceful and integrated co-existence between the site and local community'? This is clearly impossible.

The proposed Plough site is in DIRECT conflict with Core Policy 4 in terms of supporting the rural economy and supporting local shops. Plumpton's thriving village shop is heavily used by the 50 people working at the Old Brickworks.

[REDACTED] for Plumpton Village and the Old Brickworks in particular. [REDACTED] will be prohibitively expensive to enclose the Business Park plus more CCTV and would not be in keeping with its rural aspect.

We were told at the Parish Council meeting on 9th October that all the prospective tenants of the proposed Plough site would be selected by LDC and 'vetted'. Given that

the Police, by their own admission, are no longer available to investigate burglary, theft and vehicle crime due to cuts in funding, this calls into question how accurate the 'vetting' process can possibly be. This is very worrying. [REDACTED]

We were also told at the meeting on 9th October that it can take up to 5 days (presumably 5 'working days'?) to evict travellers who lodge illegally on the site. What sort of trouble could happen in those 5 days? And nights? What sort of compensation could we expect in such an event? I don't see how LDC can have the staff to cover these sorts of eventualities.

We would doubtless be left to fend for ourselves.

The Plough site is on a 60mph busy rural road with no footpath connecting it to the village more than 0.5km away. The current south entrance was made illegally and is woefully unsuitable and in an area which floods. It is only a matter of metres from the top of the hill with poor visibility and I ask how large and long Traveller-type, showmen's vehicles, mobile homes and 'static' caravans can possibly turn onto this sloping field safely off the rural road without ruining ditches and hedges and creating obstructions.

The proposed Plough site is for 5 pitches. As this only takes up to 0.69ha of a 4.4ha field the worry locally is that this site could easily be extended over the years either legally or illegally as has happened on other sites, e.g. Offham and Dale Farm. Is there ANY guarantee that this will not happen. Only 2 nights ago on the news Travellers had filled up a large field (near Epsom, I believe) where their caravans were with [REDACTED] [REDACTED]. It is going to cost the Council over £1million to clear up. They had been doing rubbish removal in London. You can see this happening in Plumpton, can't you?

What precedent might be set by developing this greenfield field in such a way.

Thank you for taking the time to read this. Please make the right decision. You have a big responsibility here.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public? Yes

Why do you feel it is necessary to participate at the Examination in Public?

From: Zoe Brown [REDACTED]
Sent: 02 November 2018 09:24
To: ldf
Subject: Proposed Gypsy and Traveller site, Plumpton Green

Categories: LPP2 comment to code - stakeholder details have been added

[REDACTED]

[REDACTED]

My family has owned and worked at the Old Brickworks, Plumpton Green, immediately adjacent to the proposed 'Plough' site for the past 60 years and we are devastated, along with the other villagers of Plumpton that this is being considered a suitable site. It failed to be considered suitable previously.

In what way is it suitable? The proposed plan was not allocated in the Neighbourhood Plan. It seems the 'goalposts' have been moved to include the Plough site which scored badly before. 5 pitches are proposed but this is a greenfield site of perfectly good grazing land which slopes north to south and our property is on the south side. Unless the concreted pitch area has good provision for surface-water management other than the present inadequate ditch, then I fear that we shall get flooded in times of heavy rainfall. The ditch close to the road is known to flood most years in bad weather.

Whilst I have been told the proposed site would have its own sewage management plant, and given that Lewes District Council are so strapped for cash that by their own admission services have been 'cut to the bone', are the Council prepared for the ongoing costs associated with managing the sewage and the site.

The Old Brickworks is a community of 21 business units. It has been painstakingly landscaped and converted over many years, and with much investment, from a partially-derelict chicken farm into a smart and well-managed site which is compatible with its rural surroundings. There is also a bungalow which has been renovated and is rented to a couple and it is their home. It is screened as far as possible with mature trees, hedges and shrubs on the east, west and south sides but on the northern boundary there is a clear view of the proposed Plough field.

Our tenants are understandably alarmed about the proposed Gypsy and Traveller site and the impact it would have on their work and future. These are legal, legitimate businesses with local, hard-working, tax-paying people who are settled in Plumpton and who are considerate to the wider Plumpton community, employing local people and contribute to the local and wider economy. They have ALL said they will leave if the Gypsy and Traveller site goes ahead. It is no idle threat. It would involve them in the expense of moving and relocating. It is completely unacceptable to cause such upheaval and upset for the sake of 5 pitches. It would obviously adversely affect the vitality and viability of the Old Brickworks to operate as a business. OUR business. This would be a tragedy after so many years of hard work and investment by my family. Why should we all be driven out by Lewes District Council in this way? The two people who work for us there would lose their jobs.

Planning Law requires the National Planning Policy Framework to be taken into account. In planning for Traveller sites, LDC should seek to identify those which are sustainable economically, socially and environmentally. In light of the above the Plough site fails on all three counts. And how would Lewes District Council 'promote a peaceful and integrated co-existence between the site and local community'? This is clearly impossible.

The proposed Plough site is in DIRECT conflict with Core Policy 4 in terms of supporting the rural economy and supporting local shops. Plumpton's thriving village shop is heavily used by the 50 people working at the Old Brickworks.

[REDACTED] for Plumpton Village and the Old Brickworks in particular. [REDACTED] will be prohibitively expensive to enclose the Business Park plus more CCTV and would not be in keeping with its rural aspect.

We were told at the Parish Council meeting on 9th October that all the prospective tenants of the proposed Plough site would be selected by LDC and 'vetted'. Given that the Police, by their own admission, are no longer available to investigate burglary, theft and vehicle crime due to cuts in funding, this calls into question how accurate the 'vetting' process can possibly be. [REDACTED]

We were also told at the meeting on 9th October that it can take up to 5 days (presumably 5 'working days'?) to evict travellers who lodge illegally on the site. What sort of trouble could happen in those 5 days? And nights? What sort of compensation could we expect in such an event? I don't see how LDC can have the staff to cover these sorts of eventualities.

We would doubtless be left to fend for ourselves.

The Plough site is on a 60mph busy rural road with no footpath connecting it to the village more than 0.5km away. The current south entrance was made illegally and is woefully unsuitable and in an area which floods. It is only a matter of metres from the top of the hill with poor visibility and I ask how large and long Traveller-type, showmen's vehicles, mobile homes and 'static' caravans can possibly turn onto this sloping field safely off the rural road without ruining ditches and hedges and creating obstructions.

The proposed Plough site is for 5 pitches. As this only takes up to 0.69ha of a 4.4ha field the worry locally is that this site could easily be extended over the years either legally or illegally as has happened on other sites, e.g. Offham and Dale Farm. Is there ANY guarantee that this will not happen. Only 2 nights ago on the news Travellers had filled up a large field (near Epsom, I believe) where their caravans were with [REDACTED]. It is going to cost the Council over £1million to clear up. They had been doing rubbish removal in London. You can see this happening in Plumpton, can't you?

What precedent might be set by developing this greenfield field in such a way.

Thank you for taking the time to read this. Please make the right decision. You have a big responsibility here.

Yours sincerely

Zoe Brown (Miss)

[REDACTED]



Sent from my iPad

Representation ID: REP/078/GT01/A
--

Representor Details:

Representor ID:	REP/078
Name:	David Brown
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	GT01 - Land south of The Plough
<i>Do you consider the document to be:</i>	
Legally Compliant:	No
Sound:	No
	Not Positively Prepared
	Not Justified
	Not Effective
	Not Consistent with national policy
Representation:	
I would like to object to the proposed permanent travellers 'site next to the Old	

Brickworks, Station Road, Plumpton Green (close to the Plough Inn).

This is a wholly unsuitable proposal and should be rejected on the basis of impact on the community, the threat to local employment, safety considerations, woefully short notice from Lewes District Council (LDC) and potential concealment issues.

This proposal has not been carefully thought out by LDC in terms of its impact on the settled community. For the households surrounding and opposite the proposed pitch the siting will have a life-changing impact. The field concerned was never considered in the Neighbourhood Development Plan having been ruled out on the basis of proximity issues.

The impact on the village, local businesses and employment opportunities will be devastating to the future of the community. As I understand it, all 21 businesses in the Old Brickworks industrial estate have stated that they would be forced to re-locate elsewhere, potentially with the loss of between 50-70 jobs. Harvey's Brewery has already threatened that it would be forced to close the Plough pub if the proposal goes ahead, with the loss of livelihood for the manager and her bar staff. The loss of another pub in the village could rip the heart out of the community, especially as the other pub, the Fountain, already runs on a parlous footing. This will probably close as well if the proposal goes ahead. The loss of potential income spent inside the village could be crippling to the local economy, especially to the future of the Plumpton Green village store. One local business at the Old Brickworks said that they collectively spent £1,000 per month in the local shop. Imagine the impact of that factored up for all businesses forced to close or relocate. We could lose our lovely village store, probably the best in the country.

Safety issues seem to have been ignored by LDC. This is a busy road and visibility of the access is impacted by hedgerows on either side of the proposed site entrance. With a 60mph speed limit in force, this is completely unsafe for road users, pedestrians, or horse riders. There is inadequate pedestrian access to the village, especially at night along unlit roads.

I have a major concern about the undue haste at which this proposal is being bulldozed through by LDC. During years of consultation with the Plumpton Parish Council over the Neighbourhood Development Plan, this idea was never mentioned or raised by LDC. Despite being a close neighbour to the proposed site I knew nothing about this scheme until mid-September and the council appears to be rushing towards what appears to be an early conclusion. The consultation period opened up very quickly on the 24th September and is closing on the 5th November before most opponents have had a chance to effectively consult appropriate legal, planning or constitutional opinion. It is alarming to see that LDC is voting on adopting this proposal in the Local Plan Part 2 as early as 26th November. It has all the hallmarks of a fait accompli. I intend to raise a complaint with the Ombudsman, the Secretary of State for the Environment and Prime Minister Theresa May. Is there a case for potential concealment if the council have known about this for years and yet have not allowed public consultation until the last moment?

It seems that the council are desperate to force this proposal through because it is the only option on the table right now. This is a failure of local democracy in its worst form and Plumpton Green will suffer the consequences of a scheme that has not been correctly thought through, is wholly inappropriate and fails the people that the council was elected to serve.

I ask you to consider that this scheme should be rejected and referred back to the LDC Planning Team to find alternative, suitable sites. Plumpton Green is not a suitable solution.

What changes do you suggest to make the document legally compliant or sound?

The council needs to consider alternative sites in more suitable locations. Plumpton Green is not a suitable location, just because it is the only option on the table.

Do you consider it necessary to participate at the Examination in Public?

No

Why do you feel it is necessary to participate at the Examination in Public?

Representation ID: REP/078/GT01/BRepresentor Details:

Representor ID:	REP/078
Name:	David Brown
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	GT01 - Land south of The Plough
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	
Representation:	<p>I would like to object to the proposed permanent travellers' site next to the Old Brickworks, Station Road, Plumpton Green (close to the Plough Inn).</p> <p>This is a wholly unsuitable proposal and should be rejected on the basis of impact on the community, the threat to local employment, safety considerations, woefully short notice from Lewes District Council (LDC) and potential concealment issues.</p>

This proposal has not been carefully thought out by LDC in terms of its impact on the settled community. For the households surrounding and opposite the proposed pitch the siting will have a life-changing impact. The field concerned was never considered in the Neighbourhood Development Plan having been ruled out on the basis of proximity issues.

The impact on the village, local businesses and employment opportunities will be devastating to the future of the community. As I understand it, all 21 businesses in the Old Brickworks industrial estate have stated that they would be forced to re-locate elsewhere, potentially with the loss of between 50-70 jobs. Harvey's Brewery has already threatened that it would be forced to close the Plough pub if the proposal goes ahead, with the loss of livelihood for the manager and her bar staff. The loss of another pub in the village could rip the heart out of the community, especially as the other pub, the Fountain, already runs on a parlous footing. This will probably close as well if the proposal goes ahead. The loss of potential income spent inside the village could be crippling to the local economy, especially to the future of the Plumpton Green village store. One local business at the Old Brickworks said that they collectively spent £1,000 per month in the local shop. Imagine the impact of that factored up for all businesses forced to close or relocate. We could lose our lovely village store, probably the best in the country.

Safety issues seem to have been ignored by LDC. This is a busy road and visibility of the access is impacted by hedgerows on either side of the proposed site entrance. With a 60mph speed limit in force, this is completely unsafe for road users, pedestrians, or horse riders. There is inadequate pedestrian access to the village, especially at night along unlit roads.

I have a major concern about the undue haste at which this proposal is being bulldozed through by LDC. During years of consultation with the Plumpton Parish Council over the Neighbourhood Development Plan, this idea was never mentioned or raised by LDC. Despite being a close neighbour to the proposed site I knew nothing about this scheme until mid-September and the council appears to be rushing towards what appears to be an early conclusion. The consultation period opened up very quickly on the 24th September and is closing on the 5th November before most opponents have had a chance to effectively consult appropriate legal, planning or constitutional opinion. It is alarming to see that LDC is voting on adopting this proposal in the Local Plan Part 2 as early as 26th November. It has all the hallmarks of a fait accompli. I intend to raise a complaint with the Ombudsman, the Secretary of State for the Environment and Prime Minister Theresa May. Is there a case for potential concealment if the council have known about this for years and yet have not allowed public consultation until the last moment?

It seems that the council are desperate to force this proposal through because it is the only option on the table right now. This is a failure of local democracy in its worst form and Plumpton Green will suffer the consequences of a scheme that has not been correctly thought through, is wholly inappropriate and fails the people that the council

was elected to serve.

I ask you to consider that this scheme should be rejected and referred back to the LDC Planning Team to find alternative, suitable sites. Plumpton Green is not a suitable solution.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public?

Why do you feel it is necessary to participate at the Examination in Public?

From: David Brown <[REDACTED]>
Sent: 02 November 2018 21:52
To: ldf
Subject: Objection to the proposed traveller site in Plumpton Green - Local Plan Part 2

Categories: LPP2 comment to code - stakeholder details have been added

Dear Sir

I would like to object to the proposed permanent travellers' site next to the Old Brickworks, Station Road, Plumpton Green (close to the Plough Inn).

This is a wholly unsuitable proposal and should be rejected on the basis of impact on the community, the threat to local employment, safety considerations, woefully short notice from Lewes District Council (LDC) and potential concealment issues.

This proposal has not been carefully thought out by LDC in terms of its impact on the settled community. For the households surrounding and opposite the proposed pitch the siting will have a life-changing impact. The field concerned was never considered in the Neighbourhood Development Plan having been ruled out on the basis of proximity issues.

The impact on the village, local businesses and employment opportunities will be devastating to the future of the community. As I understand it, all 21 businesses in the Old Brickworks industrial estate have stated that they would be forced to re-locate elsewhere, potentially with the loss of between 50-70 jobs. Harvey's Brewery has already threatened that it would be forced to close the Plough pub if the proposal goes ahead, with the loss of livelihood for the manager and her bar staff. The loss of another pub in the village could rip the heart out of the community, especially as the other pub, the Fountain, already runs on a parlous footing. This will probably close as well if the proposal goes ahead. The loss of potential income spent inside the village could be crippling to the local economy, especially to the future of the Plumpton Green village store. One local business at the Old Brickworks said that they collectively spent £1,000 per month in the local shop. Imagine the impact of that factored up for all businesses forced to close or relocate. We could lose our lovely village store, probably the best in the country.

Safety issues seem to have been ignored by LDC. This is a busy road and visibility of the access is impacted by hedgerows on either side of the proposed site entrance. With a 60mph speed limit in force, this is completely unsafe for road users, pedestrians, or horse riders. There is inadequate pedestrian access to the village, especially at night along unlit roads.

I have a major concern about the undue haste at which this proposal is being bulldozed through by LDC. During years of consultation with the Plumpton Parish Council over the Neighbourhood Development Plan, this idea was never mentioned or raised by LDC. Despite being a close neighbour to the proposed site I knew nothing about this scheme until mid-September and the council appears to be rushing towards what appears to be an early conclusion. The consultation period opened up very quickly on the 24th September and is closing on the 5th November before most opponents have had a chance to effectively consult appropriate legal, planning or constitutional opinion. It is alarming to see that LDC is voting on adopting this proposal in the Local Plan Part 2 as early as 26th November. It has all the hallmarks of a *fait accompli*. I intend to raise a complaint with the Ombudsman, the Secretary of State for the Environment and Prime Minister Theresa May. Is there a case for potential concealment if the council have known about this for years and yet have not allowed public consultation until the last moment?

It seems that the council are desperate to force this proposal through because it is the only option on the table right now. This is a failure of local democracy in its worst form and Plumpton Green will suffer the consequences of a scheme that has not been correctly thought through, is wholly inappropriate and fails the people that the council was elected to serve.

I ask you to consider that this scheme should be rejected and referred back to the LDC Planning Team to find alternative, suitable sites. Plumpton Green is not a suitable solution.

Yours faithfully

David Brown

[REDACTED]

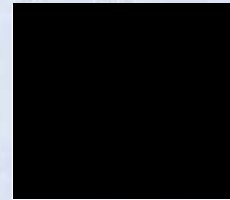
[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

RECEIVED
07 NOV 2018
MAILROOM



Dear Sir

I would like to object to the proposed permanent travellers' site next to the Old Brickworks, Station Road, Plumpton Green (close to the Plough Inn).

This is a wholly unsuitable proposal and should be rejected on the basis of impact on the community, the threat to local employment, safety considerations, woefully short notice from Lewes District Council (LDC) and potential concealment issues.

This proposal has not been carefully thought out by LDC in terms of its impact on the settled community. For the households surrounding and opposite the proposed pitch the siting will have a life-changing impact. The field concerned was never considered in the Neighbourhood Development Plan having been ruled out on the basis of proximity issues.

The impact on the village, local businesses and employment opportunities will be devastating to the future of the community. As I understand it, all 21 businesses in the Old Brickworks industrial estate have stated that they would be forced to re-locate elsewhere, potentially with the loss of between 50-70 jobs. Harvey's Brewery has already threatened that it would be forced to close the Plough pub if the proposal goes ahead, with the loss of livelihood for the manager and her bar staff. The loss of another pub in the village could rip the heart out of the community, especially as the other pub, the Fountain, already runs on a parlous footing. This will probably close as well if the proposal goes ahead. The loss of potential income spent inside the village could be crippling to the local economy, especially to the future of the Plumpton Green village store. One local business at the Old Brickworks said that they collectively spent £1,000 per month in the local shop. Imagine the impact of that factored up for all businesses forced to close or relocate. We could lose our lovely village store, probably the best in the country.

Safety issues seem to have been ignored by LDC. This is a busy road and visibility of the access is impacted by hedgerows on either side of the proposed site entrance. With a 60mph speed limit in force, this is completely unsafe for road users, pedestrians, or horse riders. There is inadequate pedestrian access to the village, especially at night along unlit roads.

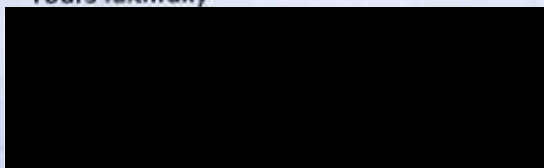
I have a major concern about the undue haste at which this proposal is being bulldozed through by LDC. During years of consultation with the Plumpton Parish Council over the Neighbourhood Development Plan, this idea was never mentioned or raised by LDC. Despite being a close neighbour to the proposed site I knew nothing about this scheme until mid-September and the council appears to be rushing towards what appears to be an early conclusion. The consultation period opened up very quickly on the 24th September and is closing on the 5th November before most opponents have had a chance to effectively consult appropriate legal, planning or constitutional opinion. It is alarming to see that LDC is voting on adopting this proposal in the Local Plan Part 2 as early as 26th November. It has all the hallmarks of a fait accompli. I intend to raise a complaint with the Ombudsman, the Secretary of State for the Environment and Prime Minister Theresa May. Is there a

case for potential concealment if the council have known about this for years and yet have not allowed public consultation until the last moment?

It seems that the council are desperate to force this proposal through because it is the only option on the table right now. This is a failure of local democracy in its worst form and Plumpton Green will suffer the consequences of a scheme that has not been correctly thought through, is wholly inappropriate and fails the people that the council was elected to serve.

I ask you to consider that this scheme should be rejected and referred back to the LDC Planning Team to find alternative, suitable sites. Plumpton Green is not a suitable solution.

Yours faithfully

A large black rectangular box redacting the signature of David Brown.

David Brown

Representation ID: REP/079/GT01Representor Details:

Representor ID:	REP/079
Name:	Mark Brunt
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	GT01 - Land south of The Plough
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	
Representation:	
<p>I object to the allocation of the site in Plumpton Green for development as a permanent site for gypsies and travellers. I will keep this letter brief, but my feelings could fill several pages...</p>	
<p>My objection is based on the following points:</p>	
*	

<div style="background-color: black; height: 30px; width: 100%;"></div> <p>* Your method of selecting potentially suitable sites is flawed – the scoring system is arbitrary and statistically invalid.</p> <p>* Developing this site would be expensive and difficult. I don't accept that this expenditure deserves public money.</p> <p>* I fear environmental impact, particularly to the adjacent stream, plus general contamination by waste materials and liquids. (ref: policies DM20, DM21 and DM22).</p> <p>* I fear expansion of the site, enhancing the problem In item 4. above, inevitably enhanced by site "overflow" of occupants, vehicles, "temporary" visitors and their infrastructure.</p> <p>* If the site be considered for development, it would be better for the development to serve the Plumpton Green community, in keeping with Policies DM13, DM14 and DM 15 of the reference document.</p> <p>Do not proceed with this flawed and unacceptable proposal.</p>
What changes do you suggest to make the document legally compliant or sound?
Do you consider it necessary to participate at the Examination in Public?
Why do you feel it is necessary to participate at the Examination in Public?

[REDACTED]

11 October 2018

Lewes District Council – Planning Department
Southover House, Southover Road,
Lewes, BN7 1AB

Dear Sir/Madam,

Proposed site Allocation for Gypsies and Travellers in Plumpton Green

Reference Document: Lewes District Local Plan -September 2018 - Part 2 Site Allocations and Development Management Policies Pre-Submission Document.

Reference Sections – Policy GT01 Land South of The Plough, plus other policies as identified below

I object to the allocation of the site in Plumpton Green for development as a permanent site for gypsies and travellers. I will keep this letter brief, but my feelings could fill several pages...

My objection is based on the following points:

1. [REDACTED]
2. Your method of selecting potentially suitable sites is flawed – the scoring system is arbitrary and statistically invalid.
3. Developing this site would be expensive and difficult. I don't accept that this expenditure deserves public money.
4. I fear environmental impact, particularly to the adjacent stream, plus general contamination by waste materials and liquids. (ref: policies DM20, DM21 and DM22).
5. I fear expansion of the site, enhancing the problem In item 4. above, inevitably enhanced by site "overflow" of occupants, vehicles, "temporary" visitors and their infrastructure.
6. If the site be considered for development, it would be better for the development to serve the Plumpton Green community, in keeping with Policies DM13, DM14 and DM 15 of the reference document.

Do not proceed with this flawed and unacceptable proposal.

[REDACTED]

Mark Brunt – Local resident

Representation ID: REP/080/E1Representor Details:

Representor ID:	REP/080
Name:	Andrew Bryant
Organisation:	
Consultation Body:	General
Stakeholder Type:	Local group or organisation

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	E1 - Land at East Quay, Newhaven Port
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	Yes
Representation:	
Surely the plan will interfere with the use of this area as a beach. What is proposed?	
What changes do you suggest to make the document legally compliant or sound?	
I suggest that the council makes the plans for this area known.	

Do you consider it necessary to participate at the Examination in Public?	Yes
Why do you feel it is necessary to participate at the Examination in Public? I think is necessary as a local inhabitant who has in the past used the area.	

Representation ID: REP/081/GT01Representor Details:

Representor ID:	REP/081
Name:	Christine Burford
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	GT01 - Land south of The Plough
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	
Representation:	<p>I have been advised of the proposal to site a permanent site on land to the south of The Plough in Plumpton Green.</p> <p>I object to this proposal as it is not in keeping with the rural nature of the village and is not included in the neighbourhood plan for this village.</p> <p>We all know the detrimental effect these sites have on the surrounding areas.</p>
What changes do you suggest to make the document legally compliant or sound?	

Do you consider it necessary to participate at the Examination in Public?
Why do you feel it is necessary to participate at the Examination in Public?

Hodgson, Lilly

From: [REDACTED]
Sent: 05 October 2018 10:13
To: ldf
Subject: Permanent Gypsy and Travellers site
Categories: LPP2 comment to code - stakeholder details have been added

I have been advised of the proposal to site a permanent site on land to the south of The Plough in Plumpton Green.

I object to this proposal as it is not in keeping with the rural nature of the village and is not included in the neighbourhood plan for this village.

We all know the detrimental effect these sites have on the surrounding areas.

Regards Christine Burford
[REDACTED]

Representation ID: REP/082/GT01Representor Details:

Representor ID:	REP/082
Name:	Paul Burford
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	GT01 - Land south of The Plough
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	
Representation: I have been advised of the proposal to provide a permanent site on land to the south of The Plough in Plumpton Green. I object to this proposal. It is not in keeping with the beautiful rural nature of the village. It is not included or connected with our neighbourhood plan for the village. The location is not close to amenities. There are other more suitable sites closer to the larger town of Burgess Hill.	

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public?
--

Why do you feel it is necessary to participate at the Examination in Public?

From: [REDACTED] >
Sent: 05 October 2018 10:23
To: ldf
Subject: Gypsy and Travellers Site Plumpton

Categories: LPP2 comment to code - stakeholder details have been added

Dear Sirs,

I have been advised of the proposal to provide a permanent site on land to the south of The Plough in Plumpton Green.

I object to this proposal.

It is not in keeping with the beautiful rural nature of the village.

It is not included or connected with our neighbourhood plan for the village.

The location is not close to amenities.

There are other more suitable sites closer to the larger town of Burgess Hill.

Paul Burford
[REDACTED]

Representation ID: REP/083/E1Representor Details:

Representor ID:	REP/083
Name:	Robert Burns
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	E1 - Land at East Quay, Newhaven Port
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	
Representation: I object to proposed policy E1 in its entirety. it represents a step too far in the development of this precious site that is of great amenity value to the local community as well as being a site of significant value to wildlife and biodiversity. Substantial development has already been allowed in this area in the face of extensive community and statutory consultee opposition. Further degradation of the Tide Mills area will effectively destroy its value forever. This is not sustainable development.	

List of reasons

- * Unacceptable and unsustainable loss of biodiversity. Including internationally rare vegetated shingle.
- * Unacceptable and unsustainable loss of local amenity value.
- * Unacceptable further likely detrimental effect on local air quality - already the subject of a local aqma.
- * Unacceptable further degradation of visual amenity with respect to the national park and local amenity.

What changes do you suggest to make the document legally compliant or sound?**Do you consider it necessary to participate at the Examination in Public?****Why do you feel it is necessary to participate at the Examination in Public?**

From: [REDACTED]
Sent: 04 November 2018 16:27
To: ldf
Subject: Ref: Proposed Policy E1 -- Lewes DC local plan

Categories: LPP2 comment to code - stakeholder details have been added

I object to proposed policy E1 in its entirety. it represents a step too far in the development of this precious site that is of great amenity value to the local community as well as being a site of significant value to wildlife and biodiversity. Substantial development has already been allowed in this area in the face of extensive community and statutory consultee opposition. Further degradation of the Tide Mills area will effectively destroy its value forever. This is not sustainable development.

List of reasons

1. Unacceptable and unsustainable loss of biodiversity. Including internationally rare vegetated shingle.
2. Unacceptable and unsustainable loss of local amenity value.
3. Unacceptable further likely detrimental effect on local air quality - already the subject of a local aqma.
4. Unacceptable further degradation of visual amenity with respect to the national park and local amenity.

rgds

Robert Burns

[REDACTED]
[REDACTED]
[REDACTED].

Representation ID: REP/084/GT01Representor Details:

Representor ID:	REP/084
Name:	Jeremy Burton
Organisation:	Plumpton Green Studios
Consultation Body:	General
Stakeholder Type:	Local Business / employer

Agent Details:

Name:
Organisation:

Contact Details:

Email Address:	
Address:	Plumpton Green Studios St Helena Lane Plumpton BN7 3DQ

Representation:

Policy/Section:	GT01 - Land south of The Plough
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	
Representation: I am joint owner of the office/B2 industrial site known as Plumpton Green Studios on St Helena Lane, BN7 3DQ. I wish to strongly object to the proposed permanent traveller's site adjacent to The Old Brickworks on the west side of Station Rd in Plumpton, and just to the south of our Units. 1 The site is a green-field area and any development there will change the nature of the environment in an unsustainable way. It does not have good access to services or the	

village – indeed there is no safe pavement to bus (should the service continue, even) nor shops at the moment. Any residents will be travelling by car everywhere – including to school.

2 A cleaning block, bins etc. and hardstanding for 5 permanent and another 5 caravans will be a blight on the local amenity and environment.

3 Our site employs some 18 people in 4 businesses some of whom live in Plumpton. They support the local rural

economy through payment of rates, use of other local business including the pubs and shop, and other local amenities. If this proposal goes ahead some of the tenants have indicated that they may have to relocate. They worry that there may be a need for greater security (fencing, lighting, cctv etc) if there is more residential development near what is presently essentially a rural site. Any future commercial tenants will require potentially intrusive security measures to an encroaching residential development. A threat of loss of business to the area does exist: PPTS, Policy B "ensure that traveller sites are sustainable economically" will be contravened.

4 "Gypsy and Traveller families often wish to have small compact and well-managed sites located in areas where they have historically resided and have a network of local family support"

There is no evidence to suggest that there has been any gypsy family has historically resided at , or near the proposed site at There is no evidence that local family support existing in the vicinity of these sites.

4 Increase in traffic, including trailered vehicle movements.

Please do not allow this proposed development to go ahead.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public?

Why do you feel it is necessary to participate at the Examination in Public?

From: Jeremy Burton [REDACTED]
Sent: 05 November 2018 15:07
To: ldf
Subject: Plumpton Travelers Site Consultation

Categories: GT01, Vanessa to deal with

Jeremy Burton, [REDACTED].

Tel: [REDACTED]. [REDACTED]

Dear Sir/Madam,

I am joint owner of the office/B2 industrial site known as Plumpton Green Studios on St Helena Lane, BN7 3DQ.

I wish to strongly object to the proposed permanent traveller's site adjacent to The Old Brickworks on the west side of Station Rd in Plumpton, and just to the south of our Units.

1 The site is a green-field area and any development there will change the nature of the environment in an unsustainable way. It does not have good access to services or the village – indeed there is no safe pavement to bus (should the service continue, even) nor shops at the moment. Any residents will be travelling by car everywhere – including to school.

2 A cleaning block, bins etc. and hardstanding for 5 permanent and another 5 caravans will be a blight on the local amenity and environment.

3 Our site employs some 18 people in 4 businesses some of whom live in Plumpton. They support the local rural

economy through payment of rates, use of other local business including the pubs and shop, and other local amenities. If this proposal goes ahead some of the tenants have indicated that they may have to relocate. They worry that there may be a need for greater security (fencing, lighting, cctv etc) if there is more residential development near what is presently essentially a rural site. Any future commercial tenants will require potentially intrusive security measures to an encroaching residential development. A threat of loss of business to the area does exist: PPTS, Policy B “ensure that traveller sites are sustainable economically” will be contravened.

4 *“Gypsy and Traveller families often wish to have small compact and well-managed sites located in areas where they have historically resided and have a network of local family support”*

There is no evidence to suggest that there has been any gypsy family has historically resided at , or near the proposed site at There is no evidence that local family support existing in the vicinity of these sites.

4 Increase in traffic, including trailered vehicle movements.

Please do not allow this proposed development to go ahead.

Yours sincerely

J. Burton (Plumpton Green Studios, St Helena Lane, Plumpton. BN7 3DQ)

Representation ID: REP/085/E1Representor Details:

Representor ID:	REP/085
Name:	Diana Burton
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	E1 - Land at East Quay, Newhaven Port
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	
Representation:	
<p>I can find no reference to the planned cement works on your web site, except going through a very hidden site on line.</p> <p>Many years ago I heard a radio programme re the cement works in Derbyshire. It was about the farming community living in the area. The families had contracted some sort of illness which was a killer. Not only that but it was proved that the milk was polluted through the cows living on the grass of the area. Unfortunately I can only remember the gist of it. An MP was involved.</p> <p>I would recommend that should Lewis Council still be thinking that a cement works is a good idea, research should be carried out re the problems. I think the cement works in</p>	

the Derbyshire area were closed down.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public?

Why do you feel it is necessary to participate at the Examination in Public?

From: D&J <[REDACTED]>
Sent: 01 November 2018 11:17
To: ldf
Subject: Newhaven Expansion plans

Categories: Complete, LPP2 comment to code - stakeholder details have been added

Dear Sir

I can find no reference to the planned cement works on your web site, except going through a very hidden site on line.

Many years ago I heard a radio programme re the cement works in Derbyshire. It was about the farming community living in the area. The families had contracted some sort of illness which was a killer. Not only that but it was proved that the milk was polluted through the cows living on the grass of the area.

Unfortunately I can only remember the gist of it. An MP was involved.

I would recommend that should Lewis Council still be thinking that a cement works is a good idea, research should be carried out re the problems. I think the cement works in the Derbyshire area were closed down.

Yours Sincerely

Diana Burton

Diana's Tablet

Representation ID: REP/086/E1Representor Details:

Representor ID:	REP/086
Name:	Julia Bush
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	E1 - Land at East Quay, Newhaven Port
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	
Representation:	
<p>This is a response to the consultation on the New Policy E1 involving development in Newhaven, East Sussex. I am a resident on Newhaven. I live there with my husband - we are both in our early 30s. We love living in the town but also feel very strongly that the local planning for the town is not clearly thought out. We were shocked and horrified to hear about the development of Tide Mills with a concrete factory and also the development for new homes in the area.</p> <p>Local plans by law must 'contribute to sustainable development' and your new policy does not. If the development at Tide Mills goes through there will be a huge loss of biodiversity (including internationally rare vegetated shingle).</p>	

The traffic and air quality in Newhaven is already extremely poor with the incinerator and industrial warehouses, and ring road, this will add to it. Instead you should be thinking about counter balancing the industry and helping the congestion on the roads.

You have also allocated new housing to Newhaven; this would be too much development; there is a huge need to preserve this designated Local Wildlife Site for nature / leisure. I have a dog and this is a very important area to me and friends to walk, socialise and exercise in.

This policy does not reflect the 'clean green marine' vision of the enterprise zone or 'renewable energy cluster' of the port masterplan. The maps weren't clear in the official consultation documents.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public?

Why do you feel it is necessary to participate at the Examination in Public?

From: Julia Burnett Armstrong <[REDACTED]>
Sent: 03 November 2018 10:21
To: ldf
Subject: Tide Mills - New Policy E1

Categories: LPP2 comment to code - stakeholder details have been added

Hello,

This is a response to the consultation on the New Policy E1 involving development in Newhaven, East Sussex. I am a resident on Newhaven. I live there with my husband - we are both in our early 30s. We love living in the town but also feel very strongly that the local planning for the town is not clearly thought out. We were shocked and horrified to hear about the development of Tide Mills with a concrete factory and also the development for new homes in the area.

Local plans by law must 'contribute to sustainable development' and your new policy does not. If the development at Tide Mills goes through there will be a huge loss of biodiversity (including internationally rare vegetated shingle).

The traffic and air quality in Newhaven is already extremely poor with the incinerator and industrial warehouses, and ring road, this will add to it. Instead you should be thinking about counter balancing the industry and helping the congestion on the roads.

You have also allocated new housing to Newhaven; this would be too much development; there is a huge need to preserve this designated Local Wildlife Site for nature / leisure. I have a dog and this is a very important area to me and friends to walk, socialise and exercise in.

This policy does not reflect the 'clean green marine' vision of the enterprise zone or 'renewable energy cluster' of the port masterplan. The maps weren't clear in the official consultation documents.

Regards,

Julia Bush

Representation ID: REP/087/GT01Representor Details:

Representor ID:	REP/087
Name:	Stephanie Butler
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	GT01 - Land south of The Plough
<i>Do you consider the document to be:</i>	
Legally Compliant:	No
Sound:	No Not Positively Prepared Not Justified Not Effective Not Consistent with national policy
Representation:	
The site is wholly unsuitable for a development of this nature. Ther site is isolated with no pavement and limited transport options to access local school, healthcare and shops.	

Due to the rural level cation there are extremely limited opportunities for work and public transport links are sporadic and limited.

The village community do not welcome or support this development and it was not part of the village action plan.

The site is adjacent to the old brickworks, small business units, the businesses have stated they will look to relocate should this development go ahead, thus damaging the local economy.

What changes do you suggest to make the document legally compliant or sound?

suggest an alternative site is considered, ideally expansion of existing site, use of brownfield site or at least a site with better access to employment opportunities and core services.

Do you consider it necessary to participate at the Examination in Public? No

Why do you feel it is necessary to participate at the Examination in Public?

Representation ID: REP/088/E1Representor Details:

Representor ID:	REP/088
Name:	Ann Butterfield
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	E1 - Land at East Quay, Newhaven Port
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	
Representation:	
I want to add my name to objecting to the ruin of tide mills a beautiful and haunting area.	
What changes do you suggest to make the document legally compliant or sound?	
Do you consider it necessary to participate at the Examination in Public?	

Why do you feel it is necessary to participate at the Examination in Public?

Kemp, Emma

From: ann butterfield <[REDACTED]>
Sent: 05 November 2018 07:34
To: ldf
Subject: Re tide mills exploitation
Categories: LPP2 comment to code - stakeholder details have been added

I want to add my name to objecting to the ruin of tide mills a beautiful and haunting area.
Ann Butterfield
[REDACTED]

[Sent from Yahoo Mail on Android](#)

Representation ID: REP/089/E1Representor Details:

Representor ID:	REP/089
Name:	Ian Cairns
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	E1 - Land at East Quay, Newhaven Port
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	
Representation: <p>I OBJECT to the allocation of Tidemills beach and land for future development.</p> <p>This plan results in loss of important public amenity and loss of diversity including internationally rare vegetated shingle habitat. The development allocation does not contribute to sustainable development and will add to pressure for traffic, air quality.</p> <p>Tidemills is an important open space separating the two conurbations of Newhaven and Seaford and this plan significantly reduces this space. Tidemills is the last</p>	

undeveloped coastal habitat between Seaford and Brighton and should be preserved as such.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public?

Why do you feel it is necessary to participate at the Examination in Public?

Hodgson, Lilly

From: [REDACTED]
Sent: 04 November 2018 18:38
To: ldf
Subject: Lewes District Local Plan Policy E1
Categories: LPP2 comment to code - stakeholder details have been added

I OBJECT to the allocation of Tidemills beach and land for future development.

This plan results in loss of important public amenity and loss of diversity including internationally rare vegetated shingle habitat. The development allocation does not contribute to sustainable development and will add to pressure for traffic, air quality.

Tidemills is an important open space separating the two conurbations of Newhaven and Seaford and this plan significantly reduces this space. Tidemills is the last undeveloped coastal habitat between Seaford and Brighton and should be preserved as such.

Ian Cairns
[REDACTED]

Representation ID: REP/090/DM1Representor Details:

Representor ID:	REP/090
Name:	
Organisation:	DLA Delivery
Consultation Body:	General
Stakeholder Type:	Planning Consultant

Agent Details:

Name:	Joseph Carr
Organisation:	David Lock Associates

Contact Details:

Email Address:	JCARR@DAVIDLOCK.COM
Address:	David Lock Associates 50 North Thirteenth St Milton Keynes Buckinghamshire MK9 3BP

Representation:

Policy/Section:	DM1: Planning Boundary
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	No Not Positively Prepared Not Justified Not Effective Not Consistent with national policy
Representation:	
This policy seeks to restrict development to locations within the 'planning boundary' of established settlements within the District. The policy takes a similar functional role to	

that of Policy CT1 of the currently adopted Local Plan 2003. The planning boundaries have been revised alongside this draft plan, and are tightly drawn around the respective settlements. These boundaries omit peripheral areas of land which are associated with the settlements themselves, and which are unconstrained and well related to services and amenities.

The draft policy states:

"Outside the planning boundaries, the distinctive character and quality of the countryside will be protected and new development will only be permitted where it is consistent with a specific development plan policy or where the need for a countryside location can be demonstrated."

Reviewing this wording, the Council seems to have completely failed to recognise that the ability to protect the countryside for its own sake has been written out of national guidance. National policy now seeks only to recognise the intrinsic character of the countryside and is to be contrasted with the Green Belt which does remain protected (see the NPPF Core Principles paragraph 17, bullet point 5).

The combination of the restrictive wording of the policy itself and the tight nature of the boundaries creates a situation where very little flexibility to accommodate sustainable development is provided. This is a situation compounded with the lack of windfall exemption policy within the plan, despite 468 dwellings required to be found from windfall sites throughout the plan period outside the National Park (Table 2 of the LP2). There is no indication within these draft development management policies or supporting text on how this windfall development is to be accommodated.

Therefore, we write to object to the wording of this policy, as it is too restrictive and does not plan to provide sustainable development, thereby failing to meet the objectives of the NPPF 2012 and subsequent government policy (such as that held in the new NPPF 2018). Further, the lack of a windfall policy held within the draft plan, coupled with the tight settlement boundaries and restrictive development management policies, as a whole, create a position where it is unclear how the additional 468 windfall dwellings are to be provided. This is unacceptable in a context where there is an acute housing need in Lewes, and even more unacceptable in a national context where government focus is to increase housing supply. Therefore, it cannot be said that this policy is consistent with national policy, and thereby is unsound.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public? Yes

Why do you feel it is necessary to participate at the Examination in Public?

We would also wish to be contacted in the event of any examination hearings should this plan proceed to examination, so we can be appropriately represented by Counsel. As you will be aware, DLA Delivery were represented at the JCS Examination, and would

wish to continue our involvement as a local land promoter keen to develop in the district.

Representation ID: REP/090/HPCRepresentor Details:

Representor ID:	REP/090
Name:	
Organisation:	DLA Delivery
Consultation Body:	General
Stakeholder Type:	Planning Consultant

Agent Details:

Name:	Joseph Carr
Organisation:	David Lock Associates

Contact Details:

Email Address:	JCARR@DAVIDLOCK.COM
Address:	David Lock Associates 50 North Thirteenth St Milton Keynes Buckinghamshire MK9 3BP

Representation:

Policy/Section:	Housing Policy Context
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	Yes Not Positively Prepared Not Justified Not Consistent with national policy
Representation:	
Overall development strategy	

The overall development strategy which is realised through the development management policies is too restrictive and potentially prevents sustainable development in sustainable locations. Whilst a strategy has been outlined to meet the housing requirement set out in the Local Plan Part 1: Joint Core Strategy (JCS), it was widely acknowledged during examination and within the inspector's report that the objectively assessed housing need is not being met by the JCS target of 6,900 dwellings. The strategy also relies upon a significant number of windfalls coming forward.

It was considered suitable to adopt the plan despite this shortfall, due to the presence of constraints within the District, such as the South Downs National Park. Within this context it is imperative that the development management policies contain sufficient flexibility to deliver sustainable development where it can be accommodated in areas without these constraints. The policies in this plan do not achieve this, therefore cannot be said to meet the tests of soundness as, the policies are not:

a) Positively prepared: the policies do not, as a minimum, seek to address the area's objectively assessed needs (OAN), or seek to allow for sufficient flexibility to even slightly meet the unmet need which was apparent in the adoption of the JCS.

b) Justified: When an OAN is not met at a strategic scale, as in this case with the deficit in supply within the JCS when compared with the OAN, it is important that areas which could contribute to meeting this unmet need are able to, especially in areas which are not subject to the constraints which have led to the shortfall against the OAN. The strategy held within this Part 2 Local Plan (LP2), by simply allocating the bare minimum of land for development against the JCS, is too restrictive, and this is reflected in the overly restrictive policies held within. This approach is not justified, as it is not an appropriate strategy taking into account reasonable alternatives.

c) Consistent with National Planning Policy: Notwithstanding the clear fact this plan has been rushed towards submission to enable examination on the basis of the previous NPPF, there are significant inconsistencies within the overall strategy and National Planning Policy, even in its previous form (NPPF 2012). Principally, the NPPF 2012 at paragraph 14 sets out the presumption in favour of sustainable development, which states that "local planning authorities should positively seek opportunities to meet development needs in their area" (my emphasis). The overly restrictive nature of the planning policies within the LP2 does not demonstrate that opportunities have been positively sought, especially when coupled with the allocation of the bare minimum of land to meet a target which is significantly below the OAN for the area. This does not enable the delivery of sustainable development in accordance with the policies of the framework.

In order to make this plan sound, the entire strategy of the plan would need to be reformulated to seek to flexibly promote development in sustainable locations. This could be achieved by a proactive approach to site allocation, allocating more than just the bare minimum of sites across the district, and directing local neighbourhood plans to meet a more ambitious target growth figures, especially in those areas subject to less development constraints. This change in strategy would need to be replicated in relevant

policies, including the addition of mechanisms within individual policies which seek to promote sustainable development.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public? Yes

Why do you feel it is necessary to participate at the Examination in Public?

We would also wish to be contacted in the event of any examination hearings should this plan proceed to examination, so we can be appropriately represented by Counsel. As you will be aware, DLA Delivery were represented at the JCS Examination, and would wish to continue our involvement as a local land promoter keen to develop in the district.



Tondra Thom
Southover House,
Southover Road,
Lewes,
BN7 1AB

31st October 2018
ZMK038/JGC/JF

Dear Tondra

**LEWES DISTRICT LOCAL PLAN PART 2: SITE ALLOCATIONS AND DEVELOPMENT
MANAGEMENT POLICIES PRE-SUBMISSION DOCUMENT**

Comments on behalf of DLA Delivery

We thank you for your email of 19th September 2018 inviting us to participate in the consultation on the above document. As you will be aware, David Lock Associates act on behalf DLA Delivery in their promotion of the development site known as Mitchelswood Farm, off Allington Road, Newick. It is in this context we wish to write to express our concerns with the above draft plan and wish to **object** to its progression in its current form, as we do not believe the plan meets the tests of soundness. Specifically, **we do not believe the plan is positively prepared, justified or is consistent with National Planning Policy** due to deficiencies in its underlying strategy, and its approach to establishing a 'planning boundary'.

Overall development strategy

The overall development strategy which is realised through the development management policies is too restrictive and potentially prevents sustainable development in sustainable locations. Whilst a strategy has been outlined to meet the housing requirement set out in the Local Plan Part 1: Joint Core Strategy (JCS), it was widely acknowledged during examination and within the inspector's report that the objectively assessed housing need is not being met by the JCS target of 6,900 dwellings. The strategy also relies upon a significant number of windfalls coming forward.

It was considered suitable to adopt the plan despite this shortfall, due to the presence of constraints within the District, such as the South Downs National Park. Within this context it is imperative that the development management policies contain sufficient flexibility to deliver sustainable development where it can be accommodated in areas without these constraints. The policies in this plan do not achieve this, therefore cannot be said to meet the tests of soundness as, the policies are not:

- a) *Positively prepared:* the policies do not, as a minimum, seek to address the area's objectively assessed needs (OAN), or seek to allow for sufficient flexibility to even slightly meet the unmet need which was apparent in the adoption of the JCS.
- b) *Justified:* When an OAN is not met at a strategic scale, as in this case with the deficit in supply within the JCS when compared with the OAN, it is important that areas which

David Lock Associates Limited
50 NORTH THIRTEENTH STREET, CENTRAL MILTON KEYNES, MK9 3BP
t: 01908 666 276 f: 01906 605 747 e: mail@davidlock.com
www.davidlock.com

VAT Reg. No. 486 0599 05. Registered in England No. 2422692. Registered Office as above.



could contribute to meeting this unmet need are able to, especially in areas which are not subject to the constraints which have led to the shortfall against the OAN. The strategy held within this Part 2 Local Plan (LP2), by simply allocating the bare minimum of land for development against the JCS, is too restrictive, and this is reflected in the overly restrictive policies held within. This approach is not justified, as it is not an appropriate strategy taking into account reasonable alternatives.

- c) *Consistent with National Planning Policy:* Notwithstanding the clear fact this plan has been rushed towards submission to enable examination on the basis of the previous NPPF, there are significant inconsistencies within the overall strategy and National Planning Policy, even in its previous form (NPPF 2012). Principally, the NPPF 2012 at paragraph 14 sets out the presumption in favour of sustainable development, which states that “*local planning authorities should positively seek opportunities to meet development needs in their area*” (my emphasis). The overly restrictive nature of the planning policies within the LP2 does not demonstrate that opportunities have been positively sought, especially when coupled with the allocation of the bare minimum of land to meet a target which is significantly below the OAN for the area. This does not enable the delivery of sustainable development in accordance with the policies of the framework.

In order to make this plan sound, the entire strategy of the plan would need to be reformulated to seek to flexibly promote development in sustainable locations. This could be achieved by a proactive approach to site allocation, allocating more than just the bare minimum of sites across the district, and directing local neighbourhood plans to meet a more ambitious target growth figures, especially in those areas subject to less development constraints. This change in strategy would need to be replicated in relevant policies, including the addition of mechanisms within individual policies which seek to promote sustainable development.

Policy DM1: Planning Boundary

This policy seeks to restrict development to locations within the ‘planning boundary’ of established settlements within the District. The policy takes a similar functional role to that of Policy CT1 of the currently adopted Local Plan 2003. The planning boundaries have been revised alongside this draft plan, and are tightly drawn around the respective settlements. These boundaries omit peripheral areas of land which are associated with the settlements themselves, and which are unconstrained and well related to services and amenities.

The draft policy states:

“Outside the planning boundaries, the distinctive character and quality of the countryside will be protected and new development will only be permitted where it is consistent with a specific development plan policy or where the need for a countryside location can be demonstrated.”

Reviewing this wording, the Council seems to have completely failed to recognise that the ability to protect the countryside for its own sake has been written out of national guidance. National policy now seeks only to recognise the intrinsic character of the countryside and is to be contrasted with the Green Belt which does remain protected (see the NPPF Core Principles paragraph 17, bullet point 5).

The combination of the restrictive wording of the policy itself and the tight nature of the boundaries creates a situation where very little flexibility to accommodate sustainable development is provided. This is a situation compounded with the lack of windfall exemption policy within the plan, despite 468 dwellings required to be found from windfall sites throughout

David Lock Associates Limited

50 NORTH THIRTEENTH STREET, CENTRAL MILTON KEYNES, MK9 3BP

t: 01908 666 276 f: 01906 605 747 e: mail@davidlock.com

www.davidlock.com

VAT Reg. No. 486 0599 05. Registered in England No. 2422692. Registered Office as above.



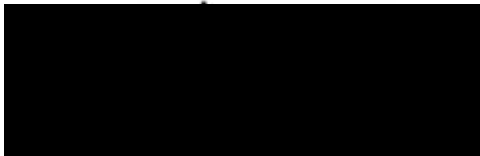
the plan period outside the National Park (Table 2 of the LP2). There is no indication within these draft development management policies or supporting text on how this windfall development is to be accommodated.

Therefore, we write to object to the wording of this policy, as it is too restrictive and does not plan to provide sustainable development, thereby failing to meet the objectives of the NPPF 2012 and subsequent government policy (such as that held in the new NPPF 2018). Further, the lack of a windfall policy held within the draft plan, coupled with the tight settlement boundaries and restrictive development management policies, as a whole, create a position where it is unclear how the additional 468 windfall dwellings are to be provided. This is unacceptable in a context where there is an acute housing need in Lewes, and even more unacceptable in a national context where government focus is to increase housing supply. Therefore, it cannot be said that this policy is consistent with national policy, and thereby is unsound.

Thank you for the opportunity to make these comments on this draft plan. We would also wish to be contacted in the event of any examination hearings should this plan proceed to examination, so we can be appropriately represented by Counsel. As you will be aware, DLA Delivery were represented at the JCS Examination, and would wish to continue our involvement as a local land promoter keen to develop in the district.

If you have any queries in relation to any of the comments made, then please do not hesitate to contact me.

Yours sincerely



JOSEPH CARR
Senior Planner

email: jcarr@davidlock.com

David Lock Associates Limited

50 NORTH THIRTEENTH STREET, CENTRAL MILTON KEYNES, MK9 3BP
t: 01908 666 276 f: 01906 605 747 e: mail@davidlock.com
www.davidlock.com

VAT Reg. No. 486 0599 05. Registered in England No. 2422692. Registered Office as above.

Representation ID: REP/091/E1Representor Details:

Representor ID:	REP/091
Name:	Clare Carroll
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	E1 - Land at East Quay, Newhaven Port
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	
Representation:	
Development plan E1 is an outrage. Please can you work to overturn it?	
The area of Tide Mills is a nature reserve which is well used by walkers. The impact of the planned industrial development will be devastating. Is the cost of developing infrastructure and destroying an area of beauty worth paying for just 30 jobs and a dirty development?	
I look forward to your reply.	
What changes do you suggest to make the document legally compliant or sound?	

Do you consider it necessary to participate at the Examination in Public?
Why do you feel it is necessary to participate at the Examination in Public?

Hodgson, Lilly

From: Clare Carroll [REDACTED]
Sent: 05 November 2018 23:31
To: ldf
Subject: Planning ref E1

Categories: Vanessa to deal with

Dear Planning Policy Team,

Development plan E1 is an outrage. Please can you work to overturn it?

The area of Tide Mills is a nature reserve which is well used by walkers. The impact of the planned industrial development will be devastating. Is the cost of developing infrastructure and destroying an area of beauty worth paying for just 30 jobs and a dirty development?

I look forward to your reply.

Kind regards

Clare Carroll

Representation ID: REP/092/E1Representor Details:

Representor ID:	REP/092
Name:	John Carroll
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	E1 - Land at East Quay, Newhaven Port
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	
Representation: I am emailing to object in the strongest terms to the proposed E1 development at the west end of the beach at Newhaven. There are several major problems with the proposal from Brett Aggregates to build an aggregate processing and concrete block making plant. It would involve the loss of nature reserve, the loss of community amenity, and would destroy a beautiful area. It is in conflict with development plans for Newhaven: it would bring pollution, and would not even deliver significant numbers of new jobs - only around 30, which is a pitiful number	

compared to the negative impacts of the development. Moreover, the local transport infrastructure is inadequate for the large numbers of lorries that the development would involve: the A27 could not cope with them.

I hope you will take my objection and comments into account.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public?

Why do you feel it is necessary to participate at the Examination in Public?

Hodgson, Lilly

From: John Carroll <[REDACTED]>
Sent: 05 November 2018 23:46
To: ldf
Subject: Planning ref E1: objection

Categories: Vanessa to deal with

Dear Sir/Madam,

I am emailing to object in the strongest terms to the proposed E1 development at the west end of the beach at Newhaven.

There are several major problems with the proposal from Brett Aggregates to build an aggregate processing and concrete block making plant. It would involve the loss of nature reserve, the loss of community amenity, and would destroy a beautiful area. It is in conflict with development plans for Newhaven: it would bring pollution, and would not even deliver significant numbers of new jobs - only around 30, which is a pitiful number compared to the negative impacts of the development. Moreover, the local transport infrastructure is inadequate for the large numbers of lorries that the development would involve: the A27 could not cope with them.

I hope you will take my objection and comments into account.

Yours faithfully,

John Carroll

[REDACTED]

Representation ID: REP/093/GT01
--

Representor Details:

Representor ID:	REP/093
Name:	maria caulfield
Organisation:	Parliament
Consultation Body:	General
Stakeholder Type:	Member of Parliament

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	unit 6 villandry newhaven bn9 9gb

Representation:

Policy/Section:	GT01 - Land south of The Plough
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	No Not Positively Prepared
Representation: <p>The proposal to place the travellers site in Plumpton is completely flawed. There has been no adequate consultation with residents or businesses. This site was rejected in the past as it does not have adequate provision for the travelling community, it has no safe road access and liable to flooding during many months of the year. In addition the 19 businesses based at the Brickworks have said they will leave the village if this site is agreed which will be a loss to the main source of employment in the area. The local pub, The Plough, have also halted their expansion until the outcome of the consultation is</p>	

known, again having a detrimental effect on the local economy.

Plumpton village has only just had their neighbourhood plan adopted in May of this year and were not asked to find a traveller site as part of this. Their plan prioritised their housing allocation, attracting businesses to the area and improving green infrastructure. This proposal goes against all of these.

In addition there has been no needs based assessment as to the need for extra traveller pitches in the District. Given the unauthorised encampments in the District over the summer , on only one occasion was the current provision full.

This proposal is not needs based, does not have the welfare of travellers in mind by placing them in a flood prone field with inadequate provision and has not engaged the local community in any meaningful way, going against their recently adopted neighbourhood plan. I urge the council to think again.

What changes do you suggest to make the document legally compliant or sound?

Do a needs based assessment and a proper consultation district wide

Do you consider it necessary to participate at the Examination in Public?

No

Why do you feel it is necessary to participate at the Examination in Public?

Representation ID: REP/094/GT01Representor Details:

Representor ID:	REP/094
Name:	Edward Cazalet
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	GT01 - Land south of The Plough
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	
Representation:	
<p>I write on behalf of myself and my wife as persons who, with our family, have been living in Plumpton Green at the above address for the last 40 years. We have grown to know and love the neighbourhood well and much value its peaceful and rural nature.</p> <p>After careful consideration we set out our objections to this proposal in the numbered paragraphs which follow below.</p> <p>Safety</p>	

* Anyone who knows the village appreciates that the narrow road known as Station Road has become more busy in recent years, with heavy trucks and buses going along it as well as a volume of other traffic which regularly runs both ways. The strip of this road running from the entrance to the proposed site down to the start of the paved area (where the 30 m.p.h. signs start at the northern end of the village - some 200/300 yards) has no pavement on either side of the road and consequently must be a danger to any person and, in particular, any person with a child or children, walking to or from the village (where both the shop and the school are situated). In our view this is a dangerous piece of road to walk at any time and, if doing so with a young child, then because of having only the long grass at the side to step into if a vehicle is about to pass, it is a particular danger.

Security Vulnerability to the Business Park and Financial Loss to the Village

* The Business Park is separated only by a fence from the site. The Old Brickworks Business Park has some 21/22 businesses operating on it. A careful walk round this large business park which immediately adjoins the area to be sited, shows that it draws many in to look at and be advised upon various types of building material and other commodities, some of which are, on occasion, outside for viewing. A walk round the buildings demonstrates that there are many points of ready entry over a fence, hedge or wall, including the very fence which separates the Business Park from the field. For this reason it would be essential for those who run their businesses there to put up security protection both around the Park itself and to make the fabric of their actual long buildings much more secure (there are not even bars in some of the windows). This would involve massive expense, and indeed by day all concerned would have to be much more cautious where any commodities are unprotected. No doubt those concerned with the Business Park will be in full communication with the District Council about this. Indeed I fear, from what I hear, that many of the businesses there would in fact, if this application were to succeed, move elsewhere. This would, of course, bring unemployment for the village and a loss of monies coming into the village. Accordingly security reasons are indeed one of the major factors as well as the loss of money coming from outside into the businesses and, indeed, the village.

Future Development

* I suppose one day it may be that the field immediately adjoining the Business Park will be viewed as suitable for development. If that is the case then, of course, the presence of the travellers site will reduce significantly the price of the houses on the market and deter possible buyers. Indeed a number of people might well not even be prepared to come to live there.

* There are also a number of people living in or retired into the village who would no doubt be concerned as to their security and they would have to take such steps as they could to protect any garden or other working items outside their particular dwelling place.

Conclusion

* In light of the above I would respectfully invite the council to decide that overall that this

is manifestly not the right place for a site.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public?

Why do you feel it is necessary to participate at the Examination in Public?

From: edward cazalet [REDACTED]
Sent: 01 November 2018 15:13
To: ldf
Subject: Objection to Proposed Traveller Site in Plumpton Green

Categories: LPP2 comment to code - stakeholder details have been added

PROPOSED TRAVELLER SITE IN PLUMPTON GREEN

Objection from Sir Edward and Lady Cazalet, [REDACTED]

To Lewes District Council in regard to the proposal for a permanent travellers site next to The Old Brickworks, Plumpton Green

I write on behalf of myself and my wife as persons who, with our family, have been living in Plumpton Green at the above address for the last 40 years. We have grown to know and love the neighbourhood well and much value its peaceful and rural nature.

After careful consideration we set out our objections to this proposal in the numbered paragraphs which follow below.

Safety

1. Anyone who knows the village appreciates that the narrow road known as Station Road has become more busy in recent years, with heavy trucks and buses going along it as well as a volume of other traffic which regularly runs both ways. The strip of this road running from the entrance to the proposed site down to the start of the paved area (where the 30 m.p.h. signs start at the northern end of the village - some 200/300 yards) has no pavement on either side of the road and consequently must be a danger to any person and, in particular, any person with a child or children, walking to or from the village (where both the shop and the school are situated). In our view this is a dangerous piece of road to walk at any time and, if doing so with a young child, then because of having only the long grass at the side to step into if a vehicle is about to pass, it is a particular danger.

Security Vulnerability to the Business Park and Financial Loss to the Village

2. The Business Park is separated only by a fence from the site. The Old Brickworks Business Park has some 21/22 businesses operating on it. A careful walk round this large business park which immediately adjoins the area to be sited, shows that it draws many in to look at and be advised upon various types of building material and other commodities, some of which are, on occasion, outside for viewing. A walk round the buildings demonstrates that there are many points of ready entry over a fence, hedge or wall, including the very fence which separates the Business Park from the field. For this reason it would be essential for those who run their businesses there to put up [REDACTED] security protection both around the Park itself and to make the fabric of their actual long buildings much more secure (there are not even bars in some of the windows). This would involve massive expense, and indeed by day all concerned would have to be much more cautious where any commodities are unprotected. No doubt those concerned with the Business Park will be in full communication with the District Council about this. Indeed I fear, from what I hear, that many of the businesses there would in fact, if this application were to succeed, move elsewhere. This would, of course, bring unemployment for the village and a loss of monies coming into the village. Accordingly security reasons are indeed one of the major factors as well as the loss of money coming from outside into the businesses and, indeed, the village.

Future Development

3. I suppose one day it may be that the field immediately adjoining the Business Park will be viewed as suitable for development. If that is the case then, of course, the presence of the travellers site will reduce significantly the price of the houses on the market and deter possible buyers. Indeed a number of people might well not even be prepared to come to live there.
4. There are also a number of people living in or retired into the village who would no doubt be concerned as to their security and they would have to take such steps as they could to protect any garden or other working items outside their particular dwelling place.

Conclusion

5. In light of the above I would respectfully invite the council to decide that overall that this is manifestly not the right place for a site.

Representation ID: REP/095/GT01Representor Details:

Representor ID:	REP/095
Name:	Iris Chalice
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	GT01 - Land south of The Plough
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	
Representation: I am writing this on behalf of my Mother. Mrs Iris Chalice. I really do object to this idea :because, There is enough development in Plumpton and surrounding area, as there is a lot of houses already planned, The traffic through this village is already bad and this site will create even more, as the travellers will have their own cars, vans and lorries for their personal use. There is no pavement from the "Old police house" to "The Plough" on either side of the road, so the safety for the people is poor,	

The pavement through the village is on one side only and like the road is poorly maintained.

The exit /entrance to this site is vulnerable because of the speed of the traffic.

The pressure on services is great enough, so extra pressure of this nature could push them over the top,

IE: Sewage, water, electricity, rubbish and recycling.

Also what about the extra pressure for school places within the village and surrounding area.

We have no Doctors in the Village so more pressure in the surrounding area.

This is a green field site, why do we have to keep using agriculture land , why not use a brown field site.

Also if allowed this site could be easily expanded to many more places with more inconvenience to the local people.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public?

Why do you feel it is necessary to participate at the Examination in Public?

From: [REDACTED]
Sent: 31 October 2018 08:50
To: ldf
Subject: Gypsy and Travellers site Plumpton Green
Categories: LPP2 comment to code - stakeholder details have been added

Dear Sirs,

I am writing this on behalf of my Mother. Mrs Iris Chalice.

I really do object to this idea :because,

There is enough development in Plumpton and surrounding area, as there is a lot of houses already planned,

The traffic through this village is already bad and this site will create even more, as the travellers will have their own cars, vans and lorries for their personal use.

There is no pavement from the "Old police house" to "The Plough" on either side of the road, so the safety for the people is poor,

The pavement through the village is on one side only and like the road is poorly maintained.

The exit /entrance to this site is vulnerable because of the speed of the traffic.

The pressure on services is great enough, so extra pressure of this nature could push them over the top,

IE: Sewage, water, electricity, rubbish and recycling.

Also what about the extra pressure for school places within the village and surrounding area.

We have no Doctors in the Village so more pressure in the surrounding area.

This is a green field site, why do we have to keep using agriculture land , why not use a brown field site.

Also if allowed this site could be easily expanded to many more places with more inconvenience to the local people.

Yours sincerely.

Mrs I J Chalice.

This email has been checked for viruses by Avast antivirus software.

<https://www.avast.com/antivirus>

Representation ID: REP/096/GT01
--

Representor Details:

Representor ID:	REP/096
Name:	Gaynor Chambers
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	GT01 - Land south of The Plough
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	No Not Justified Not Effective Not Consistent with national policy
Representation:	
1. Lewes District Council Local Plan Part 2: Site Allocations and Development Management Policies - Pre-Submission Document {"the Draft Plan"} refers at paragraphs 2.132 to 2.142 to a proposal to provide 5 permanent pitches for Gypsy,	

Traveller and/or Travelling Showpeople at land south of the Plough in Plumpton Green {"the Site"}. This proposal is termed "Policy GT01".

* I am a resident of Plumpton and wish to make representations in relation to proposed Policy GTO1 on the basis that it is not "sound", and in particular in that it is not positively prepared, justified, effective and/or consistent with national policy.

* The modification sought is the deletion of (1) the 'second two sentences of paragraph 2.135; and (2) all of the remainder of the relevant section (that is, the text from the end of paragraph 2.135 to the end of paragraph 2.142).

* I wish to exercise the right to be heard in relation to this matter as the below is a merely a short summary of some of the key points I wish to be taken into account in assessing the necessity to modify the relevant section of the Draft Plan. My postal and email addresses are at the end of this Summary and can be used for notification purposes.

* I have not annexed copies of documents referred to as they are either in the local planning authority's possession or are readily available to download from the internet. I would however be happy to provide PDF copies on request.

B: Policy Requirements

* Provision for traveller sites ought to comply with the requirements of the Department for Communities and Local Government "Planning Policy for traveller sites" dated August 2015 ("PPTS"). This accompanies the March 2012 National Planning Policy Framework and must be taken into consideration in preparing local plans and making planning decisions.

* The government's overarching aim is stated to be "to ensure fair and equal treatment for travellers, in a way that facilitates the traditional and nomadic way of life of travellers while respecting the interests of the settled community".

* A series of matters contributing towards the achievement of the overarching aim are listed at paragraph 3 PPTS, including at sub-paragraph 3(j): "to enable provision of suitable accommodation from which travellers can access education, health, welfare and employment infrastructure"

* This aim is elaborated upon at paragraph 13 PPTS as follows: "Local planning policies should ensure that traveller sites are sustainable economically, socially, and environmentally. Local planning authorities should therefore ensure that their policies:

a) promote peaceful and integrated co-existence between the site and the local community

b) promote, in collaboration with commissioners of health services, access to appropriate health services

c) ensure that children can attend school on a regular basis

d) provide a settled base that reduces both the need for long- distance travelling and possible environmental damage caused by unauthorised encampment

e) provide for proper consideration of the effect of local environmental quality (such as noise and air quality) 'on the health and well being of any travellers that may locate there or on others as a result of new development

j) avoid placing pressure on local infrastructure and services

g) do not locate sites in areas at risk of high flooding, including functional floodplains, given the particular vulnerability of caravans

h) reflect the extent to which traditional lifestyles (whereby some travellers live and work from the same location thereby omitting many travel to work journeys) can contribute to sustainability"

* The use of the word "should" indicates that compliance by local planning authorities with these requirements is mandatory.

* Paragraph 25 PPTS states in terms that LP As should very strictly limit new traveller site developments in open countryside that is away from existing settlements or outside areas allocated in the development plan ".

* Further, paragraph 26 PPTS states that weight should be attached to inter alia "effective use of previously developed (brownfield) untidy or derelict land".

c: Gypsies and Travellers

* House of Commons Briefing Paper Number 08083 dated 8th May 2018, headed "Gypsies and Travellers" ("the Briefing Paper") details inter alia inequalities experienced by gypsies and travellers, including:

(a) Poor health experiences compared with the general population, including low child immunisation levels, and a higher prevalence of anxiety and depression.

(b) The lowest employment rates and highest level of economic inactivity of all ethnic groups, including 28% long term sick and disabled and 31 % looking after the family.

* Further:

(a) The most common family household type was lone parent at 24%, compared with 11 % of all households in England and Wales (paragraph 1.5).

(b) 45% of Gypsy and Traveller households had dependent children in 2011, well above the average for the whole of England and Wales (29%) (paragraph 1.5).

D: Planning History of the Site

* In December 2012, Lewes District Council and the South Downs National Park Authority produced a Gypsy and Traveller Site Assessment Addendum ("the Assessment").

* This used an agreed set of criteria to score a long list of 14 sites in public ownership. One of the sites listed at Table 1 is "Land between the Plough and the Old Brickworks, Station Road, Plumpton". This is termed Site I.

* At Table 3, this site was stated to be subject to a highway authority objection.

* Details of Site I, and the relevant objection, are contained in Appendix 1, page 39ff. The site referred to within Policy GTO 1 is in the south east corner of Site I.

* The commentary states as follows:

"ESCC Highway Authority assessed two potential access points, the first fronting St Helena Lane, west of the site, and the second from Station Road in the east, at an existing field entrance in the south east corner of the site.

... The achievement of required visibility splays on Station Road is also a highway concern due to ... obstructions from a bus shelter, slight curve and uphill gradient of road to the north of the considered access point. Due to the site's rural and isolated location it is over a kilometre from a Primary Route Network.

The village of Plumpton Green, as a local village, to the south of the site has some key services including primary school, convenience store and post office. Further services can be accessed via bus from within 800m of the site, or bus and train from Plumpton Green.

The main constraint to development of this site is the lack of suitable access as the required visibility splays are not considered achievable. The site is also considered isolated in terms of access to facilities".

E: Assessment of the Site

* The Site is isolated, and is over 0.5km from a local settlement (Plumpton Green). It is 650m outside the village planning boundary.

E.1 Transport

* The nearest bus stop is almost 1 km away, along a busy road without pavements or lighting.

* There is only one bus every 2 hours from the relevant bus stop, on schooldays only, using Route 166. The earliest bus to Lewes departs at 07.22, and the latest at 18.53. Services to Haywards Heath also run at limited times, with the earliest departure being at 07.58 and the latest 18.13.

* Plumpton train station is around 2.5km away, and the first 1km of that journey is again along a busy road without pavements or lighting. There is a pavement from the beginning of the main section of Plumpton Green, but there are no lights at all in the village.

E.2 Access to facilities

* As was acknowledged within the Assessment, the Site is isolated in terms of access to facilities. See paragraph 19 above.

* Plumpton Green has limited facilities, namely a small village school and a convenience store/post office. Both are around 2km from the Site, with the first 1 km of that journey again being along a busy road without pavements or lighting, and the balance along unlit pavements.

* From late October to early February any journeys from Plumpton Village Primary

School to the site in the afternoons would be carried out in twilight, or even darkness.

* There is no senior school in Plumpton Green. Access to secondary education cannot be readily achieved from the Site due to (1) its isolated nature; (2) limited services from the nearest bus stop; and (3) the lengthy walk to the nearest train station.

* The convenience store/post office is far too expensive for a weekly shop. The nearest branches of major supermarkets such as Tesco and Aldi are in Lewes, a journey of around 30 minutes using the 166 bus route, which as stated above operates every 2 hours on schooldays only.

* The alternative means of access to Lewes would be the circa 2km walk to Plumpton train station, taking a train into Lewes, walking circa 0.5km from Lewes train station to the supermarket and then taking the same journey back carrying shopping.

EJ Access to Healthcare and welfare facilities

* The nearest GP's surgery which is accessible using route 166 is in Hassocks. The journey means changing at the bottom of Plumpton Lane in order to use the 167 bus.

* The nearest alternative surgery is in South Chailey. That can only be reached by taking the train or bus into Lewes, and then catching a further bus to reach the surgery.

* The nearest hospital offering antenatal care is on the outskirts of Lewes, again necessitating a 30 minute journey on the 166 bus (on schooldays only).

* Welfare facilities are not available in Plumpton Green.

E.4 Access to employment infrastructure

* There are no, or no significant, employment opportunities in Plumpton Green or Plumpton. Access to employment infrastructure is also adversely affected by the isolated nature of the Site and limited public transport referred to in Sections E.1 to E.4 above.

E.5 Flood Risk

35. The Site is in an area with between a 1 in 30 and 1 in 100 year flood risk, as indicated by the Flood Map for Surface Water included within the Plumpton Parish Neighbourhood Plan.

F: Why should the Policy GT01 be modified? .

* In summary, I contend that Policy GT01 should be modified as:

(a) The Site does not provide suitable accommodation from which travellers can access education, health, welfare and employment infrastructure, in direct contravention of the overarching aim set out at sub-paragraph 30) of the PPTS (see paragraph 7 and Sections E.1 to E.4 above).

(b) The policy does not promote access to appropriate health services, In contravention of paragraph 13(b) of the PPTS (see paragraph 8 and Section E.3 above).

(c) The policy does not ensure that children can attend school on a regular basis, in contravention of paragraph 13(c) of the PPTS (see paragraph 8 and Section E.2 above).

(d) The Site is in an area at a risk of flooding, in contravention of paragraph 13(g) of the PPTS (see paragraph 8 and Section E.5 above).

(e) The policy does not ensure that the proposed traveller site is sustainable economically, socially and environmentally, in contravention of the first sentence of paragraph 13 of the PPTS (see paragraph 8 and Sections E.1 to E.5 above).

(f) The policy is not justified in that the Site cannot be utilised for the intended purpose due to lack of suitable access and egress from the Site. See paragraph 19 above.

(g) The policy fails to consider adequately or at all the inequalities experienced by gypsies and travellers and/or the higher than usual prevalence of larger families and/or single parents, factors which render the Site unsuitable due to its isolated nature and lack of access to facilities. See Sections C, D and E above.

(h) The policy fails to comply with paragraph 25 PPTS, which states that strict limitations should be placed on new traveller site developments in open countryside, away from existing settlements or outside areas allocated in the development plan. See paragraphs 19 and 20 above.

(i) The policy is not justified in that no or no adequate weight has been given to using previously developed (brownfield) land. See paragraph 12 above and the Assessment.

What changes do you suggest to make the document legally compliant or sound?

THE DELETION OF THE SECOND TWO SENTENCES OF PARAGRAPH 2.135 AND ALL OF THE REMAINDER OF THE RELEVANT SECTION (THAT IS, THE TEXT FROM THE END OF PARAGRAPH 2.135 TO THE END OF PARAGRAPH 2.142)

Do you consider it necessary to participate at the Examination in Public?

Yes

Why do you feel it is necessary to participate at the Examination in Public?

The attached summary contains only a summary of my primary objections which will need to be expanded upon orally at the examination

**SUMMARY OF REPRESENTATIONS
IN RELATION TO LEWES DISTRICT COUNCIL
LOCAL PLAN PART 2: SITE ALLOCATIONS AND DEVELOPMENT
MANAGEMENT POLICIES – PRE-SUBMISSION DOCUMENT POLICY GT01
PROPOSED SITE FOR GYPSY, TRAVELLER AND TRAVELLING SHOWPEOPLE
AT LAND SOUTH OF THE PLOUGH IN PLUMPTON GREEN**

A: Introduction

1. Lewes District Council Local Plan Part 2: Site Allocations and Development Management Policies – Pre-Submission Document (“the Draft Plan”) refers at paragraphs 2.132 to 2.142 to a proposal to provide 5 permanent pitches for Gypsy, Traveller and/or Travelling Showpeople at land south of the Plough in Plumpton Green (“the Site”). This proposal is termed “Policy GT01”.
2. I am a resident of Plumpton and wish to make representations in relation to proposed Policy GT01 on the basis that it is not “sound”, and in particular in that it is not positively prepared, justified, effective and/or consistent with national policy.
3. The modification sought is the deletion of (1) the second two sentences of paragraph 2.135; and (2) all of the remainder of the relevant section (that is, the text from the end of paragraph 2.135 to the end of paragraph 2.142).
4. I wish to exercise the right to be heard in relation to this matter as the below is a merely a short summary of some of the key points I wish to be taken into account in assessing the necessity to modify the relevant section of the Draft Plan. My postal and e mail addresses are at the end of this Summary and can be used for notification purposes.
5. I have not annexed copies of documents referred to as they are either in the local planning authority’s possession or are readily available to download from the internet. I would however be happy to provide PDF copies on request.

B: Policy Requirements

6. Provision for traveller sites ought to comply with the requirements of the Department for Communities and Local Government “Planning Policy for traveller sites” dated August 2015 (“PPTS”). This accompanies the March 2012 National Planning Policy Framework and must be taken into consideration in preparing local plans and making planning decisions.
7. The government’s overarching aim is stated to be *“to ensure fair and equal treatment for travellers, in a way that facilitates the traditional and nomadic way of life of travellers while respecting the interests of the settled community”*¹.
8. A series of matters contributing towards the achievement of the overarching aim are listed at paragraph 3 PPTS, including at sub-paragraph 3(j):

“to enable provision of suitable accommodation from which travellers can access education, health, welfare and employment infrastructure”

9. This aim is elaborated upon at paragraph 13 PPTS as follows:

“Local planning policies should ensure that traveller sites are sustainable economically, socially, and environmentally. Local planning authorities should therefore ensure that their policies:

- a) promote peaceful and integrated co-existence between the site and the local community*
- b) promote, in collaboration with commissioners of health services, access to appropriate health services*
- c) ensure that children can attend school on a regular basis*
- d) provide a settled base that reduces both the need for long- distance travelling and possible environmental damage caused by unauthorised encampment*
- e) provide for proper consideration of the effect of local environmental quality (such as noise and air quality) on the health and well being of any travellers that may locate there or on others as a result of new development*
- f) avoid placing pressure on local infrastructure and services*
- g) do not locate sites in areas at risk of high flooding, including functional floodplains, given the particular vulnerability of caravans*

¹ See paragraph 3 PPTS

h) reflect the extent to which traditional lifestyles (whereby some travellers live and work from the same location thereby omitting many travel to work journeys) can contribute to sustainability"

10. The use of the word "*should*" indicates that compliance by local planning authorities with these requirements is mandatory.
11. Paragraph 25 PPTS states in terms that LPAs should "*very strictly limit new traveller site developments in open countryside that is away from existing settlements or outside areas allocated in the development plan*".
12. Further, paragraph 26 PPTS states that weight should be attached to inter alia "*effective use of previously developed (brownfield) untidy or derelict land*".

C: Gypsies and Travellers

13. House of Commons Briefing Paper Number 08083 dated 8th May 2018, headed "Gypsies and Travellers" ("the Briefing Paper") details inter alia inequalities experienced by gypsies and travellers, including:
 - (a) Poor health experiences compared with the general population, including low child immunisation levels, and a higher prevalence of anxiety and depression.
 - (b) The lowest employment rates and highest level of economic inactivity of all ethnic groups, including 28% long term sick and disabled and 31% looking after the family.
14. Further:
 - (a) The most common family household type was lone parent at 24%, compared with 11% of all households in England and Wales (paragraph 1.5).
 - (b) 45% of Gypsy and Traveller households had dependent children in 2011, well above the average for the whole of England and Wales (29%) (paragraph 1.5).

D: Planning History of the Site

15. In December 2012, Lewes District Council and the South Downs National Park Authority produced a Gypsy and Traveller Site Assessment Addendum (“the Assessment”).
16. This used an agreed set of criteria to score a long list of 14 sites in public ownership. One of the sites listed at Table 1 is “Land between the Plough and the Old Brickworks, Station Road, Plumpton”. This is termed Site I.
17. At Table 3, this site was stated to be subject to a highway authority objection.
18. Details of Site I, and the relevant objection, are contained in Appendix 1, page 39ff. The site referred to within Policy GT01 is in the south east corner of Site I.
19. The commentary states as follows:

“ESCC Highway Authority assessed two potential access points, the first fronting St Helena Lane, west of the site, and the second from Station Road in the east, at an existing field entrance in the south east corner of the site.

..... The achievement of required visibility splays on Station Road is also a highway concern due to ... obstructions from a bus shelter, slight curve and uphill gradient of road to the north of the considered access point.

Due to the site’s rural and isolated location it is over a kilometre from a Primary Route Network.

The village of Plumpton Green, as a local village, to the south of the site has some key services including primary school, convenience store and post office. Further services can be accessed via bus from within 800m of the site, or bus and train from Plumpton Green.

.....

The main constraint to development of this site is the lack of suitable access as the required visibility splays are not considered achievable. The site is also considered isolated in terms of access to facilities”.

(emphasis added)

E: Assessment of the Site

20. The Site is isolated, and is over 0.5km from a local settlement (Plumpton Green). It is 650m outside the village planning boundary.

E.1 Transport

21. The nearest bus stop is almost 1km away, along a busy road without pavements or lighting.
22. There is only one bus every 2 hours from the relevant bus stop, on schooldays only, using Route 166. The earliest bus to Lewes departs at 07.22, and the latest at 18.53. Services to Haywards Heath also run at limited times, with the earliest departure being at 07.58 and the latest 18.13.
23. Plumpton train station is around 2.5km away, and the first 1km of that journey is again along a busy road without pavements or lighting. There is a pavement from the beginning of the main section of Plumpton Green, but there are no lights at all in the village.

E.2 Access to facilities

24. As was acknowledged within the Assessment, the Site is isolated in terms of access to facilities. See paragraph 19 above.
25. Plumpton Green has limited facilities, namely a small village school and a convenience store/post office. Both are around 2km from the Site, with the first 1km of that journey again being along a busy road without pavements or lighting, and the balance along unlit pavements.
26. From late October to early February any journeys from Plumpton Village Primary School to the site in the afternoons would be carried out in twilight, or even darkness.
27. There is no senior school in Plumpton Green. Access to secondary education cannot be readily achieved from the Site due to (1) its isolated nature; (2) limited services from the nearest bus stop; and (3) the lengthy walk to the nearest train station.

28. The convenience store/post office is far too expensive for a weekly shop. The nearest branches of major supermarkets such as Tesco and Aldi are in Lewes, a journey or around 30 minutes using the 166 bus route, which as stated above operates every 2 hours on schooldays only.

29. The alternative means of access to Lewes would be the circa 2km walk to Plumpton train station, taking a train into Lewes, walking circa 0.5km from Lewes train station to the supermarket and then taking the same journey back carrying shopping.

E.3 Access to Healthcare and welfare facilities

30. The nearest GP's surgery which is accessible using route 166 is in Hassocks. The journey means changing at the bottom of Plumpton Lane in order to use the 167 bus.

31. The nearest alternative surgery is in South Chailey. That can only be reached by taking the train or bus into Lewes, and then catching a further bus to reach the surgery.

32. The nearest hospital offering antenatal care is on the outskirts of Lewes, again necessitating a 30 minute journey on the 166 bus (on schooldays only).

33. Welfare facilities are not available in Plumpton Green.

E.4 Access to employment infrastructure

34. There are no, or no significant, employment opportunities in Plumpton Green or Plumpton. Access to employment infrastructure is also adversely affected by the isolated nature of the Site and limited public transport referred to in Sections E.1 to E.4 above.

E.5 Flood Risk

35. The Site is in an area with between a 1 in 30 and 1 in 100 year flood risk, as indicated by the Flood Map for Surface Water included within the Plumpton Parish Neighbourhood Plan.

F: Why should the Policy GT01 be modified?

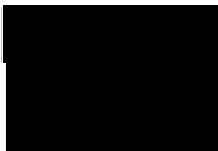
36. In summary, I contend that Policy GT01 should be modified as:

- (a) The Site does not provide suitable accommodation from which travellers can access education, health, welfare and employment infrastructure, in direct contravention of the overarching aim set out at sub-paragraph 3(j) of the PPTS (see paragraph 7 and Sections E.1 to E.4 above).
- (b) The policy does not promote access to appropriate health services, in contravention of paragraph 13(b) of the PPTS (see paragraph 8 and Section E.3 above).
- (c) The policy does not ensure that children can attend school on a regular basis, in contravention of paragraph 13(c) of the PPTS (see paragraph 8 and Section E.2 above).
- (d) The Site is in an area at a risk of flooding, in contravention of paragraph 13(g) of the PPTS (see paragraph 8 and Section E.5 above).
- (e) The policy does not ensure that the proposed traveller site is sustainable economically, socially and environmentally, in contravention of the first sentence of paragraph 13 of the PPTS (see paragraph 8 and Sections E.1 to E.5 above).
- (f) The policy is not justified in that the Site cannot be utilised for the intended purpose due to lack of suitable access and egress from the Site. See paragraph 19 above.
- (g) The policy fails to consider adequately or at all the inequalities experienced by gypsies and travellers and/or the higher than usual prevalence of larger families and/or single parents, factors which render the Site unsuitable due to its isolated nature and lack of access to facilities. See Sections C, D and E above.

- (h) The policy fails to comply with paragraph 25 PPTS, which states that strict limitations should be placed on new traveller site developments in open countryside, away from existing settlements or outside areas allocated in the development plan. See paragraphs 19 and 20 above.
- (i) The policy is not justified in that no or no adequate weight has been given to using previously developed (brownfield) land. See paragraph 12 above and the Assessment.

GAYNOR CHAMBERS

2 November 2018



E mail: [REDACTED]

Representation ID: REP/097/E1

Representor Details:

Representor ID:	REP/097
Name:	Dennis Chanter
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	E1 - Land at East Quay, Newhaven Port
<p><i>Do you consider the document to be:</i></p> <p>Legally Compliant:</p> <p>Sound:</p>	
<p>Representation:</p> <p>This email is a response to the current consultation concerning Lewes District Local Plan policy E1. I'd be grateful if you would acknowledge receipt.</p> <p>Although not a resident of Newhaven myself (I live in Eastbourne), I frequently visit the area in question and would be very concerned if yet more of the land at Tide Mills were to be designated for development. This area of vegetated shingle is an extremely rare</p>	

habitat in this country and I frequently see birds and insects there which are not often seen in other parts of Sussex, or indeed the UK.

Rather than replicate the various arguments against this proposal, of which there are many more than have been presented in favour of it, I would like to say that I have read the draft objection compiled by Community Action Newhaven (CAN) and fully support the arguments made in that response. This has obviously been a very time-consuming piece of work to put together, by volunteers, and demonstrates the strength of feeling against this proposal.

Further, I would like to comment that I find the deficiencies in the consultation process, highlighted in the CAN objection, extremely disturbing. As our paid servants it is the duty of Lewes District Council staff to ensure that such consultation processes are done efficiently and correctly, and it would appear that this has not been the case with regard to E1.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public?

Why do you feel it is necessary to participate at the Examination in Public?

Hodgson, Lilly

From: Dennis Chanter (home) <[REDACTED]>
Sent: 31 October 2018 11:26
To: ldf
Subject: Response to consultation concerning E1

Categories: LPP2 comment to code - stakeholder details have been added

This email is a response to the current consultation concerning Lewes District Local Plan policy E1. I'd be grateful if you would acknowledge receipt.

Although not a resident of Newhaven myself (I live in Eastbourne), I frequently visit the area in question and would be very concerned if yet more of the land at Tide Mills were to be designated for development. This area of vegetated shingle is an extremely rare habitat in this country and I frequently see birds and insects there which are not often seen in other parts of Sussex, or indeed the UK.

Rather than replicate the various arguments against this proposal, of which there are many more than have been presented in favour of it, I would like to say that I have read the draft objection compiled by Community Action Newhaven (CAN) and fully support the arguments made in that response. This has obviously been a very time-consuming piece of work to put together, by volunteers, and demonstrates the strength of feeling against this proposal.

Further, I would like to comment that I find the deficiencies in the consultation process, highlighted in the CAN objection, extremely disturbing. As our paid servants it is the duty of Lewes District Council staff to ensure that such consultation processes are done efficiently and correctly, and it would appear that this has not been the case with regard to E1.

Sincerely,

Dr Dennis O. Chanter
[REDACTED]

Representation ID: REP/098/GT01Representor Details:

Representor ID:	REP/098
Name:	Chris Chapman
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	GT01 - Land south of The Plough
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	No Not Positively Prepared Not Justified Not Effective Not Consistent with national policy
Representation:	
The site is patently unsuitable because:	

- a) there is no safe pedestrian access to the village centre and its facilities including the village school and shop.
- b) access to public transport is not easy due to the infrequent buses and remoteness of the train station for pedestrians
- c) unsuitable access to Station Road for vehicles. Improvement would mean destroying hedgerows and the consequent change to the rural nature of the existing site
- d) lack of easy access to healthcare services
- e) the site is subject to occasional flooding

I am particularly concerned by the changes that would be required to allow suitable vehicle access to and from the site, specifically but not limited to, the removal of hedgerows. Station Road is the key access point to the village for the vast majority of the villagers. Many choose to live in Plumpton Green because of its village nature and its rural location. Destroying the hedgerow will contribute to a change to the feel of the place to a greater degree than the just the change itself because of the high profile location of the site. Basically the place will not feel as rural or village like and people will be reminded of this every time they leave/enter Plumpton Green.

What changes do you suggest to make the document legally compliant or sound?

The changes proposed are the deletion of (1) the second two sentences of paragraph 2.135; and (2) all of the remainder of the relevant section (that is, the text from the end of paragraph 2.135 to the end of paragraph 2.142).

Do you consider it necessary to participate at the Examination in Public? No

Why do you feel it is necessary to participate at the Examination in Public?

Representation ID: REP/099/E1Representor Details:

Representor ID:	REP/099
Name:	Jonathan Chappell
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	E1 - Land at East Quay, Newhaven Port
<i>Do you consider the document to be:</i>	
Legally Compliant:	No
Sound:	No Not Positively Prepared Not Justified Not Consistent with national policy
Representation:	Destruction of untouched original habitat. Plus proposing adding dozens of hgv and car movements s into the Halfords roundabout which cannot cope with existing traffic. You cannot keep drawing rectangles on maps and ignore the existing ecology and just hope

the existing infrastructure will cope .

What changes do you suggest to make the document legally compliant or sound?

The protect should be abandoned indecinite .ecological and enviry safeguards must be put in place. Transport infrastructure particularly the area around Halfords roundabout and the Ouse swing bridge must be improved so that it can take present traffic levels without gridlock before adding additional lorry movements into the mix .

Do you consider it necessary to participate at the Examination in Public?

Yes

Why do you feel it is necessary to participate at the Examination in Public?

To give voice to my concerns and see face to face how anyone thinks this development is a good idea. One only has to spend a few hours around the proposed site to see that the area cannot cope with this development.

Representation ID: REP/100/E1

Representor Details:

Representor ID:	REP/100
Name:	Juliet Charrington
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	E1 - Land at East Quay, Newhaven Port
<i>Do you consider the document to be:</i>	
Legally Compliant:	No
Sound:	No Not Justified
Representation:	
While I am not familiar enough with the planning process, the development of Tidemills into further space for industry such as the Brett proposal which was railroaded through against the strongly expressed wishes of the local inhabitants goes against all that should be law and due process. It represents a significant ingress into an important area of environmental interest. Many rare birds and reptiles live here and we have already	

lost too much habitat. It is also important historically and socially. The area is utilised and loved by residents. Sustainable development is the only way forward if we are to leave anything worthwhile for future generations and this proposed extension to an already dreadful plan falls extremely far short of sustainable. In the light of the IPCC report showing we have around 12 years to make changes, this sort of uncontrolled and unwanted industrial development is the precise sort of thing that must be suspended at the least and preferably stopped. I have strong suspicions about the whole process regarding the Brett proposal in the first place and this extension is definitely unsound and unjustified.

What changes do you suggest to make the document legally compliant or sound?

it needs to be cancelled. Tidemills is not the place for this, it is both environmentally and historically important. It is bad enough that the Brett development has been pushed through regardless of the wishes of local people, but extending it out in this way is simply appalling.

Do you consider it necessary to participate at the Examination in Public?

No

Why do you feel it is necessary to participate at the Examination in Public?

Representation ID: REP/101/GT01Representor Details:

Representor ID:	REP/101
Name:	Daniel Clark
Organisation:	
Consultation Body:	General
Stakeholder Type:	Local Business / employer

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	info@danclarkfurniture.co.uk
Address:	Dan Clark Furniture Ltd, Unit 54, The Old Brickworks, Station Rd, Plumpton Green Lewes East Sussex BN7 3DF

Representation:

Policy/Section:	GT01 - Land south of The Plough
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	No
Representation: I am writing to object about the proposal set out for the adjacent field to The Old Brickworks in Plumpton Green. The field proposed is right next to my business premises which is on the very north side of the industrial estate. I regrettably would be forced to leave the Old Brickworks as there is too much fear and	

uncertainty about security. Where I completely understand that a decline in security is not necessarily going to become a reality if the proposal were to go ahead, I am frightened that the chance of that happening would increase, purely by inhabiting what is now empty land. Business is fragile and security is essential, so I would not want to take any kind of risk by staying on the estate.

The estate security is pretty minimal as it is. The biggest security strength is that it is in a fairly remote setting as the land around it is largely uninhabited. Any kind of habitation, be it housing or caravan would increase security risk. Particularly if there's expansion in the future.

Another incentive for me is that I work closely with the Koop furniture Ltd. who are in the unit next door to me. The feeling there is that they would also relocate their business if the plans were to go ahead. At present for me, the feeling on the estate is of a community of like minded craftspeople, furniture makers and designers. We often work together, pass work to each other, lend materials etc etc. Re creating this somewhere else would be very unachievable and unlikely.

The Old Brickworks is in a beautiful setting and that is a big reason why I chose to move there in the first place. If the on site security measures are dramatically increased, fences and the like, I think it would be intrusive and damaging to the feel of the estate. Also there would be a substantial cost to increasing security this and I am concerned it would end up being paid for by the businesses on the estate.

There are no pavements to the surrounding area of the field I would consider it unsuitable/unsafe for pedestrian access.

Please reconsider the plan, as among other things I feel it will damage what is a valuable and irreplaceable community of businesses which bring needed trade to the other village businesses and make a significant contribution to the life of the village.

What changes do you suggest to make the document legally compliant or sound?

Choose a site that is more appropriate and somewhere where security and safety is suitable.

Somewhere that's not immediately next to a business estate with very low security measures.

Do you consider it necessary to participate at the Examination in Public?

No

Why do you feel it is necessary to participate at the Examination in Public?

Representation ID: REP/102/E1

Representor Details:

Representor ID:	REP/102
Name:	Simon Clark
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	E1 - Land at East Quay, Newhaven Port
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	No Not Positively Prepared Not Justified Not Effective Not Consistent with national policy
Representation:	
I am writing to express my concern about plans for development of the land at East Quay, Newhaven Port. Newhaven Town Council and many others are saying that there should be no development east of the Port Access Road and Bridge onto Tide Mills	

once the road and bridge are built. I agree with the position of Newhaven Town Council on this issue. The continuing development of Newhaven port in a way that neglects the wishes of local citizens is threatening a fragile and beautiful area which has important natural and environmental value. The economic development of the area could be positive if it takes into consideration the development of tourism in and around Newhaven. I don't oppose the economic development of port facilities in Newhaven, but additional new facilities should demonstrably add to the local economy in a way that benefits local people and should not be destructive to the environment, landscape and wildlife in the area. It may be difficult to reconcile all these objectives, but this is what local citizens expect competent local authorities and their advisers to deliver. Citizens will not accept an ugly industrial development which provides few jobs or other inputs to the local community is ultimately in their best interests, because it is not.

What changes do you suggest to make the document legally compliant or sound?

There needs to be a much more specific discussion on the potential uses of the new land. If the site ends up being used to create a concrete-making plant or a similar industrial use, then this is not going to be acceptable to local people. If there is a proposal to develop the site with work spaces and facilities which can be used by local employers and citizens and tourists then the project could win a lot of local support. It is possible to use this land in a way that is positive to the local economy, the local citizens and existing businesses, but there is need for a much more specific discussion before general approval is granted.

Do you consider it necessary to participate at the Examination in Public? No

Why do you feel it is necessary to participate at the Examination in Public?

Representation ID: REP/103/E1

Representor Details:

Representor ID:	REP/103
Name:	Richard Clayton
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	E1 - Land at East Quay, Newhaven Port
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	
Representation: I wish to object to the proposed new policy E1 in the Lewes District Local Plan on the following grounds: Loss of biodiversity (including internationally rare vegetated shingle) Traffic and air quality in the area Overdevelopment of the area will cause increased traffic in the area, polluting the atmosphere and will cause traffic to grind to a halt on the A259 where this feeder road will join the main carriageway. The development would not reflect the clean marine vision of the enterprise zone or renewable energy cluster of the port master plan This designated local wildlife site must be preserved for future generations, nature and leisure for the residents of Newhaven and beyond	
What changes do you suggest to make the document legally compliant or sound?	

Do you consider it necessary to participate at the Examination in Public?
Why do you feel it is necessary to participate at the Examination in Public?

From: Richard Clayton [REDACTED]
Sent: 05 November 2018 20:08
To: ldf
Subject: E1 Policy Development at Tide Mills

Categories: Vanessa to deal with

Dear Sirs

I wish to object to the proposed new policy E1 in the Lewes District Local Plan on the following grounds:

Loss of biodiversity (including internationally rare vegetated shingle)

Traffic and air quality in the area

Overdevelopment of the area will cause increased traffic in the area, polluting the atmosphere and will cause traffic to grind to a halt on the A259 where this feeder road will join the main carriageway.

The development would not reflect the clean marine vision of the enterprise zone or renewable energy cluster of the port master plan

This designated local wildlife site must be preserved for future generations, nature and leisure for the residents of Newhaven and beyond

Yours faithfully
Richard Clayton

Sent from my iPad

Representation ID: REP/104/E1Representor Details:

Representor ID:	REP/104
Name:	Sandy Clayton
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	E1 - Land at East Quay, Newhaven Port
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	
Representation:	<p>I wish to object to the proposed new policy E1 in the Lewes District Local Plan on the following grounds:</p> <p>Loss of biodiversity (including internationally rare vegetated shingle)</p> <p>Traffic and air quality in the area</p> <p>Overdevelopment of the area with increased traffic from additional housing polluting the atmosphere and traffic grinding to a halt on the A259</p> <p>The development would not reflect the clean marine vision of the enterprise zone or renewable energy cluster of the port master plan</p>

This designated local wildlife site must be preserved for future generations, nature and leisure for the residents of Newhaven and beyond

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public?

Why do you feel it is necessary to participate at the Examination in Public?

Thea Davis

From: Sandy Clayton [REDACTED]
Sent: 04 November 2018 15:17
To: ldf
Subject: E1 policy

Categories: LPP2 comment to code - stakeholder details have been added

Dear Sirs

I wish to object to the proposed new policy E1 in the Lewes District Local Plan on the following grounds:

Loss of biodiversity (including internationally rare vegetated shingle)

Traffic and air quality in the area

Overdevelopment of the area with increased traffic from additional housing polluting the atmosphere and traffic grinding to a halt on the A259

The development would not reflect the clean marine vision of the enterprise zone or renewable energy cluster of the port master plan

This designated local wildlife site must be preserved for future generations, nature and leisure for the residents of Newhaven and beyond

Yours faithfully
Sandy Clayton

Sent from my iPad

Representation ID: REP/105/BH01
--

Representor Details:

Representor ID:	REP/105
Name:	Patrick Collins
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	BH01 - Land at The Nuggets, Valebridge Road
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	No Not Justified
Representation: The access to Valebridge Road for this development is unsafe and this will increase traffic onto an already congested road. More development in this area will only add to the loss of habitat for wildlife and destroy ancient hedgerows.	
What changes do you suggest to make the document legally compliant or sound?	

Remove the allocation of this land for residential development.

Do you consider it necessary to participate at the Examination in Public?	No
--	----

Why do you feel it is necessary to participate at the Examination in Public?

Representation ID: REP/105/DM35Representor Details:

Representor ID:	REP/105
Name:	Patrick Collins
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	DM35: Footpath, Cycle and Bridleway Network
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	Yes
Representation:	
Suggest the addition of 'and maintained' such that the last sentence reads or improved quality delivered and maintained as part of the development.	
What changes do you suggest to make the document legally compliant or sound?	

Do you consider it necessary to participate at the Examination in Public?	No
Why do you feel it is necessary to participate at the Examination in Public?	

Representation ID: REP/105/INTRepresentor Details:

Representor ID:	REP/105
Name:	Patrick Collins
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	Figure 1
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	Yes
Representation:	
This map correctly defines the area covered by the Wivelsfield Parish Neighbourhood Plan; ie. the whole of Wivelsfield Parish - there is no break-out area defined as 'The Edge of Burgess Hill', which is referred to later in the document.	
What changes do you suggest to make the document legally compliant or sound?	
None, this is a comment only.	

Do you consider it necessary to participate at the Examination in Public?	Yes
Why do you feel it is necessary to participate at the Examination in Public?	
To ensure correct interpretation of the NPPF.	

Representation ID: REP/105/HPCRepresentor Details:

Representor ID:	REP/105
Name:	Patrick Collins
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	Housing Policy Context
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	No
Representation: This is the section in which the Lewes District Local Plan Part 2 starts to go wrong. It has developed a new 'Settlement Area' called 'Edge of Burgess Hill' which has never existed before, it is actually part of Wivelsfield Parish. 'I live in Wivelsfield, this is a small rural parish and we have an adopted Neighbourhood Plan, the whole of the village considered this plan and voted upon it in a referendum. I happen to live in the settlement of West Wivelsfield and have done so for more than 20	

years, we have families established in this area since the early 1800's and it has always been West Wivelsfield; in fact we are closer to the Parish Church than Wivelsfield Green! We are not Edge of Burgess Hill.

'In Wivelsfield we all understood the importance for our rural area of ensuring we met the NPPF requirements and some of us attended the opening review meeting for the Lewes District Local Plan Part 1. Our Parish Council ensured that we complied with the allocations set out in our Wivelsfield Parish Neighbourhood Plan, where we met or exceeded our development allocations.

'So development has proceeded in our area and we have suffered for it, environmentally, much increased traffic, loss of habitat for songbirds; the badgers have gone; the river is polluted, flooding returned to Wivelsfield station, no parking available. We understand this is our cross to bear and we have taken our fair share, but enough is enough. We have tried and we gained nothing, no community facilities were provided for the extra homes and once again Lewes depended upon Mid Sussex to carry the load.

'I have sympathy with Lewes District Council; I realise with formation of the South Downs National Park that 50% of their area was taken away and only 20% of the allocated development was removed which placed a huge load on the rest of the planning area but I cannot accept the formation of this new settlement 'Edge of Burgess Hill' are we going to have to rename the Parish Church?

What changes do you suggest to make the document legally compliant or sound?

Remove the Settlement Area 'Edge of Burgess Hill', we are part of Wivelsfield with an adopted Neighbourhood Plan.

Do you consider it necessary to participate at the Examination in Public? Yes

Why do you feel it is necessary to participate at the Examination in Public?

To ensure the examiner is aware of the importance of this topic.

Representation ID: REP/106/GT01Representor Details:

Representor ID:	REP/106
Name:	Pamela Conlon
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	GT01 - Land south of The Plough
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	
Representation:	
<p>I wish to object to the inclusion in the draft Local Plan Part 2 of the proposed Gypsy and Traveller site at Plumpton Green. The reasons for my objection are as follows:</p> <ul style="list-style-type: none">* This would be an inappropriate development of an unspoiled greenfield site.* The proposed site was not so allocated in the Plumpton Neighbourhood Plan* Access to the village from the proposed site would be unsafe on foot, since there is no footway and the road is busy and dangerous. Access to local facilities would therefore	

have to be by vehicle thus further worsening the existing traffic problems in the narrow village street.

* Such a site may damage the village economy since I understand that the 21 businesses currently operating from the Old Brickworks have informed the landlord that they will be forced to relocate if the site goes ahead. This could cause local job losses in an area with few employment opportunities.

* The site would be difficult to contain and manage

* There would be an inevitably adverse effect on the rural character of the area and on the existing properties nearby.

I should be grateful if my objections could be duly considered.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public?

Why do you feel it is necessary to participate at the Examination in Public?

Hodgson, Lilly

From: Pamela Conlon [REDACTED]
Sent: 30 October 2018 15:55
To: ldf
Subject: Local Plan Part 2: Proposed Gypsy site at Plumpton Green
Categories: LPP2 comment to code - stakeholder details have been added

Dear Sirs,

I wish to object to the inclusion in the draft Local Plan Part 2 of the proposed Gypsy and Traveller site at Plumpton Green. The reasons for my objection are as follows:

1. This would be an inappropriate development of an unspoiled greenfield site.
2. The proposed site was not so allocated in the Plumpton Neighbourhood Plan
3. Access to the village from the proposed site would be unsafe on foot, since there is no footway and the road is busy and dangerous. Access to local facilities would therefore have to be by vehicle thus further worsening the existing traffic problems in the narrow village street.
4. Such a site may damage the village economy since I understand that the 21 businesses currently operating from the Old Brickworks have informed the landlord that they will be forced to relocate if the site goes ahead. This could cause local job losses in an area with few employment opportunities.
5. The site would be difficult to contain and manage
6. There would be an inevitably adverse effect on the rural character of the area and on the existing properties nearby.

I should be grateful if my objections could be duly considered.

Yours faithfully,

Mrs Pamela Conlon
[REDACTED]

Sent from [Mail](#) for Windows 10

Representation ID: REP/107/GT01Representor Details:

Representor ID:	REP/107
Name:	Michael Conlon QC
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	GT01 - Land south of The Plough
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	
Representation:	
<p>I write to object to inclusion of the above proposal in the draft Local Plan, on the following grounds:</p> <ul style="list-style-type: none">* The site is accessed by a country lane which is unlit, has no footway and no speed restriction. It is, however, much used by through traffic. The proposal would inevitably lead to an increase in the dangers these pose.* Further, as it is likely that occupiers of the site would access the village of Plumpton Green by vehicle only, this would further add to congestion and parking problems in the	

village.

* The site is an unspoiled greenfield site. It is close to an area of outstanding natural beauty.

* The proposed development would adversely affect the character of the area.

Please take my objections into consideration.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public?

Why do you feel it is necessary to participate at the Examination in Public?

Hodgson, Lilly

From: Michael <[REDACTED]>
Sent: 31 October 2018 16:27
To: ldf
Subject: Proposed Gypsy Site at Plumpton Green
Categories: LPP2 comment to code - stakeholder details have been added

Dear Sirs,

I write to object to inclusion of the above proposal in the draft Local Plan, on the following grounds:

1. The site is accessed by a country lane which is unlit, has no footway and no speed restriction. It is, however, much used by through traffic. The proposal would inevitably lead to an increase in the dangers these pose.
2. Further, as it is likely that occupiers of the site would access the village of Plumpton Green by vehicle only, this would further add to congestion and parking problems in the village.
3. The site is an unspoiled greenfield site. It is close to an area of outstanding natural beauty.
4. The proposed development would adversely affect the character of the area.

Please take my objections into consideration.

Yours faithfully,

Michael Conlon QC
[REDACTED]

Sent from [Mail](#) for Windows 10

Representation ID: REP/108/CH01Representor Details:

Representor ID:	REP/108
Name:	Johanna Constable
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	CH01 - Glendene, Station Road
<i>Do you consider the document to be:</i>	
Legally Compliant:	No
Sound:	No Not Justified Not Effective Not Consistent with national policy
Representation: This proposal is going to increase traffic on a road that is already too busy for purpose especially at school drop off and pick ups. This proposal is going to have a negative impact on house prices in the area and as a single woman living alone will make me feel unsafe in my own home	

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public?	No
--	-----------

Why do you feel it is necessary to participate at the Examination in Public?

Representation ID: REP/109/E1/ARepresentor Details:

Representor ID:	REP/109
Name:	John Cooper
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	E1 - Land at East Quay, Newhaven Port
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	
Representation:	
Objection to Policy E1	
Reference "New policies or updated policies proposed in the Pre-Submission Local Plan (N)"	
Policy Type Description of Change Reason for Change	
E1: Land at East Quay Newhaven Port N Addition of Employment Land Allocation E1	

Updated Employment Allocation

Reason for Objection

Changing the use of the land to permit Employment will

- Destroy flora and fauna that have been there for many decades and are enjoyed by the local and visiting members of public.
- Further restrict access to the beach that currently is used by residents and visitors
- Will give rise to more vehicular movement that will further raise pollution levels adjacent to an area that is already highly polluted and has no long term pollution measurement in place.

The area highlighted therefore needs to be protected against this Policy decision to preserve the original and natural beauty of this land that is seen as part of the South Downs Park.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public?

Why do you feel it is necessary to participate at the Examination in Public?

Representation ID: REP/109/E1/BRepresentor Details:

Representor ID:	REP/109
Name:	John Cooper
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	E1 - Land at East Quay, Newhaven Port
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	
Representation:	
<p>I object most strongly to proposal (Policy E1) as within the documentation there is reference on pg 209 to medium and currently unclassified risk (ie Amber in colour) in respect of Land Efficiency, Biodiversity and Environment (abstract below for ease of reference)</p> <p>Until such time as mitigation of the risks identified in table 113 are in place then a decision to proceed would be considered by many to be unsafe and liable to serious</p>	

consequences.

Furthermore rating Waste, Water , Energy and Air Quality as zero is not correct and certainly item 13 Air Quality should start as RED until positive mitigations are in place, monitored over time and then reviewed.

This Policy comes very quickly and seemingly very convenient, to all except Newhaven residents and visitors to the greenfields and beach area of "E1", after the New Port Access Road bridge was approved.

That project in itself, when taking into account the seriously ailing fiscal situation within the Council, is now to be seen as a gross misuse of Public funds which need to be redirected without delay to budgets that are already in desperate need for funds to allow them to continue serving the community.

I trust this proposal does not proceed and I have copied in our MP who needs to be aware of the finer detail, some of which is flawed.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public?

Why do you feel it is necessary to participate at the Examination in Public?

Thea Davis

From: John Cooper [REDACTED] >
Sent: 29 October 2018 09:29
To: ldf
Cc: 'Joanne Martin'
Subject: Ref Policy E1 - Objection

Categories: LPP2 comment to code - stakeholder details have been added

Objection to Policy E1

Reference "New policies or updated policies proposed in the Pre-Submission Local Plan (N)"

Policy Type Description of Change Reason for Change

E1: Land at East Quay Newhaven Port N Addition of Employment Land Allocation E1 Updated Employment Allocation

Reason for Objection

Changing the use of the land to permit Employment will

- Destroy flora and fauna that have been there for many decades and are enjoyed by the local and visiting members of public.
- Further restrict access to the beach that currently is used by residents and visitors
- Will give rise to more vehicular movement that will further raise pollution levels adjacent to an area that is already highly polluted and has no long term pollution measurement in place.

The area highlighted therefore needs to be protected against this Policy decision to preserve the original and natural beauty of this land that is seen as part of the South Downs Park.

John Cooper

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Thea Davis

From: John Cooper [REDACTED]
Sent: 03 November 2018 13:31
To: ldf
Cc: [REDACTED]
Subject: Lewes District Local Plan part 2, Policy E1 - Objection to proposed development on greenfield area, East Quay

Categories: LPP2 comment to code - stakeholder details have been added

To whom it may concern,

Document

Lewes District Council
Pre-Submission Lewes District Local Plan Part 2
Site Allocations and Development Managements Policies
Document
Sustainability Appraisal (Incorporating a Strategic Environmental
Assessment)
August 2018 Cabinet Version

I object most strongly to proposal (Policy E1) as within the documentation there is reference on pg 209 to medium and currently unclassified risk (ie Amber in colour) in respect of Land Efficiency, Biodiversity and Environment (abstract below for ease of reference)

N. Assessment of the Employment Allocations

Table 113 Policy E1: Land at East Quay, Newhaven Port

Objectives	S	M	L	Explanation
1.Housing	0	0	0	
2.Deprivation	0	0	0	
3.Travel	+	+	+	The site benefits from relatively good access to the A26 and Harbour train station.
4.Communities	0	0	0	
5.Health	0	0	0	
6.Education	0	0	0	
7.Land Efficiency	-	-	-	The site is mostly greenfield land.
8.Biodiversity	-?	-?	-?	The site is within an SNCI. Therefore development on the site could impact on the setting of the National Park planning boundary, it was not assessed within the Landscape adjacent to a site (Ouse Estuary Nature Reserve) which is a sensitive area with no capacity for change. The site is adjacent to the area.
9.Environment	-?	-?	-?	
10.Waste	0	0	0	
11.Water	0	0	0	
12.Energy	0	0	0	
13.Air Quality	0	0	0	
14.Flooding	0	0	0	Part of the site is within flood zone 2 and surrounding area; future use of the site is likely to be water compatible.
15.Coastal	0	0	0	

Until such time as mitigation of the risks identified in table 113 are in place then a decision to proceed would be considered by many to be unsafe and liable to serious consequences.

Furthermore rating Waste, Water, Energy and Air Quality as zero is not correct and certainly item 13 Air Quality should start as RED until positive mitigations are in place, monitored over time and then reviewed.

This Policy comes very quickly and seemingly very convenient, to all except Newhaven residents and visitors to the greenfields and beach area of "E1", after the New Port Access Road bridge was approved.

That project in itself, when taking into account the seriously ailing fiscal situation within the Council, is now to be seen as a gross misuse of Public funds which need to be redirected without delay to budgets that are already in desperate need for funds to allow them to continue serving the community.

I trust this proposal does not proceed and I have copied in our MP who needs to be aware of the finer detail, some of which is flawed.

John Cooper

[REDACTED]

Representation ID: REP/110/E1Representor Details:

Representor ID:	REP/110
Name:	Joanne Cooper
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	E1 - Land at East Quay, Newhaven Port
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	
Representation: I wish to object in the strongest terms to the proposal to industrialise the coast indicated as E1 in the Lewes District Local Plan on the following grounds: * It will ruin the beach environment and destroy existing plants and wildlife in the area, which will already be struggling after the Brett Aggregates operation commences. * There are existing public footpaths running through the E1 zone which are likely to be affected by any development there. * It is too close to the South Downs National Park and should be preserved as a buffer zone against the unpleasant industrial actions that are proposed by Brett Aggregates,	

which will cause air noise and visual pollution.

* It is completely unnecessary to make this portion of the coast available for industry of any sort as there are acres of commercial and industrial land around the port area which is lying vacant.

* This area is a very much loved green space used constantly by the public for recreation and as such is important for mental wellbeing as a welcome relief from the creeping traffic jam which is enveloping Newhaven.

It is suspicious that the proposal has been inserted hot on the heels of the Port Access Road being granted permission, thus it appears to have been waiting in the wings to justify the gradual ruin of the much loved area.

Lewes Council must listen to local views as the plan is termed 'Local Plan' so should be just that, rather than always prioritising commercial greed over the future of diminishing public open space.

Please listen !

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public?

Why do you feel it is necessary to participate at the Examination in Public?

Hodgson, Lilly

From: Joanne Martin <[REDACTED]>
Sent: 03 November 2018 12:33
To: ldf
Subject: FW: Objection to New Policy E1 - development at Tidemills
Categories: LPP2 comment to code - stakeholder details have been added

Good Morning

I wish to object in the strongest terms to the proposal to industrialise the coast indicated as E1 in the Lewes District Local Plan on the following grounds:

- It will ruin the beach **environment** and destroy existing **plants and** wildlife in the area, which will already be struggling after the Brett Aggregates operation commences.
- There are existing public footpaths running through the E1 zone which are likely to be affected by any development there.
- It is too close to the South Downs National Park and should be preserved as a buffer zone against the unpleasant industrial actions that are proposed by Brett Aggregates, which will cause air noise and visual pollution.
- It is completely unnecessary to make this portion of the coast available for industry of any sort as there are acres of commercial and industrial land around the port area which is lying vacant.
- This area is a very much loved green space used constantly by the public for recreation and as such is important for mental wellbeing as a welcome relief from the creeping traffic jam which is enveloping Newhaven.

It is suspicious that the proposal has been inserted hot on the heels of the Port Access Road being granted permission, thus it appears to have been waiting in the wings to justify the gradual ruin of the much loved area.

Lewes Council must listen to local views as the plan is termed 'Local Plan' so should be just that, rather than always prioritising commercial greed over the future of diminishing public open space.

Please listen !

Kind regards Joanne M Cooper.

Representation ID: REP/111/GT01Representor Details:

Representor ID:	REP/111
Name:	John Cottenham
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:
Organisation:

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	GT01 - Land south of The Plough
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	
Representation:	
<p>I'm writing to express my absolute objection to the plans for 5 permanent travellers pitches in Plumpton Green at the land South of The Plough.</p> <p>I object to this proposal because:</p> <ol style="list-style-type: none">1) Loss of green open space and negative environmental impact2) Housing was dismissed at this site when forming the Neighbourhood Plan. Placing other subsequent dwellings there would be unfair and discriminatory3) Poor drainage, no sewage network4) There are no footpaths or street lights so the travellers would be too isolated	

- 5)A detrimental effect on neighbouring business units. Unemployment and hence loss of income to the village as they support and spend in the village shop and pubs.
- 6)The proposal will have a negative impact on the public houses within the village, particularly The Plough being just next door.
- 7)The access point to the site is unsuitable and hazardous
- 8)The proposal would adversely affect the character of the area contravening Core Policy 3.
- 9)The proposal will result in negative environmental impact with wildlife disturbance, noise pollution and loss of green space.
- 10)The site is not within reasonable walking distance from the village shop or school for the travellers and there are no footpaths along the northern route and the traffic limit is 60mph. This would isolate the travellers and place them at risk
- 11)There are limited transport links near the site. There is a very limited bus service but this is at risk and no bus stops near the access point
- 12)The consultation period for this proposal has been very short indeed. It seems LDC have not paid particular attention to "early and effective community engagement.." . Instead, hastily made decisions or deliberate concealment of plans has occurred.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public?

Why do you feel it is necessary to participate at the Examination in Public?

From: John Cottenham <[REDACTED]>
Sent: 03 November 2018 07:49
To: ldf
Subject: Objection to Traveller Site (GT01) Plumpton Green

Categories: LPP2 comment to code - stakeholder details have been added

To Whom it May Concern

I'm writing to express my absolute objection to the plans for 5 permanent travellers pitches in Plumpton Green at the land South of The Plough.

I object to this proposal because:

- 1) Loss of green open space and negative environmental impact
- 2) Housing was dismissed at this site when forming the Neighbourhood Plan. Placing other subsequent dwellings there would be unfair and discriminatory
- 3) Poor drainage, no sewage network
- 4) There are no footpaths or street lights so the travellers would be too isolated
- 5) A detrimental effect on neighbouring business units. Unemployment and hence loss of income to the village as they support and spend in the village shop and pubs.
- 6) The proposal will have a negative impact on the public houses within the village, particularly The Plough being just next door.
- 7) The access point to the site is unsuitable and hazardous
- 8) The proposal would adversely affect the character of the area contravening Core Policy 3.
- 9) The proposal will result in negative environmental impact with wildlife disturbance, noise pollution and loss of green space.
- 10) The site is not within reasonable walking distance from the village shop or school for the travellers and there are no footpaths along the northern route and the traffic limit is 60mph. This would isolate the travellers and place them at risk
- 11) There are limited transport links near the site. There is a very limited bus service but this is at risk and no bus stops near the access point
- 12) The consultation period for this proposal has been very short indeed. It seems LDC have not paid particular attention to "early and effective community engagement..". Instead, hastily made decisions or deliberate concealment of plans has occurred.

Yours faithfully

John Cottenham

Representation ID: REP/112/GT01Representor Details:

Representor ID:	REP/112
Name:	Sally Cottenham
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	GT01 - Land south of The Plough
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	
Representation:	
<p>I'm writing to express my strongest objection to the plans for 5 permanent travellers pitches in Plumpton Green at the land South of The Plough.</p> <p>I cannot imagine how LDC have even contemplated this site as it is quite simply ridiculous in many ways.</p> <p>I base my objections on:</p> <p>1) This is green open space that helps delineate the village from surrounding villages. This land has not been built on before and would be lost forever.</p> <p>2) This site was rejected during our village consultations and in the formation of the</p>	

Neighbourhood Plan. To then go ahead and place dwellings on an already rejected site would contravene (and make a mockery of) the Neighbourhood Plan and the wishes of the village.

3)The site is very poorly drained

4)There are no footpaths or street lights so the travellers would be too isolated

5)The proposal would have a very detrimental effect on neighbouring business units who have already indicated they will be forced to relocate. This will result in loss of income to the village as they support and spend in the village shop and pubs.

6)The proposal will have a negative impact on the public houses within the village, particularly The Plough being just next door.

7)The access point to the site is unsuitable causing a hazard for drivers/cyclists/horse-riders through the village

8)The proposal would adversely affect the character of the area contravening Core Policy 3.

9)The proposal will result in negative environmental impact with wildlife disturbance, noise pollution and loss of green space.

10)The site is not within reasonable walking distance from the village shop or school for the travellers and there are no footpaths along the northern route and the traffic limit is 60mph. This would isolate the travellers and place them at risk

11)There are limited transport links near the site. There is a very limited bus service but this is at risk and no bus stops near the access point

12)The consultation period for this proposal has been very short indeed. It seems LDC have not paid particular attention to "early and effective community engagement..". Instead, hastily made decisions or deliberate concealment of plans has occurred.

13)I have heard there are other proposals available for this site which would be more sustainable and be of increased benefit to the village.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public?

Why do you feel it is necessary to participate at the Examination in Public?

Thea Davis

From: Sally Cottenham <[REDACTED]>
Sent: 03 November 2018 07:40
To: ldf
Subject: OBJECTION TO TRAVELLER SITE GT01 PLUMPTON GREEN

Categories: LPP2 comment to code - stakeholder details have been added

To Whom it May Concern

I'm writing to express my strongest objection to the plans for 5 permanent travellers pitches in Plumpton Green at the land South of The Plough.

I cannot imagine how LDC have even contemplated this site as it is quite simply ridiculous in many ways.

I base my objections on:

- 1) This is green open space that helps delineate the village from surrounding villages. This land has not been built on before and would be lost forever.
- 2) This site was rejected during our village consultations and in the formation of the Neighbourhood Plan. To then go ahead and place dwellings on an already rejected site would contravene (and make a mockery of) the Neighbourhood Plan and the wishes of the village.
- 3) The site is very poorly drained
- 4) There are no footpaths or street lights so the travellers would be too isolated
- 5) The proposal would have a very detrimental effect on neighbouring business units who have already indicated they will be forced to relocate. This will result in loss of income to the village as they support and spend in the village shop and pubs.
- 6) The proposal will have a negative impact on the public houses within the village, particularly The Plough being just next door.
- 7) The access point to the site is unsuitable causing a hazard for drivers/cyclists/horse-riders through the village
- 8) The proposal would adversely affect the character of the area contravening Core Policy 3.
- 9) The proposal will result in negative environmental impact with wildlife disturbance, noise pollution and loss of green space.
- 10) The site is not within reasonable walking distance from the village shop or school for the travellers and there are no footpaths along the northern route and the traffic limit is 60mph. This would isolate the travellers and place them at risk
- 11) There are limited transport links near the site. There is a very limited bus service but this is at risk and no bus stops near the access point
- 12) The consultation period for this proposal has been very short indeed. It seems LDC have not paid particular attention to "early and effective community engagement..". Instead, hastily made decisions or deliberate concealment of plans has occurred.
- 13) I have heard there are other proposals available for this site which would be more sustainable and be of increased benefit to the village.

Yours faithfully

Dr Sally Cottenham BSc(hons)MA Vet MB MRCVS

Sent from my iPhone

Representation ID: REP/113/E1Representor Details:

Representor ID:	REP/113
Name:	Liz Cowlett
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:
Organisation:

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	E1 - Land at East Quay, Newhaven Port
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	
Representation: Objections to the encroachment further towards Tidemills shown in the Local Plan. I wish to add my voice to those objecting to the use of this site for further industrial development. I understand that there may have been historical earmarking of certain sites for industrial development, but think that this should be revisited as the economic and environmental situations have changed. The beach is a well used amenity over half of which will be lost if this is agreed. In addition it is one of the places where the National Park meets the sea and has specific vegetation on the beach which is relatively rare. The plan also seems to be contrary to the green development of Newhaven which is already suffering from the addition of an incinerator and a cement factory.	

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public?
--

Why do you feel it is necessary to participate at the Examination in Public?

Hodgson, Lilly

From: Liz <[REDACTED]>
Sent: 04 November 2018 16:26
To: ldf
Subject: Ref E1 Local Plan

Categories: LPP2 comment to code - stakeholder details have been added

Objections to the encroachment further towards Tidemills shown in the Local Plan.

I wish to add my voice to those objecting to the use of this site for further industrial development. I understand that there may have been historical earmarking of certain sites for industrial development, but think that this should be revisited as the economic and environmental situations have changed. The beach is a well used amenity over half of which will be lost if this is agreed. In addition it is one of the places where the National Park meets the sea and has specific vegetation on the beach which is relatively rare. The plan also seems to be contrary to the green development of Newhaven which is already suffering from the addition of an incinerator and a cement factory.

Regards
Liz Cowlett

E Cowlett
[REDACTED]

Representation ID: REP/114/E1

Representor Details:

Representor ID:	REP/114
Name:	Tim Cox
Organisation:	
Consultation Body:	General
Stakeholder Type:	Local group or organisation

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	E1 - Land at East Quay, Newhaven Port
<i>Do you consider the document to be:</i>	
Legally Compliant:	No
Sound:	No Not Consistent with national policy
Representation:	
The west end of the beach has established rights of way that are not protected in the plan	
What changes do you suggest to make the document legally compliant or sound?	

protect the west end of the land in the plan
Do you consider it necessary to participate at the Examination in Public? No
Why do you feel it is necessary to participate at the Examination in Public?

Representation ID: REP/115/GT01/ARepresentor Details:

Representor ID:	REP/115
Name:	Graham Crawford
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	GT01 - Land south of The Plough
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	
Representation:	
<p>I find it unbelievable that you are actually considering this proposal for the following reasons.</p> <p>* The Damage this would do to the local economy. Firstly the Plough would lose business and there has been talk of the current landlord leaving. Do you even know if Harveys will want a pub there [REDACTED] The Plough is also heavily used on race day meeting so I am sure that the Racecourse will not be pleased.</p> <p>* The Fountain is probably in the same position as it too is close to the field.</p> <p>* The brickworks have several businesses who are talking about moving as they are</p>	

NEXT to the field. Has any one actually considered this economic impact?

- * The site entrance was illegally built and is a dangerous turning onto the road.
- * The site was turned down for housing
- * I have been informed that other sites are better suited.
- * There are no real amenities: No street lights, sewage, footpaths or a water system. You are its abandoning a bunch of people in a field as clearly you have put zero thought into this.
- * I would like to know who is accountable for this decision when someone gets hit by a bus or a business closes. Whose final decision is it or is it just a committee.
- * This proposal also appears to have arrived very suddenly with an element of haste attached which is unfair to local residents. Can you comment.
- * I know that petitions will not be considered and that the travellers cannot be stereotyped [REDACTED]

I await your reply with interest.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public?

Why do you feel it is necessary to participate at the Examination in Public?

Representation ID: REP/115/GT01/BRepresentor Details:

Representor ID:	REP/115
Name:	Graham Crawford
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	GT01 - Land south of The Plough
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	
Representation: My objection to this is as follows. <ol style="list-style-type: none">1. Road not suitable,2. No Street lighting.3. Harvey's and Brickworks say they will shut creating unemployment.4. No other sites have been considered, although others are better suited.	
What changes do you suggest to make the document legally compliant or sound?	

Do you consider it necessary to participate at the Examination in Public?
Why do you feel it is necessary to participate at the Examination in Public?

Hodgson, Lilly

From: Graham Crawford <[REDACTED]>
Sent: 08 October 2018 12:21
To: ldf
Cc: Julie Crawford
Subject: Letter of Objection to Plumpton Travellers.

Categories: LPP2 comment to code - stakeholder details have been added

I find it unbelievable that you are actually considering this proposal for the following reasons.

1. The Damage this would do to the local economy. Firstly the Plough would lose business and there has been talk of the current landlord leaving. Do you even know if Harveys will want a pub there [REDACTED]
[REDACTED] The Plough is also heavily used on race day meeting so I am sure that the Racecourse will not be pleased.
2. The Fountain is probably in the same position as it too is close to the field.
3. The brickworks have several businesses who are talking about moving as they are NEXT to the field. Has any one actually considered this economic impact?
4. The site entrance was illegally built and is a dangerous turning onto the road.
5. The site was turned down for housing
6. I have been informed that other sites are better suited.
7. There are no real amenities: No street lights, sewage, footpaths or a water system. You are its abandoning a bunch of people in a field as clearly you have put zero thought into this.
8. I would like to know who is accountable for this decision when someone gets hit by a bus or a business closes. Whose final decision is it or is it just a committee.
9. This proposal also appears to have arrived very suddenly with an element of haste attached which is unfair to local residents. Can you comment.
10. I know that petitions will not be considered and that the travellers cannot be stereotyped [REDACTED]
[REDACTED]

I await your reply with interest.

Regards

Graham

(Local Resident)

Hodgson, Lilly

From: Graham Crawford <[REDACTED]>
Sent: 05 November 2018 12:30
To: ldf
Subject: Objection to Travellers Site Plumpton Green
Categories: GT01, Vanessa to deal with

Afternoon,

My objection to this is as follows.

1. Road not suitable,
2. No Street lighting.
3. Harvey's and Brickworks say they will shut creating unemployment.
4. No other sites have been considered, although others are better suited.

Regards

Graham

Representation ID: REP/116/E1Representor Details:

Representor ID:	REP/116
Name:	Melanie Crawshaw
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	E1 - Land at East Quay, Newhaven Port
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	
Representation: I am writing to oppose the development of the Tide Mills area in Newhaven. I have been a Newhaven resident for 11 years and have seen many a shocked face when I tell people how beautiful parts of Newhaven are, but it is true and Tidemills is just one of these beauty spots. I regularly walk my dog's there and particularly in high summer the sheer amount of biodiversity astounds me. This is an internationally rare area of vegetated shingle which should be protected and absolutely not developed for industry purposes! Have we learned nothing in all these years of destroying our planet? I am shocked that the council seems to give priority to industry over protecting what is left of this beautiful place.	

They have been building a road with planning permission which was granted over 20yrs ago, hoping no one would notice! They really should be ashamed of themselves! This is an area very close to the south downs national park, people come from all over the world to visit the seven sisters cliffs, this is 10 minutes drive away, we should be developing a way of protecting what we have already caused so much harm to rather than just deciding "oh well it's too late, let's put a tarmac plant on the beach". Please don't condemn Newhaven any further than she has already been condemned, please act to protect what is left of our beautiful town and don't allow the developers to destroy such biodiverse land which many people get a good deal of joy from visiting, many of us on a daily basis.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public?

Why do you feel it is necessary to participate at the Examination in Public?

Hodgson, Lilly

From: Melanie <[REDACTED]>
Sent: 04 November 2018 20:00
To: ldf
Subject: E1 Newhaven

Categories: Vanessa to deal with

Dear councillor,

I am writing to oppose the development of the Tide Mills area in Newhaven.

I have been a Newhaven resident for 11 years and have seen many a shocked face when I tell people how beautiful parts of Newhaven are, but it is true and Tidemills is just one of these beauty spots.

I regularly walk my dog's there and particularly in high summer the sheer amount of biodiversity astounds me. This is an internationally rare area of vegetated shingle which should be protected and absolutely not developed for industry purposes! Have we learned nothing in all these years of destroying our planet? I am shocked that the council seems to give priority to industry over protecting what is left of this beautiful place.

They have been building a road with planning permission which was granted over 20yrs ago, hoping no one would notice! They really should be ashamed of themselves! This is an area very close to the south downs national park, people come from all over the world to visit the seven sisters cliffs, this is 10 minutes drive away, we should be developing a way of protecting what we have already caused so much harm to rather than just deciding "oh well it's too late, let's put a tarmac plant on the beach". Please don't condemn Newhaven any further than she has already been condemned, please act to protect what is left of our beautiful town and don't allow the developers to destroy such biodiverse land which many people get a good deal of joy from visiting, many of us on a daily basis.

Kind Regards,
Melanie Crawshaw

Representation ID: REP/117/E1/A
--

Representor Details:

Representor ID:	REP/117
Name:	Emma Creighton
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	E1 - Land at East Quay, Newhaven Port
<i>Do you consider the document to be:</i>	
Legally Compliant:	No
Sound:	No Not Justified Not Consistent with national policy
Representation:	Leave tide mills and beach alone, goes against environment protection and is unwanted. About time newhaven had a voice in council.
What changes do you suggest to make the document legally compliant or sound?	

Leave tidesmills alone.	
Do you consider it necessary to participate at the Examination in Public?	No
Why do you feel it is necessary to participate at the Examination in Public?	

Representation ID: REP/117/E1/BRepresentor Details:

Representor ID:	REP/117
Name:	Emma Creighton
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	E1 - Land at East Quay, Newhaven Port
<i>Do you consider the document to be:</i>	
Legally Compliant:	No
Sound:	No Not Justified Not Consistent with national policy
Representation: Leave tide mills alone	
What changes do you suggest to make the document legally compliant or sound? 	

Do you consider it necessary to participate at the Examination in Public?	No
Why do you feel it is necessary to participate at the Examination in Public?	

Representation ID: REP/117/SARepresentor Details:

Representor ID:	REP/117
Name:	Emma Creighton
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	Sustainability Appraisal
<i>Do you consider the document to be:</i>	
Legally Compliant:	No
Sound:	No Not Justified
Representation:	
Leave tide mills alone.	
What changes do you suggest to make the document legally compliant or sound?	

Do you consider it necessary to participate at the Examination in Public?	No
Why do you feel it is necessary to participate at the Examination in Public?	

Representation ID: REP/117/HRARepresentor Details:

Representor ID:	REP/117
Name:	Emma Creighton
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	Habitats Regulation Assessment
<i>Do you consider the document to be:</i>	
Legally Compliant:	No
Sound:	No Not Justified
Representation:	
I think a conservation report should be carried out on tide mills. There are a number of birds that frequent the area and could be harmed by a road through their natural habitat.	
What changes do you suggest to make the document legally compliant or sound?	
Scrap all plans for tide mills and listen to the local people instead of industry.	

Do you consider it necessary to participate at the Examination in Public?	No
Why do you feel it is necessary to participate at the Examination in Public?	

Representation ID: REP/118/GT01Representor Details:

Representor ID:	REP/118
Name:	Karen Crouch
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	GT01 - Land south of The Plough
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	
Representation: I am writing to express my serious concerns regarding the proposed traveller site here in our idyllic village where we work incredibly hard to pay and live here. I am absolutely furious on how this proposal has not been shared by yourselves, we heard by word of mouth, very underhand. This is a friendly village where our children play and the crime rate is virtually non existent, There would be lorries and trucks speeding through the village and our properties would de valuing. Please do find a site for the travellers but not in our village, somewhere similar to Bridies	

tan on the A27 is more suitable away from a lovely residential area.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public?

Why do you feel it is necessary to participate at the Examination in Public?

Hodgson, Lilly

From: Karen Crouch <[REDACTED]>
Sent: 24 September 2018 10:11
To: ldf
Subject: Proposed traveller site plumpton

Categories: LPP2 comment to code - stakeholder details have been added, LLPP2 comment to put on Inovem

Good morning

I am writing to express my serious concerns regarding the proposed traveller site here in our idyllic village where we work incredibly hard to pay and live here. I am absolutely furious on how this proposal has not been shared by yourselves, we heard by word of mouth, very underhand. This is a [REDACTED] friendly village where our children play and the crime rate is virtually non-existent, [REDACTED]. There would be lorries and trucks speeding through the village and our properties would [REDACTED] de valuing. Please do find a site for the travellers but not in our village, somewhere similar to Bridies tan on the A27 is more suitable away from a lovely residential area.

Regards

Karen crouch

Sent from my iPhone

Sent from my iPhone

Representation ID: REP/119/E1

Representor Details:

Representor ID:	REP/119
Name:	Katie Cunningham
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	E1 - Land at East Quay, Newhaven Port
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	
Representation:	<p>I am very disappointed by the E1 plans to build on the Tide Mills site at Newhaven.</p> <p>I strongly object to the developments for the following reasons:</p> <ul style="list-style-type: none"> - the new plans, only recently announced & some might say somewhat rushed, claim more of the site than was originally planned. Not only is this taking more precious local land, it is a beautiful sandy beach area. It will completely destroy this space for local people & tourists. Nobody will want to visit a beach with a massive cement factory so effectively this wonderful local resource is being taken away. - this site is crucial for local wildlife. The cement factory will pollute and destroy precious habitat. Tide Mills is an important part of the nature corridor of the South Downs. At a

time where there is an increased acknowledgement of the responsibility we have towards the wildlife we share the land with, it is ludicrous to be destroying habitat rather than building on already developed sites. Each year more species are lost forever. We can actually do something about this - so shouldn't we be doing what we can?;

- as one of the only points of contact from where the South Downs meets the sea, this site is of ecological & geological importance;

- increase of heavy traffic into Newhaven will put pressure on the already crowded roads & infrastructure;

- the views of local people have barely been taken into consideration. The people of Newhaven will have to endure the pollution, reduction in air quality, spoiling of a beach that has been enjoyed by local families for many years, whilst Lewes District Council look on & are not impacted by the developments at all.

You really are making life harder & harder for the people of Newhaven. Newhaven is an incredibly peaceful place & sanctuary for wildlife.

I am also very interested to hear what you are doing to improve air quality for people living in Newhaven? Having also overseen the building of an incinerator in Newhaven, the output of which is not seen in Lewes nor is the air breathed there, I do have to wonder at the reasons behind Newhaven being the chosen site for polluting industry that no one else wants on their doorstep. How much else can you put on one town?

If you would like to make money out of Newhaven how about actually helping to improve the town? Town planners have effectively killed the high street with a grim ring road that encircles the centre and ensures no one really shops there anymore. In these increasingly divisive times how about building links with France to attract French & other European tourists to the UK via Newhaven port? As the very first thing visitors will see, is a cement works really going to create a good impression of our lush green rolling hills of Southern England? We can do better than that!

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public?

Why do you feel it is necessary to participate at the Examination in Public?

From: Katie Cunningham [REDACTED]
Sent: 02 November 2018 20:39
To: ldf
Cc: caroline.lucas.mp@parliament.uk
Subject: E1

Categories: LPP2 comment to code - stakeholder details have been added

Dear Lewes District Council,

I am very disappointed by the E1 plans to build on the Tide Mills site at Newhaven.

I strongly object to the developments for the following reasons:

- the new plans, only recently announced & some might say somewhat rushed, claim more of the site than was originally planned. Not only is this taking more precious local land, it is a beautiful sandy beach area. It will completely destroy this space for local people & tourists. Nobody will want to visit a beach with a massive cement factory so effectively this wonderful local resource is being taken away.

- this site is crucial for local wildlife. The cement factory will pollute and destroy precious habitat. Tide Mills is an important part of the nature corridor of the South Downs. At a time where there is an increased acknowledgement of the responsibility we have towards the wildlife we share the land with, it is ludicrous to be destroying habitat rather than building on already developed sites. Each year more species are lost forever. We can actually do something about this - so shouldn't we be doing what we can?;

- as one of the only points of contact from where the South Downs meets the sea, this site is of ecological & geological importance;

- increase of heavy traffic into Newhaven will put pressure on the already crowded roads & infrastructure;

- the views of local people have barely been taken into consideration. The people of Newhaven will have to endure the pollution, reduction in air quality, spoiling of a beach that has been enjoyed by local families for many years, whilst Lewes District Council look on & are not impacted by the developments at all.

You really are making life harder & harder for the people of Newhaven. Newhaven is an incredibly peaceful place & sanctuary for wildlife.

I am also very interested to hear what you are doing to improve air quality for people living in Newhaven? Having also overseen the building of an incinerator in Newhaven, the output of which is not seen in Lewes nor is the air breathed there, I do have to wonder at the reasons behind Newhaven being the chosen site for polluting industry that no one else wants on their doorstep. How much else can you put on one town?

If you would like to make money out of Newhaven how about actually helping to improve the town? Town planners have effectively killed the high street with a grim ring road that encircles the centre and ensures no one really shops there anymore. In these increasingly divisive times how about building links with France to attract French & other European tourists to the UK via

Newhaven port? As the very first thing visitors will see, is a cement works really going to create a good impression of our lush green rolling hills of Southern England? We can do better than that!

Yours sincerely,
Katie Cunningham

A solid black rectangular box used to redact the signature of Katie Cunningham.

Representation ID: REP/120/GT01Representor Details:

Representor ID:	REP/120
Name:	Michael Currivan
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	GT01 - Land south of The Plough
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	
Representation:	
<p>I would like to register my opposition to the proposal to build a Gypsy/Traveller site in the village of Plumpton Green.</p> <p>I am not against housing or providing sites for gypsies or travellers, in fact I agree it should be pro-actively done. But the site must be suitable for the purpose.</p> <p>Siting a traveller site in a rural village where there are limited facilities is not a good idea. Plumpton Green is a rural village with one shop and two pubs. Putting a gypsy/traveller camp right next door to a rural pub is fraught with issues. [REDACTED]</p> <p>[REDACTED]. That is just a fact, regardless of the</p>	

'rights and wrongs' of the situation.

[REDACTED]

[REDACTED] should be sited in a town where there are facilities on their doorstep. Local towns such as Lewes, Burgess Hill or Haywards Heath would be far more suitable.

Therefore, I think this proposal needs revisiting and a better, more suitable, site found.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public?

Why do you feel it is necessary to participate at the Examination in Public?

Hodgson, Lilly

From: michael currivan <[REDACTED]>
Sent: 12 October 2018 21:29
To: ldf
Subject: Proposed Gypsy Camp at Plumpton Green

Categories: LPP2 comment to code - stakeholder details have been added

To Whom It May Concern,

I would like to register my opposition to the proposal to build a Gypsy/Traveller site in the village of Plumpton Green. I am not against housing or providing sites for gypsies or travellers, in fact I agree it should be pro-actively done. But the site must be suitable for the purpose.

Siting a traveller site in a rural village where there are limited facilities is not a good idea. Plumpton Green is a rural village with one shop and two pubs. Putting a gypsy/traveller camp right next door to a rural pub is fraught with issues.

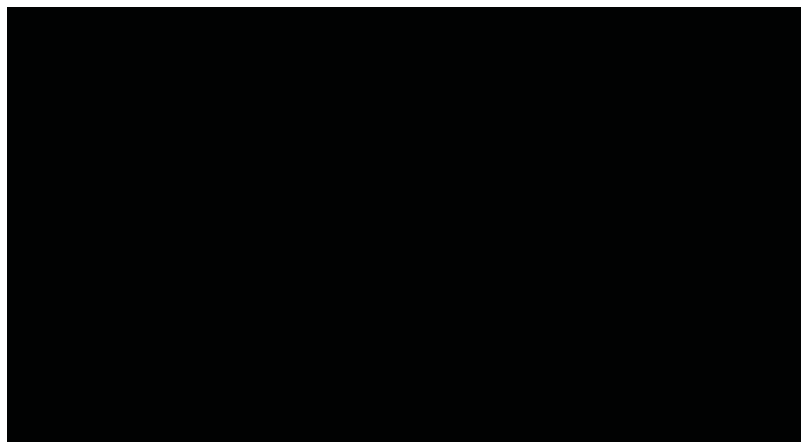
[REDACTED]
[REDACTED] That is just a fact, regardless of the 'rights and wrongs' of the situation.
[REDACTED]
[REDACTED].

They should be sited in a town where there are facilities on their doorstep. Local towns such as Lewes, Burgess Hill or Haywards Heath would be far more suitable.

Therefore, I think this proposal needs revisiting and a better, more suitable, site found.

Yours Sincerely,
Michael Currivan.

[2011 Census analysis - Office for National Statistics](#)



Representation ID: REP/121/GT01Representor Details:

Representor ID:	REP/121
Name:	Jamie and Alison Curtain
Organisation:	heat solutions sussex ltd
Consultation Body:	General
Stakeholder Type:	Local Business / employer

Agent Details:

Name:
Organisation:

Contact Details:

Email Address:	heatsolutionssussex@gmail.com
Address:	Unit 42, The Old Brickworks Plumpton Green Lewes East Sussex BN7 3DF

Representation:

Policy/Section:	GT01 - Land south of The Plough
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	
Representation:	
We are writing to object and voice our concerns regarding the proposed Gypsy site in Plumpton Green.	
We run a business serving the local community from the Old Brickworks adjacent to your proposed site.	
As you are aware there is major concerns [REDACTED]	

<p>██████████ due to the current soft boundary surrounding the premises.</p> <p>This is one of the reasons we chose this site due to its natural surroundings and peaceful location and feel if this proposal was to go ahead we would certainly have to relocate ██████████</p> <p>The proposal will have a negative impact on local economy as business will go elsewhere to other industrial parks and jobs will be lost in the local area.</p> <p>This is a Greenfield site and is currently a quiet rural location even the Old Brickworks is a very quiet industrial site, this will 100% be compromised with this proposed development.</p> <p>There can also be no assurances that the development could expand in years to come.</p> <p>Pedestrian access to the village is inadequate as is access to the site.</p> <p>Security fencing, cameras, lighting will all have to be installed around the perimeter of the business park which again will have a negative impact on this village.</p>
What changes do you suggest to make the document legally compliant or sound?
Do you consider it necessary to participate at the Examination in Public?
Why do you feel it is necessary to participate at the Examination in Public?

Representation ID: REP/122/GT01Representor Details:

Representor ID:	REP/122
Name:	Alison and Jamie Curtain
Organisation:	
Consultation Body:	General
Stakeholder Type:	Local Business / employer

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	Unit 42 The Old Brickworks Plumpton Green East Sussex BN7 3DF

Representation:

Policy/Section:	GT01 - Land south of The Plough
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	
Representation:	<p>I am writing with reference to the proposed Gypsy and Traveller Site, Ref GT01 - Land South of The Plough, Plumpton Green, Lewes.</p> <p>We run our solid fuel heating business from premises located at The Old Brickworks, bordering the proposed site. A business we have worked hard to build up over the last five years.</p>

We would like to list our objections and reasons why and hope you can understand our concerns.

* The proposed site is on valuable Green Belt Land, we feel Brownfield Land would be far more suitable.

* There is no infrastructure; Gas, Electricity, Drainage or Sewage.

* The site is located just over one mile from the village amenities, pedestrian access is limited with NO Pavement, NO Street lighting, on a 60 Mph Road limit.

* [REDACTED]

[REDACTED]. If plans go ahead we will be forced to relocate our business elsewhere.

[REDACTED]

Finally, can the council reassure residents the site will remain restricted to 5 pitches only should it go ahead?

Thank you for taking the time to read our objections, this will have an impact on our business so please can i ask you to consider carefully.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public?

Why do you feel it is necessary to participate at the Examination in Public?

Thea Davis

From: Jamie & Alison <heatsolutionssussex@gmail.com>
Sent: 19 October 2018 14:24
To: ldf
Subject: Proposed Gypsy Site in Plumpton Green

Categories: LPP2 comment to code - stakeholder details have been added

Dear Sir/Madam,

We are writing to object and voice our concerns regarding the proposed Gypsy site in Plumpton Green.

We run a business serving the local community from the Old Brickworks adjacent to your proposed site.

As you are aware there is major concerns [REDACTED]
[REDACTED] due to the current soft boundary surrounding the premises.

This is one of the reasons we chose this site due to its natural surroundings and peaceful location and feel if this proposal was to go ahead we would certainly have to relocate [REDACTED]
[REDACTED].

The proposal will have a negative impact on local economy as business will go elsewhere to other industrial parks and jobs will be lost in the local area.

This is a Greenfield site and is currently a quiet rural location even the Old Brickworks is a very quiet industrial site, this will 100% be compromised with this proposed development.

There can also be no assurances that the development could expand in years to come.

Pedestrian access to the village is inadequate as is access to the site.

[REDACTED] will all have to be installed around the perimeter of the business park which again will have a negative impact on this village.

Regards

Jamie & Alison Curtain



Heat Solutions Sussex Ltd

Unit 42

The Old Brickworks

Plumpton Green

East Sussex

BN7 3DF

01273 890222

www.heatsolutions-sussex.co.uk

Representation ID: REP/123/E1Representor Details:

Representor ID:	REP/123
Name:	Oliver Darlington
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	E1 - Land at East Quay, Newhaven Port
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	
Representation: I wish to register my opposition to any further development at Tide Mills, Newhaven. This area has been used for decades for public recreation and is the habitat for abundant wildlife. I have walked on it on numerous occasions since 1965. Developing it would destroy this tranquil environment completely.	
What changes do you suggest to make the document legally compliant or sound?	

Do you consider it necessary to participate at the Examination in Public?
Why do you feel it is necessary to participate at the Examination in Public?

Hodgson, Lilly

From: Oliver Darlington <[REDACTED]>
Sent: 31 October 2018 12:12
To: ldf
Subject: Tide Mills development

Categories: LPP2 comment to code - stakeholder details have been added

I wish to register my opposition to any further development at Tide Mills, Newhaven. This area has been used for decades for public recreation and is the habitat for abundant wildlife. I have walked on it on numerous occasions since 1965. Developing it would destroy this tranquil environment completely.

Oliver Darlington
[REDACTED]
[REDACTED]

You don't know what you've got ...



... till it's gone. Joni Mitchell

Representation ID: REP/124/E1Representor Details:

Representor ID:	REP/124
Name:	Cheryl Davies
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	E1 - Land at East Quay, Newhaven Port
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	
Representation: <p>I am really concerned regarding the above and even more development at Tide Mills. It does not seem to be part of the "clean, green, marine" vision of the enterprise zone or the renewable energy cluster of the port's masterplan.</p> <p>I don't think that the local Newhaven population have really been considered at all in this with the extra traffic and pollution that will be generated in the town. Pollution is a particular concern for me having had a close family relative die from asthma under the age of 40. Also there is already such a bad smell in that area of the port due to the what seems to be a sewerage plant. Will anyone want to work with that particularly in the</p>	

summer. Can constantly having to tolerate that be good for your health? Are Lewes District Council aware of how bad it gets?

Could you please send me confirmation that you have received this email please.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public?

Why do you feel it is necessary to participate at the Examination in Public?

From: Cheryl Davies <[REDACTED]>
Sent: 04 November 2018 23:38
To: ldf
Subject: Concerns regarding New policy E1

Categories: Vanessa to deal with

I am really concerned regarding the above and even more development at Tide Mills. It does not seem to be part of the “clean, green, marine” vision of the enterprise zone or the renewable energy cluster of the port’s masterplan.

I don’t think that the local Newhaven population have really been considered at all in this with the extra traffic and pollution that will be generated in the town. Pollution is a particular concern for me having had a close family relative die from asthma under the age of 40. Also there is already such a bad smell in that area of the port due to the what seems to be a sewerage plant. Will anyone want to work with that particularly in the summer. Can constantly having to tolerate that be good for your health? Are Lewes District Council aware of how bad it gets?

Could you please send me confirmation that you have received this email please.

Cheryl Davies
[REDACTED]

Representation ID: REP/125/E1

Representor Details:

Representor ID:	REP/125
Name:	Lynne Davies
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	E1 - Land at East Quay, Newhaven Port
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	No Not Justified Not Effective
Representation: Newhaven is a giant car park, any more development will gridlock the whole town affecting Seaford too. The whole Seaford/Tide Mills bay needs to be protected, therefore, no further building works along the shoreline should be made. The only sandy beach left in this area will be spoilt. Develop the town of Newhaven and there must be more brown field sites in the area without ruining the coastline.	
What changes do you suggest to make the document legally compliant or sound?	

Do you consider it necessary to participate at the Examination in Public?	No
Why do you feel it is necessary to participate at the Examination in Public?	

Representation ID: REP/126/E1Representor Details:

Representor ID:	REP/126
Name:	Chris Dawson
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	E1 - Land at East Quay, Newhaven Port
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	
Representation:	
<p>The area bounded by Tidemills, Mill Creek, the port and the sea should not be built on for two main reasons.</p> <p>It is a valuable amenity for the people of Newhaven and Seaford and an important area for resident and migrating birds.</p> <p>The proposed plan appears to allow about half this valuable area to be lost to possible future development.</p> <p>I personally spend a lot of time photographing the wildlife here and it is wonderful to see</p>	

so many linnets, stonechats, goldfinches, greenfinches, whitethroats, wrens, robins etc in such large numbers and all in one place, as well as rare visitors such as the red backed shrike.

If the area is developed as planned it will undoubtedly have an adverse affect on the less common birds that we see all around the creek and Tide Mills area, many stopping off on their migration. I have seen and photographed little egrets, turnstones, redshanks, avocets, kestrels, whimbrels, ringed plovers, grey herons, bar tailed godwits and many more. I am no expert but I love walking around this unspoiled area photographing the birds and learning about them. I understand that around 200 bird species have been recorded in the Tide Mills area.

I strongly object to the area being planned for future development as shown in Policy E1 on the above grounds.

A rare visitor photographed right in the middle of the proposed development area - a Red Backed Shrike:

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public?

Why do you feel it is necessary to participate at the Examination in Public?

From: Chris <[REDACTED]>
Sent: 24 October 2018 18:55
To: ldf
Subject: Reference: Policy E1

Categories: LPP2 comment to code - stakeholder details have been added

The area bounded by Tidemills, Mill Creek, the port and the sea should not be built on for two main reasons.

It is a valuable amenity for the people of Newhaven and Seaford and an important area for resident and migrating birds.

The proposed plan appears to allow about half this valuable area to be lost to possible future development.

I personally spend a lot of time photographing the wildlife here and it is wonderful to see so many linnets, stonechats, goldfinches, greenfinches, whitethroats, wrens, robins etc in such large numbers and all in one place, as well as rare visitors such as the red backed shrike.

If the area is developed as planned it will undoubtedly have an adverse affect on the less common birds that we see all around the creek and Tide Mills area, many stopping off on their migration. I have seen and photographed little egrets, turnstones, redshanks, avocets, kestrels, whimbrels, ringed plovers, grey herons, bar tailed godwits and many more. I am no expert but I love walking around this unspoiled area photographing the birds and learning about them. I understand that around 200 bird species have been recorded in the Tide Mills area.

I strongly object to the area being planned for future development as shown in Policy E1 on the above grounds.

A rare visitor photographed right in the middle of the proposed development area - a Red Backed Shrike:



Chris Dawson, [REDACTED]
[REDACTED]

Representation ID: REP/127/E1Representor Details:

Representor ID:	REP/127
Name:	Mary de Pleave
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	E1 - Land at East Quay, Newhaven Port
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	
Representation: <p>I object in the strongest manner to any industrialisation of the Tide Mills area. That such a thing could even be envisaged by the council is appalling. Newhaven suffers enough from pollution and the ecology suffers by such ill considered actions. It is an area giving pleasure, enjoyed by the locals for walking and relaxing. The usual ploy trotted out is that work is provided for the area and then we often find that this has been over-stated and weighs lightly against other more damaging aspects eg. pollution/poor air quality. I imagine also that the people who would vote for this don't live next door and are devoid of imagination. Commerce at the expense of vital, valuable aspects of our lives simply is</p>	

not worth it. I also wonder if councils ever take any notice of the people they represent.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public?

Why do you feel it is necessary to participate at the Examination in Public?

Hodgson, Lilly

From: Mary de Pleave <[REDACTED]>
Sent: 04 November 2018 08:24
To: ldf
Subject: REF: E1.

Categories: LPP2 comment to code - stakeholder details have been added

Dear Lewes Council, I object in the strongest manner to any industrialisation of the Tide Mills area. That such a thing could even be envisaged by the council is appalling. Newhaven suffers enough from pollution and the ecology suffers by such ill considered actions. It is an area giving pleasure, enjoyed by the locals for walking and relaxing. The usual ploy trotted out is that work is provided for the area and then we often find that this has been over-stated and weighs lightly against other more damaging aspects eg. pollution/poor air quality. I imagine also that the people who would vote for this don't live next door and are devoid of imagination. Commerce at the expense of vital, valuable aspects of our lives simply is not worth it. I also wonder if councils ever take any notice of the people they represent.

Sincerely,

Mary de Pleave

[REDACTED]

Representation ID: REP/128/E1

Representor Details:

Representor ID:	REP/128
Name:	Daniele de Winter
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	E1 - Land at East Quay, Newhaven Port
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	No Not Justified
Representation: <p>The Western End of Tide Mills and Seaford Bay is one of the few remaining unspoilt green areas close to the sea in the Newhaven area and is home to precious wildlife, both on land and in the sea. It is incredibly important that this wildlife be protected and preserved! According to Friends of The Earth the UK has lost over 70% of its rabbits, 75% of all songbirds and over 80% or all insects, to say nothing of honeybees, moles,</p>	

voles and other small wildlife in JUST 20 years. An environmental apocalypse is happening on our doorstep. While the poisonous chemicals used in mass agriculture appear largely to blame, these animals are also being robbed of their natural habitat, they literally have nowhere to live. It is becoming desperately urgent for Lewes & Eastbourne Council to treat protection of natural habitat and preservation of unspoilt, wild green spaces as an ABSOLUTE PRIORITY, up on the same level as clean air and clean water. You still have the chance to protect the Western End of Tide Mills and Seaford Bay from development and keep it green and unspoilt. Please, PLEASE do so.

What changes do you suggest to make the document legally compliant or sound?

To integrate the environmental and wildlife issues mentioned above into the key priorities and considerations of the planning process.

Do you consider it necessary to participate at the Examination in Public? Yes

Why do you feel it is necessary to participate at the Examination in Public?

To allow objective evaluation of all relevant issues.

Representation ID: REP/129/GT01Representor Details:

Representor ID:	REP/129
Name:	Roger Deakin
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	GT01 - Land south of The Plough
<i>Do you consider the document to be:</i>	
Legally Compliant:	No
Sound:	No
Representation: We wish to register our objections to this proposal. As long term village residents and having followed closely the development of the Neighbourhood Plan and the phenomenal amount of work that has taken place to complete it, this proposal is totally contrary to the agreed plan. The proposal does not respect the agreed village boundaries that contained any development to be within	

them, and so does not preserve the surrounding green spaces that the village established in the Neighbourhood Plan.

Further by agreeing to such a development in the outlying hamlet on a green field site, it would create a precedent for further planning permissions being submitted which would be difficult to refuse. Indeed other submissions for building outside the village boundary were turned down in the formulation of the Neighbourhood Plan.

What changes do you suggest to make the document legally compliant or sound?

There seems to have been no early communication or pre-consultation with the residents or Plumpton Parish Council, contrary to policy. The proposal introduces additional development not in any way compliant with the Neighbourhood Plan.

Do you consider it necessary to participate at the Examination in Public? No

Why do you feel it is necessary to participate at the Examination in Public?

Representation ID: REP/130/E1Representor Details:

Representor ID:	REP/130
Name:	Anthony Delaney
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	E1 - Land at East Quay, Newhaven Port
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	Yes
Representation:	
As I cannot paste into this box, my comments are in the box below - which allows me to paste. My changes come at the end of the comments.	
What changes do you suggest to make the document legally compliant or sound?	
The unused land in area E1 should not be developed. The land between E1 and the River Ouse is already in the first stage of development, and this should not be extended	

eastwards along the shore and back lands of Seaford Bay.

This area is one of the few locations where Newhaven residents and visitors have access to the beach and sea. The open land along Seaford Bay [including Tidemills] forms a natural break between Newhaven and Seaford. Half of the bay area has already been developed as Seaford town and the rest should be preserved as an area of farming, nature reserves, open beach for recreation, and the historically important site of Tidemills.

Development has progressed far enough. Organisations such as the Sussex Wildlife Trust, South Downs National Park, National Trust, Water Sports groups and Newhaven and Seaford town councils have consistently campaigned for the area to be kept as open for the uses already mentioned. Similar areas are few and far between along the E Sussex Coast.

Economic development of the Western end of Seaford Bay to a large degree contradict Management policies:-

which could create healthy and sustainable communities. Physical and mental well being are important aspects of any community and Newhaven has limited quantities of open space, especially close to the sea. The area E1, and its surrounds, qualify as part of the River Ouse, its margins, and associated Wetland, [as well as the relevant stretches of Beach]

[Policy DM18.].

These areas should be preserved for the people of Newhaven, and Lewes District, and visitors from further afield, to enjoy recreation, access to the sea, wildlife and 'Green Space'. This should also have applied to the land at the mouth of the Ouse, which is currently undergoing its first phase of development. Surely that development should be the limit to industrialisation of Seaford Bay.

CHANGES

- The land comprising area E1 should be left undeveloped, except for what is currently built up, and left open as a recreational / wildlife / nature resource to benefit the inhabitants of Newhaven and Lewes District.
- The value of this area as recreational land / nature reserves should be endorsed by local government and actively promoted for its attributes.
- As much of the land as possible should be incorporated into the South Downs National Park. Failing this it should be given local protection.

Do you consider it necessary to participate at the Examination in Public?

No

Why do you feel it is necessary to participate at the Examination in Public?

Representation ID: REP/131/E1

Representor Details:

Representor ID:	REP/131
Name:	Mike Deubert
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	E1 - Land at East Quay, Newhaven Port
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	
Representation:	<p>The proposal to extend the area proposed for further industrial expansion does not give sufficient importance to maintaining the overall tidemills area. This area of undeveloped foreshore is unique as being the only stretch of natural beach foreshore along the Sussex coast from Worthing to Eastbourne and beyond.</p> <p>It is therefore essential that any further development opportunities are removed from the proposed Local Plan to ensure that not only can the public continue to enjoy this very special piece of marine foreshore and for local residents, in particular those living at Bishopstone and the southern part of Seaford from the inevitable increase in pollution of air quality from increased commercial activity.</p>

It also appears to indicate in the Proposals, developement will probably extend to what appears to be around 50% of the entire foreshore between the eastern harbour breakwater and the Buckle, and would also finish very close to, if not abutting, the boundary with the National Park Boundary, which is totally inappropriate in an area of confirmed natural beauty and of great importance for birds and wildlife.

I therefor urge the Council to delete this proposal from the 10 year Plan. In hope that common sense and concern for retaining what little is left of a very special area prevails over and above the usual obsession with money as the only concern which seems to override everything these days.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public?

Why do you feel it is necessary to participate at the Examination in Public?

From: mike deubert <[REDACTED]>
Sent: 02 November 2018 19:07
To: ldf
Subject: Lewes District Local Plan, Newhaven, Port expansion in Tidemills Area

Categories: LPP2 comment to code - stakeholder details have been added

The proposal to extend the area proposed for further industrial expansion does not give sufficient importance to maintaining the overall tidemills area. This area of undeveloped foreshore is unique as being the only stretch of natural beach foreshore along the Sussex coast from Worthing to Eastbourne and beyond.

It is therefore essential that any further development opportunities are removed from the proposed Local Plan to ensure that not only can the public continue to enjoy this very special piece of marine foreshore and for local residents, in particular those living at Bishopstone and the southern part of Seaford from the inevitable increase in pollution of air quality from increased commercial activity.

It also appears to indicate in the Proposals, development will probably extend to what appears to be around 50% of the entire foreshore between the eastern harbour breakwater and the Buckle, and would also finish very close to, if not abutting, the boundary with the National Park Boundary, which is totally inappropriate in an area of confirmed natural beauty and of great importance for birds and wildlife.

I therefore urge the Council to delete this proposal from the 10 year Plan. In hope that common sense and concern for retaining what little is left of a very special area prevails over and above the usual obsession with money as the only concern which seems to override everything these days. M.J.Deubert, [REDACTED]

,

Representation ID: REP/132/E1Representor Details:

Representor ID:	REP/132
Name:	Shirley Deubert
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	E1 - Land at East Quay, Newhaven Port
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	
Representation:	
<p>I have read the above and am completely against the proposal to extend the area currently covered for Port and commercial use into the remaining Tidemills area..</p> <p>I see that the map on your document is unclear as to the extent of this proposal. - for example exactly how close is it to the area used by locals and visitors for walking , swimming, or just relaxing. .It is just some black lines on part of a map. We have dedicated residents who regularly keep the beach nearby clear of rubbish plastic itself. Dont we all deserve this. I used to swim in this area many years ago and back then it</p>	

was unsafe to sit on the beach because of oil. Dont let our special area be at risk to any pollution.

I visited the Tourist Office in Church Street Seaford to consult the map from which this proposal was taken. It was not available.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public?

Why do you feel it is necessary to participate at the Examination in Public?

Thea Davis

From: Shirley Deubert [REDACTED]
Sent: 02 November 2018 17:23
To: ldf
Subject: E1

Categories: LPP2 comment to code - stakeholder details have been added

Lewes District Plan Part 2 Tidemills

I have read the above and am completely against the proposal to extend the area currently covered for Port and commercial use into the remaining Tidemills area..

I see that the map on your document is unclear as to the extent of this proposal. - for example exactly how close is it to the area used by locals and visitors for walking , swimming, or just relaxing. .It is just some black lines on part of a map. We have dedicated residents who regularly keep the beach nearby clear of rubbish plastic itself. Dont we all deserve this. I used to swim in this area many years ago and back then it was unsafe to sit on the beach because of oil. Dont let our special area be at risk to any pollution.

I visited the Tourist Office in Church Street Seaford to consult the map from which this proposal was taken. It was not available.

sincerely Shirley Deubert [REDACTED]

Representation ID: REP/133/E1Representor Details:

Representor ID:	REP/133
Name:	Marilyn Dewberry
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	E1 - Land at East Quay, Newhaven Port
<i>Do you consider the document to be:</i>	
Legally Compliant:	No
Sound:	No Not Justified
Representation: The area and beach in this Tide Mills area is a Local wildlife area for nature and a pleasurable area for both leisure and exercise. It does not represent the clean green vision that was promised for this region and will not contribute to sustainable development and Newhaven does not need more traffic and air pollution as air quality in this town is already way above acceptable levels. The loss of biodiversity and concerns regarding rare vegetated shingle have been totally ignored.	

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public?	No
--	-----------

Why do you feel it is necessary to participate at the Examination in Public?

Representation ID: REP/134/GT01Representor Details:

Representor ID:	REP/134
Name:	Kirsty Dickie
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	GT01 - Land south of The Plough
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	
Representation:	
<p>These are my objections regarding LDC application for a Traveller site south of the Plough. GT01.</p> <p>* The land is sited at the lowest point on the sloping hill, which regularly pools with rain on the roadside and within the field. This is due to the high water table and clay soil type, resulting in flooded grass and muddy, bog surface several months in the year.</p> <p>2. Proposed sight is on a highway with a 60mph limit, regularly exceeded by cars at rush</p>	

hour,morning and evening. No provision for a pavement,making it very treacherous for any pedestrians to walk to the school,shop ,train station onto the village. This results in any residents being reliant on a car and endangering adult and child safety.

* No regular public transport infrastructure to allow residents travel to work,school,supermarket,chemist doctor or dentist. All necessary for adults and children.

* Destruction of a rural field and native hedgerow within a picturesque rural village and countryside.

* The need to look at brownfield sites where residents could be near a more regular transport infrastructure and employment opportunities,with road safety a high priority.

* A site that is located onto a public highway with street lighting and a pavement ,for safe access to and from their dwellings.

I hope all these points can be taken into consideration

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public?

Why do you feel it is necessary to participate at the Examination in Public?

Hodgson, Lilly

From: Kirsty Dickie [REDACTED]
Sent: 04 November 2018 23:56
To: ldf
Subject: Local plan part 2/ GT01 Land south of the Plough

Categories: GT01, Vanessa to deal with

These are my objections regarding LDC application for a Traveller site south of the Plough. GT01.

1. The land is sited at the lowest point on the sloping hill, which regularly pools with rain on the roadside and within the field. This is due to the high water table and clay soil type, resulting in flooded grass and muddy, bog surface several months in the year.

2. Proposed sight is on a highway with a 60mph limit, regularly exceeded by cars at rush hour, morning and evening. No provision for a pavement, making it very treacherous for any pedestrians to walk to the school, shop, train station onto the village. This results in any residents being reliant on a car and endangering adult and child safety.

3. No regular public transport infrastructure to allow residents travel to work, school, supermarket, chemist, doctor or dentist. All necessary for adults and children.

4. Destruction of a rural field and native hedgerow within a picturesque rural village and countryside.

5. The need to look at brownfield sites where residents could be near a more regular transport infrastructure and employment opportunities, with road safety a high priority.

6. A site that is located onto a public highway with street lighting and a pavement, for safe access to and from their dwellings.

I hope all these points can be taken into consideration,

Yours sincerely,
Kirsty Dickie.

[REDACTED]

Sent from my iPad

Representation ID: REP/135/DM2

Representor Details:

Representor ID:	REP/135
Name:	Ken Dijksman
Organisation:	Dijksman Planning (UK) LLP
Consultation Body:	General
Stakeholder Type:	Planning Consultant

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	DM2: Affordable Homes Exception Sites
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	No Not Positively Prepared Not Consistent with national policy
Representation:	<p>This policy is inconsistent with Paragraph 71 of the NPPF. This is a very positive National Government Policy that specifically urges Local Authorities to support the delivery of Entry Level homes (as defined within the 2016 Act) – The NPPF states:</p> <p>71. Local planning authorities should support the development of entry-level exception</p>

sites, suitable for first time buyers (or those looking to rent their first home), unless the need for such homes is already being met within the authority's area.

This places the burden upon the Local Authority to demonstrate that the need for entry level homes is already being met.

This Government policy does not require that such sites are justified based upon need, the need for them is assumed within the policy – it is for the decision maker to show that the need is 'already being met.' The policy does not require the applicant to demonstrate that the need has not been met, this is an important and distinctive element of this policy. It is positively worded and should be followed until the Council can demonstrate otherwise.

The wording of the proposed policy DM2 focusses upon rural sites, this emphasis does not appear in the NPPF. In addition, the proposed policy makes no mention of the key 'Starter Homes' element of the Government policy.

What changes do you suggest to make the document legally compliant or sound?

Policy DM2 needs to be re-worded to accord with the principles set out within the NPPF, to include Starter Homes as the key qualifying criteria, to delete the emphasis within the text upon rural exceptions, it relates to all settlements, and to delete the requirement to prove need, the NPPF puts the onus upon the Council to demonstrate that starter homes need has been met, or to allow such schemes – subject to usual design criteria and limitations as set out within the NPPF.

Do you consider it necessary to participate at the Examination in Public? Yes

Why do you feel it is necessary to participate at the Examination in Public?

Because the Council are seeking to reduce and undermine the positive effect of this Government Policy

Representation ID: REP/135/HSA

Representor Details:

Representor ID:	REP/135
Name:	Ken Dijksman
Organisation:	Dijksman Planning (UK) LLP
Consultation Body:	General
Stakeholder Type:	Planning Consultant

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	Housing Site Allocations
<i>Do you consider the document to be:</i>	
Legally Compliant:	No
Sound:	No
	Not Positively Prepared
	Not Effective
	Not Consistent with national policy
Representation:	
Neighbourhood plan responsibilities - The delegation of responsibility to 3 neighbourhood plans for the delivery of the housing allocations is in accordance with government advice. However, it is important that those neighbourhood plans fulfil the requirements set out within the part one local plan in terms of housing delivery and the	

achievement of the Strategic Objectives for that plan. In order to ensure that this occurs the Part 2 plan, (in specifying that the neighbourhood plans have taken responsibility), should set out the expectations and responsibilities which fall to be delivered by those three neighbourhood plans. Otherwise there is the genuine risk that the strategic objectives will not be fulfilled. Of particular concern is the delivery of affordable housing. With specific reference to Seaford the emerging neighbourhood plan is identifying mainly previously developed sites; several of which have been allocated in the past and have failed to come forward due to flooding and contamination issues. All the 'new' allocated sites could be developed without any change in policies as the proposed residential redevelopments would be in accordance with current policy, but this has not been viable to date, or it would have occurred. It is therefore highly unlikely that the 40% affordable housing goal set out within the part one plan will be achieved.

Affordable Housing - Therefore in order to be effective and positively prepared in the achievement of the strategic objectives set out within the part one plan this part two plan should direct the neighbourhood plans (to which it is delegating the allocation of sites) to deliver the necessary affordable housing provision as part of these allocations. It is not enough simply to draw attention to the fact that the allocation of sites is being delegated to neighbourhood plans. To be effective this part one plan should be more specific in its expectations bearing in mind the need to fulfil the strategic requirements set out within the part one plan. Core policy 1 Affordable Housing is of central importance to the part one plan and underpins the entire strategic housing policies. And yet the issue of affordable housing, and its delivery, does not feature within the part two plan in respect of the proposed neighbourhood plan allocations.

Timescales - Neighbourhood plans can take a considerable time to finalised and can on occasion grind to a halt. Therefore, this part two plan should specify expected timescales for delivery of both the neighbourhood plans and the allocations within them. For example, the emerging Seaford neighbourhood plan is allocating sites which have a history of non-delivery despite being in accordance with policy and subject of previous policy encouragement. It is therefore probable that the delivery will be slow or perhaps fail entirely. The part 2 plan should therefore set out what is expected in terms of the NDP allocations and if these fail to take place within a certain timeframe then a review of the part 2 to plan will be triggered in order to more effectively allocate the necessary sites. This is particularly important in respect of Seaford because it is a very large town with a reduced housing allocation due to the national park constraints. The housing allocation number was based upon a SHLAA that included modest expansions of the town on land outside the National Park, these have been deleted and there is therefore an obvious and strong likelihood that the housing allocations based upon redevelopment of existing sites will not take place within the plan period. As a result, the delivery of much-needed houses will not take place; including importantly the affordable housing which is central as a strategic requirement within the joint core strategy. The part 2 plan, to be positive and effectively prepared in accordance with the strategic priorities of the joint core strategy should recognise this potential problem and incorporate a mechanism for dealing with it.

Newlands School

Paragraph 2.12 of the draft plan refers to the recent permission for 183 dwellings of the former Newlands School site. This was a straightforward windfall development granted in accordance with current policies. It is being used as an excuse to not find space for 200 additional dwellings in locations to be determined as illustrated in table 3. This categorisation of a normal windfall site as an allocation within the local plan, after it has been granted permission, is unsound; it is unjustified and not a positive or effective response to the need to deliver more housing. Particularly in relation to large town which has very limited means of finding additional houses but there is a clear and obvious requirement for new homes based on the sheer size of the settlement, particularly in respect of affordable homes. Therefore, this categorisation of Newlands

School planning permission as an allocation site, after the event, is an unacceptable attempt to avoid the responsibilities of identifying suitable sites for the 200 dwellings 'to be determined' even though a significant proportion of these can be accommodated on sites on the edge of Seaford outside the National Park.

What changes do you suggest to make the document legally compliant or sound?

A policy should be written to set out the expectations and timescales related to the three neighbourhood plans which are being charged with the duty of housing allocations.

Specifically, this policy should require delivery of affordable housing in accordance with the strategic objectives of the joint core strategy, namely 40% of the total number dwellings.

The policy should set out realistic timescales for the adoption of the neighbourhood plans and evidence of delivery of the allocated sites within them.

This is particularly important for Seaford which has very limited housing allocations due to the constraints resulting from the surrounding National Park. These constraints have been exacerbated by the deletion of previously identified highly deliverable sites that were used in part to justify the proposed number of dwellings.

It should not be an option for the neighbourhood plan is to simply allocate sites that have no realistic prospect of coming forward whilst the part 2 plan remaining silent as to how this failure to deliver will be dealt with.

A policy should be worded to deal explicitly with this eventuality to ensure the delivery of the required number of houses and importantly the 40% of that number as affordable homes.

At least 50 of the 200 dwellings identified in table 3 as 'to be determined' should be added to the housing number allocated for Seaford because there is land available outside the National Park for this number of dwellings to be accommodated. The plan should be modified by deleting paragraph 2.12 and 2.13 as this is a mechanism for categorising a previous windfall site that already has permission as a new housing allocation in an emerging draft local plan.

Do you consider it necessary to participate at the Examination in Public?	Yes
Why do you feel it is necessary to participate at the Examination in Public?	
<p>I believe it is necessary to speak to the inspector at the examination to discuss in detail why it is important that delegation to neighbourhood plans the allocation of sites does not remove the need for some oversight of strategic priorities by the district Council, particularly in the difficult circumstances which arise where settlements are entirely surrounded by national park designation. The overall strategic priorities of the joint core strategy should be fully incorporated and reflected in the drafting of the park to plan, including in its delegation of responsibility for allocations to neighbourhood plans. In this context the delivery of affordable homes is of critical importance and should be discussed in detail in the examination.</p>	

Representation ID: REP/136/E1

Representor Details:

Representor ID:	REP/136
Name:	Johnny Dimond
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	E1 - Land at East Quay, Newhaven Port
<p><i>Do you consider the document to be:</i></p> <p>Legally Compliant:</p> <p>Sound:</p>	
<p>Representation:</p> <p>I have deep concerns regarding the development plans for the western reaches of Tidemills beach and the shingle vegetative hinterland thereof.</p> <p>This is an important wildlife area. Designated as a local wildlife site the development site it is part of a unique habitat.</p> <p>The "habitats regulation assessment" is totally misleading. Stating it will have no impact on protected areas may be true but the local wildlife site is not officially protected under these terms and it would of course be totally destroyed. It would reduce the all important wildlife corridor from the sea to the downland national park to a potentially unsustainable area.</p>	

As a local resident and I oppose the potential development of this area.

May I also say that the way it is presented I feel is purposefully opaque. It is not clear at all exactly where the development will be nor what form it will take. Lewes District Council should be representing their residents better than this.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public?

Why do you feel it is necessary to participate at the Examination in Public?

Hodgson, Lilly

From: Johnny Dimond [REDACTED]
Sent: 02 November 2018 17:11
To: ldf
Subject: Tidemills development plan

Categories: LPP2 comment to code - stakeholder details have been added

To whom it may concern,

I have deep concerns regarding the development plans for the western reaches of Tidemills beach and the shingle vegetative hinterland thereof.

This is an important wildlife area. Designated as a local wildlife site the development site it is part of a unique habitat.

The “habitats regulation assessment” is totally misleading. Stating it will have no impact on protected areas may be true but the local wildlife site is not officially protected under these terms and it would of course be totally destroyed. It would reduce the all important wildlife corridor from the sea to the downland national park to a potentially unsustainable area.

As a local resident and I oppose the potential development of this area.

May I also say that the way it is presented I feel is purposefully opaque. It is not clear at all exactly where the development will be nor what form it will take. Lewes District Council should be representing their residents better than this.

Yours faithfully,

Johnny Dimond

Representation ID: REP/137/GT01Representor Details:

Representor ID:	REP/137
Name:	Hilary Diver
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	GT01 - Land south of The Plough
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	
Representation:	
I am against the above proposal for the following reasons;	
* It is a quiet and well kept village and it is well known that which is not in keeping with the village.	
* It would be next to successful businesses at The Old Brickworks, which could have a detrimental effect on them or them relocating, hence jobs may be lost.	
* There is no pavement on either side of the road making it hazardous for both drivers and pedestrians alike.	

- | |
|---|
| <ul style="list-style-type: none">* Who and how is the site to be managed?* Has the land been sold to Lewes DC? By whom? |
| What changes do you suggest to make the document legally compliant or sound? |
| Do you consider it necessary to participate at the Examination in Public? |
| Why do you feel it is necessary to participate at the Examination in Public? |

Hodgson, Lilly

From: Hilary Diver <[REDACTED]>
Sent: 19 October 2018 19:22
To: ldf
Subject: Proposed Gypsy Site in Plumpton Green
Categories: LPP2 comment to code - stakeholder details have been added

Proposed Gypsy Site in Plumpton Green

I am against the above proposal for the following reasons;

1. It is a quiet and well kept village and it is well known that [REDACTED], which is not in keeping with the village.
2. It would be next to successful businesses at The Old Brickworks, which could have a detrimental effect on them [REDACTED] or them relocating, hence jobs may be lost.
3. There is no pavement on either side of the road making it hazardous for both drivers and pedestrians alike.
4. Who and how is the site to be managed?
5. Has the land been sold to Lewes DC? By whom?

Hilary Diver

[REDACTED]

Representation ID: REP/138/GT01Representor Details:

Representor ID:	REP/138
Name:	Beverley Downard
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	GT01 - Land south of The Plough
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	
Representation: I am writing to express my objection to the proposal to allocate Land south of The Plough for use as a permanent Gypsy Traveller site. The residents and members of Plumpton Parish Council have invested significant effort and funds over the last few years to develop a Neighbourhood Plan, clearly outlining planning boundaries and ensuring housing needs can be accommodated whilst	

maintaining the rural character of the village. This plan has been adopted.

The requirement for 5 additional permanent traveller sites, was not identified as a requirement to be considered as part of this planning process. In fact, the Parish Council was not made aware of this requirement, Policy GT01, until September 2018, with just a 6-week consultation period. This new requirement constitutes an additional 5 permanent dwellings, to those already provisioned by the neighbourhood plan on a site which is outside of the agreed planning boundary.

I wish to launch my objection to Policy GT01 on the following grounds:

- * Neighbourhood Plan - Policy GT01 is not in accordance with the Neighbourhood Plan, specifically it is outside the planning boundaries, it is a greenfield site and would not preserve the rural character of the hamlet. Introduces significant risk to the local economy, as business owners at the Brickworks are highly likely to relocate, removing a valuable source of income from the village shop, post office and public houses.

- * Location & suitability – this site was previously assessed as not suitable for residential development. Policy GT01 constitutes residential development, Gypsy Travellers should not be placed on a site considered unsuitable for traditional brick-built residences.

- * Safety – access to the site would be dangerous on foot as the road is busy with a national speed limit. Ingress and egress of the site by car, would be dangerous too due to the speeds of vehicles along the road. I have witnessed 2 accidents and many more near misses near the entrance to the Brick Works over the last few years.

- * Containment – the proposed site would be located next to the remainder of the field which would be extremely difficult to secure to prevent overflow by unauthorised travellers. Expansion of the proposed site to meet any future increased requirements is also a concern in that it would further affect the rural character of the hamlet.

- * Loss of dark skies - due to lighting required to ensure the security of the tenants.

I find it hard to believe that a suitable alternative site is not available within the district, as inspection of the LDC Brownfield site register appears to show a number of available locations in the Newhaven & Seaford areas. These locations would in my opinion provide far more suitable sites for the Gypsy Traveller community, much closer to services and amenities with more frequent and reliable transport links. However, I suspect that LDC will seek to prioritise commercial gain by selling these sites for development over the consideration of the needs of the Gypsy Traveller community.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public?

Why do you feel it is necessary to participate at the Examination in Public?

From: [REDACTED]
Sent: 02 November 2018 21:25
To: ldf
Cc: [REDACTED]
Subject: Lewes District Local Plan Part 2 Site Allocations and Development Management Policies Consultation

Categories: LPP2 comment to code - stakeholder details have been added



Planning Policy Team
Lewes District Council
Southover House
Southover Road
Lewes
East Sussex
BN7 1AB 2nd November 2018

RE: Lewes District Local Plan Part 2 Site Allocations and Development Management Policies Consultation - Pre-submission version Policy GT01 - Land south of The Plough

Dear Sir/ Madam

I am writing to express my objection to the proposal to allocate Land south of The Plough for use as a permanent Gypsy Traveller site.

The residents and members of Plumpton Parish Council have invested significant effort and funds over the last few years to develop a Neighbourhood Plan, clearly outlining planning boundaries and ensuring housing needs can be accommodated whilst maintaining the rural character of the village. This plan has been adopted.

The requirement for 5 additional permanent traveller sites, was not identified as a requirement to be considered as part of this planning process. In fact, the Parish Council was not made aware of this requirement, Policy GT01, until September 2018, with just a 6-week consultation period. This new requirement constitutes an additional 5 permanent dwellings, to those already provisioned by the neighbourhood plan on a site which is outside of the agreed planning boundary.

I wish to launch my objection to Policy GT01 on the following grounds:

- **Neighbourhood Plan** - Policy GT01 is **not in accordance with the Neighbourhood Plan**, specifically it is outside the planning boundaries, it is a greenfield site and would not preserve the rural character of the hamlet. Introduces significant risk to the local economy, as business owners at the Brickworks are highly likely to relocate, removing a valuable source of income from the village shop, post office and public houses.
- **Location & suitability** – this site was previously assessed as **not suitable for residential development**. Policy GT01 constitutes residential development, Gypsy Travellers should not be placed on a site considered unsuitable for traditional brick-built residences.

- **Safety** – access to the site would be **dangerous** on foot as the road is busy with a national speed limit. Ingress and egress of the site by car, would be **dangerous** too due to the speeds of vehicles along the road. I have witnessed 2 accidents and many more near misses near the entrance to the Brick Works over the last few years.
- **Containment** – the proposed site would be located next to the remainder of the field which would be extremely difficult to secure to prevent overflow by **unauthorised travellers**. Expansion of the proposed site to meet any future increased requirements is also a concern in that it would further affect the rural character of the hamlet.
- **Loss of dark skies** - due to lighting required to ensure the **security of the tenants**.

I find it hard to believe that a suitable alternative site is not available within the district, as inspection of the LDC Brownfield site register appears to show a number of available locations in the Newhaven & Seaford areas. These locations would in my opinion provide far more suitable sites for the Gypsy Traveller community, much closer to services and amenities with more frequent and reliable transport links. However, I suspect that LDC will seek to prioritise commercial gain by selling these sites for development over the consideration of the needs of the Gypsy Traveller community.

Yours sincerely

Beverley Downard

[REDACTED]

Representation ID: REP/139/GT01
--

Representor Details:

Representor ID:	REP/139
Name:	John Downard
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	GT01 - Land south of The Plough
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	
Representation:	<p>I wish to formally object to the proposal to allocate Land south of The Plough (Plumpton) for use as a permanent Gypsy Traveller site.</p> <p>Plumpton Parish Council worked diligently to produce, and have adopted, a Neighbourhood Plan, to ensure housing needs could be accommodated whilst maintaining the rural character of the village, this proposal is not in harmony with that plan. Had the Parish Council and Plumpton residents had reasonable notice, of the additional requirement to accommodate a site for travellers, during the plan drafting</p>

phase it is conceivable that it may have been possible to integrate this need alongside new housing developments.

It is my opinion that the identified site is wholly unsuitable on the following grounds:

- This is a green field rural site, there is no need to consume agricultural or grazing land for mobile home pitches, a repurposed brown field site would likely to be closer to amenities and be much better use of space.
- I believe that it is expected that the residents of the proposed traveller site will attend local schools, none of these schools are within reasonable walking distance and would require further vehicle traffic at drop off and collections times.
- No footpath exists from the proposed site to the heart of the village and it is unlikely that families would consider it practical to walk this distance to schools or the village shop. The option to create a foot path in the opposite direction to the bus stop near the Plough pub will be of little use given the infrequency of the bus service.
- There are safety concerns with residents choosing to walk to the village, necessarily on the road, with oncoming traffic traveling at up to 60MPH.
- Egress from the site, particularly for vehicles towing caravans, will be hazardous with other traffic approaching at speed.
- Whether founded or not, local business are expressing concerns for the [REDACTED] [REDACTED] and have indicated that they would relocate and incur the cost and inconvenience of so doing rather tolerate a perceived increased risk. This will result in loss of local employment.

I hope that these views will be considered in the approval process for this site.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public?

Why do you feel it is necessary to participate at the Examination in Public?

From: John Downard <[REDACTED]>
Sent: 04 November 2018 19:07
To: ldf
Subject: Lewes District Local Plan Part 2 Site Allocations and Development Management Policies Consultation

Categories: LPP2 comment to code - stakeholder details have been added



Planning Policy Team
Lewes District Council
Southover House
Southover Road
Lewes
East Sussex
BN7 1AB

4th November 2018

RE: Lewes District Local Plan Part 2 Site Allocations and Development Management Policies Consultation - Pre-submission version Policy GT01 - Land south of The Plough

Dear Sir/ Madam

I wish to formally object to the proposal to allocate Land south of The Plough (Plumpton) for use as a permanent Gypsy Traveller site.

Plumpton Parish Council worked diligently to produce, and have adopted, a Neighbourhood Plan, to ensure housing needs could be accommodated whilst maintaining the rural character of the village, this proposal is not in harmony with that plan. Had the Parish Council and Plumpton residents had reasonable notice, of the additional requirement to accommodate a site for travellers, during the plan drafting phase it is conceivable that it may have been possible to integrate this need alongside new housing developments.

It is my opinion that the identified site is wholly unsuitable on the following grounds:

- This is a green field rural site, there is no need to consume agricultural or grazing land for mobile home pitches, a repurposed brown field site would likely to be closer to amenities and be much better use of space.
- I believe that it is expected that the residents of the proposed traveller site will attend local schools, none of these schools are within reasonable walking distance and would require further vehicle traffic at drop off and collections times.
- No footpath exists from the proposed site to the heart of the village and it is unlikely that families would consider it practical to walk this distance to schools or the village shop. The option to create a foot path in the opposite direction to the bus stop near the Plough pub will be of little use given the infrequency of the bus service.
- There are safety concerns with residents choosing to walk to the village, necessarily on the road, with oncoming traffic traveling at up to 60MPH.

- Egress from the site, particularly for vehicles towing caravans, will be hazardous with other traffic approaching at speed.
- Whether founded or not, local business are expressing concerns for [REDACTED] [REDACTED] and have indicated that they would relocate and incur the cost and inconvenience of so doing rather tolerate a perceived increased risk. This will result in loss of local employment.

I hope that these views will be considered in the approval process for this site.

Yours sincerely

John Downard

Representation ID: REP/140/E1Representor Details:

Representor ID:	REP/140
Name:	Bob Downing
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	E1 - Land at East Quay, Newhaven Port
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	
Representation:	<p>I am writing to object to Policy E1 proposed in the consultation papers as published on the Council website, which seeks to have a marked area of land allocated for use as an Employment Site, as below. I believe the Policy as expressed to be wholly flawed and completely unnecessary.</p> <p>* The map of the area to be affected (above) shows that the Council seeks to enclose a substantial part of the former railway goods yard south of Mill Creek, between the</p>

pedestrian footbridge and Tide Mills. This area is criss-crossed by footpaths used by many people for leisure and recreation, and particularly to get to the only partially-sandy stretch of beach in the area, since the Newhaven Port Authority decided to close public access to the West Beach some years ago. The map provided and the preamble make no mention of this current usage.

* The primary footpath from / into Beach Road – identified as Footpath 7a on a plan of the final stages of the Port Access Road – is neither indicated nor considered. It has already been diverted once from its original route (directly from the footbridge over Mill Creek to the beach), around the employment/industrial unit shown on the Council plan. It is unclear whether the path would be simply blocked off along the northern boundary of E1, thus rendering the Mill Creek footbridge redundant, or diverted once again around the north and east boundary. If the latter is intended, the Council will have increased the distance from Beach Road to beach by a factor of approximately 4.

* Twittens are a familiar feature of Newhaven and Seaford. The past failure of LDC to insist that Footpath 7a should remain, as a twitten between the two sites, should not be seen as a precedent; extending the diversion around E1 is not an acceptable proposal.

* The proposed E1 zone already includes (north-west portion) an industrial unit, which provides employment. Unless the purpose of including it within E1 is to grant the Council retrospective permission for having granted planning permission for such a site on such land, then it obviously does not belong in this proposal.

* The proposal as illustrated omits all mention of the Port Access Road, which will terminate in a roundabout slap bang in the middle of E1. LDC must already know that this will happen, and that much of the site will be entirely changed by this. A roundabout and whatever roads (designed for heavy goods vehicles and therefore substantial) lead off it cannot be deemed to offer "employment" to anyone, apart from occasional brief visits by ESCC Highways maintenance teams.

* The south-west part of the proposed E1 is to be turned into a 3½ha nature reserve by the NPP, under the terms of LW/15/0034. Unless LDC has separately agreed to release the NPP from this obligation, designating a previously agreed nature reserve as an employment site is self-contradictory and very badly thought out.

* The remaining land indicated – ie not already built on, destined to become a wildlife reserve or to be buried under roadworks – is far too small to merit special designation, unless the entire purpose of Policy E1 is merely to tick boxes. This remaining land is also unsuitable for development by such smaller enterprises as might be able to fit into the remaining spaces, as each would have to have expensive deep foundations, probably ruling them out on cost grounds alone. The land is undulating and mostly unstable shingle; the adjacent port aggregates development is having to have work done to raise its surface above possible flood levels, as well as include piling through to solid ground. E1 is only partially protected from flooding by a bank along the Mill Creek, but anticipated sea-level rise would threaten it from the seaward side. To summarise, it is wholly unsuitable for anything other than large-scale development, for which there will simply be no room. It is a non-starter, and therefore pointless.

* The drawing includes a specific kink in its southern (beach) border, which takes in part of the former seaplane base. There is nothing on the ground at this point to warrant this. Nor is there any clear reason for determining the eastern border. Arbitrary lines on maps are unacceptable and must be justified.

* What the proposal map does show is a threat to the remaining land between E1 (or the Port Access Road) and Tide Mills south of Mill Creek. If the Council does intend to take powers to permit further eastward development of the shoreline for employment / industrial use, then it should come clean now and say so.

* The Council ought to be well aware of the sensitive location of E1. It almost borders the South Downs National Park and the Ouse Estuary Nature Reserve; only the topography of the railway and Mill Creek prevent this, and the beach there is widely seen as both a part of the valuable coastal environment and a green buffer zone between Newhaven, Bishopstone and Seaford. The Friends of Tide Mills (who, together with the SDNP maintain wildlife "refuge logs" within the proposed E1) have recently testified that the numbers of visitors continues to increase, and that it is a significant site for bird watchers – and therefore birds which are relatively rare. The complete lack of sensitivity shown in the proposal (regardless of its imminent demise under concrete and tarmac) is unacceptable.

A rather more realistic plan of what is already happening and is about to happen to the site in the wretchedly badly presented E1 proposal would be something like this: (See Map attached via full response attached below)

I very much hope that future Policy and Planning-related proposals will demonstrate a recognition of the complete situation surrounding any given piece of land, and not waste the time of both the team itself and Councillors and members of the public by proposing ideas which are unrealistic and divorced from reality.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public?

Why do you feel it is necessary to participate at the Examination in Public?

Thea Davis

From: Bob Downing <[REDACTED]>
Sent: 23 October 2018 16:41
To: ldf
Subject: Proposed Policy E1
Attachments: PortAccessRoad.pdf; LDC PolicyE1.docx

Categories: LPP2 comment to code - stakeholder details have been added

Dear Team,

Please find enclosed my objection to your proposed Policy E1 (Land in Newhaven).
The PDF also enclosed is referred to in the document.

(No, I didn't wish to comment online as it strikes me as silly to have to register again in order to login simply because the IT people merging LDC and EBC lost all the existing registrations!)

Regards,

Bob Downing

[REDACTED]



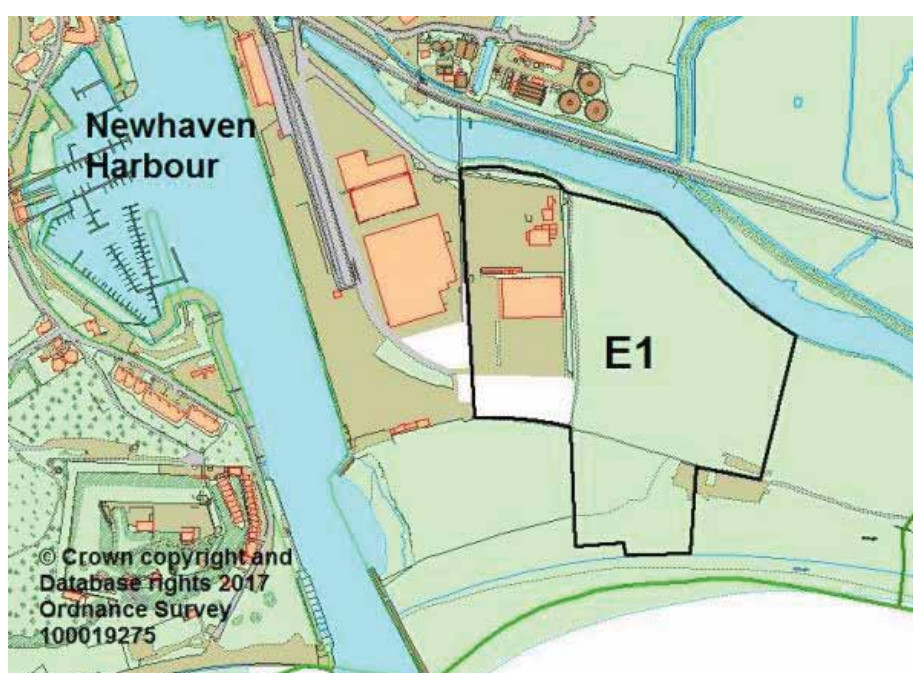
Planning Policy Team
[ldf@lewes.gov.uk]
Lewes District Council

23 October 2018

Dear Policy Team,

LEWES DISTRICT LOCAL PLAN, PART 2 – POLICY E1 - LAND AT EAST QUAY, NEWHAVEN PORT

I am writing to object to Policy E1 proposed in the consultation papers as published on the Council website, which seeks to have a marked area of land allocated for use as an Employment Site, as below. I believe the Policy as expressed to be wholly flawed and completely unnecessary.



- The map of the area to be affected (above) shows that the Council seeks to enclose a substantial part of the former railway goods yard south of Mill Creek, between the pedestrian footbridge and Tide Mills. This area is criss-crossed by footpaths used by many people for leisure and recreation, and particularly to get to the only partially-sandy stretch of beach in the area, since the Newhaven Port Authority decided to close public access to the West Beach some years ago. The map provided and the preamble make no mention of this current usage.
- The primary footpath from / into Beach Road – identified as Footpath 7a on a plan of the final stages of the Port Access Road ¹ – is neither indicated nor considered. It has already been diverted once from its original route (directly from the footbridge over Mill Creek to the beach), around the employment/industrial unit shown on the Council plan. It is unclear whether the path would be simply blocked off along the northern boundary of E1, thus rendering the Mill Creek footbridge redundant, or diverted once again around the north and east boundary. If the latter is intended, the Council will have increased the distance from Beach Road to beach by a factor of approximately 4.

¹ See separate enclosure

- Twittens are a familiar feature of Newhaven and Seaford. The past failure of LDC to insist that Footpath 7a should remain, as a twitten between the two sites, should not be seen as a precedent; extending the diversion around E1 is not an acceptable proposal.
- The proposed E1 zone already includes (north-west portion) an industrial unit, which provides employment. Unless the purpose of including it within E1 is to grant the Council retrospective permission for having granted planning permission for such a site on such land, then it obviously does not belong in this proposal.
- The proposal as illustrated omits all mention of the Port Access Road, which will terminate in a roundabout slap bang in the middle of E1. LDC must already know that this will happen, and that much of the site will be entirely changed by this. A roundabout and whatever roads (designed for heavy goods vehicles and therefore substantial) lead off it cannot be deemed to offer “employment” to anyone, apart from occasional brief visits by ESCC Highways maintenance teams.
- The south-west part of the proposed E1 is to be turned into a 3½ha nature reserve by the NPP, under the terms of LW/15/0034. Unless LDC has separately agreed to release the NPP from this obligation, designating a previously agreed nature reserve as an employment site is self-contradictory and very badly thought out.
- The remaining land indicated – ie not already built on, destined to become a wildlife reserve or to be buried under roadworks – is far too small to merit special designation, unless the entire purpose of Policy E1 is merely to tick boxes. This remaining land is also unsuitable for development by such smaller enterprises as might be able to fit into the remaining spaces, as each would have to have expensive deep foundations, probably ruling them out on cost grounds alone. The land is undulating and mostly unstable shingle; the adjacent port aggregates development is having to have work done to raise its surface above possible flood levels, as well as include piling through to solid ground. E1 is only partially protected from flooding by a bank along the Mill Creek, but anticipated sea-level rise would threaten it from the seaward side. To summarise, it is wholly unsuitable for anything other than large-scale development, for which there will simply be no room. It is a non-starter, and therefore pointless.
- The drawing includes a specific kink in its southern (beach) border, which takes in part of the former seaplane base. There is nothing on the ground at this point to warrant this. Nor is there any clear reason for determining the eastern border. Arbitrary lines on maps are unacceptable and must be justified.
- What the proposal map does show is a threat to the remaining land between E1 (or the Port Access Road) and Tide Mills south of Mill Creek. If the Council does intend to take powers to permit further eastward development of the shoreline for employment / industrial use, then it should come clean now and say so.
- The Council ought to be well aware of the sensitive location of E1. It almost borders the South Downs National Park and the Ouse Estuary Nature Reserve; only the topography of the railway and Mill Creek prevent this, and the beach there is widely seen as both a part of the valuable coastal environment and a green buffer zone between Newhaven, Bishopstone and Seaford. The Friends of Tide Mills (who, together with the SDNP maintain wildlife “refuge logs” within the proposed E1) have recently testified that the numbers of visitors continues to increase, and that it is a significant site for bird watchers – and therefore birds which are relatively rare. The complete lack of sensitivity shown in the proposal (regardless of its imminent demise under concrete and tarmac) is unacceptable.

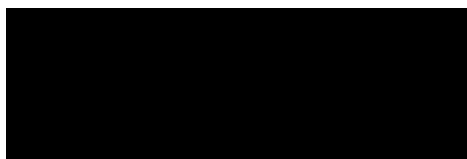
A rather more realistic plan of what is already happening and is about to happen to the site in the wretchedly badly presented E1 proposal would be something like this:



Via email

I very much hope that future Policy and Planning-related proposals will demonstrate a recognition of the complete situation surrounding any given piece of land, and not waste the time of both the team itself and Councillors and members of the public by proposing ideas which are unrealistic and divorced from reality.

Yours sincerely,

A large black rectangular box used to redact the signature of Bob Downing.

Bob Downing

Representation ID: REP/141/GT01/A
--

Representor Details:

Representor ID:	REP/141
Name:	Josephine and Eddie Dubber
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	GT01 - Land south of The Plough
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	No Not Justified Not Effective
Representation:	<p>Plumpton Green is a small village environment at the entrance to the National Park and surrounded by green belt with unspoilt views to the south downs. This field was specifically excluded from the Neighbourhood plan. It is at the village entrance and building here would destroy open spaces. Multiple parked and mobile caravans would</p>

spoil the view, the rural character and impact on the narrow roads within a five mile radius of the village. There are no footpaths into the village, street lighting or infrastructure to support a travelling community (or any residential use). This site has potential to expand significantly over time especially as there is no agreement has yet been made with the landowner. It would be difficult to maintain and manage with local council teams and enforcement authorities located miles away. the entrance is at the foot of a hill and towing traffic moving onto a narrow busy road would be dangerous. The site would also damage the local economy as 21 businesses on the adjacent site have indicated they would relocate away from Plumpton as [REDACTED]

What changes do you suggest to make the document legally compliant or sound?

Reject the use of this site under the plan and find an alternative brownfield site with the correct infrastructure to support a transient community.

Do you consider it necessary to participate at the Examination in Public?

No

Why do you feel it is necessary to participate at the Examination in Public?

Representation ID: REP/141/GT01/BRepresentor Details:

Representor ID:	REP/141
Name:	Josephine and Eddie Dubber
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	GT01 - Land south of The Plough
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	
Representation:	
<p>We have submitted a comment on the website but not sure that the full content registered or whether I entered correctly:</p> <p>Our comments are</p> <p>Plumpton Green is a small village environment at the entrance to the National Park and surrounded by green belt with unspoilt views to the south downs. This field was</p>	

specifically excluded from the Neighbourhood plan. It is at the village entrance and building here would destroy open spaces. Multiple parked and mobile caravans would spoil the view, the rural character and impact on the narrow roads within a five mile radius of the village. There are no footpaths into the village, street lighting or infrastructure to support a travelling community (or any residential use). This site has potential to expand significantly over time especially as there is no agreement has yet been made with the landowner. It would be difficult to maintain and manage with local council teams and enforcement authorities located miles away. the entrance is at the foot of a hill and towing traffic moving onto a narrow busy road would be dangerous. The site would also damage the local economy as 21 businesses on the adjacent site have indicated they would relocate away from Plumpton as they see their properties at risk especially with no local policing

What changes do you suggest to make the document legally compliant or sound?

Reject the use of this site under the plan and find an alternative brownfield site with the correct infrastructure to support a transient community

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public?

Why do you feel it is necessary to participate at the Examination in Public?

Hodgson, Lilly

From: Jo Dubber [REDACTED]
Sent: 01 November 2018 20:06
To: ldf
Subject: Proposed Gypsy site in Plumpton Green

Categories: LPP2 comment to code - stakeholder details have been added

Dear Planning Policy Team, LDC

We have submitted a comment on the website but not sure that the full content registered or whether I entered correctly:

Our comments are

Plumpton Green is a small village environment at the entrance to the National Park and surrounded by green belt with unspoilt views to the south downs. This field was specifically excluded from the Neighbourhood plan. It is at the village entrance and building here would destroy open spaces. Multiple parked and mobile caravans would spoil the view, the rural character and impact on the narrow roads within a five mile radius of the village. There are no footpaths into the village, street lighting or infrastructure to support a travelling community (or any residential use). This site has potential to expand significantly over time especially as there is no agreement has yet been made with the landowner. It would be difficult to maintain and manage with local council teams and enforcement authorities located miles away. the entrance is at the foot of a hill and towing traffic moving onto a narrow busy road would be dangerous. The site would also damage the local economy as 21 businesses on the adjacent site have indicated they would relocate away from Plumpton as they see their properties at risk especially with no local policing

What changes do you suggest to make the document legally compliant or sound?	Reject the use of this site under the plan and find an alternative brownfield site with the correct infrastructure to support a transient community
--	---

Eddie and Jo Dubber
[REDACTED]

Representation ID: REP/142/E1Representor Details:

Representor ID:	REP/142
Name:	Martyn Dunne
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:
Organisation:

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	E1 - Land at East Quay, Newhaven Port
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	
Representation: I wish to raise my concerns regarding the proposed new policy (E1 of the Lewes District Local Plan). I understand that by law local plans must "contribute to sustainable development" and am concerned that there is no guarantee that any development on this site would be sustainable especially given the distinct probability of sea-level rises in the not too distant future. If the area is industrialised and floods surely there is a clear risk of serious pollution both to the internationally rare vegetated shingle and the local marine environment? Inevitably there would be increased traffic, especially lorries, adding to local air pollution.	

Has the possibility been considered that ,post Brexit, many more lorries may use the ferry at newhaven to avoid the log-jams at Dover, which would make the additional burden on the roads of lorries going to the proposed industrial area even worse?

I live in Lewes but enjoy taking my dog for a walk in the Tidemills area I am concerned that the proposed new development would impact upon this.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public?

Why do you feel it is necessary to participate at the Examination in Public?

From: Martyn Dunne <[REDACTED]>
Sent: 04 November 2018 15:34
To: ldf
Subject: Re: Consultation on new policy - E1. of the Lewes District Local Plan.

Categories: LPP2 comment to code - stakeholder details have been added

Hello,

I wish to raise my concerns regarding the proposed new policy (E1 of the Lewes District Local Plan). I understand that by law local plans must "contribute to sustainable development" and am concerned that there is no guarantee that any development on this site would be sustainable especially given the distinct probability of sea-level rises in the not too distant future. If the area is industrialised and floods surely there is a clear risk of serious pollution both to the internationally rare vegetated shingle and the local marine environment?

Inevitably there would be increased traffic, especially lorries, adding to local air pollution. Has the possibility been considered that, post Brexit, many more lorries may use the ferry at Newhaven to avoid the log-jams at Dover, which would make the additional burden on the roads of lorries going to the proposed industrial area even worse?

I live in Lewes but enjoy taking my dog for a walk in the Tidemills area. I am concerned that the proposed new development would impact upon this.

Regards
Martyn Dunne

Representation ID: REP/143/E1Representor Details:

Representor ID:	REP/143
Name:	Barbara Dye
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	E1 - Land at East Quay, Newhaven Port
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	
Representation: I am shocked and disgusted that LDC are even considering development between Tide Mills and the area to which ESCC have already given planning consent. The remaining area is a valuable resource for wildlife and for local people and visitors. It should be managed in perpetuity as such and in no circumstances developed at any time. One of the attractions of this area has always been the comparatively "wild" green lung between Seaford and Newhaven. Last week we walked with some visitors who	

have been coming here for nearly 40 years. They greeted the news of the plans with utter disbelief - and the comment that Lewes District Councillors are a bunch of Philistines to be even considering the idea.

Hopefully the council will see sense before it's too late.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public?

Why do you feel it is necessary to participate at the Examination in Public?

Hodgson, Lilly

From: Barbara Dye <[REDACTED]>
Sent: 05 November 2018 10:14
To: ldf
Subject: East Beach and Tide Mills

Categories: Vanessa to deal with

I am shocked and disgusted that LDC are even considering development between Tide Mills and the area to which ESCC have already given planning consent.

The remaining area is a valuable resource for wildlife and for local people and visitors. It should be managed in perpetuity as such and in no circumstances developed at any time. One of the attractions of this area has always been the comparatively "wild" green lung between Seaford and Newhaven. Last week we walked with some visitors who have been coming here for nearly 40 years. They greeted the news of the plans with utter disbelief - and the comment that Lewes District Councillors are a bunch of Philistines to be even considering the idea.

Hopefully the council will see sense before it's too late.

Barbara Dye
[REDACTED]
[REDACTED]
[REDACTED]

Representation ID: REP/144/E1Representor Details:

Representor ID:	REP/144
Name:	Robert Eade
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	E1 - Land at East Quay, Newhaven Port
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	Yes Not Justified
Representation:	See below.
What changes do you suggest to make the document legally compliant or sound?	
Tide Mills and the surrounding area is such an important area for local wildlife, already severely damaged by the plans that have been given the go ahead already. It is very	

important that nature, for once, is given priority in the area. Many rare creatures have been seen there in recent years and many nest there.

This is also one of the few areas locally where people with mobility problems can walk as it is flat, as well as being in the countryside. Every day Tide Mills is used by many people for exercise and any further damage to the area would be a great loss to all concerned.

Do you consider it necessary to participate at the Examination in Public?	No
--	----

Why do you feel it is necessary to participate at the Examination in Public?

Representation ID: REP/145/E1Representor Details:

Representor ID:	REP/145
Name:	Mick Easton
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	E1 - Land at East Quay, Newhaven Port
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	
Representation:	
The tide Mills beach is important for the wildlife migrating birds hedgehogs foxes and reptiles. The beach and seafront walk is also important to the people of Newhaven and Seaford. Beaches are good for peoples lives should be thinking of making Seaford Bay including the water a nature reserve	
What changes do you suggest to make the document legally compliant or sound?	
Do you consider it necessary to participate at the Examination in Public?	

Why do you feel it is necessary to participate at the Examination in Public?

Hodgson, Lilly

From: Mick Easton <[REDACTED]>
Sent: 03 November 2018 09:26
To: ldf
Subject: E1

Categories: LPP2 comment to code - stakeholder details have been added

The tide Mills beach is important for the wildlife migrating birds hedgehogs foxes and reptiles. The beach and seafront walk is also important to the people of Newhaven and Seaford. Beaches are good for peoples lives should be thinking of making Seaford Bay including the water a nature reserve

Representation ID: REP/146/E1Representor Details:

Representor ID:	REP/146
Name:	Michael Easton
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:
Organisation:

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	E1 - Land at East Quay, Newhaven Port
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	
Representation: Tide mills beach should be made a nature reserve left for the wild life, and the beaches are a public right to roam not to close off and concrete over ruining the environment the roads cannot take any more pollution for once think of the town not work against it . It will not be true there will be more employment the working staff will brought in from outside very locals will be employed. NEWHAVEN and SEAFORD need the bay from the end of the breakwater to Seaford head, land and sea to be made a nature area.	
What changes do you suggest to make the document legally compliant or sound?	

Do you consider it necessary to participate at the Examination in Public?
Why do you feel it is necessary to participate at the Examination in Public?

Hodgson, Lilly

From: Michael Easton <[REDACTED]>
Sent: 03 November 2018 20:02
To: ldf
Subject: E1

Categories: LPP2 comment to code - stakeholder details have been added

Tide mills beach should be made a nature reserve left for the wild life, and the beaches are a public right to roam not to close off and concrete over ruining the environment the roads cannot take any more pollution for once think of the town not work against it . It will not be true there will be more employment the working staff will brought in from outside very locals will be employed. NEWHAVEN and SEAFORD need the bay from the end of the breakwater to Seaford head, land and sea to be made a nature area.

[REDACTED]

Representation ID: REP/147/E1Representor Details:

Representor ID:	REP/147
Name:	Rowena Easton
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	E1 - Land at East Quay, Newhaven Port
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	No Not Justified
Representation: Selfish commercial interests should not be allowed to trump environmental and public good. This development cannot be justified and will change the landscape to the detriment of all.	
What changes do you suggest to make the document legally compliant or sound? 	

Do you consider it necessary to participate at the Examination in Public?	Yes
Why do you feel it is necessary to participate at the Examination in Public? Selfish commercial interests should not be allowed to trump environmental and public good. This development cannot be justified and will change the landscape to the detriment of all.	

Representation ID: REP/148/E1Representor Details:

Representor ID:	REP/148
Name:	John Edson
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	E1 - Land at East Quay, Newhaven Port
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	
Representation:	<p>Local plans by law must 'contribute to sustainable development,' this doesn't.</p> <p>Loss of biodiversity (including internationally rare vegetated shingle); more traffic and bad air quality; with all the housing already allocated for Newhaven, this would be too much development. We need to preserve this designated Local Wildlife Site for nature / leisure.</p>

<p>The policy does not reflect the 'clean green marine' vision of the enterprise zone or 'renewable energy cluster' of the port masterplan. The maps of the area weren't clear in the official consultation documents. So would the appropriate authority stop giving permission to desicrate this part of our seafront that is shared by residents of Newhaven, Seaford and surrounding areas.</p>
<p>What changes do you suggest to make the document legally compliant or sound?</p>
<p>Do you consider it necessary to participate at the Examination in Public?</p>
<p>Why do you feel it is necessary to participate at the Examination in Public?</p>

Hodgson, Lilly

From: John Edson <[REDACTED]>
Sent: 03 November 2018 13:43
To: ldf
Subject: Lewes District Local Plan

Categories: LPP2 comment to code - stakeholder details have been added

Re: New Policy E1

Local plans by law must 'contribute to sustainable development,' this doesn't.

Loss of biodiversity (including internationally rare vegetated shingle); more traffic and bad air quality; with all the housing already allocated for Newhaven, this would be too much development. We need to preserve this designated Local Wildlife Site for nature / leisure.

The policy does not reflect the 'clean green marine' vision of the enterprise zone or 'renewable energy cluster' of the port masterplan. The maps of the area weren't clear in the official consultation documents. So would the appropriate authority stop giving permission to desicrate this part of our seafront that is shared by residents of Newhaven, Seaford and surrounding areas.

Yours sincerely
John Edson

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Representation ID: REP/149/E1Representor Details:

Representor ID:	REP/149
Name:	Terry Edwards
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	E1 - Land at East Quay, Newhaven Port
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	
Representation:	
<p>I feel I must write and object to the proposed development in Newhaven, the scrap yard working 24 hours a day on east quay is bad enough and now you have granted permission for an aggregate plant as well, these are destroying any chance of quality regeneration, what about the traffic increase are the delays not bad enough already, the air pollution from increased vehicle movements, not to mention the loss of the beach which can never be replaced with its vegetated shingle and the addition of more dirty</p>	

industry at the start of the seven sisters does not improve anything. Please consider the views of the people who can vote for you.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public?

Why do you feel it is necessary to participate at the Examination in Public?

From: [REDACTED]
Sent: 31 October 2018 09:32
To: ldf
Subject: new policy E1

Categories: LPP2 comment to code - stakeholder details have been added

Dear sirs I feel I must write and object to the proposed development in Newhaven, the scrap yard working 24 hours a day on east quay is bad enough and now you have granted permission for an aggregate plant as well, these are destroying any chance of quality regeneration, what about the traffic increase are the delays not bad enough already, the air pollution from increased vehicle movements, not to mention the loss of the beach which can never be replaced with its vegetated shingle and the addition of more dirty industry at the start of the seven sisters does not improve anything. Please consider the views of the people who can vote for you. Regards Terry Edwards [REDACTED]
[REDACTED]

Representation ID: REP/150/GT01Representor Details:

Representor ID:	REP/150
Name:	Hamish Elder
Organisation:	Harveys Brewery
Consultation Body:	General
Stakeholder Type:	Local Business / employer

Agent Details:

Name:
Organisation:

Contact Details:

Email Address:	helder@harveys.org.uk
Address:	

Representation:

Policy/Section:	GT01 - Land south of The Plough
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	
Representation:	
<p>It has recently been drawn to my attention that there is a threat of a permanent traveler site in the next field to our public house The Plough at Plumpton .</p> <p>This is an idyllic destination pub setting dependent on its views, solitude and general isolated environment. Moreover Harveys' pub has a pristine meadow and a unique airforce war memorial commemorating Polish pilots from the Battle of Britain. Frankly, if there is any prospect of this coming about, The Plough (already marginal for commercial viability) will be certain to close down.</p> <p>[REDACTED]</p>	

██████████ I don't believe an operator could be found for such a pub in the current climate.

At Harveys, we have recently been discussing a serious prospect of major investment in The Plough , extending its activities and creating employment . Any such ideas have been put on hold pending confirmation that the above prospect has been permanently rejected.

I look forward to your urgent response

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public?

Why do you feel it is necessary to participate at the Examination in Public?

Thea Davis

From: Carpenter, Natalie
Sent: 01 November 2018 13:17
To: ldf
Subject: FW: Plough Plumpton , Traveller site

Categories: LPP2 comment to code - stakeholder details have been added

Please see below representation made from Harveys Brewery on GT01. Please can it be added to Inovem with other representations.

From: Hamish Elder [<mailto:helder@harveys.org.uk>]
Sent: 11 October 2018 15:54
To: Carpenter, Natalie
Cc: CAULFIELD, Maria
Subject: Plough Plumpton , Traveller site

Dear Natalie/ Robert

It has recently been drawn to my attention that there is a threat of a permanent traveler site in the next field to our public house The Plough at Plumpton .

This is an idyllic destination pub setting dependent on its views, solitude and general isolated environment. Moreover Harveys' pub has a pristine meadow and a unique airforce war memorial commemorating Polish pilots from the Battle of Britain. Frankly, if there is any prospect of this coming about, The Plough (already marginal for commercial viability) will be certain to close down.

[REDACTED]
[REDACTED] I don't believe an operator could be found for such a pub in the current climate.

At Harveys, we have recently been discussing a serious prospect of major investment in The Plough , extending its activities and creating employment . Any such ideas have been put on hold pending confirmation that the above prospect has been permanently rejected.

I look forward to your urgent response

Kind regards

Hamish Elder
Executive Chairman

This email has been scanned by the Symantec Email Security.cloud service.
For more information please visit <http://www.symanteccloud.com>

Representation ID: REP/151/E1Representor Details:

Representor ID:	REP/151
Name:	Alice Eldridge
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	E1 - Land at East Quay, Newhaven Port
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	
Representation: I am writing to express concern at the proposal to extend Employment Site Allocations into area E1 at East Quay, Newhaven Port. My concerns are as follows: * In accurate map in original consultation materials The original consultation map shows a much smaller (dark green) area for proposed use, clear also delimiting the extensive area which now appears as important wildlife territory http://planningpolicyconsult.lewes-eastbourne.gov.uk/gf2.ti/f/960002/41336613.1/PDF/-	

/Inset_2_Newhaven_v3_copy.pdf

This is highly likely to have misled local individuals and organisations

* Concern over focus on "visual impact" The E1 proposal is introduced by saying: "All development proposals should ensure that the visual impact on the landscape and scenic beauty of the South Downs National Park is minimised. "

Visual impact is important, but air, water and noise pollution and habitat destruction are far more serious consequences which are being ignored in Newhaven.

or at the very least, should reflect the vision for Newhaven which is expressed in the Core Strategy Part 1, the Port Masterplan, the Draft South Downs Local Plan, the Neighbourhood Plan and the Enterprise zone regeneration plans for the area i.e. restrict development to clean/green/ marine/renewable and/or sustainable tourism. If the term 'port related activity' is used there must be a clear definition of what this means.

Unanimous objections to the incinerator were ignored.

The existing metal recycling contravenes its original thresholds for operation times, noise and dust pollution and NOTHING is done about it. Failure to intervene may just be ineptitude on behalf of the council, but also smacks of disinterest or even corruption.

Similarly, the recent planning permission ceded to Brett Aggregates, despite their abominable track record across the country smacks of desperation and lack of foresight at best, and again, underhanded dealings.

As a community, we have no reason to have any faith in the idea that our council (salaried by our taxes) holds any interest in the well being and future of our local community.

The proposed developed contravenes many of the core objectives previously stated:

Objective 4. To create and sustain vibrant, safe and distinctive communities.
(Communities)

Newhaven is an area of high disadvantage (as evidenced in the indices of multiple deprivation) with severe health inequalities. It has limited open space. The loss of this popular and well used public open space crossed by official public footpaths will severely impact on community happiness, health and wellbeing. It makes no sense to grade is as of 'no likely effect' and it must be graded red (--)

Objective 5. To improve the health of the Plan Areas population. (Health) Newhaven has severe health inequalities and issues related to congestion and poor air quality (see below). Any additional road use arising from this development must be considered detrimental and it should be graded amber rather than as 'of no likely effect.'

Objective 8. To conserve and enhance the biodiversity of the Plan Area. (Biodiversity)
This development of a local wildlife site (formerly SNCI) which contains nationally important habitat (see below for more detail) cannot sensibly be rated amber (-?). It must be rated red (--)

Objective 13. To improve the Plan Area's air quality. (Air quality) As detailed in the

previous town plan, Newhaven is already on a red alert. The extra traffic will directly endanger air quality in an area of high environmental sensitivity, and in addition will affect the nearby Newhaven AQMA, so should have been rated amber rather than of 'no likely effect.'

I am not alone in these concerns. Please listen to your communities and try to approach town planning with a slightly longer term vision. Yours, Dr Alice Eldridge

-- New paper Sounding Out Acoustic Indices out now in Ecological Indicators
[<https://authors.elsevier.com/a/1Xjst,XRNLZ1uR>] Dr Alice Eldridge Lecturer in Music Technology University of Sussex Falmer Brighton BN1 9RG

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public?

Why do you feel it is necessary to participate at the Examination in Public?

Kemp, Emma

From: Alice Eldridge <[REDACTED]>
Sent: 05 November 2018 12:26
To: Idf
Subject: Objection to policy E1 in the Lewes District Plan
Categories: Vanessa to deal with

To whom it may concern,

I am writing to express concern at the proposal to extend Employment Site Allocations into area E1 at East Quay, Newhaven Port.

My concerns are as follows:

1. In accurate map in original consultation materials

The original consultation map shows a much smaller (dark green) area for proposed use, clear also delimiting the extensive area which now appears as important wildlife territory

http://planningpolicyconsult.lewes-eastbourne.gov.uk/gf2.ti/f/960002/41336613.1/PDF/-/Inset_2_Newhaven_v3_copy.pdf

This is highly likely to have misled local individuals and organisations

2. Concern over focus on "visual impact"

The E1 proposal is introduced by saying: "All development proposals should ensure that the visual impact on the landscape and scenic beauty of the South Downs National Park is minimised."

Visual impact is important, but air, water and noise pollution and habitat destruction are far more serious consequences which are being ignored in Newhaven.

or at the very least, should reflect the vision for Newhaven which is expressed in the Core Strategy Part 1, the Port Masterplan, the Draft South Downs Local Plan, the Neighbourhood Plan and the Enterprise zone regeneration plans for the area i.e. restrict development to clean/green/ marine/renewable and/or sustainable tourism. If the term 'port related activity' is used there must be a clear definition of what this means.

Unanimous objections to the incinerator were ignored.

The existing metal recycling contravenes its original thresholds for operation times, noise and dust pollution and NOTHING is done about it. Failure to intervene may just be ineptitude on behalf of the council, but also smacks of disinterest or even corruption.

Similarly, the recent planning permission ceded to Brett Aggregates, despite their abominable track record across the country smacks of desperation and lack of foresight at best, and again, underhanded dealings.

As a community, we have no reason to have any faith in the idea that our council (salaried by our taxes) holds any interest in the well being and future of our local community.

The proposed developed contravenes many of the core objectives previously stated:

Objective 4. To create and sustain vibrant, safe and distinctive communities. (Communities)

Newhaven is an area of high disadvantage (as evidenced in the indices of multiple deprivation) with severe health inequalities. It has limited open space. The loss of this popular and well used public open space crossed by official public footpaths will severely impact on community happiness, health and wellbeing. It makes no sense to grade is as of 'no likely effect' and it must be graded red (--)

Objective 5. To improve the health of the Plan Areas population. (Health)

Newhaven has severe health inequalities and issues related to congestion and poor air quality (see below). Any additional road use arising from this development must be considered detrimental and it should be graded amber rather than as 'of no likely effect.'

Objective 8. To conserve and enhance the biodiversity of the Plan Area. (Biodiversity)

This development of a local wildlife site (formerly SNCI) which contains nationally important habitat (see below for more detail) cannot sensibly be rated amber (-?). It must be rated red (--).

Objective 13. To improve the Plan Area’s air quality. (Air quality)

As detailed in the previous town plan, Newhaven is already on a red alert. The extra traffic will directly endanger air quality in an area of high environmental sensitivity, and in addition will affect the nearby Newhaven AQMA, so should have been rated amber rather than of ‘no likely effect.’

I am not alone in these concerns.

Please listen to your communities and try to approach town planning with a slightly longer term vision.

Yours,

Dr Alice Eldridge

--

New paper *Sounding Out Acoustic Indices* out now in [Ecological Indicators](#)

[Redacted signature block]

[REDACTED]

Representation ID: REP/152/GT01Representor Details:

Representor ID:	REP/152
Name:	Ian Ellis
Organisation:	
Consultation Body:	General
Stakeholder Type:	Local Business / employer

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	52 The Old Brickworks Plumpton Green East Sussex BN7 3DF

Representation:

Policy/Section:	GT01 - Land south of The Plough
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	
Representation:	
<p>I am writing to raise my objections to the proposal for a travellers' site in Plumpton Green, south of the Plough Public House.</p> <p>As a business owner at the Old Brickworks adjacent to the proposed site, this would have serious implications for myself and my staff, [REDACTED]</p> <p>[REDACTED]</p> <p>In my opinion the proposed site is wholly unsuitable as there is no infrastructure in place</p>	

(sewage, electricity etc), there is no proper access to the proposed site, nor any footpath or street lighting - quite unsafe for pedestrians travelling into the village, school etc.

The proposed piece of land is also on quite a slope so presumably substantial groundworks would need to be implemented, causing severe disruption.

I'm afraid if the proposed plan goes ahead I would feel forced to relocate my business (employing 5 people) at great financial expense & interruption. This would, I feel be obligatory, having a knock-on effect not only on my Landlord's revenue but a loss of support to the neighbouring shop, pub & post office in the village, especially if other businesses in The Old Brickworks reach the same conclusion, as they have indicated to me.

To reiterate, I think the proposal is completely wrong on so many levels & I strongly object.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public?

Why do you feel it is necessary to participate at the Examination in Public?

Hodgson, Lilly

From: Ian Ellis <[REDACTED]>
Sent: 21 October 2018 12:33
To: ldf
Cc: Caroline Standen
Subject: Proposed travellers' site in Plumpton Green

Categories: LPP2 comment to code - stakeholder details have been added

To whom it may concern,

I am writing to raise my objections to the proposal for a travellers' site in Plumpton Green, south of the Plough Public House.

As a business owner at the Old Brickworks adjacent to the proposed site, this would have serious implications for myself and my staff, [REDACTED]
[REDACTED]

In my opinion the proposed site is wholly unsuitable as there is no infrastructure in place (sewage, electricity etc), there is no proper access to the proposed site, nor any footpath or street lighting - quite unsafe for pedestrians travelling into the village, school etc.

The proposed piece of land is also on quite a slope so presumably substantial groundworks would need to be implemented, causing severe disruption.

I'm afraid if the proposed plan goes ahead I would feel forced to relocate my business (employing 5 people) at great financial expense & interruption. This would, I feel be obligatory, having a knock-on effect not only on my Landlord's revenue but a loss of support to the neighbouring shop, pub & post office in the village, especially if other businesses in The Old Brickworks reach the same conclusion, as they have indicated to me.

To reiterate, I think the proposal is completely wrong on so many levels & I strongly object.

Regards

Ian Ellis

www.ianellisalfaromeo.com

52 The Old Brickworks

Plumpton Green

BN7 3DF

Representation ID: REP/153/E1/ARepresentor Details:

Representor ID:	REP/153
Name:	Rod Evans
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	E1 - Land at East Quay, Newhaven Port
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	No Not Justified
Representation: Seaford Beach will soon disappear if all this encroachment is allowed. And the hinterland is being despoliated. Please stop it!	
What changes do you suggest to make the document legally compliant or sound? Expunge it.	

Do you consider it necessary to participate at the Examination in Public?	No
Why do you feel it is necessary to participate at the Examination in Public?	

Representation ID: REP/153/E1/BRepresentor Details:

Representor ID:	REP/153
Name:	Rod Evans
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	E1 - Land at East Quay, Newhaven Port
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	No Not Justified Not Effective Not Consistent with national policy
Representation:	<p>Tide Mills beach and its hinterland are unspoilt areas, too few of which remain. Pollution, noise, traffic, visual vileness all threaten this pleasant space and should be resisted, for the good of the populations of Newhaven and Seaford. Recreation in nature is much more important than yet another industrial sprawl. I enjoy walking in the peace and fresh</p>

air to be found along this strip of the coastline - please do not spoil it! There must be other areas of Newhaven where new eyesores would have little or no impact.

Loss of biodiversity on this site is a worry too. Birds nest and feed here, vegetation of types particular to the coast should be protected, walkers, swimmers and kite-surfers love this place and it would be an act of damaging vandalism to destroy this natural environment.

What changes do you suggest to make the document legally compliant or sound?

Protect our few remaining natural open spaces, including both beach and coastal strip.

Do you consider it necessary to participate at the Examination in Public? No

Why do you feel it is necessary to participate at the Examination in Public?

Representation ID: REP/154/E1Representor Details:

Representor ID:	REP/154
Name:	Margaret Evans
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	E1 - Land at East Quay, Newhaven Port
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	
Representation: This part of the town should be left to nature, for the enjoyment and recreation of all. There would be loss of biodiversity (including internationally rare vegetated shingle); worries about traffic and air quality; with all the housing already allocated for Newhaven, this would be too much development; I like to walk in the fresh air there and enjoy the natural life and surroundings. Please do not spoil yet another natural open space. There are other places in Newhaven for industry!	
What changes do you suggest to make the document legally compliant or sound?	

Do you consider it necessary to participate at the Examination in Public?
Why do you feel it is necessary to participate at the Examination in Public?

Hodgson, Lilly

From: Rod Evans <[REDACTED]>
Sent: 04 November 2018 19:29
To: ldf
Subject: Newhaven east beach area

Categories: LPP2 comment to code - stakeholder details have been added

Dear Sir,

This part of the town should be left to nature, for the enjoyment and recreation of all. There would be loss of biodiversity (including internationally rare vegetated shingle); worries about traffic and air quality; with all the housing already allocated for Newhaven, this would be too much development; I like to walk in the fresh air there and enjoy the natural life and surroundings. Please do not spoil yet another natural open space. There are other places in Newhaven for industry!

Yours faithfully,
Margaret Evans

Representation ID: REP/155/E1

Representor Details:

Representor ID:	REP/155
Name:	jean fairbairn
Organisation:	
Consultation Body:	General
Stakeholder Type:	Developer/Landowner

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	E1 - Land at East Quay, Newhaven Port
<i>Do you consider the document to be:</i>	
Legally Compliant:	No
Sound:	No Not Justified
Representation: The "Gap" between Newhaven and Peacehaven and guarded like a precious jewel is not a "Gap" protecting the open space between the '2 settlements is no "Gap" at all . I speak of " Plots 42-48 Land South of Wilmington Road" which appeared (the whole field that is, not just these plots which I co-own) in The Physical Development Vision for Newhaven 2010 as WESTERN HEIGHTS (Option 2). Why 'was this site dismissed?	

What changes do you suggest to make the document legally compliant or sound?

As there are houses all around it (Haven Way , a huge communications mast. houses etc.)why not infill? Dismissing this site NH47 it was stated that 9 quality houses could be built on that plot?

Do you consider it necessary to participate at the Examination in Public? No

Why do you feel it is necessary to participate at the Examination in Public?

Representation ID: REP/156/E1

Representor Details:

Representor ID:	REP/156
Name:	Sue Fasquelle
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:
Organisation:

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	E1 - Land at East Quay, Newhaven Port
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	
Representation: I wish to register my opposition to any further development east of the Port Access Road and Bridge onto Tide Mills once the road and bridge are built. This is an area rich in native flora and fauna and should be preserved for the enjoyment of future generations.	
What changes do you suggest to make the document legally compliant or sound?	
Do you consider it necessary to participate at the Examination in Public?	
Why do you feel it is necessary to participate at the Examination in Public?	

--

Hodgson, Lilly

From: Sue Fasquelle <[REDACTED]>
Sent: 31 October 2018 09:52
To: ldf
Subject: Tide Mills

Categories: LPP2 comment to code - stakeholder details have been added

I wish to register my opposition to any further development east of the Port Access Road and Bridge onto Tide Mills once the road and bridge are built. This is an area rich in native flora and fauna and should be preserved for the enjoyment of future generations.

Sue Fasquelle

Representation ID: REP/157/GT01
--

Representor Details:

Representor ID:	REP/157
Name:	Richard and Sioban Fawdrey
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	GT01 - Land south of The Plough
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	
Representation:	<p>we wish to object to the proposed traveller site in plumpton Green</p> <p>As a resident of Plumpton Green and within a short walking distance I would make the following points, regarding our concerns and objections to a permanent traveller site in Plumpton Green.</p> <p>* The site was deemed to be unsuitable for housing due to many factors including the large distance to village facilities, there not being a footpath from the north of the village outside the development area for the village, until you get to the 30mph sign, and as speeding is a huge issue also in this area walking on a verge or crossing the road anywhere north of that sign is deadly (we know we live in this area and we have a</p>

partially sighted son who has no independence outside of paved areas of the village) There is no connection to Mains drainage and other factors, this will cost a considerable amount to connect, If a cesspit is installed who will end up being responsible financially for the emptying of it, currently homeowner in this part of the village fund it themselves, will the travellers also be? WE do not understand why this site is now suitable for fixed non mobile dwellings.

* The village has limited employment opportunities and the brickworks estate next door is a valuable asset to the village both in terms of employment and attracting trades. In turn this provides business also to the village shop, not only from the businesses but from the delivery people and clients visiting these units, The commercial employers have stated they will leave if this site is developed impacting the village shop and possibly the loss of extensive revenue will force the closure of the shop which is a valuable asset particularly to the elderly or less mobile residents.

* Creating this site in close proximity to housing will impact property values negatively not only generally in the village but particularly those houses located closely to the proposed site. in particular the ones nearby are high value properties and loss of their value will be substantial

* The local pubs which are a central feature to the community they have already raised concerns due to [REDACTED]

[REDACTED], we have not known this in over 20 years that we have lived here.

* We have a learning disabled adult son who lives with us in a house very near to the proposed site, He is vulnerable adult and although currently he is safe we are very concerned this will change and that he will loose some of the limited freedoms and safety he currently has. If say for instance someone knocks on the door and asks to come in , and for instance say your mum and dad says it ok to do so and they have said its ok to take etc... he would let them in ! although we are trying to be fair in our concerns, unfortunately there is a [REDACTED] [REDACTED] and this is a huge concern to us as his parents that he could one day be in this situation .This is not fair on him and In turn this increases the stress on us his parents.

* The understood although unpublished cost if thus site is £1m. Is this a viable use of tax payers money? If purchased the site will need to be developed and thus will add further to the cost and ongoing costs as the site has no drainage.somebody seemed to imply that a path would be made up to the bus stop (next to the pub) to allow safe access to transportation, why ?? we live with a son who is partially sighted (who would love the independence of accessing village facilities, the train station, bus stops.. friends etc but there is no path from our house approx 75 yards north of the 30mph signs, will provision and funding be made available to build such a path for his and the residents use in this area to safely access the village on foot. surely if one is provide for the travellers then what about providing one our son!!!

* in the planning meeting it was stated that the site was not viable for further

development due to road access etc. However as there are no other sites in the area there will be lack of choice if further places are needed and the guidance on non development will be broken.

* adjoining the site are fields with gate access. we feel that These will be very tempting locations for non permitted travellers to occupy causing further issues.

* during the meeting it was stated some travellers are now in housing. Why should the additional travellers not also have housing? A permanent caravan is less environmentally effective and shorter life and has no practical difference to a house. Houses have drives to park caravans so I do not see the argument that a travelling family who are normally in the fixed caravan would not be better suited to a fixed house that would benefit from sewage connections and better locations to facilities as well as safe access for children to footpaths to school as well as facilities.

Although these sites are being proposed as suitable for static mobile homes, this area has not been approved for permanent housing, however we are concerned that the mobile units will eventually be allowed to be replaced by houses, such as what happened by the amenity tip in burgers hill !! if this happens then it opens up the possibility that any field in the are will be allowed to have houses built on them.

we strongly oppose to the plans for a travellers site in the village.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public?

Why do you feel it is necessary to participate at the Examination in Public?

From: sfwrules <[REDACTED]>
Sent: 05 November 2018 11:48
To: ldf
Subject: objection to proposed traveller site in plumpton Green
Categories: Vanessa to deal with

To whom it may concern

we wish to object to the proposed traveller site in plumpton Green

As a resident of Plumpton Green and within a short walking distance I would make the following points, regarding our concerns and objections to a permanent traveller site in Plumpton Green.

1. The site was deemed to be unsuitable for housing due to many factors including the large distance to village facilities, there not being a footpath from the north of the village outside the development area for the village, until you get to the 30mph sign, and as speeding is a huge issue also in this area walking on a verge or crossing the road anywhere north of that sign is deadly (we know we live in this area and we have a partially sighted son who has no independence outside of paved areas of the village) There is no connection to Mains drainage and other factors, this will cost a considerable amount to connect, If a cesspit is installed who will end up being responsible financially for the emptying of it, currently homeowner in this part of the village fund it themselves, will the travellers also be? WE do not understand why this site is now suitable for fixed non mobile dwellings.

2. The village has limited employment opportunities and the brickworks estate next door is a valuable asset to the village both in terms of employment and attracting trades. In turn this provides business also to the village shop, not only from the businesses but from the delivery people and clients visiting these units, The commercial employers have stated they will leave if this site is developed impacting the village shop and possibly the loss of extensive revenue will force the closure of the shop which is a valuable asset particularly to the elderly or less mobile residents.

3. Creating this site in close proximity to housing will impact property values negatively not only generally in the village but particularly those houses located closely to the proposed site. in particular the ones nearby are high value properties and loss of their value will be substantial.

4. The local pubs which are a central feature to the community they have already raised concerns due to [REDACTED], we have not known this in over 20 years that we have lived here.

5. We have a learning disabled adult son who lives with us in a house very near to the proposed site, He is vulnerable adult and although currently he is safe we are very concerned this will change and that he will loose some of the limited freedoms and safety he currently has. If say for instance someone knocks on the door and asks to come in , and for instance say your mum and dad says it ok to do so and they have said its ok to take etc... he would let them in ! although we are trying to be fair in our concerns, unfortunately there is a [REDACTED] and this is a huge concern to us as

his parents that he could one day be in this situation .This is not fair on him and In turn this increases the stress on us his parents.

6. The understood although unpublished cost if this site is £1m. Is this a viable use of tax payers money? If purchased the site will need to be developed and thus will add further to the cost and ongoing costs as the site has no drainage.somebody seemed to imply that a path would be made up to the bus stop (next to the pub) to allow safe access to transportation, why ?? we live with a son who is partially sighted (who would love the independence of accessing village facilities, the train station, bus stops.. friends etc but there is no path from our house approx 75 yards north of the 30mph signs, will provision and funding be made available to build such a path for his and the residents use in this area to safely access the village on foot. surely if one is provide for the travellers then what about providing one our son!!!

7 in the planning meeting it was stated that the site was not viable for further development due to road access etc. However as there are no other sites in the area there will be lack of choice if further places are needed and the guidance on non development will be broken.

8 adjoining the site are fields with gate access. we feel that These will be very tempting locations for non permitted travellers to occupy causing further issues.

9 during the meeting it was stated some travellers are now in housing. Why should the additional travellers not also have housing? A permanent caravan is less environmentally effective and shorter life and has no practical difference to a house. Houses have drives to park caravans so I do not see the argument that a travelling family who are normally in the fixed caravan would not be better suited to a fixed house that would benefit from sewage connections and better locations to facilities as well as safe access for children to footpaths to school as well as facilities.

Although these sites are being proposed as suitable for static mobile homes, this area has not been approved for permanent housing, however we are concerned that the mobile units will eventually be allowed to be replaced by houses, such as what happened by the amenity tip in burgers hill !! if this happens then it opens up the possibility that any field in the are will be allowed to have houses built on them.

we strongly oppose to the plans for a travellers site in the village.

please can you email by return to acknowledge our objection has been received. many thanks

Best Regards
Richard and Sioban Fawdrey

Representation ID: REP/158/GT01Representor Details:

Representor ID:	REP/158
Name:	Sarah Feeley
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	GT01 - Land south of The Plough
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	No Not Positively Prepared Not Consistent with national policy
Representation: I am a resident of Plumpton and wish to object to this proposed site on the following grounds: 'The site is greenfield and we should be seeking to preserve our countryside, not erode it with further building/development. A brownfield site should be found as an alternative.	

'The need for a site for the gypsy and traveller community was not a requirement of our neighbourhood plan and therefore there has not been sufficient time to consider or propose alternative sites.

'There is clearly no safe pedestrian access to/from the site. It is my understanding that a housing development proposal was previously turned down because of this reason. It therefore makes no sense to dismiss these safety concerns for a different section of the community.

What changes do you suggest to make the document legally compliant or sound?

An alternative site should be identified in a brownfield site with safe access.

Do you consider it necessary to participate at the Examination in Public? No

Why do you feel it is necessary to participate at the Examination in Public?

Representation ID: REP/159/GEN

Representor Details:

Representor ID:	REP/159
Name:	Chloe Firman
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	General
<i>Do you consider the document to be:</i>	
Legally Compliant:	No
Sound:	No Not Justified
Representation:	
What changes do you suggest to make the document legally compliant or sound?	
Do you consider it necessary to participate at the Examination in Public? No	
Why do you feel it is necessary to participate at the Examination in Public?	

--

Representation ID: REP/160/GT01Representor Details:

Representor ID:	REP/160
Name:	Alistair Fleming
Organisation:	Plumpton Green Studios
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:
Organisation:

Contact Details:

Email Address:	[REDACTED]
Address:	[REDACTED]

Representation:

Policy/Section:	GT01 - Land south of The Plough
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	
Representation: I am writing to object to the proposed permanent traveller's site adjacent to The Old Brickworks in Plumpton which is a field away from our industrial unit. I am the co-owner of the site at Plumpton Green Studios in St. Helena's Lane and we occupy Unit 2 on the site to manufacture our bespoke kitchens. Others have covered the unsuitability of the site on the grounds of environmental impact which I also share.	

My additional concern is one of security. The site employs 18 people directly, in 4 separate businesses. We also have other dependent employees working from our showroom in Lewes. We are an expanding local business and need to rely on the security of our manufacturing premises.

I am worried that the provision of a permanent site for travellers who may not be similarly invested in the local community will have implications [REDACTED]
[REDACTED]

Given the extremely tight planning conditions we have had attached to our use of the buildings it seems a contradiction to allow permission for this site.

I am therefore writing to object strongly to this planning application and hope that another more suitable site can be found. We would seriously need to consider relocation if it were to be approved.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public?

Why do you feel it is necessary to participate at the Examination in Public?

Thea Davis

From: Alistair Fleming [REDACTED]
Sent: 05 November 2018 18:04
To: ldf
Subject: Re. Proposed Travellers Site in Plumpton Green
Categories: GT01, Vanessa to deal with

Dear Sir / Madam,

I am writing to object to the proposed permanent traveller's site adjacent to The Old Brickworks in Plumpton which is a field away from our industrial unit. I am the co-owner of the site at Plumpton Green Studios in St. Helena's Lane and we occupy Unit 2 on the site to manufacture our bespoke kitchens.

Others have covered the unsuitability of the site on the grounds of environmental impact which I also share.

My additional concern is one of security. The site employs 18 people directly, in 4 separate businesses. We also have other dependent employees working from our showroom in Lewes. We are an expanding local business and need to rely on the security of our manufacturing premises.

I am worried that the provision of a permanent site for travellers who may not be similarly invested in the local community [REDACTED]

Given the extremely tight planning conditions we have had attached to our use of the buildings it seems a contradiction to allow permission for this site.

I am therefore writing to object strongly to this planning application and hope that another more suitable site can be found. We would seriously need to consider relocation if it were to be approved.

Yours sincerely,

Alistair Fleming [REDACTED]

[REDACTED]

Representation ID: REP/161/E1Representor Details:

Representor ID:	REP/161
Name:	Anne Fletcher
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	E1 - Land at East Quay, Newhaven Port
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	
Representation:	
<p>I'm using this method of replying because I was unable to access the consultation website because you did not respond to my request to set up a new password.</p> <p>This response relates to the Land at East Quay Newhaven Port (Section 3.11 on)</p> <p>I recognise the need for more employment opportunities in Newhaven but cannot support the use of the area west of Tidemills for this purpose for the following reasons -</p> <p>The area is a very well-used amenity whose loss will have a significant effect on local</p>	

people, particularly when you consider that they have already lost the use of the west beach.

Area E1 appears to include part of the Site of Nature Conservation Importance. As a member of the Seaford Natural History Society I know that there are vegetative shingle plants growing there. As these plants are becoming increasingly rare, we should be preserving sites where they grow rather than building on them.

The south coast of England is very built up. The Seaford Bay area from Newhaven harbour to the Bishopstone Station is one of the few stretches of coast which not built on and to which there is easy access. I think the bridge over the railway is inappropriate and so is this proposal.

Lastly, if development on this site goes ahead, I am concerned that we should not lose access to the west end of the beach and that any buildings which are put in place should not spoil the view. We disregard the importance of the environment on mental health at our peril.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public?

Why do you feel it is necessary to participate at the Examination in Public?

Kemp, Emma

From: Anne Fletcher <[REDACTED]>
Sent: 02 November 2018 15:03
To: Idf
Subject: Lewes District Local Plan Part 2: Site Allocations and Development Management Policies DPD - Pre-Submission version - consultation
Categories: LPP2 comment to code - stakeholder details have been added

I'm using this method of replying because I was unable to access the consultation website because you did not respond to my request to set up a new password.

This response relates to the ***Land at East Quay Newhaven Port (Section 3.11 on)***

I recognise the need for more employment opportunities in Newhaven but cannot support the use of the area west of Tidemills for this purpose for the following reasons -

The area is a very well-used amenity whose loss will have a significant effect on local people, particularly when you consider that they have already lost the use of the west beach.

Area E1 appears to include part of the Site of Nature Conservation Importance. As a member of the Seaford Natural History Society I know that there are vegetative shingle plants growing there. As these plants are becoming increasingly rare, we should be preserving sites where they grow rather than building on them.

The south coast of England is very built up. The Seaford Bay area from Newhaven harbour to the Bishopstone Station is one of the few stretches of coast which not built on and to which there is easy access. I think the bridge over the railway is inappropriate and so is this proposal.

Lastly, if development on this site goes ahead, I am concerned that we should not lose access to the west end of the beach and that any buildings which are put in place should not spoil the view. We disregard the importance of the environment on mental health at our peril.

M Anne Fletcher
[REDACTED]

Representation ID: REP/162/GT01/A
--

Representor Details:

Representor ID:	REP/162
Name:	Penelope Forbes
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	GT01 - Land south of The Plough
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	
Representation:	
<p>We are horrified at the prospect of a Gypsy/Travellers' site anywhere in or near Plumpton. We have heard that your proposal is for a permanent site for such caravans just south of the Plough, near The Old Brickworks.</p> <p>As Plumpton residents we have every right absolutely to refuse to have this forced on our unique South Downs village community.</p>	

That the Planning Policy Team can even dream of inflicting such an outrageous scheme on such a special village is so unthinkable as to seem too far-fetched and implausible even to be believed; i.e. you cannot be serious, and what on earth are you thinking of?!

Has this plan been put forward by those of the Team who will be unaffected by it because they reside in an opposite direction, south of Lewes, for example?

A final point: by the time Brexit is in operation, economist experts, including the Bank of England and LSE, predict that our property values will tumble by 40 per cent or well over one-third: as if that is not bad enough; but a permanent Travellers' site will have a permanently negative [REDACTED] effect in [REDACTED] the value of what we leave behind for our children and grandchildren. This would be a personal calamity for us all.

Very soon the whole village will be up in arms, not only over the prospect of financial ruin but in particular over the [REDACTED] close proximity of the proposed Gypsy/Travellers' site.

This needs re-thinking. There are several brownfield sites near urbanised areas that are not rural gems yet offer ample and more practical space for caravans ([REDACTED] [REDACTED]) without blemishing precious rural South Downs countryside.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public?

Why do you feel it is necessary to participate at the Examination in Public?

Representation ID: REP/162/GT01/B
--

Representor Details:

Representor ID:	REP/162
Name:	Penelope Forbes
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	GT01 - Land south of The Plough
<i>Do you consider the document to be:</i>	
Legally Compliant:	No
Sound:	No
	Not Positively Prepared
	Not Justified
	Not Effective
	Not Consistent with national policy
Representation:	
We are shocked and [REDACTED] at the prospect of a Gypsy/Travellers' site literally just up the road from our Plumpton residences. Such a scheme cannot be enforced anywhere	

in or near this remarkably beautiful, rural South Downs village with its small population.

The scheme needs re-thinking: for example, what would resolve the issue without desecrating our unique and beautiful South Downs location, would be to utilise so-called brownfield sites on the outskirts of urban or semi-urban areas which offer good public transport and offer pleasant, green, ample space - far more practical for caravans [REDACTED]

We all suspect this proposal has been put forward by those of the Planning Team who are unaffected by this gypsy site because they reside in an opposite direction! for example, south of Lewes. That the Planning Policy Team can even dream of inflicting such an outrageous scheme on such a rural gem seems too far-fetched and implausible even to be believed!

PROPERTY VALUES: As Plumpton residents we have every right absolutely to refuse to have this blight forced on our unique South Downs village, which will also sharply downgrade property values - and it is now more crucial than ever to have something to pass on to our children and grandchildren!

Bearing the latter in mind: our economist experts, including the Bank of England and LSE, predict that post-Brexit our property values will tumble by 40 per cent or well over one-third. As if this negative prediction is not bad enough, but even worse: you propose a [REDACTED] effect on our house values with a permanent Travellers 'site, completely [REDACTED] the value of what we leave behind for our children and grandchildren. This would be a PERSONAL CALAMITY for us all. Very soon the whole village will be up in arms, over financial ruin plus the disturbingly close proximity of a Gypsy/Travellers 'site. [REDACTED]

What changes do you suggest to make the document legally compliant or sound?

The scheme needs re-thinking: for example, what would resolve the issue and avoid [REDACTED] our precious South Downs National Park countryside would be to utilise so-called brownfield sites on the outskirts of urban or semi-urban areas which offer good public transport and offer pleasant, green, ample space far more practical for caravans and their [REDACTED]

A Traveller/Gypsy site will inevitably increase in size and increasingly encroach directly on our small village population. Whereas on the outskirts of a town, such social strain and social disruption would be barely noticed.

The scheme needs proper scrutiny. There is general suspicion it has been proposed by those of the Planning Team who will be unaffected because they reside in an opposite direction or nowhere near the planned gypsy site.

The negative impact on our property values MUST be taken into account. I put ALL my life-savings into buying in Plumpton for its beautiful location, above all to be able to pass

something to my children and grandchildren. Post-Brexit the Bank of England and LSE predict that our property values will tumble by 40% or well over one-third. On top of this, our small South Downs village of Plumpton CANNOT be made to endure a PERMANENT [REDACTED] of house values by enforcing a permanent Gypsy site here. This would bring personal calamity and financial ruin, in addition to having to contend with the [REDACTED] close proximity of a Gypsy site. To the rear of our houses are much beloved fields, but with a Gypsy site nearby these would [REDACTED] [REDACTED] latter plus all the above-mentioned consequences would lead to an unacceptable radically altered, frankly miserable lifestyle -especially upsetting for those of us who live alone. Emotive issues provide very valid points and CANNOT be dismissed or ignored.

Do you consider it necessary to participate at the Examination in Public? Yes

Why do you feel it is necessary to participate at the Examination in Public?

Ideally I would like to attend in order to reinforce the above points.

Representation ID: REP/162/GT01/C
--

Representor Details:

Representor ID:	REP/162
Name:	Penelope Forbes
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	GT01 - Land south of The Plough
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	
Representation:	<p>(1) We object in the strongest terms to Policy GT1 and to any area of Plumpton being used as a permanent Gypsy/Traveller site. The larger than expected size of the proposed site leads one to presuppose the relative ease (once established) to slip through approval to expand the number from 'six' to several more permanent caravans,</p> <p></p>

2) From the point of view of the Travellers(a)expansion of the existing site in the town of LEWES makes far more sense, as there is already an inbuilt infrastructure and far better transport. Alternatively, a brownfield area – often pleasantly green – would in the same way offer Travellers good facilities, including rubbish disposal facilities.

(b) By contrast, Gypsies/Travellers would feel isolated and suffer from a lack of integration in our rural village. Aside from an integration problem, a rural site in Plumpton would be highly unsuitable in terms of lack of infrastructure and lack of facilities.

3) From the point of view of Plumpton residents: the threat of your proposed Policy GT1 is causing enormous stress to an appalled village community. Shocked opposition from the entire village of Plumpton is hardly surprising in a close-knit community: we are all extremely upset that a permanent Travellers' camp can even be envisaged in our beautiful South Downs country village and farming community.

It has now been revealed how the Council purchased the land south of the Plough without revealing the purpose of the purchase. The Council's arbitrary seizure of a beautiful section of our village land for the purpose of forcing through such a development is completely unacceptable.

[REDACTED]

This needs re-thinking: there are several pleasant brownfield sites offering ample, more practical space for caravans and their [REDACTED] (without blemishing precious South Downs countryside). Utilising or expanding the existing travellers' site in Lewes town makes far more sense, as this site is already sustained by an infrastructure, good transport and far better facilities including rubbish disposal facilities.

[REDACTED] by a permanent caravan site literally just up the road from our end of Plumpton, we as Plumpton residents have every right absolutely to refuse to have this [REDACTED] forced on our unique Downs village community. That this rural gem could be even envisaged as a Traveller site shocks us all and leads us to suspect the option was proposed by those of the Planning Team who are unaffected because they reside in an opposite direction from Plumpton.

A final point: by the time Brexit is operative, economist experts, including the Bank of England and LSE, predict that UK property values will tumble by 40 per cent or well over one-third. As if that is not bad enough, the [REDACTED] of a permanent Travellers' site will have a permanently negative effect on the value of what we leave behind for our children and grandchildren, for whose sakes I have put all my life savings into my home here, which would be decimated in value. Such financial ruin would be a personal calamity for us all.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public?
Why do you feel it is necessary to participate at the Examination in Public?

Representation ID: REP/162/GT01/D
--

Representor Details:

Representor ID:	REP/162
Name:	Penelope Forbes
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	GT01 - Land south of The Plough
<i>Do you consider the document to be:</i>	
Legally Compliant:	No
Sound:	No Not Positively Prepared Not Justified Not Effective Not Consistent with national policy
Representation:	
1) We object in the strongest terms to Policy GT1 and to any area of Plumpton being used as a Gypsy/Traveller site. Having looked at the proposed site, its larger than expected size leads one to presuppose the relative ease (once established) to slip	

through approval to expand the number from 'six' to several more permanent caravans, as inevitably the Traveller population would expand.

2) From the point of view of the Travellers: this rural area is likely to present a problem for them, as they would feel isolated and suffer from a lack of integration with the village residents. It would be highly unsuitable in terms of integration, lack of infrastructure, lack of facilities.

3) Expansion of the existing travellers' site in Lewes town centre makes far more sense, as there is already an inbuilt infrastructure, far better transport and facilities. Alternatively, a brownfield area (often pleasantly green) would in the same way offer far better facilities, including rubbish disposal facilities.

4) From the point of view of Plumpton residents: the proposed Policy GT1 comes as a [REDACTED], causing a great deal of stress. This is hardly surprising in a close-knit village community, as we are all extremely upset even at the thought of our beautiful South Downs village and farming community being considered as a location for a Gypsy/Travellers' [REDACTED]. The LDC's arbitrary seizure of a beautiful section of our village land for the purpose of forcing through such a development is completely unacceptable.

[REDACTED]

[REDACTED]

What changes do you suggest to make the document legally compliant or sound?

Expansion of the existing travellers' site in Lewes town centre makes far more sense, as there is already an inbuilt infrastructure, far better transport and facilities. Alternatively, a brownfield area (often pleasantly green) would in the same way offer far better facilities, including necessary rubbish disposal facilities.

Do you consider it necessary to participate at the Examination in Public?

No

Why do you feel it is necessary to participate at the Examination in Public?

From: PJM Forbes <[REDACTED]>
Sent: 29 September 2018 18:14
To: ldf
Subject: PUBLIC CONSULTATION on LOCAL PLAN PART 2, 24Sept-5th November. URGENT protest against LDC proposal for Gypsy/Travellers' site

Importance: High

Categories: LPP2 comment to code - stakeholder details have been added

To the PLANNING INSPECTOR

Dear Sir/Madam,

We are horrified at the [REDACTED] prospect of a Gypsy/Travellers' site anywhere in or near Plumpton. We have heard that your proposal is for a permanent site for such caravans just south of the Plough, near The Old Brickworks.

As Plumpton residents we have *every right absolutely to refuse to have this* [REDACTED] forced on our unique South Downs village community.

That the Planning Policy Team can even dream of inflicting such an outrageous scheme on such a special village is so unthinkable as to seem too far-fetched and implausible even to be believed; i.e. you cannot be serious, and what on earth are you thinking of?!

Has this plan been put forward by those of the Team who will be unaffected by it because they reside in an opposite direction, *south* of Lewes, for example?

A final point: by the time Brexit is in operation, economist experts, including the Bank of England and LSE, predict that our property values will tumble by 40 per cent or well over one-third: as if that is not bad enough; but a permanent Travellers' site will have a permanently negative [REDACTED] effect in [REDACTED] the value of what we leave behind for our children and grandchildren. **This would be a personal calamity for us all.**

Very soon the whole village will be up in arms, not only over the prospect of financial ruin but in particular over the disturbingly close proximity of the proposed Gypsy/Travellers' site.

This needs re-thinking. There are several brownfield sites near urbanised areas that are not rural gems yet offer ample and more practical space for caravans ([REDACTED]) without blemishing precious rural South Downs countryside.

Yours faithfully,

Penelope Forbes
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

From: PJM Forbes <[REDACTED]>
Sent: 05 November 2018 14:43
To: ldf
Subject: URGENT protest against LDC proposal for Gypsy/Travellers' site: PUBLIC CONSULTATION on LOCAL PLAN PART 2

Importance: High

Categories: GT01, Vanessa to deal with

To the PLANNING INSPECTOR

Dear Sir/Madam,

(1) We object in the strongest terms to Policy GT1 and to any area of Plumpton being used as a permanent Gypsy/Traveller site. The larger than expected size of the proposed site leads one to presuppose the relative ease (once established) to slip through approval to expand the number from 'six' to several more permanent caravans. [REDACTED]

2) From the point of view of the Travellers (a) expansion of the existing site in the town of LEWES makes far more sense, as there is already an inbuilt infrastructure and far better transport. Alternatively, a brownfield area – often pleasantly green – would in the same way offer Travellers good facilities, including rubbish disposal facilities.

(b) By contrast, Gypsies/Travellers would feel isolated and suffer from a lack of integration in our rural village. Aside from an integration problem, a rural site in Plumpton would be highly unsuitable in terms of lack of infrastructure and lack of facilities.

3) From the point of view of Plumpton residents: the threat of your proposed Policy GT1 is causing enormous stress to an appalled village community. Shocked opposition from the entire village of Plumpton is hardly surprising in a close-knit community: we are all extremely upset that a permanent Travellers' [REDACTED] can even be *envisaged* in our beautiful South Downs country village and farming community.

It has now been revealed how the Council purchased the land south of the Plough without revealing the purpose of the purchase. The Council's arbitrary seizure of a beautiful section of our village land **for the purpose of forcing through such a development is completely unacceptable.**

[REDACTED]

This needs re-thinking: there are several pleasant brownfield sites offering ample, more practical space for caravans and their [REDACTED] (without blemishing precious South Downs countryside). Utilising or expanding the existing travellers' site in Lewes town makes far more sense, as this site is already sustained by an infrastructure, good transport and far better facilities including rubbish disposal facilities.

Threatened by a permanent caravan site literally just up the road from our end of Plumpton, we as Plumpton residents have *every right absolutely to refuse* to have this [REDACTED] forced on our unique Downs village community. That this rural gem could be even *envisaged* as a Traveller site shocks us all and leads us to suspect the option was proposed by those of the Planning Team who are unaffected because they reside in an opposite direction from Plumpton.

A final point: by the time Brexit is operative, economist experts, including the Bank of England and LSE, predict that UK property values will tumble by 40 per cent or well over one-third. As if that is not bad enough, the [REDACTED] of a permanent Travellers' site will have a permanently negative effect on the value of what we leave behind for our children and grandchildren, for whose sakes I have put all my life savings into my home here, which would be [REDACTED] in value. Such financial ruin would be a personal calamity for us all.

Yours faithfully,

Penelope Forbes

[REDACTED]
[REDACTED]
[REDACTED]

Representation ID: REP/163/GT01/ARepresentor Details:

Representor ID:	REP/163
Name:	Meredith Forman
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	GT01 - Land south of The Plough
<i>Do you consider the document to be:</i>	
Legally Compliant:	No
Sound:	No Not Justified
Representation: I wish to notify you of my objections to the proposed Gypsy and Traveller site in the field north of the brickworks, Plumpton Green. My primary reasons are that the site itself is not suitable for any housing development and that it does not sit within the the Government's national planning policy framework	

for good design of Gypsy and Traveller sites.

The safety of any new residents placed here the primary concern.

I understand that a previous planning application for housing was turned down due the location of the site directly onto a fast road and I wish to question why this is being overlooked. To my knowledge there have been no exceptional circumstances highlighted to residents as to why the suitability of this site for housing has changed.

Fundamentally, the site is unsafe and unsuitable for any new community development. It is positioned next to a light Industrial site on the outskirts of a linear village. The site is accessed from an unlit country road in a 60 mile an hour limit zone. There is no pavement at all along this stretch of road, in either direction on either side of the road, preventing safe pedestrian access to the distant village facilities and any public transport at all.

The site has no easy or convenient access to major roads; this will have a detrimental effect on the ability of any community to seek and retain employment or complete education and further training. Leaving any new community isolated and disadvantaged.

Easy access to local services, social integration and a sense of belonging to the wider community is vital for any new members joining an established community. However, this is not possible at this location and is a divisive choice, potentially fuelling unnecessary dissatisfaction from both the established and the potential new communities. When there are other more suitable sites available to the council why chose one where significant detrimental issues are obvious?

Given the likelihood of a high density of children within any new community how can this site be considered a responsible and caring choice when it has direct access to an unpaved and unlit 60 mile an hour road? I would not want my children walking home in the dark on the edge of a busy road. The threat to loss of life is an unacceptable risk for our community. I believe the site does not meet the criteria as it could not be deemed safe for any community with children and animals.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public? No

Why do you feel it is necessary to participate at the Examination in Public?

Representation ID: REP/163/GT01/BRepresentor Details:

Representor ID:	REP/163
Name:	Meredith Forman
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	GT01 - Land south of The Plough
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	
Representation:	<p>My primary concerns are that the site itself is not suitable for any housing development and that it does not sit within the governments national planning policy framework for good design of Gypsy and Traveller sites. The safety of any new residents placed here the primary concern.</p> <p>I understand that a previous planning application for housing was turned down due the</p>

location of the site directly onto a fast road with no pavement and I wish to question why this is being overlooked. To my knowledge there have been no exceptional circumstances highlighted to residents as to why the suitability of this site for housing has changed.

Fundamentally, I believe that the site is unsafe and unsuitable for any new community development. It is positioned next to a light industrial site on the outskirts of a linear village. The site is accessed from an unlit country road in a 60 mile an hour limit zone. There is no pavement at all along this stretch of road, in either direction of either side of the road, preventing safe pedestrian access to the distant village facilities and any public transport at all.

This site has no easy or convenient access to major roads; this will have a detrimental effect on the ability of any community to seek and retain employment or complete education for further training potentially resulting in any new community becoming isolated and disadvantaged.

This site is in a rural area with a single lane road leading in and out of the village; I believe that an increase in traffic volume from either end of the village would be undesirable.

Easy access to local services, social integration and a sense of belonging to the wider community is vital for any new members joining an established community. However, this is not possible at the location and it is a division choice, potentially fuelling unnecessary dissatisfaction from both the established and the potential new communities. I understand that there are other more suitable sites available to the council. Why chose one where significant detrimental issues are obvious from the outset?

Highway safety is a strong concern; given the likelihood of a high density of children within any new community how can this site be considered a responsible and caring choice when it has direct access to an unpaved and unlit 60 mile an hour road? I would not want my young children walking home in the dark on the edge of a busy road. The threat to loss of life both to pedestrian and driver is an unacceptable risk for any community with children and animals.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public?

Why do you feel it is necessary to participate at the Examination in Public?

[REDACTED]

2/10/2018



Dear Sir/Madam,

I wish to notify you of my objections to the proposed Gypsy and Traveller site in the field north of the brickworks, Plumpton Green. Policy GT01, consultation phase.

My primary concerns are that the site itself is not suitable for any housing development and that it does not sit within the the Government's national planning policy framework for good design of Gypsy and Traveller sites.

The safety of any new residents placed here the primary concern.

I understand that a previous planning application for housing was turned down due the location of the site directly onto a fast road with no pavement and I wish to question why this is being overlooked. To my knowledge there have been no exceptional circumstances highlighted to residents as to why the suitability of this site for housing has changed.

Fundamentally, I believe that the site is unsafe and unsuitable for any new community development. It is positioned next to a light Industrial site on the outskirts of a linear village. The site is accessed from an unlit country road in a 60 mile an hour limit zone. There is no pavement at all along this stretch of road, in either direction on either side of the road, preventing safe pedestrian access to the distant village facilities and any public transport at all.

The site has no easy or convenient access to major roads; this will have a detrimental effect on the ability of any community to seek and retain employment or complete education and further training potentially resulting in any new community becoming isolated and disadvantaged.

The site is in a rural area with a single-lane road leading in and out of the village; I believe that an increase in traffic volume from either end of the village would be undesirable.

Easy access to local services, social integration and a sense of belonging to the wider community is vital for any new members joining an established community. However, this is not possible at this location and it is a divisive choice, potentially fuelling unnecessary dissatisfaction from both the established and the potential new communities. I understand that there are other more suitable sites available to the council. Why chose one where significant detrimental issues are obvious from the outset?

Highway safety is a strong concern; given the likelihood of a high density of children within any new community how can this site be considered a responsible and caring choice when it has direct access to an unpaved and unlit 60 mile an hour road? I would not want my young children walking home in the dark on the edge of a busy road. The threat to loss of life both to pedestrian and driver is an unacceptable risk for our community. I believe the site does not meet the criteria as it could not be deemed safe for any community with children and animals.

Yours faithfully

[REDACTED]

Meredith Forman

I have also commented on the

Representation ID: REP/164/E1

Representor Details:

Representor ID:	REP/164
Name:	Emma Forrest
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	E1 - Land at East Quay, Newhaven Port
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	
Representation:	<p>I am getting in touch to share my opposition to the development of the Tide Mills area, as above.</p> <p>The development of a large portion of the previous Tide Mills area goes beyond my love of the area as a local of the town, and stems from a simple concern over the lack of sustainable development proposed.</p> <p>The development directly go against the requirement that local plans must contribute to sustainable development and is instead actively destroying a green marine area and along with it, destroying rare vegetated shingle (an utter loss of biodiversity).</p> <p>Most worrying is that this comes at a time when we have all been told by the UN that the</p>

globe has 12 years to reduce the negative impacts of climate change and protect - a key word! - our delicate environments. Sadly, this plan, along with so many others, is working against that and seems to have forgotten we don't have a Planet B to go to.

I hope this gets to the right person/team and these plans are halted. This is not sustainable development in any way, shape or form.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public?

Why do you feel it is necessary to participate at the Examination in Public?

Hodgson, Lilly

From: Emma Forrest <[REDACTED]>
Sent: 04 November 2018 20:29
To: ldf
Subject: Opposition to Policy E1 in Tide Mills, Newhaven
Categories: Vanessa to deal with

To whom it may concern,

I am getting in touch to share my opposition to the development of the Tide Mills area, as above.

The development of a large portion of the previous Tide Mills area goes beyond my love of the area as a local of the town, and stems from a simple concern over the lack of sustainable development proposed.

The development directly go against the requirement that local plans must contribute to sustainable development and is instead actively destroying a green marine area and along with it, destroying rare vegetated shingle (an utter loss of biodiversity).

Most worrying is that this comes at a time when we have all been told by the UN that the globe has 12 years to reduce the negative impacts of climate change and protect - a key word! - our delicate environments. Sadly, this plan, along with so many others, is working against that and seems to have forgotten we don't have a Planet B to go to.

I hope this gets to the right person/team and these plans are halted. This is not sustainable development in any way, shape or form.

Kind regards,

Emma

Representation ID: REP/165/E1Representor Details:

Representor ID:	REP/165
Name:	Imogene Foss
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	E1 - Land at East Quay, Newhaven Port
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	
Representation:	<p>Hello I would like to object to the development at Tide mills.</p> <p>No proper consultation</p> <p>During the planning meeting in July of this year, the expansion into Tide mills was not clearly stated, so the majority of people locally in Seaford and Newhaven are unaware of this proposed expansion and were not properly consulted. There are no information notices on or near the site, the only notices relate to the channel expansion.</p>

Not related to port activity, loss of important natural habitat, alternative sites in Newhaven

Giving permission for industrial use - not related to the port activity seems like a poor use of the land, there are many brown field sites and industrial zones in Newhaven that can be used for industry without the loss of the E1 site - which contains important natural habitat and is a UN designated Living Coast Biosphere containing rare species of birds and plants.

Damaging Tourism, wildlife and the loss of peaceful enjoyment of Tide mills by local people

Tide mills should be protected for the benefit of wildlife and leisure, recreation and tourism. Rather than building large metal sheds, why not preserve Tide mills and utilise it to encourage more tourism to East Sussex? T

he beautiful wild beach and land of Tide mills is a precious and rare resource, with it's rich history, still visible in the ruins of Tide mills and the Sea plane site.

Cllr Godfrey Daniel stated in the July planning meeting that the people of Seaford and Newhaven had 'been totally conned' by a vision of clean, green, marine. He stated that because there is a large scrap metal site operating on the Newhaven side of the port that objecting to further development was ridiculous - I disagree.

A large section of the beach on the Seaford side is going to be lost to widen the port, which is regrettable but understandable, but this proposed development adjacent to that seems unnecessary, as it is not related to the port and also a bad use of an important local natural resource when other industrial sites are available in Newhaven.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public?

Why do you feel it is necessary to participate at the Examination in Public?

From: I Foss <[REDACTED]>
Sent: 04 November 2018 17:58
To: ldf
Subject: E1 - Tidemills

Categories: LPP2 comment to code - stakeholder details have been added

Policy E1

Hello I would like to object to the development at Tide mills.

No proper consultation

During the planning meeting in July of this year, the expansion into Tide mills was not clearly stated, so the majority of people locally in Seaford and Newhaven are unaware of this proposed expansion and were not properly consulted. There are no information notices on or near the site, the only notices relate to the channel expansion.

Not related to port activity, loss of important natural habitat, alternative sites in Newhaven

Giving permission for industrial use - not related to the port activity seems like a poor use of the land, there are many brown field sites and industrial zones in Newhaven that can be used for industry without the loss of the E1 site - which contains important natural habitat and is a UN designated *Living Coast Biosphere* containing rare species of birds and plants.

Damaging Tourism, wildlife and the loss of peaceful enjoyment of Tide mills by local people

Tide mills should be protected for the benefit of wildlife and leisure, recreation and tourism. Rather than building large metal sheds, why not preserve Tide mills and utilise it to encourage more tourism to East Sussex? T

he beautiful wild beach and land of Tide mills is a precious and rare resource, with it's rich history, still visible in the ruins of Tide mills and the Sea plane site.

Cllr Godfrey Daniel stated in the July planning meeting that the people of Seaford and Newhaven had 'been totally conned' by a vision of *clean, green, marine*. He stated that because there is a large scrap metal site operating on the Newhaven side of the port that objecting to further development was ridiculous - I disagree.

A large section of the beach on the Seaford side is going to be lost to widen the port, which is regrettable but understandable, but this proposed development adjacent to that seems unnecessary, as it is not related to the port and also a bad use of an important local natural resource when other industrial sites are available in Newhaven.

Kind regards
Imogene Foss
[REDACTED]

Representation ID: REP/166/E1

Representor Details:

Representor ID:	REP/166
Name:	Ann and Colin Fox
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	E1 - Land at East Quay, Newhaven Port
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	
Representation:	<p>We are appalled at the proposed plan to allow industrial development on Tide Mills Beach. This is a unique area of peace, tranquillity, and is a protected wildlife site.</p> <p>Is there no one at Lewes District Council who cares what happens to our area. No notice seems to have been taken over the proposed Aggregates Concrete Factory and the £23million to be spent on a flyover (to where?)</p> <p>Please don't dump any other monstrosity on our lovely area. There are few locations like this around. Leave it for future generations to have the same pleasure in our lovely Tide Mills we have had.</p>

Once it has gone it can never be replaced.

As they say in the adverts—when it's gone it's gone.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public?

Why do you feel it is necessary to participate at the Examination in Public?

Kemp, Emma

From: Ann Fox <[REDACTED]>
Sent: 04 November 2018 16:22
To: Idf
Subject: reference E1
Categories: LPP2 comment to code - stakeholder details have been added

Dear Sir,

We are appalled at the proposed plan to allow industrial development on Tide Mills Beach. This is a unique area of peace, tranquillity, and is a protected wildlife site. Is there **no one** at Lewes District Council who cares what happens to our area. No notice seems to have been taken over the proposed Aggregates Concrete Factory and the £23million to be spent on a flyover (to where?) Please don't dump any other monstrosity on our lovely area. There are few locations like this around. Leave it for future generations to have the same pleasure in our lovely Tide Mills we have had. Once it has gone it can never be replaced. As they say in the adverts—when it's gone it's gone.
Ann & Colin Fox

Representation ID: REP/167/E1Representor Details:

Representor ID:	REP/167
Name:	Jane Franklin
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:
Organisation:

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	E1 - Land at East Quay, Newhaven Port
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	
Representation: Please preserve this area of shingle. It may look like wasteland but is a valuable breathing lung of green space that is essential for keeping a dividing line between Newhaven and Seaford.. There will be so much new development in Newhaven it would be tragic to lose such an area of wild space that is valued by so many different groups of our society, walkers, family s, cyclists...everyone needs a bit of head space and fresh air	
What changes do you suggest to make the document legally compliant or sound?	

Do you consider it necessary to participate at the Examination in Public?
Why do you feel it is necessary to participate at the Examination in Public?

Hodgson, Lilly

From: Jane Franklin [REDACTED]
Sent: 31 October 2018 16:31
To: ldf
Subject: the east beach and tidemills

Categories: LPP2 comment to code - stakeholder details have been added

Please preserve this area of shingle. It may look like wasteland but is a valuable breathing lung of green space that is essential for keeping a dividing line between Newhaven and Seaford.. There will be so much new development in Newhaven it would be tragic to lose such an area of wild space that is valued by so many different groups of our society, walkers, family s, cyclists...everyone needs a bit of head space and fresh air
Jane Franklin

Representation ID: REP/168/E1Representor Details:

Representor ID:	REP/168
Name:	Helen Frederick
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:
Organisation:

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	E1 - Land at East Quay, Newhaven Port
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	
Representation: <p>I am writing to urge you to protect this area from industrial development. It has far more potential for tourism and leisure. In fact the whole harbour area could become an attractive leisure and commercial area with the right investment. It is such a beautiful area and would attract visitors from Brighton, London and overseas. This is what would push the economy. There is so much wealth nearby. We must stop seeing Newhaven as an industrial town and work on its merits.</p> <p>The wildlife and habitats at tide mills needs protecting. They have significant educational, leisure and health value for the local population.</p> <p>Please think very carefully and believe in Newhaven" capacity to be much more than it</p>	

has been allowed to be

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public?

Why do you feel it is necessary to participate at the Examination in Public?

Representation ID: REP/169/E1

Representor Details:

Representor ID:	REP/169
Name:	Dan Freeland
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:
Organisation:

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	E1 - Land at East Quay, Newhaven Port
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	
Representation: In relation to e1 in proposed development plan. This is an area of natural beauty and should not be developed. Development would further ruin this area which is about to be impacted by developments to the west.	
What changes do you suggest to make the document legally compliant or sound?	
Do you consider it necessary to participate at the Examination in Public?	
Why do you feel it is necessary to participate at the Examination in Public?	

--

Hodgson, Lilly

From: dan freeland [REDACTED]
Sent: 04 November 2018 15:19
To: ldf
Subject: Reference e1

Categories: LPP2 comment to code - stakeholder details have been added

Dear Lewes council

In relation to e1 in proposed development plan. This is an area of natural beauty and should not be developed. Development would further ruin this area which is about to be impacted by developments to the west.

Regard

D.freeland

Get [Outlook for Android](#)

Representation ID: REP/170/E1

Representor Details:

Representor ID:	REP/170
Name:	Sally Freeman
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	E1 - Land at East Quay, Newhaven Port
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	
Representation:	<p>I strongly object to the proposal for the E1 site at the Tide Mills beach in Newhaven to allow industrial development on the beach, the area should be protected as a local wildlife site, as in keeping with the surrounding area to the east and the South Downs National Park.</p> <p>Any industrialisation of this site will upset the wildlife living in the surrounding area and stop visitors and residents from enjoying the rare sandy beach at low tide, this includes Lewes residents. Would you take your children to a beach next to a cement works ?</p> <p>The treatment of Newhaven residents by East Sussex County Council, Lewes District Council and the Port Authority is disgraceful by slyly adding the E1 development at the</p>

last minute, hoping that they can get away with it.

Who are these people meant to be representing us ?

Enough is enough - leave the coastline away from development.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public?

Why do you feel it is necessary to participate at the Examination in Public?

Thea Davis

From: SALLY FREEMAN <[REDACTED]>
Sent: 05 November 2018 09:23
To: ldf
Subject: Reference: E1 at Newhaven - Consultation

Categories: Vanessa to deal with

Dear Sir,

I strongly object to the proposal for the E1 site at the Tide Mills beach in Newhaven to allow industrial development on the beach, the area should be protected as a local wildlife site, as in keeping with the surrounding area to the east and the South Downs National Park.

Any industrialisation of this site will upset the wildlife living in the surrounding area and stop visitors and residents from enjoying the rare sandy beach at low tide, this includes Lewes residents. Would you take your children to a beach next to a cement works ?

The treatment of Newhaven residents by East Sussex County Council, Lewes District Council and the Port Authority is disgraceful by slyly adding the E1 development at the last minute, hoping that they can get away with it.

Who are these people meant to be representing us ?

Enough is enough - leave the coastline away from development.

Yours faithfully

S. Freeman

Representation ID: REP/171/GT01Representor Details:

Representor ID:	REP/171
Name:	Julian and Rosalie Frost
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	GT01 - Land south of The Plough
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	
Representation:	
<p>Proposed Permanent Travellers Site in Plumpton Green – Local Plan Part 2 Ref: LP2</p> <p>We have serious concerns regarding the above proposal and therefore set out below our main objections.</p> <p>1. Have the Council considered the true impact of their proposal on the local businesses at The Old Brickworks industrial estate, adjacent to the proposed site? It will be a tragedy if the businesses concerned leave, as they have threatened to do, should the</p>	

above proposal be given the go ahead. We regularly use the garage there, and the village shop will suffer a huge loss of business without the owners/employees regular custom.

2. How will the Gypsy children walk to school safely? There are no pavements or street lighting between the site and the centre of the village. We must assume, therefore, that they will be driving to school causing more congestion and pollution.

3. The proposed site is located at the end of a national speed limit D road and is therefore very dangerous. There is no gas supply or mains sewerage. How do the Council propose tackling these problems, as well as the lack of street lighting and pavements?

4. We have noticed an increase in traffic over the past few years with the additional housing in the village and the expansion of Plumpton College. College coaches, cars to the primary school, station commuters, not to mention everyone else travelling in the morning and afternoon rush hours to their jobs at The Brickworks and elsewhere; can the village safely cope with an increase in local traffic at these times of day?

5. The previous planning applications for the site were turned down on the basis of safety. The site is adjoined to a road with cars travelling at speeds of up to 60mph. Why is it deemed safe for Gypsies to live here but not the previous applicants?

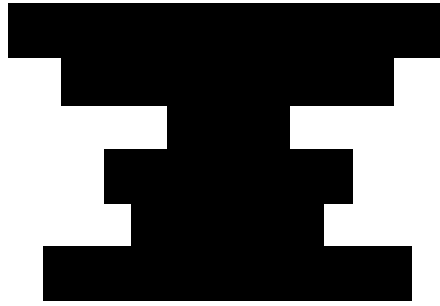
6. We have lived locally on and off since 1969. We know the area and the locals extremely well. We witnessed an enormous level of public resistance at the meetings, and the general feeling locally is negative. We feel that the Council have a duty of care to the local residents, businesses and their employees.

With the above in mind, we would ask that you take our objections seriously and reconsider the land at Plumpton Green being an appropriate location for the proposed gypsy site.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public?

Why do you feel it is necessary to participate at the Examination in Public?



Lewes District Council
Southover House
Southover Road
Lewes
BN7 1AB

3rd November 2018

Dear Sir/Madam

Proposed Permanent Travellers Site in Plumpton Green – Local Plan Part 2 Ref: LP2

We have serious concerns regarding the above proposal and therefore set out below our main objections.

1. Have the Council considered the true impact of their proposal on the local businesses at The Old Brickworks industrial estate, adjacent to the proposed site? It will be a tragedy if the businesses concerned leave, as they have threatened to do, should the above proposal be given the go ahead. We regularly use the garage there, and the village shop will suffer a huge loss of business without the owners/employees regular custom.
2. How will the Gypsy children walk to school safely? There are no pavements or street lighting between the site and the centre of the village. We must assume, therefore, that they will be driving to school causing more congestion and pollution.
3. The proposed site is located at the end of a national speed limit D road and is therefore very dangerous. There is no gas supply or mains sewerage. How do the Council propose tackling these problems, as well as the lack of street lighting and pavements?

4. We have noticed an increase in traffic over the past few years with the additional housing in the village and the expansion of Plumpton College. College coaches, cars to the primary school, station commuters, not to mention everyone else travelling in the morning and afternoon rush hours to their jobs at The Brickworks and elsewhere; can the village safely cope with an increase in local traffic at these times of day?
5. The previous planning applications for the site were turned down on the basis of safety. The site is adjoined to a road with cars travelling at speeds of up to 60mph. Why is it deemed safe for Gypsies to live here but not the previous applicants?
6. We have lived locally on and off since 1969. We know the area and the locals extremely well. We witnessed an enormous level of public resistance at the meetings, and the general feeling locally is negative. We feel that the Council have a duty of care to the local residents, businesses and their employees.

With the above in mind, we would ask that you take our objections seriously and reconsider the land at Plumpton Green being an appropriate location for the proposed gypsy site.

Yours faithfully

Julian and Rosalie Frost

Representation ID: REP/172/E1

Representor Details:

Representor ID:	REP/172
Name:	Rachel Fryer
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	E1 - Land at East Quay, Newhaven Port
<p><i>Do you consider the document to be:</i></p> <p>Legally Compliant:</p> <p>Sound:</p>	
<p>Representation:</p> <p>I am writing with some comments and objections to the proposed Lewes District Local Plan part 2.</p> <p>I would urge you to remove the new Policy E1. This important local wildlife site (formerly SNCI) should be protected for the benefit of wildlife and leisure, recreation and tourism.</p> <p>Policy E1 will work against sustainable development. It is based on a saved policy which is no longer appropriate for the area; and which is against both the agreed vision for the area and community wishes. It is not justified by employment need. It has not been fully and explicitly included in previous consultation drafts which would have allowed the community to voice those concerns so there hasn't been enough consultation on this.</p>	

E1 represents a change from the previous draft. It removes the need for developments to be associated with port activity. It allocates a much larger area of Tidemills for development, an area which is used and loved by many members of the public. They would not be able to enjoy it so much if it is developed and there is a great deal of biodiversity there which, whatever conditions are placed on a development, there is inevitably going to be some impact on. And there isn't even any guarantee on the number of jobs this would generate.

Newhaven already has a large industrial area and an incinerator. There is a great deal of potential for economic expansion in Newhaven which is sustainable, 'clean and green' but as we know from recent developments, allocating yet more land for development without the possibility to specify what type of activity happens means there will be no guarantee of the type of development that will happen here and whether it will be for the greater good of the town in terms of increased traffic, pollution, or more jobs. There is little or no evidence that recent developments have benefitted the town.

I support and endorse everything that has been said by Community Action Newhaven and urge you to remove Policy E1.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public?

Why do you feel it is necessary to participate at the Examination in Public?

From: Rachel Fryer <[REDACTED]>
Sent: 22 October 2018 22:02
To: ldf
Subject: Response to Local Plan

Follow Up Flag: Follow up
Flag Status: Completed

Categories: LPP2 comment to code - stakeholder details have been added

To whom it may concern

I am writing with some comments and objections to the proposed Lewes District Local Plan part 2.

I would urge you to remove the new Policy E1. This important local wildlife site (formerly SNCI) should be protected for the benefit of wildlife and leisure, recreation and tourism.

Policy E1 will work against sustainable development. It is based on a saved policy which is no longer appropriate for the area; and which is against both the agreed vision for the area and community wishes. It is not justified by employment need. It has not been fully and explicitly included in previous consultation drafts which would have allowed the community to voice those concerns so there hasn't been enough consultation on this.

E1 represents a change from the previous draft. It removes the need for developments to be associated with port activity. It allocates a much larger area of Tidemills for development, an area which is used and loved by many members of the public. They would not be able to enjoy it so much if it is developed and there is a great deal of biodiversity there which, whatever conditions are placed on a development, there is inevitably going to be some impact on. And there isn't even any guarantee on the number of jobs this would generate.

Newhaven already has a large industrial area and an incinerator. There is a great deal of potential for economic expansion in Newhaven which is sustainable, 'clean and green' but as we know from recent developments, allocating yet more land for development without the possibility to specify what type of activity happens means there will be no guarantee of the type of development that will happen here and whether it will be for the greater good of the town in terms of increased traffic, pollution, or more jobs. There is little or no evidence that recent developments have benefitted the town.

I support and endorse everything that has been said by Community Action Newhaven and urge you to remove Policy E1.

Thanks and wishes,

Rachel Fryer

Representation ID: REP/173/GT01Representor Details:

Representor ID:	REP/173
Name:	Margaret Galletly
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:
Organisation:

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	GT01 - Land south of The Plough
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	
Representation:	
There are several reason why I object to the plan to provide this site; We have already completed the Neighbourhood Plan and there was no mention of this site then. This is a green field site outside the village so should not be developed. The area has no pavement or lighting therefore is dangerous for people/children walking when dark. Businesses in the Old Brickworks have voiced worries for their businesses and have said they would move to new premises if this site were to open, this will be very	

detrimental for local employment.

Once planning is approved this site could be expanded in the future which would be very detrimental for the village.

Who would be managing the site?

[REDACTED]

I do hope the council will reconsider this application.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public?

Why do you feel it is necessary to participate at the Examination in Public?

Hodgson, Lilly

From: Margaret Galletly <[REDACTED]>
Sent: 20 October 2018 21:34
To: ldf
Subject: Planning Plumpton Gypsy Site next to Old Brickworks
Categories: LPP2 comment to code - stakeholder details have been added

Dear Sir/Madam,
There are several reason why I object to the plan to provide this site;
We have already completed the Neighbourhood Plan and there was no mention of this site then.
This is a green field site outside the village so should not be developed.
The area has no pavement or lighting therefore is dangerous for people/children walking when dark.
Businesses in the Old Brickworks have voiced worries for their businesses and have said they would move to new premises if this site were to open, this will be very detrimental for local employment.
Once planning is approved this site could be expanded in the future which would be very detrimental for the village.
Who would be managing the site? [REDACTED]
[REDACTED]

I do hope the council will reconsider this application.
Yours
Margaret Galletly

Representation ID: REP/174/GT01Representor Details:

Representor ID:	REP/174
Name:	Rebecca Gallington
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	GT01 - Land south of The Plough
<i>Do you consider the document to be:</i>	
Legally Compliant:	No
Sound:	No Not Positively Prepared Not Justified
Representation: There has been insufficient early and effective community engagement with both settled and traveller communities, we (the settled community) were advised on the 5th September, with a 5 WEEK consultation period starting on the 24th September! This is not in accordance with Policy A of the PPTS. The planning permission of the proposal is flawed with the site previously being refused	

for development as it was unsuitable. This current proposal was not incorporated at any point into the (Plumpton Parish Neighbourhood Plan) PPNP and is not in accordance with the following policies: Policy 1: Spatial plan for the parish Policy 2: New-build environment and design Policy 3: Landscape and biodiversity Policy 5: New housing Policy 6: Local employment Policy 7: Plumpton Green Village Centre (see attached PPNP)

What changes do you suggest to make the document legally compliant or sound?

Be transparent in your objectives at an earlier stage.

Adhere to current planning policies, including the Plumpton Parish Neighbourhood Plan

Do you consider it necessary to participate at the Examination in Public? No

Why do you feel it is necessary to participate at the Examination in Public?



PLUMPTON PARISH NEIGHBOURHOOD PLAN 2017-2030



January 2018

Adopted by Lewes District Council on 2nd May 2018
and by the South Downs National Park Authority on 12th April 2018

Plumpton Parish Neighbourhood Plan 2017–2030

January 2018

Contents

List of policies	3
Foreword	4
1. Introduction and Background	6
2. The Neighbourhood Area	9
3. Planning and policy context	12
4. Community views on planning issues	17
5. Vision, Objectives and Land Use Policies	27
6. Neighbourhood Plan Implementation	57
7. Policies Map	59
8. Annex – Evidence Base	60

List of Policies

Policy 1: Spatial plan for the parish	30
Policy 2: New-build environment and design	32
Policy 3: Landscape and biodiversity	33
Policy 4: Sustainable drainage and wastewater management	34
Policy 5: New housing	37
Policy 5.1: Riddens Lane, Plumpton Green	38
Policy 5.2: Wells Close, Plumpton Green	40
Policy 5.3: The Glebe, Plumpton Green	42
Policy 5.4: Land rear of Oakfield, Plumpton Green	45
Policy 6: Local employment	47
Policy 7: Plumpton Green Village Centre	48
Policy 8: Plumpton College	49
Policy 9: Plumpton Racecourse	51
Policy 10: Community facilities	53
Policy 11: Local Green Spaces and Open Spaces	56

Foreword

The Localism Act 2011 and the associated Neighbourhood Planning (General) Regulations give local communities the opportunity to take direct control of certain aspects of the planning process in their areas.

Plumpton Parish Council applied for designation of the parish for the purposes of producing a Neighbourhood Plan in November 2013. The parish as a whole was designated as a Neighbourhood Area by Lewes District Council (LDC) in April 2014.

The Parish Council then set up the Plumpton Parish Neighbourhood Plan Steering Group (hereafter referred to as the Steering Group) and this group was charged with preparing the Neighbourhood Plan that would lead development in the parish through to 2030. The group was fully constituted and given clear terms of reference and initially comprised four parish councillors and eight residents who volunteered for this important task.

The Steering Group, working with outside advisers, held regular and frequent meetings with the initial objective of defining a Vision Statement for the parish for the period of the Neighbourhood Plan. The Vision Statement is set out in Section 5 of this plan.

There were many considerations for the Steering Group in drawing the plan together, arguably the most important being housing. Lewes District Council requires Plumpton Green to provide a minimum of 50 housing units during the plan period. This led to a call for landowners to come forward with sites that could be made available for development, which have been assessed according to national and local planning laws and guidance.

Following extensive consultations with the residents of the parish, including a parish-wide questionnaire, a draft plan was published in June 2016. A statutory Regulation 14 consultation, seeking feedback from both residents and statutory consultees such as Lewes District Council and East Sussex County Council, followed.

A revised draft plan sought to respond to that feedback while maintaining the core principles of the original Vision Statement and the parish preferences expressed throughout the plan process. This was again put out for Regulation 14 consultation, and further amended in the light of feedback from statutory consultees and residents. It was approved for submission by the Parish Council in September 2017.

The policies in this plan:

- allocate small-scale, individual housing developments in the centre of Plumpton Green that:
 - are low in density;
 - retain the rural character of the village;
 - protect existing landscape and natural features;
 - allow easy access to village amenities; and
 - maintain the 'green gap' to the north that is so important to many residents;
- offer local businesses the support they need to grow;
- designate Local Green Spaces that have been identified as particularly special

and significant to the parish's population, in order to preserve them for future generations;

- seek to protect important community assets so that they remain available to the community.

The Plumpton Parish Neighbourhood Plan (PPNP) will form a significant part of the planning process for the parish over the next 15 years. When considering planning applications, all relevant planning authorities, but especially Lewes District Council and South Downs National Park Authority, will take full account of these policies.

Nick Beaumont / Catherine Jackson

Co-Chairs, Plumpton Parish Neighbourhood Plan Steering Group

1. Introduction and background

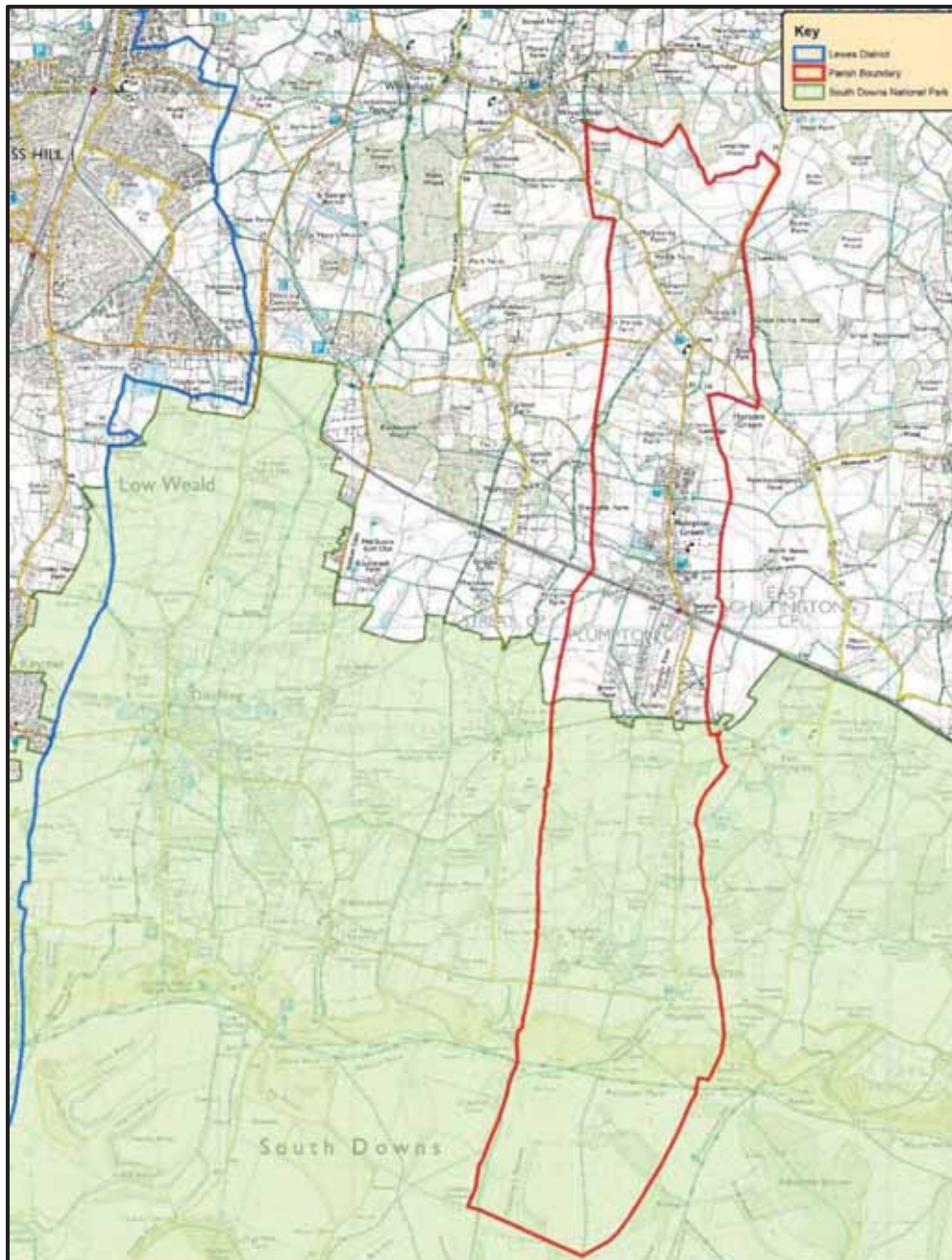
1.1 Abbreviations used in this document:

- JCS Joint Core Strategy
- LDC Lewes District Council
- NPPF National Planning Policy Framework
- PPC Plumpton Parish Council
- PPNP Plumpton Parish Neighbourhood Plan
- SA Sustainability Appraisal
- SDNP South Downs National Park
- SDNPA South Downs National Park Authority
- SEA Strategic Environment Assessment
- SHELAA Strategic Housing and Economic Land Availability Assessment

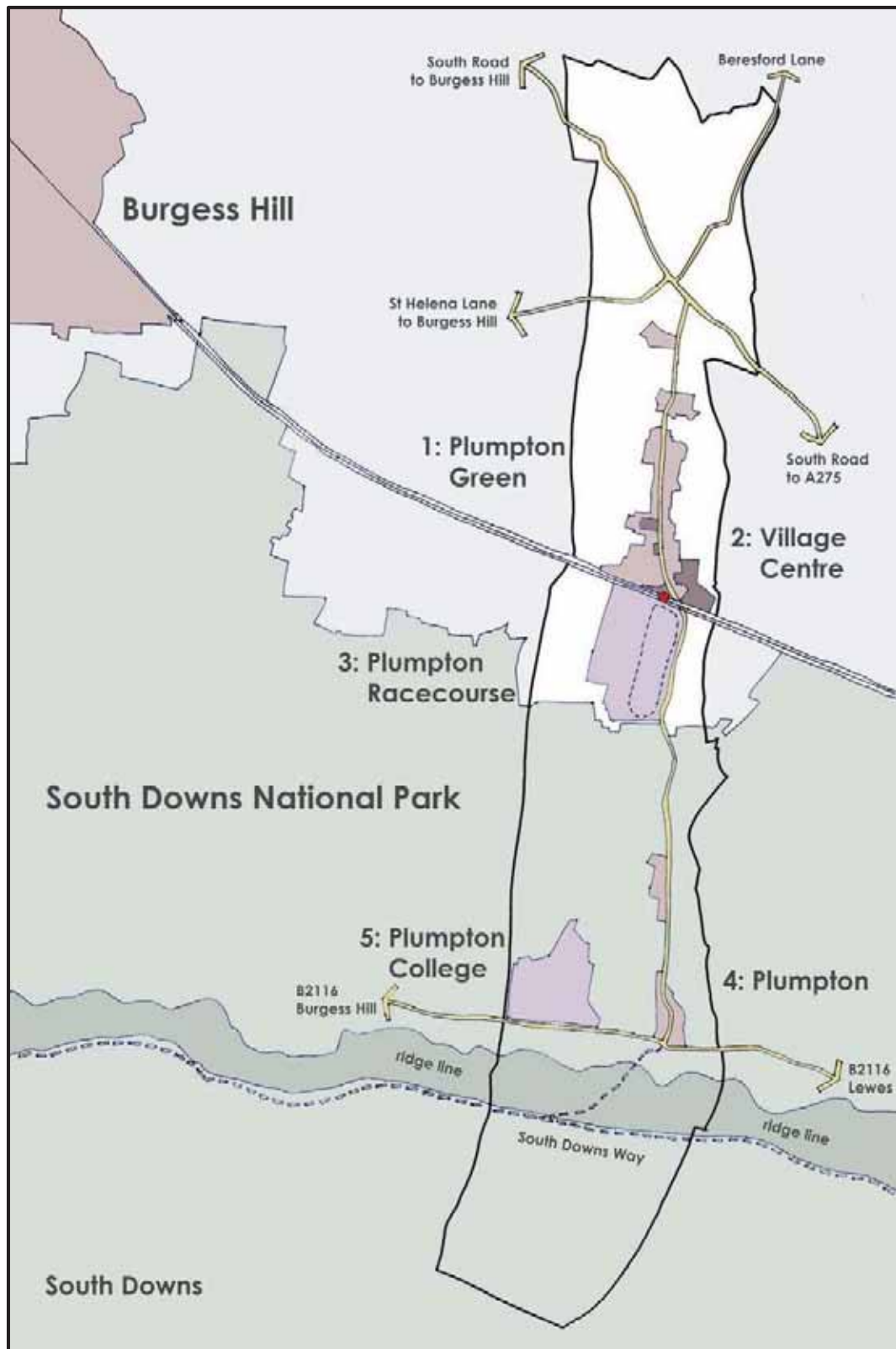
1.2 PPC has prepared a Neighbourhood Plan for the area designated by the relevant local planning authorities, including LDC and SDNPA, under the provisions of the Localism Act 2011 and of the Neighbourhood Planning (General) Regulations 2012. The designated area is shown in red on Map A (p. 7) and in more detail on Map B (p. 8).

1.3 The purpose of the PPNP is to make planning policies that aim to protect the character of the parish and encourage development proposals that are of benefit to the local community. Where planning frameworks allow, those policies will then guide LDC and other statutory bodies, such as the SDNPA, in determining planning applications in the area, with due regard for Plumpton parishioners' preferences.

Map A: The Designated Plumpton Parish Area



Map B: Plumpton Parish



2. The neighbourhood area

- 2.1 The parish of Plumpton is located in the county of East Sussex, within the Lewes district. The parish lies to the north west of the district and is primarily a rural area with access to the urban conurbations of Lewes, Haywards Heath and Burgess Hill, the last two in a different local authority area. Further afield lie Brighton and the south coast towns.
- 2.2 In Saxon times, the Manor of Plumpton belonged to the church of Bosham, but after the Conquest became part of the Rape of Lewes.
- 2.3 In the Medieval Period, Plumpton Green was part of the waste or common lands of the Manor of Plumpton. Known as Plumpton Common, it was gradually colonised by small, dispersed farmsteads. The common was enclosed by the beginning of the 17th century, with the results still being evident in the areas of smaller fields edged by shaws, the most obvious example of this being the fields to the west of the Fountain Inn, being part of Little Inholmes Farm.
- 2.4 By the time of the tithe apportionment of 1842 there were about 10 properties located along the north-south 'drove' road, inside the edge of the manorial roadside waste and hence set back from the current Station Road.
- 2.5 The late Victorian and Edwardian period saw the arrival of the railway and widespread development of the brick-making industry. This era is evidenced from the listed Victorian station complex, the development of a roadside frontage of houses of the time (including small brickworkers' cottages and larger speculative housing) built on the verges of the original 'drove' road, plus other commercial properties, some of which have been lost or converted. In representing the origins of the area as a distinct residential settlement, separate from Plumpton, this arguably forms the most important historical character of the village.
- 2.6 The vast majority of housing in Plumpton Green was constructed during the second half of the 20th century. It comprises two distinct types:
 - individual speculative houses built as infills in the existing road network, being mainly larger detached houses fronting onto Station Road;
 - speculative developments and two local authority housing schemes built on either former brickworking areas or on agricultural fields. The brownfield sites, Chapel Road and Woodgate Meadow etc, occupy 'backland', i.e. land to the rear of existing housing, while the greenfield sites have tended to be built on lateral spurs jutting well into the surrounding farmland without direct

impact on the rear of existing properties, e.g. East View Fields, West Gate and Wells Close. The latter in particular provide another characteristic of this village.

- 2.7 The vast majority of these more modern houses have been built mainly in brick and tile. Although this was most likely due to economy and fashion, it means that they conform to possibly the most important vernacular materials of the village as a historic brickyard area set on Wealden Clay.
- 2.8 The parish is situated in a predominantly rural setting and is surrounded by farmland to north, east and west, and the South Downs to the south. With a current population of approximately 1,650 residents, it supports a thriving community with many social clubs and societies in a much beloved environment rich in wildlife and beauty.
- 2.9 A small amount of housing development has taken place over the last 30 years predominantly in two medium-sized developments. Most local employment is provided by Plumpton College and Plumpton Racecourse and small businesses on two commercial estates. The railway station in the parish provides regular train services to London, Eastbourne and Hastings. The parish also benefits from a primary school, a shop with post office and three public houses.
- 2.10 Much of the above information on historical aspects is abstracted from A Historic Landscape Characterisation of Plumpton Green, East Sussex (Millum, 2016), which is included in the supporting documents.



3. Planning and policy context

- 3.1 The parish lies within LDC and the SDNPA in the county of East Sussex. Each of these administrations has policies and proposals that have a significant influence on the strategy and detailed content of the PPNP.
- 3.2 The NPPF published by the Government in 2012 is an important guide in the preparation of local plans and neighbourhood plans. The PPNP must have regard to the provisions of the NPPF. The following paragraphs of the NPPF are especially relevant to the PPNP:
- Supporting a prosperous rural economy (paragraph 28);
 - Good design (paragraph 58);
 - Protecting healthy communities (paragraph 70);
 - Protecting local green spaces (paragraph 76);
 - Conserving and enhancing the natural environment (paragraph 109);
 - Conserving and enhancing the historic environment (paragraph 126);
 - Neighbourhood planning (paragraph 185).
- 3.3 The Joint Core Strategy (JCS) was adopted by LDC on 11 May 2016 and the SDNPA on 23 June 2016, so now forms part of the development plan for the district. It therefore forms the local planning policy with which the Neighbourhood Plan must in general conform. While the 2003 Lewes District Local Plan has been superseded, some of the 'saved' policies of the 2003 Lewes District Local Plan have been retained through the JCS (see list below), and so are still also part of the development plan.

The Lewes District Local Plan 2003

- 3.4 LDC undertook a review of its 2003 Local Plan 'saved' policies to determine their consistency with the NPPF, published in 2012. Following the adoption of the JCS, a number of the 'saved' policies have been superseded. They do not form part of the Local Plan and will not be used in future to determine planning applications. The retained policies relevant to the PPNP are the following policies:
- Policy ST3/4: Design, Form and Setting of Development. This policy sets out development criteria for new development;
 - Policy RES8: Replacement Dwelling in the Countryside. Outside the planning boundary, replacement dwellings are only permitted when the replacement dwelling is similar to the original;

- Policy RES10: Exception Sites. Principles are set out for affordable housing exception sites that may be granted outside the planning boundary;
- RES19: Provision of Outdoor Playing Space. In areas where provision is deficient, residential development is required to contribute towards outdoor sports and/or children's outdoor play spaces;
- Policy CT1: Planning Boundary and Key Countryside Policy. This policy aims to resist development outside existing planning boundaries unless it meets certain criteria. Plumpton Green is the only settlement in the parish that has a planning boundary;
- Policy H2: Listed Buildings. This policy resists development proposals that would adversely affect the architectural and historic character of listed buildings;
- Policy RE1: Provision of Sport, Recreation and Play. This policy sets minimum standards for the provision of outdoor public and private playing spaces.

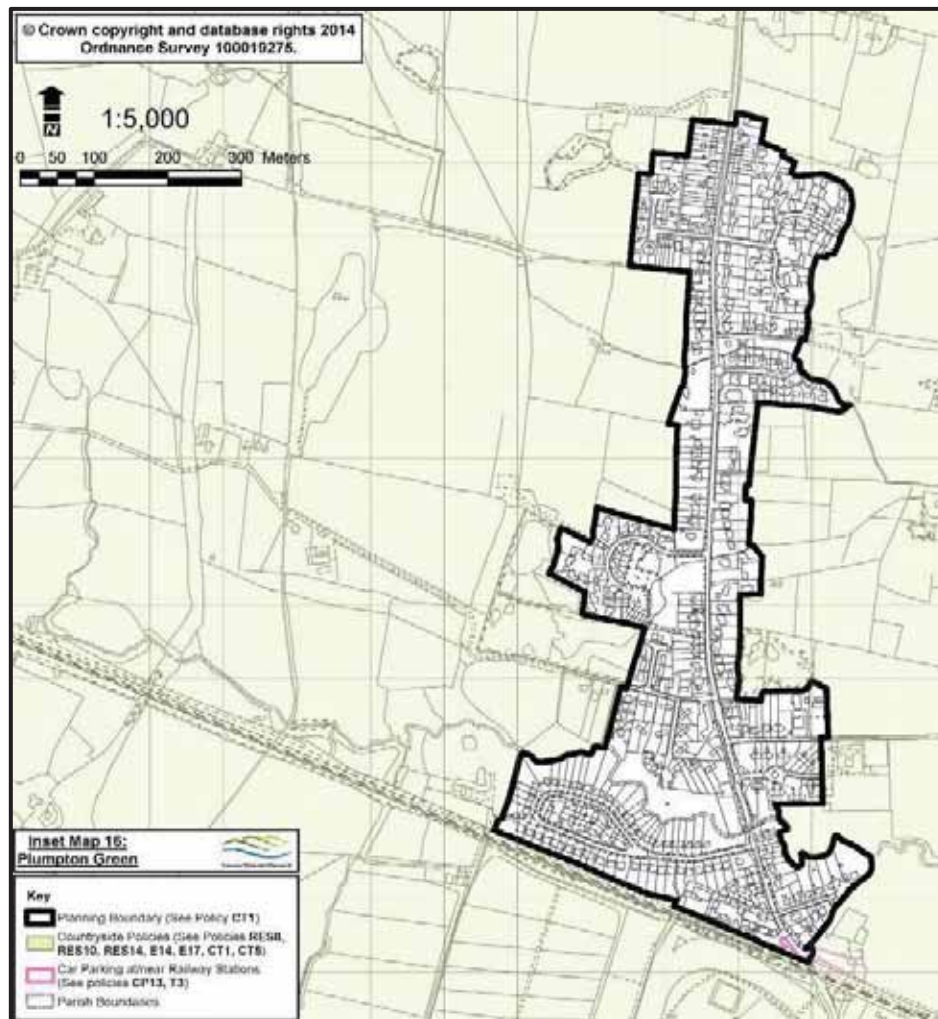
The Joint Core Strategy (Local Plan Part 1) (JCS)

- 3.5 The Joint Core Strategy (JCS) sets out the strategic policy context for the Lewes District until 2030. This includes the parts of the district, and therefore of the parish, both within and outside the South Down National Park. It was adopted by LDC in May 2016 and by the SDNPA in June 2016. It is noted that further to a High Court ruling, JCS policies SP1 and SP2 which relate to the SDNP have been quashed.
- 3.6 It should be mentioned that the evidence base for the JCS and its emerging policies have been influential in the preparation and development of the PPNP, even before the JCS was adopted in May 2016. This is important in ensuring that the PPNP is consistent with the strategic policies for the district at the point at which it is adopted for the entire plan period.
- 3.7 There are two settlements in Plumpton Parish. The settlement hierarchy in the JCS identifies Plumpton Green, the main settlement in the parish, as a Service Village. A settlement of this size should provide around 30-100 housing units during the plan period. Plumpton, a separate settlement that lies at the southern part of the parish within the SDNPA, has been identified as a Hamlet. Given the characteristics of Plumpton, it is thought that new housing should not be focused in this location, and therefore no level of growth has been identified for it.
- 3.8 The JCS Spatial Policy 1 (Provision of Housing and Employment Land) sets a minimum of 6,900 net additional dwellings to be provided across the

district up to 2030. The JCS Spatial Policy 2 (Distribution of Housing) breaks down this housing growth requirement between the settlements and sets a planned level of growth for Plumpton Green of a minimum of 50 net additional units over the plan period up to 2030. Plumpton does not have a planned level of growth for the plan period. The parish could contribute to the windfall allowance through the delivery of unidentified small scale (fewer than six units) sites and to the rural expectations sites allowance, which aims at providing additional affordable housing across the district.

- 3.9 It should be noted that the JCS Spatial Policy 2 also states that an additional 200 net additional units will need to be allocated to settlements across the district in locations yet to be determined. It may involve some additional housing land allocations in Local Plan Part 2 beyond those identified in the Neighbourhood Plan. This could include Plumpton Green.
- 3.10 The following policies will play an important part in shaping Plumpton Parish during the plan period:
- Core Policy 1: Affordable Housing. This policy sets a district-wide target for the on-site provision of 40% affordable housing on developments of 11 or more dwellings;
 - Core Policy 2: Housing Type, Mix and Density. This policy sets a policy framework for new development to provide an appropriate and flexible range of dwelling types, mix and density;
 - Core Policy 4: Encouraging Economic Development and Regeneration. This policy looks to stimulate and maintain the local economy through focusing retail and services around hubs and safeguarding existing employment;
 - Core Policy 6: Retail and Sustainable Town and Local Centres. This policy aims to retain a range of retail, employment, leisure, cultural and community uses and to maintain focused centres of these shops and services, in order to maintain their vitality and viability. The policy also supports and retains local shops in areas not identified in the retail hierarchy;
 - Core Policy 8: Green Infrastructure. This policy promotes the creation of increased green infrastructure by looking at how to deliver a network linking green corridors and green spaces for the use of the community.

Map C: Planning boundary at Plumpton Green as per the JCS



The South Downs Local Plan

- 3.11 The SDNPA is currently preparing a Local Plan for the entire National Park, which will replace the JCS in areas within the National Park when it is adopted (estimated adoption July 2018). A significant part of the Neighbourhood Area lies within the SDNP. The Environment Act 1995 establishes the statutory purposes of national parks as being to conserve and enhance their natural beauty, wildlife and cultural heritage, and to promote opportunities for the understanding and enjoyment of their special qualities. The Neighbourhood Plan recognises and supports these statutory purposes.

The Sites Allocation and Development Management Policies (Local Plan Part 2)

- 3.12 LDC is currently preparing the Local Plan Part 2: Site Allocations and Development Management Policies. It will constitute the second part of the Lewes District Local Plan, covering the area outside the South Downs

National Park. Once adopted, it will replace the retained policies of the 2003 Lewes District Local Plan, and address site allocations where this has not been done through the neighbourhood planning process.

Other policies that influence the PPNP

- 3.13 East Sussex Local Transport Plan 2011-2026, and East Sussex Local Transport Plan Implementation Plan 2016-2021.
- 3.14 ESCC's planning guidance on parking for residential and non-residential development, as found at www.eastsussex.gov.uk/environment/planning/applications/development-control/tdc-planning-apps/
- 3.15 The PPNP, once adopted, will form part of the LDC and SDNPA development plan, alongside other adopted neighbourhood plans. It will provide the site allocation and additional development management policies more specific to Plumpton Parish to accompany those in the development plan.

4. Community views on planning issues

- 4.1 The PPNP Steering Group has consulted with the local community during the course of the PPNP preparation process, and the PPNP is based on the results of these consultations, which have included meetings, open days and community surveys.
- 4.2 The PPNP Steering Group organised several consultation events for the village community, which were well attended.

First consultation drop-in

- 4.3 The first was a drop-in open event on 29 April 2014 to launch the Neighbourhood Plan process to residents and gauge their views on the implications of the minimum housing development required by LDC.
- 4.4 The event was held in the village hall from 3.00pm to 7.30pm to allow as many people as possible to visit. A number of displays were created around six main themes:
 - village identity:
 - what makes Plumpton special?
 - why do we live here?
 - how do we feel about living here?
 - what would we like for the future of Plumpton?
 - housing;
 - transport;
 - business;
 - leisure;
 - wildlife and public spaces.
- 4.5 Residents were invited to post comments on the displays. A total of 168 comments were contributed by 108 residents. The PPNP village consultation April 2014 – summary report provides a detailed breakdown of the responses.
- 4.6 Broadly, what mattered most to residents was the rural nature of the parish, its green surroundings and tranquility, and its strong community spirit and character.
- 4.7 The majority agreed that some new housing was necessary, but with the following caveats: any new housing should be clustered in small sites, on brownfield sites where available (38% support); it should include affordable housing for older and younger people (31%); and views and green spaces should be protected (25%).

- 4.8 Residents supported encouraging and developing existing and new businesses within the parish and improving the economic activity of the village through tourism (e.g. cafe and cycle hire) in order to capitalise on its proximity to the South Downs National Park.
- 4.9 Infrastructure adequacy was a concern, and loss of space and poor broadband connectivity and utilities were all mentioned. Some commented that they didn't want Plumpton to become a 'dormitory', with only commuters living in the parish.
- 4.10 Transport and parking were also of concern: 33% of these comments wanted more parking provision, and specifically parking at the railway station (18%). Lower speed limits in and around the parish were mentioned in 19% of comments (although 10% did not want reduced speed limits), and 14% wanted more encouragement for green transport. Better train and bus services were requested by 11% in total.
- 4.11 Asked about access to leisure activities, residents favoured preservation of green spaces (34%), followed by better use of and improvements to existing village facilities (26%).
- 4.12 On wildlife issues and preserving wildlife habitats, 39% of comments concerned the potential negative impact of new housing, and 39% said the protection of wildlife should be a priority. An overwhelming 90% of responses favoured conservation of wildlife in general, and also of trees and hedges and natural public space.

Second consultation drop-in

- 4.13 The second consultation event took place on 16 September 2014 and was again an open drop-in, from 3.00pm to 8.00pm at the village hall. A total of 109 residents attended, of whom 43 had also been to the first consultation event. We thus reached in total 174 residents over the two events.
- 4.14 We again used display boards and tables to invite residents to comment on the following questions:
- What would we like for the future?
 - What do we like about Plumpton and Plumpton Green now?
- 4.15 The following key topic areas were presented and residents' comments were invited on potential strengths, weaknesses, opportunities and threats:
- economy and local business;

- environment;
- transport;
- housing;
- heritage.

- 4.16 The PPNP village consultation event September 2014 – analysis of feedback document contains a detailed summary of the responses. The answers mostly echoed those in the first consultation event, although more people (58%) expressed concern about the prospect of housing development than felt more positively towards it (42%). The positive responses highlighted opportunities to invest in infrastructure and transport links, including pavements, as well as community life such as clubs and sports.
- 4.17 The most comments in relation to the future could be clustered under the themes of 'retain natural countryside and wildlife' (22%) and 'retain character of the village' (21%). Some 15% of comments supported 'small, discreet, affordable development'.
- 4.18 Asked what they liked about Plumpton parish now, again the majority (64%) of comments referred to its quiet/peace and landscape and its strength of community (41%).
- 4.19 On housing, the greatest number of comments related to the threats posed by any development: to the countryside, from flood risks, from increased road traffic and parking problems, and from damage to the village's rural character. There was also concern about maintaining public confidence if an existing covenant preventing development on one site was not honoured. Residents feared that existing services and infrastructure would not be able to sustain additional housing (19 responses). Opportunities identified included affordable housing for young and old, the opportunity to develop nature reserves, and improvements to flood defences (30 comments).
- 4.20 Overall, the event confirmed the conclusions from the previous consultation.
1. Sites should be small and spread evenly around the village, to include sites north and south as well as east and west.
 2. Brownfield sites should be used wherever possible and open countryside, views and wildlife protected.
 3. Affordable housing should be incorporated to provide housing for young families, young people who want to remain in the village and older residents who may wish to move on from larger homes.

First landowners/sponsors meeting

- 4.21 The next public meeting was an evening event on 6 January 2015 at the village hall, where we invited local landowners or their agents to present their housing development proposals to the PPNP Steering Group.
- 4.22 More than 100 village residents attended. There were six formal presentations:
- land south of Riddens Lane;
 - land north of Wells Close;
 - Fallbrook, Plumpton Lane (subsequently discounted as outside the development area);
 - land at Little Inholmes Farm;
 - land behind the school, North Barnes Lane;
 - land to the rear of Oakfield, Station Road.
- 4.23 In addition, proposals for three sites for which no development plans had yet been prepared were informally presented to the PPNP Steering Group after the main meeting closed:
- land to the north of the Old Police House, Station Road;
 - land at Inholms Farm, Station Road;
 - land south of Inholms Farm, Station Road.

Second landowners/sponsors meeting

- 4.24 A second meeting with further owners/agents of land potentially available for development was organised on 3 March 2015. Parish residents were again invited to attend, and 110 came.
- 4.25 Proposals for development of a further six potential areas were presented:
- church Glebe land and the Rectory, Station Road;
 - land to the north of the Old Police House, Station Road;
 - land at Inholms Farm, Station Road;
 - Nolands Farm, off Station Road;
 - land east of Plumpton Lane, south of the railway line;
 - land south of Inholms Farm, Station Road.
- 4.26 Again, members of the PPNP Steering Group and parish residents were

invited to ask questions and offer comments. These further sites were taken forward for detailed consideration by the PPNP Steering Group.

Resident questionnaire

4.27 In January 2015, the PPNP Steering Group distributed a questionnaire to all parish households. The questionnaires were returned to a central collection site at the village shop or collected personally, door to door, by PPNP Steering Group members. In total, 632 questionnaires were distributed and 358 returned – a 57% response rate.

4.28 The questionnaire sought residents' views on where and what kind of housing development they would prefer, and what aspects of village life they wanted the Neighbourhood Plan to conserve and enhance. The summary findings were as follows.

Village layout – Parishioners were asked: 'Plumpton can be described as a Scarpsfoot or linear parish, being long and narrow and having developed from the foot of the Downs. Would you:

- a. Prefer to maintain this characteristic with any development on a north-south axis? Yes/No
- b. Prefer to see the shape of the village change and expand width-ways on an east-west axis? Yes/no'

The majority (63%) of respondents preferred a). However, a sizeable minority (39%) preferred b). The validity of this question was later challenged, as discussed in point 4.38.

Development priorities – 45% of respondents supported development that would allow people to work locally and that would encourage tourism in the village.

Village qualities – The vast majority (91%) of respondents wanted all valued aspects of current village life preserved – e.g. its dark skies (no street lighting), clubs and societies, bus/train services, post office and shop, school, sports pavilion and village hall. Additional aspects to be preserved include All Saint's Church (19%), pubs (13%) and railway crossing gates (9%).

Quality of life – 95% of respondents said the countryside, footpaths and views of the South Downs significantly contributed to quality of life, but there was no significant interest in improving cycle access.

Wildlife – 90% wanted wildlife and habitat conservation measures incorporated into new developments.

Open spaces – The three most valued open spaces were: the playing field (22%); the South Downs (18%); and the network of footpaths (18%).

Development size and timescale – 87% favoured development phased over a long period of time and limited to no more than 10-20 units per site.

Type of development – The majority (74%) of respondents wanted medium-size (3-bed) units or a combination of small and medium-size units (81%); warden-assisted accommodation (77%); and retirement homes (71%). Most respondents (80%) were opposed to 4-5 bedroom homes and combinations of different-sized units that included 4-5 bed homes (61%). They were also opposed to flats in small blocks (60%). Respondents were ambivalent about including a care/nursing home, with 55% for and 45% against.

Community management – 68% supported a community-led approach to the management of village assets, including housing developments.

Business/employment – 69% wanted more business and employment opportunities. The employment most people wanted to see develop locally was agriculture, followed by trades, leisure, tourism, business support and retail. However, only 43% of respondents overall supported the identification of land for business development; 57% opposed this.

Business benefits – local business owners wanted better public transport, high speed broadband, and more patronage from residents. Least important to them were more parking provision, more housing, land for expansion and shared work/office space.

Roads and footpaths – 50% of respondents felt that local roads were poorly maintained; 54% said local footpaths were well maintained. But 82% had no particular view about cycle paths, and 84% thought the same about bridleways. Respondents were divided on whether pavements were well maintained. Most people either had no particular view (47%) about parking conditions or thought that parking areas were poorly maintained (41%).

Parking – 55% of respondents did not want parking charges at the station and 68% did not want parking charges at the playing field; 28% supported parking charges at the station and 18% at the playing field, and 16% had no particular view.

Renewable/sustainable energy – 56% had no particular view about sustainable energy or felt it wasn't important; 44% supported more use of sustainable energy by the community.

Young people's questionnaire

- 4.29 The questionnaire included a young people's section, 65 of which were returned. Their responses are summarised below.

What do you most like about living here? Mostly, the young people liked living in the countryside, the fields and the parish's proximity to the South Downs (33%); the friendliness of the community (29%); the playground and playing fields (17%); and the peace and quiet (17%).

What do you like least about living here? The largest number (9) said there was nothing or not enough to do; six said there was not enough transport; six had concerns about speeding traffic or dangerous roads; four were worried about development; four wanted playground facilities for older children.

Will anything stop you from setting up home in Plumpton when you grow up? Nine were concerned about high house prices/high rent; eight didn't want to stay in a small village; seven wouldn't want to stay if the village got too big; five said they wouldn't be able to find employment locally and three said they would move if new housing was built in the 'wrong place'.

Bus services. Only 13 said they used the local bus services, either to get to school or to go to Lewes or Haywards Heath. Five said they would use the service more often if it was more frequent and on time.

Events for young people. Respondents suggested a range of activities: a drama club; social activities for older children/teenagers; a cycling club; gymnastics; music; and swimming. They welcomed the new Youth Club (now closed), but wanted it to meet more frequently.

Facilities for young people. Respondents suggested a swimming pool, better provision for teenagers at the playing fields, including a covered/sheltered area where they could hang out, and a roller-skating rink.

Cycling and walking. Several said they were put off walking or cycling more by the speeding traffic, the poor surface condition of the roads and pavements, the lack of pedestrian walkways along Plumpton Lane and north up to the Plough public house, and the lack of cycle paths.

Preferred sites drop-in event

4.30 A final village consultation event took place on 15 September 2015 from 3.00pm to 7.00pm to present to the village the preferred sites that the PPNP Steering Group proposed to include in the draft PPNP. The event presented: details of all the sites put forward for consideration for inclusion in the PPNP; how each was assessed on a range of objective measures of suitability, achievability, availability and acceptability; which sites were recommended for inclusion by the PPNP Steering Group; and the number of houses allocated to each site. In total, some 154 residents visited the display.

4.31 The selected sites at this time were:

- land south of Riddens Lane (16 units);
- land north of Wells Close (6 units);

- land to the north of the Old Police House, Station Road (12 units);
- land south of Inholms Farm, Station Road (12 units);
- land south of the railway, east of Plumpton Lane (12 units, plus provision for station parking).

4.32 These sites would deliver 58 housing units, slightly above the 'minimum 50' required by LDC.

4.33 The rejected sites were:

- church Glebe land and the Rectory, Station Road;
- Nolands Farm, off Station Road;
- land at Inholms Farm, Station Road;
- land at Little Inholms Farm;
- land behind the school, North Barnes Lane;
- land to the rear of Oakfield, Station Road.

Draft plans and Regulation 14 pre-submission consultations

4.34 Prior to completion of the draft plan a further potential housing site at Plumpton Racecourse (for 19 units) came forward, which also offered the additional benefit of car parking for railway station users. With an already existing policy on supporting the sustainability and growth of the racecourse in place it was felt this site should be considered and a site assessment was carried out. This proved positive and the site was allocated in the pre-submission plan, with the Riddens Lane site moved to a reserve site.

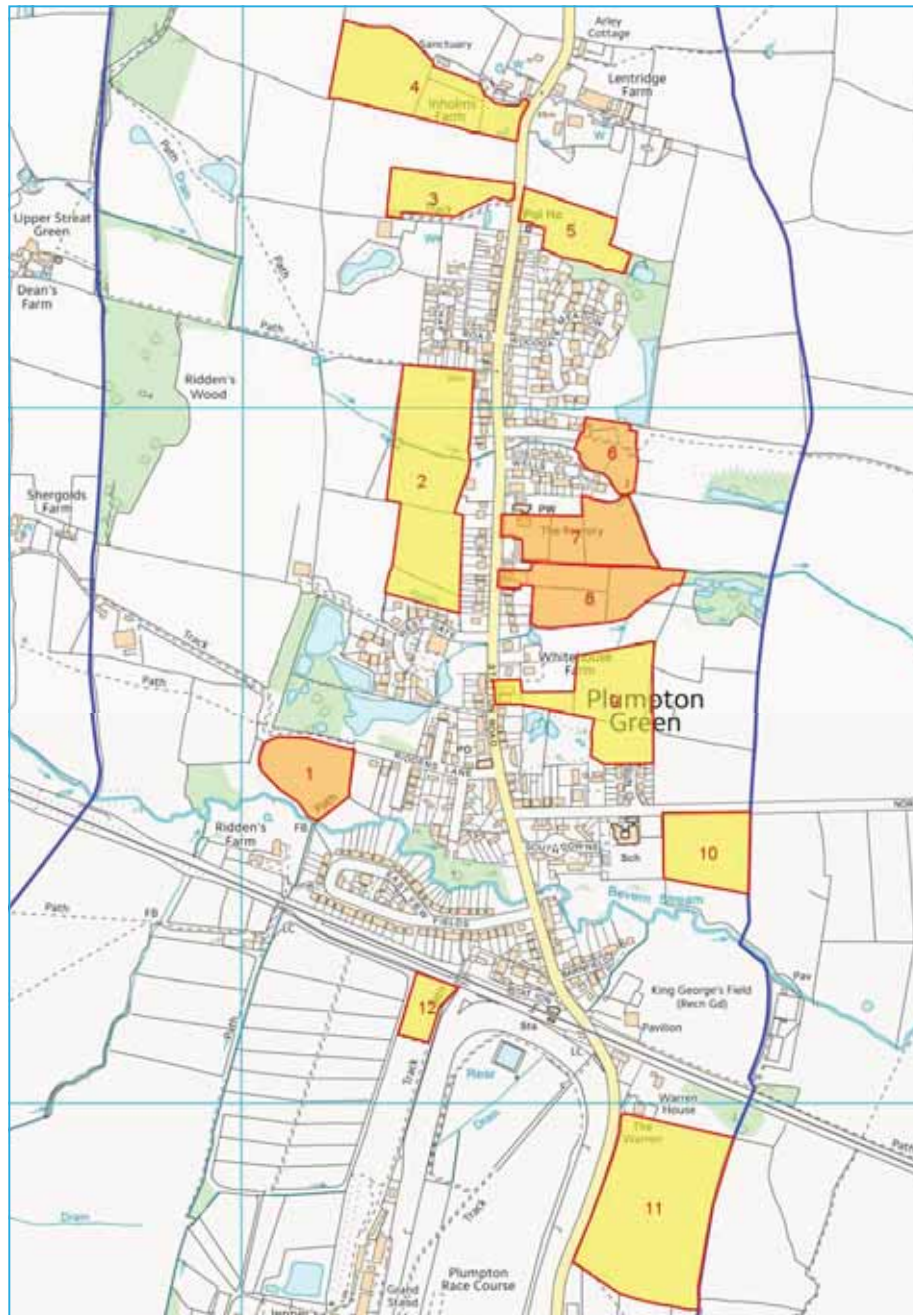
4.35 The statutory six-week Regulation 14 pre-submission consultation on the draft plan began on 9 May 2016 and ended on 28 June 2016. There were public consultation events on 18 May and 12 June where members of the Steering Group were available to answer questions and receive feedback.

4.36 In addition to individual responses from some 100 parishioners, the consultation generated six responses from statutory bodies, the most significant being that from LDC. LDC's response made clear that it regarded some of the sites in the draft plan as less sustainable than others included in the LDC Strategic Housing and Economic Land Availability Assessment (SHELAA). Sites deemed suitable, achievable and available could still be given planning permission, even if not included in the PPNP or in Lewes District Local Plan. A concern to the PPNP Steering Group was that, if chosen sites were less sustainable in the eyes of LDC, then their inclusion in the PPNP would be less defensible, and raise the likelihood that other, more sustainable sites might successfully apply for planning

permission in addition to the NP allocation.

- 4.37 LDC further advised in its response its opinion, based on its own assessment processes, that sites east of Station Road were the most suitable and sustainable.
- 4.38 In addition, the Regulation 14 consultation resulted in a number of responses challenging the principle established in the 2015 resident questionnaire of 'maintaining' the parish's 'characteristic Scarpfoot parish linear development'. While the parish itself is indeed linear, the Plumpton Green settlement long ago ceased to develop along those lines, and has in recent years developed only to the east and west. Linear development also contravenes established best-practice planning principles that discourage ribbon development and rural sprawl. In this respect, the questionnaire was misleading, as option b) did not represent change in principle, as this had been the prevailing planning policy for many decades, and reflects LDC's preference for sites to the east of Station Road as most suitable and sustainable.
- 4.39 Following the consultation, the landowners withdrew the site south-east of the railway (Policy 2.4 – 2016 draft plan). The racecourse site (Policy 2.1 – 2016 draft plan) remains undeliverable, because safe pedestrian access cannot be provided at the railway crossing.
- 4.40 For all these reasons, it was decided to review the site allocations and submit a revised draft plan for Regulation 14 consultation.
- 4.41 A further significant factor in the decision to revise the plan was LDC's advice that it has to allocate 200 additional units across the district in its Local Plan Part 2 process. As the SHELAA process revealed, there are several sites in Plumpton Green that are suitable, available and deliverable. Therefore, Plumpton Green is likely to be required to provide some of these additional units. LDC advised that if the PPNP allocated sites for more than the minimum required, this would put the parish in a stronger position to guide development up to 2030. This meant reviewing some of the previously rejected sites to find substitutes for the withdrawn site and the racecourse, and to provide sites for some additional housing.
- 4.42 The revised draft plan was published for Regulation 14 consultation from 19 June to 30 July 2017 and, following further amendment in response to feedback from the statutory consultees and residents, is presented here.

Map D: Map of assessed sites (orange sites are recommended for inclusion in the Neighbourhood Plan)



Key to sites

- | | | | |
|----|-----------------------------|-----|------------------------------------|
| 1. | Riddens Lane (Policy 5.1) | 7. | Glebe Land (Policy 5.3) |
| 2. | Little Inholmes Farm | 8. | Land rear of Oakfield (Policy 5.4) |
| 3. | Land south of Inholmes Farm | 9. | Land east of Nolands Farm |
| 4. | Land at Inholmes | 10. | Land behind school |
| 5. | Lentridge/ Old Police House | 11. | Land south east of railway |
| 6. | Wells Close (Policy 5.2) | 12. | Racecourse land |

5. Vision, objectives and land use policies

Vision

5.1 The vision for the parish in 2030 is:

The parish of Plumpton will have retained its character and identity as a rural village with a strong sense of community and strengthened its relationship to the landscape setting through improved public access, the development of new open space amenities and the enhancement of its biodiversity and landscape assets.

Community facilities will have expanded and become more varied to meet the changing needs of residents, with the school, village hall, shops, station and recreation amenities all thriving and creating a stronger village centre. The parish's natural assets will provide benefits for pedestrian and cycle movements through improved connectivity and additions to the network of footpaths, bridleways and public rights of way, many of which will directly connect to the new developments.

The parish will have a strong, positive and supportive working relationship with Plumpton Racecourse and Plumpton College, which in turn will have led to the parish benefitting through an increase in tourism, visitors, support for local businesses and a greater range of facilities being available to the parish.

The parish will have continued to support local employment businesses and facilitated new employment opportunities within the parish for local people and to support the services within the parish.

The parish will also enjoy a positive relationship with the SDNP, which will have become more accessible to the community for recreation and leisure. The parish and SDNP will have worked together to protect their shared setting and to define a role for the parish as a gateway to the park.

There will have been a modest growth in housing numbers through the provision of new homes purposely designed to meet local needs, including homes for people wishing to downsize and for young families, and to provide a balance of dwelling types and ownership structures to serve the community over the long term. These new homes will have been provided on sites that do not detract from the character and setting of the parish.

Objectives

5.2 To achieve this vision, a number of key objectives have been identified, as follows:

1. to protect the character of the parish and future growth through maintaining the spatial and qualitative relationships between the areas;
2. to retain and enhance existing community services and amenities to support a wider range of parish needs and reinforce the identity and purpose of the village centre. To work with Plumpton College and Plumpton Racecourse to integrate their longer-term plans with these objectives;
3. to identify sites for development that are sympathetic to the scale, topography and character of the parish and that will not have a detrimental impact on the setting. Ensure new development is designed to offer potential for wildlife habitat maintenance and enhancement;
4. to conserve and enhance the historic environment of the parish including its archaeological interest using the Historic Environment Record and East Sussex Record Office as the primary evidence base;
5. to plan for some housing to meet local needs, in particular for young families and local people wishing to downsize;
6. to secure the future of the existing employment uses within the parish and plan for their growth to serve parish needs;
7. to plan for increased public access to and enjoyment of local green spaces and the SDNP as a recreation, education and leisure amenity, while recognising that areas of significant biodiversity should be retained and enhanced; to integrate the existing network of rural lanes, bridleways and footpaths, and improve and extend safe pedestrian and cycling routes.

Monitoring and review policies

5.3 The PPNP will be monitored by the PPC, using data collected in planning monitoring reports. The objectives will form the core of the monitoring activity, but other data collected and reported at a parish level relevant to the PPNP may also be included. It is expected that the PPNP will be formally reviewed on a five-year cycle or to coincide with the development and review of the development plan for Lewes, if this cycle is different.

Land use planning policies

5.4 The planning policy context and the community engagement work already undertaken have raised a number of issues that the PPNP has considered:

- what are the most important characteristics of the Parish that new development should respect?
- what sites are either available now or may become available for development in the plan period that the PPNP should influence through the use of design and development principles that deliver the plan's objectives, if indeed the sites are suited to development at all? What are the design characteristics of the area that could be included in a policy?
- is there a need for a local employment policy to refine the existing Local Plan protection policies?
- what community facilities would be on the list of those to be protected from change of use?
- which spaces meet the criteria for designation as local green spaces?

5.5 Land use policies are used to determine planning applications made for development proposals. They can establish the principles for retaining or changing the use of land in settlements and in the countryside. They can also set out the conditions against which development proposals will be judged in terms of their design, access, etc.

5.6 The PPNP deliberately avoids repeating existing national or local planning policies. The proposed policies therefore focus on a relatively small number of key development issues in the area. For all other planning matters, the national and local policies of other planning documents, the NPPF and the policies of the JCS will continue to be used.

5.7 Set out below are the proposed policies of the PPNP. Each policy has a number and title, and the policy itself is written in bold italics for ease of reference. There is also a short statement explaining the intention of the policy and any other relevant background information. At the end of this document is the Policies Map (Map M on p. 59). A policy that refers to a specific site or area is shown on the map with the relevant policy number.

Policy 1: Spatial plan for the parish

New development proposals within the planning boundary for Plumpton Green (see Map C) will be supported, provided they accord with the other provisions of the PPNP and the development plan for the area*. (NB: The planning boundary as referred to above will be extended to incorporate the sites allocated for residential development in Policy 5.)

Development outside the revised planning boundary will not be supported if it individually or cumulatively results in coalescence and the loss of the separation between and distinct identities of neighbouring settlements and/or alters the spatial character and views of the landscape, notably from the SDNP.

- 5.8 This policy sets out the spatial plan for the parish, and directs future development within the planning boundaries. Housing will be provided in small-to medium clusters in sustainable sites around the centre of Plumpton Green village, maintaining green gaps to the north and south of the village to retain the character of the existing settlement and the agricultural nature of the parish.
- 5.9 This policy makes it clear that development should primarily be considered within the existing planning boundary. Within Plumpton parish, there is only the planning boundary at Plumpton Green. However, it is accepted that there may be some windfall development over the life of the Neighbourhood Plan on small, unallocated sites, such as extension or erection of homes for individual households. This policy sets out under what conditions this type of development will be supported.
- 5.10 This policy seeks to preserve the rural character of the village by ensuring new development is contained around and within the current centre of Plumpton Green. This is to preserve the green gap to the north of the village and prevent coalescence between Plumpton Green and the settlement around Lentridge Farm and neighbouring properties, and to maintain the green gap to the east, on the borders with the neighbouring parish of East Chiltington, and to the south, where the railway line provides an established, geographical boundary between Plumpton Green and the SDNP.

* The development plan includes the JCS and it will include the Local plan part 2, the South Downs Local Plan and the neighbourhood plan once they are adopted.

- 5.11 Coalescence, although not specifically mentioned in the NPPF, is nevertheless an issue of landscape quality and character, which are specifically managed within the NPPF. In particular, the NPPF refers to the cumulative landscape and visual impact, and those landscapes that form the spaces in between settlements. NPPF 109 and NPPF 58, bullet point 2 and 3, are particularly concerned with the impact of development on local character.
- 5.12 The Lewes District Council and South Downs National Park Authority Landscape Capacity Study (LDC/SDNPA, 2012) identified limited landscape capacity around Plumpton Green, due to the open views from the Downs. Land east of Station Road was identified as the preferred area for development as there are several smaller fields bounded by mature trees and hedgerows. These features contain the landscape and shield outside views, meaning this area offers the greatest opportunity for change without impacting on the landscape character.
- 5.13 This policy conforms to Policy CT1 Planning Boundary and Key Countryside Policy and is in line with Policy SP1 and SP2 of the LDC JCS in terms of providing for future housing and employment land to meet the parish's need.

Policy 2: New-build environment and design

New development should reflect the scale, density, massing, landscape design and material of surrounding buildings, having regard to the Plumpton Design Statement. New development should:

- 1. use high-quality building materials and construction methods reflecting the local vernacular finishes and landscaping that complement the surroundings;***
- 2. be no more than two storeys in height, although this would not preclude the use of roof space;***
- 3. avoid light pollution by careful design, location and mitigation measures where lighting is necessary for health and safety reasons;***
- 4. where sites are within the SDNP or its setting, conserve and enhance its special qualities;***
- 5. where sites are adjacent, maintain a clear separation between them by means of woodland and hedgerow 'landscape buffers'. These landscape buffers should be consistent with local landscape character in terms of species, scale and pattern, and should be incorporated into the green infrastructure plans for the site;***
- 6. provide locally appropriate and characteristic landscape features that deliver multiple benefits for people and wildlife (such as integrated SuDS, wildlife habitats/corridors, improved visual amenity and local green spaces).***

- 5.14 This policy requires all development proposals to deliver high-quality schemes that reflect the character of the parish. It also acknowledges that part of the parish lies within the SDNP, and therefore the design of any proposed housing development must accord with the SDNP Authority's development plan and must be appropriate to the SDNP setting.
- 5.15 A green buffer between adjacent sites will ensure sites do not de facto merge to become one site that is larger than the small scale (less than 20 units) preferred by parishioners, and will help retain the rural character of the village, also valued by parishioners.

Policy 3: Landscape and biodiversity

Layout and landscape schemes of new development should be informed by the landscape character of the area, seek to achieve landscape and biodiversity enhancements and will have regard to the following principles.

- 1. Trees and hedges make a valued contribution to the local landscape. Existing trees and hedges, including those that are not covered by relevant protection, should be retained and protected. Where this is not feasible, they should be replaced with native species of local provenance.***
- 2. Provision for wildlife, particularly threatened species.***
- 3. The retention and, where possible, enhancement of existing green corridors, ponds and other wildlife features will be supported. Sites should be landscaped to provide green corridors to connect the development with the open countryside and existing wildlife habitats, and incorporate new SuDS features (see Policy 4) and public rights of way/permissive paths where possible, to create a network of multi-functional landscapes.***

- 5.16 This policy governs the impact of new development on the intrinsic character and beauty of the parish by requiring that all development takes into account the diversity of its landscapes and heritage and its wildlife habitats (see PPNP Landscape and Biodiversity Evidence Report in the evidence base).
- 5.17 PPC will not support development that would have a significant adverse impact on the countryside or the defining characteristics of the landscape and heritage. PPC wishes to see the distinctive views of the surrounding countryside that are enjoyed from the many public vantage points in and around Plumpton Green be protected and preserved. PPC would also like to see developments ensure the conservation and enhancement of the natural beauty of the parish and its setting, and pay due regard to the SDNP aims and management plan.
- 5.18 The policy also prioritises the protection and conservation of specific sites and species. PPC would like to see all development provide appropriate mitigation and/or compensation for any adverse impact on habitat and biodiversity.

Policy 4: Sustainable drainage and wastewater management

The development of Sustainable Drainage Systems (SuDS) as part of new developments will be supported. These may include features such as:

- 1. permeable driveways and parking areas;***
- 2. rainwater re-use;***
- 3. green roofs;***
- 4. soakaways and filter strips;***
- 5. retention of wetland basins;***
- 6. appropriate use of existing watercourses;***
- 7. drainage schemes that provide enhancement or creation of wildlife habitat;***
- 8. appropriate foul water drainage.***

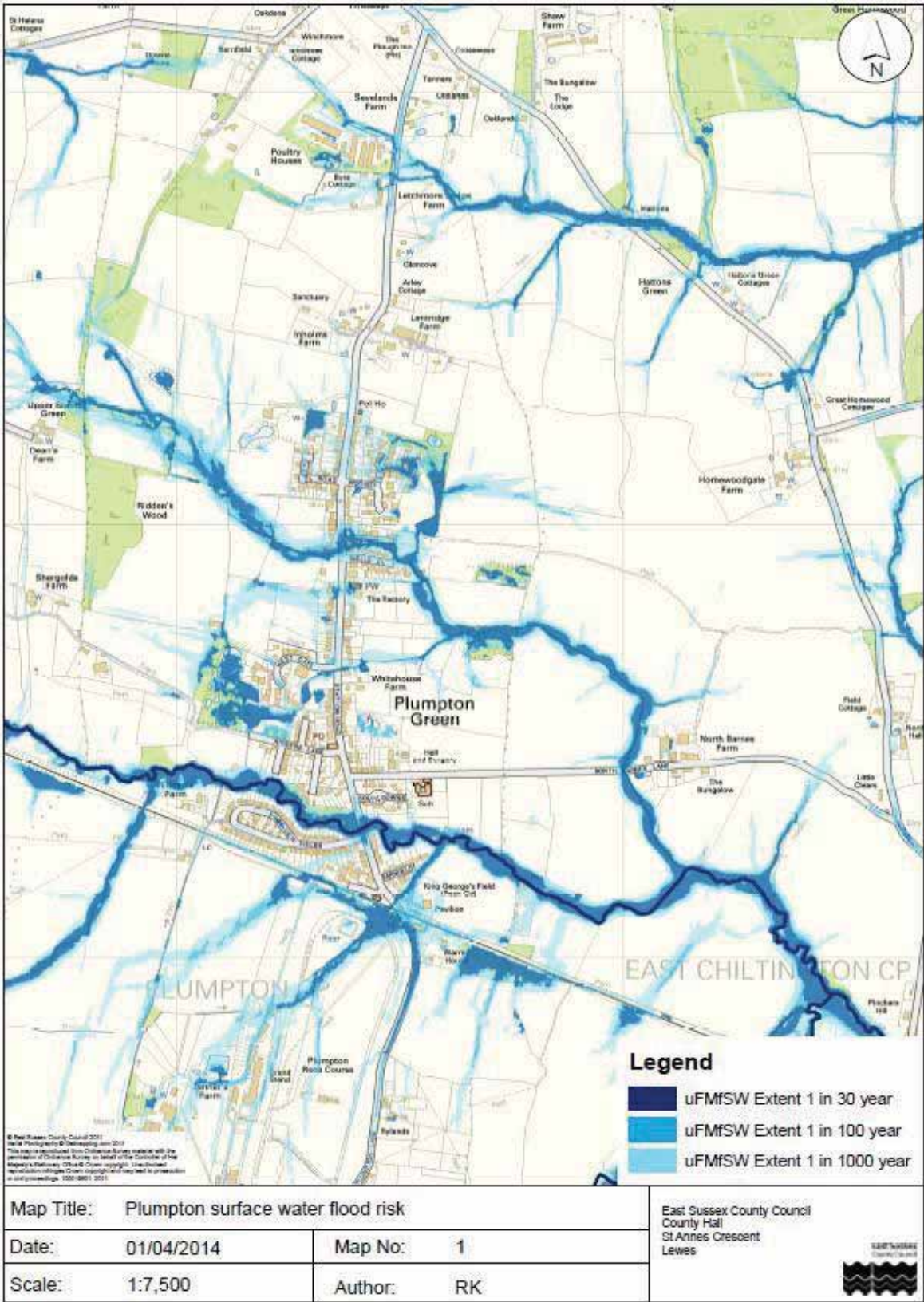
These should be designed to manage the risk of flooding, groundwater flooding, flash flooding and surface water run-off over land, and the impact on the sewerage network, and naturalised in design terms wherever possible as part of a network of multi-functional landscapes.

- 5.19 This policy addresses the separate but related issues of surface water and wastewater, as well as associated wastewater sewerage infrastructure and wastewater treatment. Surface water is essentially rainfall, but also includes rainfall that arrives in the parish via natural watercourses. Surface water is relatively clean from an environmental perspective, but can contain contamination from domestic and non-domestic human activity.
- 5.20 This policy ensures that all new development will be provided with adequate infrastructure to serve it for its anticipated lifetime.
- 5.21 Development proposals are expected to adhere to the relevant sections of the National Planning Policy Framework that directs sustainable development. Developments must also adhere to Part H3 of the Building Regulations.
- 5.22 The issue of surface water and other drainage is of major concern to parishioners, expressed during the consultation meetings and in the resident questionnaire. The site assessment process also reflected the need to address concerns regarding significant problems with flooding, surface water flooding, flash flooding and wastewater conveyance. This policy responds to those concerns by requiring developers to mitigate the effect of additional waste and surface water.
- 5.23 The Policy requires developers to demonstrate that there is adequate

wastewater capacity both on and off the site to serve the development, and that the development will not lead to problems for existing or new users. In many cases, it will be necessary for developers to fund studies to ascertain whether the proposed development will lead to overloading of the existing wastewater infrastructure. SuDS initiatives will be required to be linked to an updated and increased sewage capacity within the village.

- 5.24 PPC would like to see sustainable drainage systems be designed to enhance and increase both the quality and quantity of habitats for wildlife, and that aim to protect and enhance the ground water quality. Such initiatives can provide an increase in local amenity and social value and associated educational opportunities.
- 5.25 Several areas surrounding the existing housing settlement are within Flood Zones 2 and 3, and are considered to be within the 1-in-30-year surface flood risk guidelines. Due to the nature of the soil structure, surface water overflow from the stream and ditch network infiltrates and lies in fields surrounding the settlement, which allows for its gradual dispersal. PPC will expect development to reflect the need for natural field flood plains to be maintained.
- 5.26 The PPNP takes into consideration the position of housing within the sites, the placement of the sites in relation to existing and future housing, and the number of units that can be sustained on each site. Development of sites will be guided by the topography of the land, which is served by a complex and inter-related network of natural drainage components.
- 5.27 The policy is in line with Policy CP12 (Flood Risk, Coastal Erosion, Sustainable Drainage and Slope Stability) of the JCS and the NPPF 100, 103 "Meeting the challenge of climate change, flooding and coastal change".
- 5.28 This policy prioritises the flood risk mitigation measures included in the policy to reflect the specific surface water flooding threats and the natural drainage capacity of local streams and ditches (see Map E: Flood risk in Plumpton Green) in Plumpton Green. Further details and references are to be found in the Landscape & Biodiversity Report.
- 5.29 The Lead Local Flood Authority has produced advice and guidance on the use of SuDS that should be consulted in designing the drainage proposals for the proposed housing allocations.

Map E: Updated Flood Map for Surface Water (uFMfSW). Included courtesy of East Sussex County Council, from data produced by the Environment Agency.



Policy 5: New housing

Subject to meeting the criteria set out below, where appropriate, residential development will be supported on the sites allocated in Neighbourhood Plan Policies 5.1 to 5.4 inclusive, and on suitable windfall sites within Plumpton Green:

- 1. Developments of more than two dwellings should provide a range of house types. The provision of one-to-three bedroom dwellings and/or dwellings that meet the needs of young families and those wishing to downsize will be especially welcome.**
- 2. Housing will be sympathetic to the scale, topography and setting of the parish and respond to its local context. Housing development schemes within the SDNP will take a landscape-led approach to the lay-out and design of the scheme.**
- 3. Developments should form small to medium sized clusters of no more than twenty dwellings and be located around the village centre.**
- 4. Developments of eleven or more dwellings must provide affordable housing in line with the requirements of the development plan.**
- 5. Landscaping buffers and screening and appropriate access will be provided.**
- 6. Proposals for the development of the allocated sites should be accompanied by a landscape and visual impact assessment to inform location of access roads, layout and design, as well as landscaping, and by a comprehensive assessment of the impact on wildlife. All protected species must be protected, and any ancient hedges on a site must be protected.**
- 7. Proposals for new housing will be expected to be accompanied, as a minimum, by an archaeological desk-based assessment.**
- 8. The provision of new footpaths and bridleways that connect with existing public rights of way and/or the green infrastructure network will be supported.**

5.30 Whilst there is no requirement for a neighbourhood plan to allocate land for the development, the PPNP allocates land for around 68 dwellings.

5.31 LDC has indicated a requirement for the Plumpton Neighbourhood Area to provide a minimum of around 50 dwellings over the plan period. In addition, land for a further 200 dwellings needs to be found across the District. In allocating land for around 68 dwellings, the PPNP is providing for significantly in excess of the minimum anticipated need, as well as contributing towards the wider needs of the District. This comprises positive planning. It will provide for the sustainable development of the Neighbourhood Area over the plan period.

5.32 PPC expects parking provision for new housing development to be in-line with requirements set by relevant higher level policies and ESCC guidance on parking as referred to in paragraph 3.14.

Policy 5.1: Riddens Lane, Plumpton Green

The land shown on Map F below, amounting to 1.1ha, is allocated for the residential development for 16 new dwellings.

Development in this location should:

- 1. upgrade Riddens Lane with a suitable surface to provide safe access for vehicles and pedestrians between the site and Station Road;*
- 2. locate housing within Flood Zone 1.*



Map F

- 5.33 This policy allocates land adjoining Riddens Lane (SHELAA site 14PL) for residential development in the central area of Plumpton Green, to the west of Station Road.
- 5.34 This is a greenfield site that is naturally well screened from the village and from the South Downs and would have a minimal impact on existing adjoining properties.
- 5.35 This site is located in the central area of Plumpton Green, to the west of Station Road. It is small in scale and assesses well against the suitability

and acceptability criteria. It is close to the village centre and amenities and within walking distance of many local services and the train station.

- 5.36 The area is included in an Archaeological Notification Area (ANA) assigned in 2008, enlarged in 2011 and the record amended following a preliminary survey in 2014. Further research is expected on the area before development is approved.
- 5.37 Development on this site will need to conform to other policies in the PPNP, in particular policies 2 to 6. PPC would also like to see obtrusive features such as street lighting to be kept to a minimum, in accordance with the New Built Environment and Design Policy, which also dictates that style, materials used and landscaping should be appropriate to minimise impact on the setting. PPC would also like to see natural screening being preserved and steps taken to mitigate the effects of development on wildlife and biodiversity. PPC is concerned to see that full regard is paid to managing utilities needs and flood risk resulting from the development of the site.
- 5.38 PPC notes that this site will be expected to provide 40% affordable housing, in line with the requirement of the LDC JCS where a proposed scheme will deliver more than 11 units.
- 5.39 Riddens Lane will need to be upgraded with a suitable surface and traffic calming measures to provide safe access for pedestrians and vehicles. There are concerns about the impact of additional vehicles on traffic flow where Riddens Lane enters onto Station Road at a busy intersection. There is also often poor visibility at this junction, due to parked cars on Station Road.
- 5.40 There is presence of protected species and wider species and habitats. These must be preserved, along with the ancient hedges. There are no known ancient trees on the site. Geological interest is also in evidence and the site is within an Archaeological Notification Area.
- 5.41 The higher, northern part of this site is within Flood Zone 1. The lower southern part falls within Flood Zones 2 and 3, where it slopes down to a natural water course. Development should be confined within Flood Zone 1, to mitigate flood risk.

Policy 5.2: Wells Close, Plumpton Green

The land shown on Map G below, amounting to 0.69ha, is allocated for the residential development for 12 dwellings.

Development in this location will be limited to the provision of one and two bed units specifically designed for older people.



Map G

- 5.42 This policy allocates land adjoining Wells Close (SHELAA site 13PL) for a housing scheme designated for elderly people seeking to downsize, in a central location in the village to the east of Station Road between Wells Close and Strawlands. This meets a stated preference of the village to provide more homes for older people.
- 5.43 The site was formerly a coal yard, and is adjacent to the planning boundary and close to most village amenities. As part of the site was previously a coal yard, appropriate investigation will be needed and remediation may be required.
- 5.44 Development on this site will need to conform to other policies in the PPNP, in particular policies 2 to 6. PPC would also like to see obtrusive features such as street lighting to be kept to a minimum, in accordance with the New Built Environment and Design Policy, which also dictates that style, materials used and landscaping should be appropriate to minimise impact on the setting. PPC would also like to see natural screening being

preserved and steps taken to mitigate the effects of development on wildlife and biodiversity. PPC is concerned to see that full regard is paid to managing utilities needs and flood risk resulting from the development of the site.

- 5.45 PPC notes that the site will be expected to provide 40% affordable housing, in line with the requirement of the LDC JCS where a proposed scheme delivers more than 11 units.
- 5.46 This site assessed well for sustainability, with a number of positives against the social and environmental objectives. The site is centrally located and within easy reach of most village services and facilities. Access to Station Road is good. The site is also well screened and unlikely to have an adverse landscape impact. However, the site is located in an area of surface water flood risk.
- 5.47 The site is likely to have an impact on neighbouring properties, but there is some natural screening and it is only partially visible from the Downs.
- 5.48 There is presence of protected/wider species and habitats, which PPC would like to see preserved, but no ancient trees or hedges or evidence of geological or archaeological interest.
- 5.49 There are no listed buildings within the vicinity.

Policy 5.3: The Glebe, Plumpton Green

The land shown on Map H below, amounting to 1.5ha, is allocated for the residential development for up to 20 dwellings.

Development in this location should:

1. be designed to include landscape buffers between it and the site allocated for residential development in Policy 5.4, to emphasise the separation of the sites;
2. be designed to avoid proximity of houses to existing properties;
3. safeguard and respect the historic character of All Saints Church, annexe, cemetery, rectory and gardens and the neighbouring property of Strollings (formerly Upper Strollings Farm), which together form a valued historic feature within Plumpton Green.

In view of the multiple records of protected and notable species in the area, an Ecological Impact Assessment should be carried out and, where indicated, steps taken to avoid and compensate for impacts on biodiversity and strengthen connectivity between existing habitats.

As this site is adjacent to site 5.4, a detailed design brief should be prepared to cover the relationship between the sites, and their design, landscaping, layout and access.

A map titled "Map H" illustrating land allocations in Plumpton Green. A large green-shaded area on the right side of the map is labeled "Policy 5.3: The Glebe, Plumpton Green". To its west are several orange-outlined buildings or plots labeled "The Rectory", "Strollings", "All Saints' Church", "Hall", "Lych Gate", and "Wells Close". Further west, along a road, are more orange-outlined structures labeled "The Old House", "Jewell's", "Muller's", "Chertsey", "Barnes", "Langtons", and "The Dell". A blue pond is visible at the top left. Various other labels like "Ansons" and "Gardens" appear near the bottom edge of the main building complex. The map uses color coding: yellow/orange for built-up areas and green for open land designated by policy.

Map H

Policy 5.3: The Glebe, Plumpton Green

The land shown on Map H below, amounting to 1.5ha, is allocated for the residential development for up to 20 dwellings.

Development in this location should:

1. be designed to include landscape buffers between it and the site allocated for residential development in Policy 5.4, to emphasise the separation of the sites;
2. be designed to avoid proximity of houses to existing properties;
3. safeguard and respect the historic character of All Saints Church, annexe, cemetery, rectory and gardens and the neighbouring property of Strollings (formerly Upper Strollings Farm), which together form a valued historic feature within Plumpton Green.

In view of the multiple records of protected and notable species in the area, an Ecological Impact Assessment should be carried out and, where indicated, steps taken to avoid and compensate for impacts on biodiversity and strengthen connectivity between existing habitats.

As this site is adjacent to site 5.4, a detailed design brief should be prepared to cover the relationship between the sites, and their design, landscaping, layout and access.

Map H

Policy 5.3: The Glebe, Plumpton Green

The land shown on Map H below, amounting to 1.5ha, is allocated for the residential development for up to 20 dwellings.

Development in this location should:

1. be designed to include landscape buffers between it and the site allocated for residential development in Policy 5.4, to emphasise the separation of the sites;
2. be designed to avoid proximity of houses to existing properties;
3. safeguard and respect the historic character of All Saints Church, annexe, cemetery, rectory and gardens and the neighbouring property of Strollings (formerly Upper Strollings Farm), which together form a valued historic feature within Plumpton Green.

In view of the multiple records of protected and notable species in the area, an Ecological Impact Assessment should be carried out and, where indicated, steps taken to avoid and compensate for impacts on biodiversity and strengthen connectivity between existing habitats.

As this site is adjacent to site 5.4, a detailed design brief should be prepared to cover the relationship between the sites, and their design, landscaping, layout and access.

Map H

- Policy 5.3: The Glebe, Plumpton Green**
- The land shown on Map H below, amounting to 1.5ha, is allocated for the residential development for up to 20 dwellings.
- Development in this location should:
1. be designed to include landscape buffers between it and the site allocated for residential development in Policy 5.4, to emphasise the separation of the sites;
 2. be designed to avoid proximity of houses to existing properties;
 3. safeguard and respect the historic character of All Saints Church, annexe, cemetery, rectory and gardens and the neighbouring property of Strollings (formerly Upper Strollings Farm), which together form a valued historic feature within Plumpton Green.
- In view of the multiple records of protected and notable species in the area, an Ecological Impact Assessment should be carried out and, where indicated, steps taken to avoid and compensate for impacts on biodiversity and strengthen connectivity between existing habitats.
- As this site is adjacent to site 5.4, a detailed design brief should be prepared to cover the relationship between the sites, and their design, landscaping, layout and access.
-
- A map titled 'Map H' showing land allocation. A large green-shaded area on the right is labeled 'Policy 5.3: The Glebe, Plumpton Green'. To its left are several orange-shaded areas labeled 'The Rectory', 'Strollings', and 'All Saints Church'. Further left are yellow-shaded areas labeled 'The Hall', 'The Chapel', 'The Farm', 'Lycell Gate', 'Mulleter's', 'Chertson', 'Jewells', 'Lanons', and 'The Dell'. A blue line representing a stream or river runs along the top and right edges of the map. A scale bar indicates 25.3m.
- Map H**

Policy 5.3: The Glebe, Plumpton Green

The land shown on Map H below, amounting to 1.5ha, is allocated for the residential development for up to 20 dwellings.

Development in this location should:

1. be designed to include landscape buffers between it and the site allocated for residential development in Policy 5.4, to emphasise the separation of the sites;
2. be designed to avoid proximity of houses to existing properties;
3. safeguard and respect the historic character of All Saints Church, annexe, cemetery, rectory and gardens and the neighbouring property of Strollings (formerly Upper Strollings Farm), which together form a valued historic feature within Plumpton Green.

In view of the multiple records of protected and notable species in the area, an Ecological Impact Assessment should be carried out and, where indicated, steps taken to avoid and compensate for impacts on biodiversity and strengthen connectivity between existing habitats.

As this site is adjacent to site 5.4, a detailed design brief should be prepared to cover the relationship between the sites, and their design, landscaping, layout and access.

A map titled 'Map H' showing land allocation. A large green-shaded area on the right is labeled 'Policy 5.3: The Glebe, Plumpton Green'. To its left are several orange-shaded areas labeled 'The Rectory', 'Strollings', and 'All Saints Church'. Further left are yellow-shaded areas labeled 'The Hall', 'The Chapel', 'The Farm', 'Lycell Gate', 'Mulleter's', 'Chertson', 'Jewells', 'Lanons', and 'The Dell'. A blue line representing a stream or path runs through the center, with a pond at the top. A scale bar indicates 25.3m.

Map H

Policy 5.3: The Glebe, Plumpton Green

The land shown on Map H below, amounting to 1.5ha, is allocated for the residential development for up to 20 dwellings.

Development in this location should:

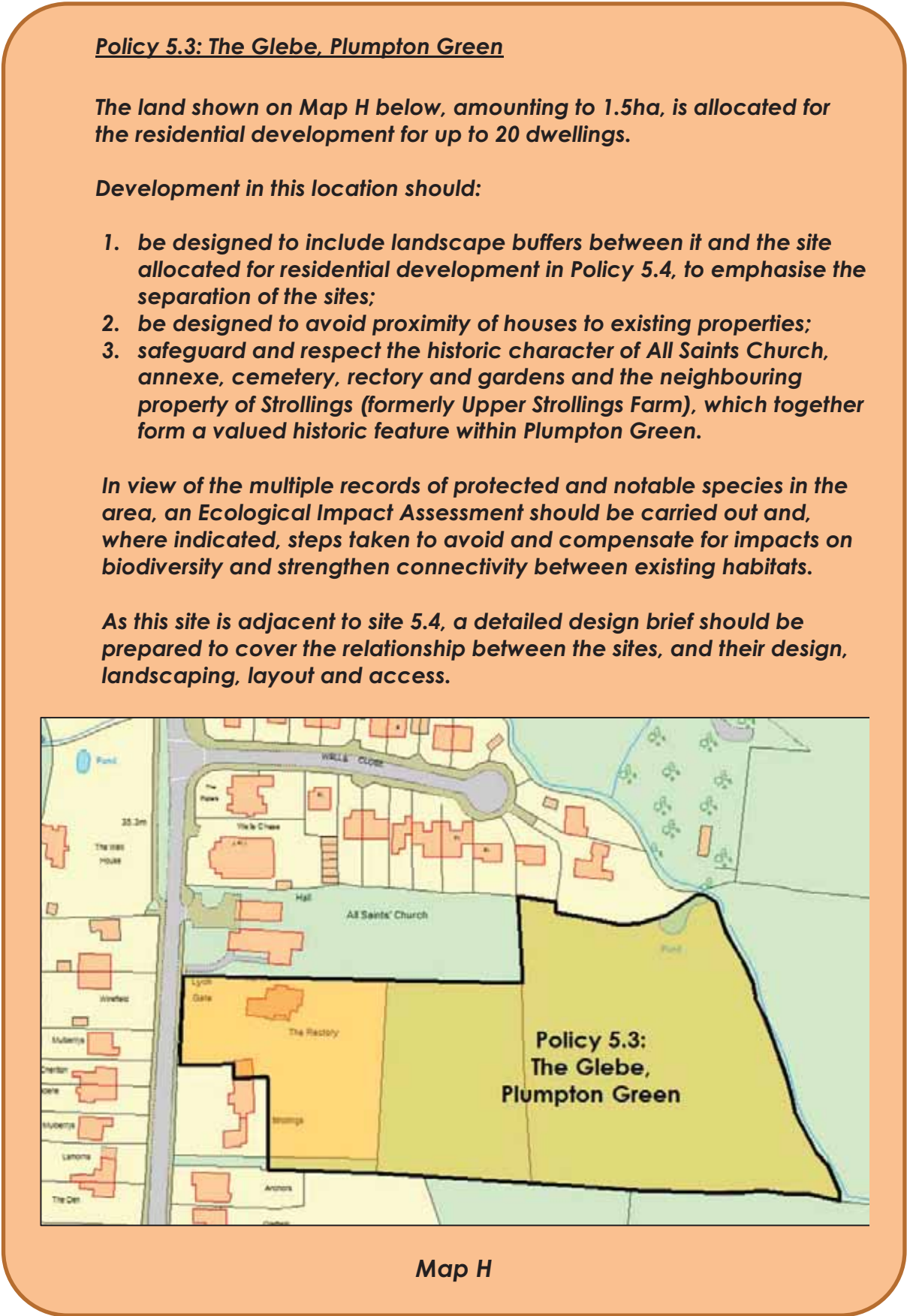
1. be designed to include landscape buffers between it and the site allocated for residential development in Policy 5.4, to emphasise the separation of the sites;
2. be designed to avoid proximity of houses to existing properties;
3. safeguard and respect the historic character of All Saints Church, annexe, cemetery, rectory and gardens and the neighbouring property of Strollings (formerly Upper Strollings Farm), which together form a valued historic feature within Plumpton Green.

In view of the multiple records of protected and notable species in the area, an Ecological Impact Assessment should be carried out and, where indicated, steps taken to avoid and compensate for impacts on biodiversity and strengthen connectivity between existing habitats.

As this site is adjacent to site 5.4, a detailed design brief should be prepared to cover the relationship between the sites, and their design, landscaping, layout and access.

A map titled 'Map H' showing land allocation. A large green-shaded area on the right is labeled 'Policy 5.3: The Glebe, Plumpton Green'. To its left are several orange-shaded areas labeled 'The Rectory', 'Strollings', and 'All Saints Church'. Further left are yellow-shaded areas labeled 'The Hall', 'The Glebe', and 'The Old House'. A blue line representing a stream or path runs through the center. Various other labels like 'Pond', 'Wells Close', 'Lycell Gate', 'Ansons', 'The Old', 'Students', 'Lanons', 'Chertons', 'Mubertys', 'Jewellies', and 'The Old House' are scattered across the map. A scale bar indicates 25.3m.

Map H



Policy 5.3: The Glebe, Plumpton Green

The land shown on Map H below, amounting to 1.5ha, is allocated for the residential development for up to 20 dwellings.

Development in this location should:

1. be designed to include landscape buffers between it and the site allocated for residential development in Policy 5.4, to emphasise the separation of the sites;
2. be designed to avoid proximity of houses to existing properties;
3. safeguard and respect the historic character of All Saints Church, annexe, cemetery, rectory and gardens and the neighbouring property of Strollings (formerly Upper Strollings Farm), which together form a valued historic feature within Plumpton Green.

In view of the multiple records of protected and notable species in the area, an Ecological Impact Assessment should be carried out and, where indicated, steps taken to avoid and compensate for impacts on biodiversity and strengthen connectivity between existing habitats.

As this site is adjacent to site 5.4, a detailed design brief should be prepared to cover the relationship between the sites, and their design, landscaping, layout and access.

A map titled 'Map H' showing land allocation. A large green-shaded area on the right is labeled 'Policy 5.3: The Glebe, Plumpton Green'. To its left are several orange-shaded areas labeled 'The Rectory', 'Strollings', and 'All Saints Church'. Further left are yellow-shaded areas labeled 'The Hall', 'The Chapel', 'The Farm', 'Lycell Gate', 'Mulleter's', 'Chertons', 'Bridgman's', 'Lanterns', and 'The Old'. A blue line representing a stream or river runs along the top and right edges of the map. A scale bar indicates 25.3m.

Map H

5.50 The site is located centrally in Plumpton Green to the east of Station Road and All Saints Church, and is currently Grade 3 agricultural use.

- 5.51 Overall this site assessed well against the social objectives due to its central location, near to village amenities. Development of the site will affect a number of adjoining properties and, notably, the church and cemetery. There are no listed buildings in the vicinity. Demolition of the rectory to facilitate the development of this site is not supported by PPC. The site adjoins another recommended site (see Policy 5.4), also promoting 20 houses. Both sites have potential for further development, which would not be supported by PPC.
- 5.52 The site is partially screened from the Downs. It is noted that access would be from Station Road. PPC would prefer to see vehicular access to this site from Station Road to be shared with and pass through site 5.4. with a footpath and cycleway to connect it directly with Station Road.
- 5.53 There is presence of protected species, and ancient trees and hedges, and minor geological interest is also in evidence. There are no known significant wider species or habitats or evidence of archaeological interest. There are three tree preservation orders (TPOs) on the site, two at the proposed access.
- 5.54 The site is within Flood Zone 1. The site assessment and, in particular the SA, highlighted surface water flood issues on the site, which is located in an area with a 1-in-30-year surface water flood risk.
- 5.55 Development on this site will need to conform to other policies in the PPNP, in particular policies 2 to 6. PPC would also like to see obtrusive features such as street lighting to be kept to a minimum, in accordance with the New Built Environment and Design Policy, which also dictates that style, materials used and landscaping should be appropriate to minimise impact on the setting. PPC would also like to see natural screening being preserved and steps taken to mitigate the effects of development on wildlife and biodiversity. PPC is concerned to see that full regard is paid to managing utilities needs and flood risk resulting from the development of the site.
- 5.56 PPC notes that the site will be expected to provide 40% affordable housing, in line with the requirement of the LDC JCS where a proposed scheme delivers more than 11 units.
- 5.57 The main concern about this site is its proximity to another proposed site (see Policy 5.4), and to Wells Close. Together this has the potential to create an area of development of a size that would be unacceptable to parish residents and is contrary to the policy preference for small-scale, distinct pockets of development to preserve the rural character of the village. This concern is addressed in Policy 2 and also in policy 5.4.

- 5.58 This site adjoins an important historic centre of the village, in the form of All Saints Church, the cemetery, annex, the rectory and gardens, and the neighbouring property of Strollings (formerly Upper Strollings Farm), which is one of the few surviving old buildings in the village. Development should respect this cluster by careful placing of housing and appropriate landscape buffer zones.

Policy 5.4: Land rear of Oakfield, Plumpton Green

The land shown on Map I below, amounting to 1.63ha, is allocated for the residential development for up to 20 dwellings.

Development in this location should:

- 1. be designed to include landscape buffers between it and the site allocated for residential development in Policy 5.3, to emphasise the separation of the sites;**
- 2. be designed to avoid proximity of houses to existing properties along Station Road.**

In view of the multiple records of protected and notable species in the area, an Ecological Impact Assessment should be carried out and, where indicated, steps taken to avoid and compensate for impacts on biodiversity and strengthen connectivity between existing habitats.

As this site is adjacent to site 5.3, a detailed design brief should be prepared to cover the relationship between the sites, and their design, landscaping, layout and access.

The southern edge of the site should be reinforced with native tree planting to minimise impact on the SDNP.



Map I

- 5.59 The site is located centrally within Plumpton Green to the east of Station Road, and currently Grade 3 agricultural use.

- 5.60 Overall, this site assessed well against some of the social objectives due to its central location, near to village amenities. Access would be directly onto Station Road at a point where visibility is good. Development of the site will affect a number of adjoining properties. It is adjacent to another proposed site (see Policy 5.3), also promoting 20 houses. Both sites have potential for further development, which would not be supported by PPC.
- 5.61 There is presence of protected/wider species and habitats, along with the ancient trees or hedges and minor geological interest also in evidence. There is no known evidence of archaeological interest on the site but there is an Archaeological Notification Area immediately adjacent to the south west corner, which the Parish Council would like to see evaluated. There is a listed building within the vicinity but no impact is anticipated.
- 5.62 The site's development would mean the loss of the garage business. However, the garage itself is understood to be on a short-term lease. The site of the garage business has previously been granted planning permission for conversion to residential use. There are two other garages in the parish.
- 5.63 Development on this site will need to conform to other policies in the PPNP, in particular policies 2 to 6. PPC would also like to see obtrusive features such as street lighting to be kept to a minimum, in accordance with the New Built Environment and Design Policy, which also dictates that style, materials used and landscaping should be appropriate to minimise impact on the setting. PPC would also like to see natural screening being preserved and steps taken to mitigate the effects of development on wildlife and biodiversity. PPC is concerned to see that full regard is paid to managing utilities needs and flood risk resulting from the development of the site.
- 5.64 PPC notes that the site will be expected to provide 40% affordable housing, in line with the requirement of the LDC JCS where a proposed scheme delivers more than 11 units.
- 5.65 The main concern about this site is its proximity to another proposed site (see Policy 5.3), which has the potential to create an area of development of a size that would be unacceptable to parish residents and is contrary to the policy preference for small-scale, distinct pockets of development to preserve the rural character of the village. This concern is addressed in Policy 2 and also in Policy 5.3.

Policy 6: Local employment

New development proposals that result in the loss of an existing employment or business use will be resisted, unless it can be demonstrated that its continued use is no longer viable. Proposals to expand an existing employment or business use will be supported, subject to development respecting local character, residential amenity and highway safety.

- 5.66 This policy conforms to NPPF paragraph 28 (especially bullet point 4), and aligns to the JCS policy E1 (point (i)), which reflects NPPF paragraphs 18-20 and is designed to secure the future of the existing employment uses within the parish and plan for their growth to serve parish needs.
- 5.67 Comments made during the consultation events made it clear that parishioners wished to see existing businesses preserved as far as possible and that they had no wish to see Plumpton become a dormitory community.

Policy 7: Plumpton Green Village Centre

New development proposals requiring planning permission that result in the loss of existing shops or commercial units in the village centre and elsewhere in the parish will be resisted, unless it can be demonstrated that their continued use is no longer viable.

- 5.68 Over the past 25 years the centre of Plumpton Green has lost one general store, one public house and a garage to housing. The remaining businesses in the village centre, in particular the village shop/post office, are important to the community as a whole but especially to residents without their own transport, as public transport services are limited. Development proposals that might negatively affect the remaining facilities and businesses will be resisted.
- 5.69 This policy aims to ensure existing village community facilities and amenities will be retained and, where possible, enhanced to support a wider range of parish needs and reinforce the identity and purpose of the village centre, particularly as the village expands with the planned new housing this plan considers.

Policy 8: Plumpton College

New development at Plumpton College that meets the purposes of the SDNP and conserves heritage assets in a manner appropriate to their significance will be supported.

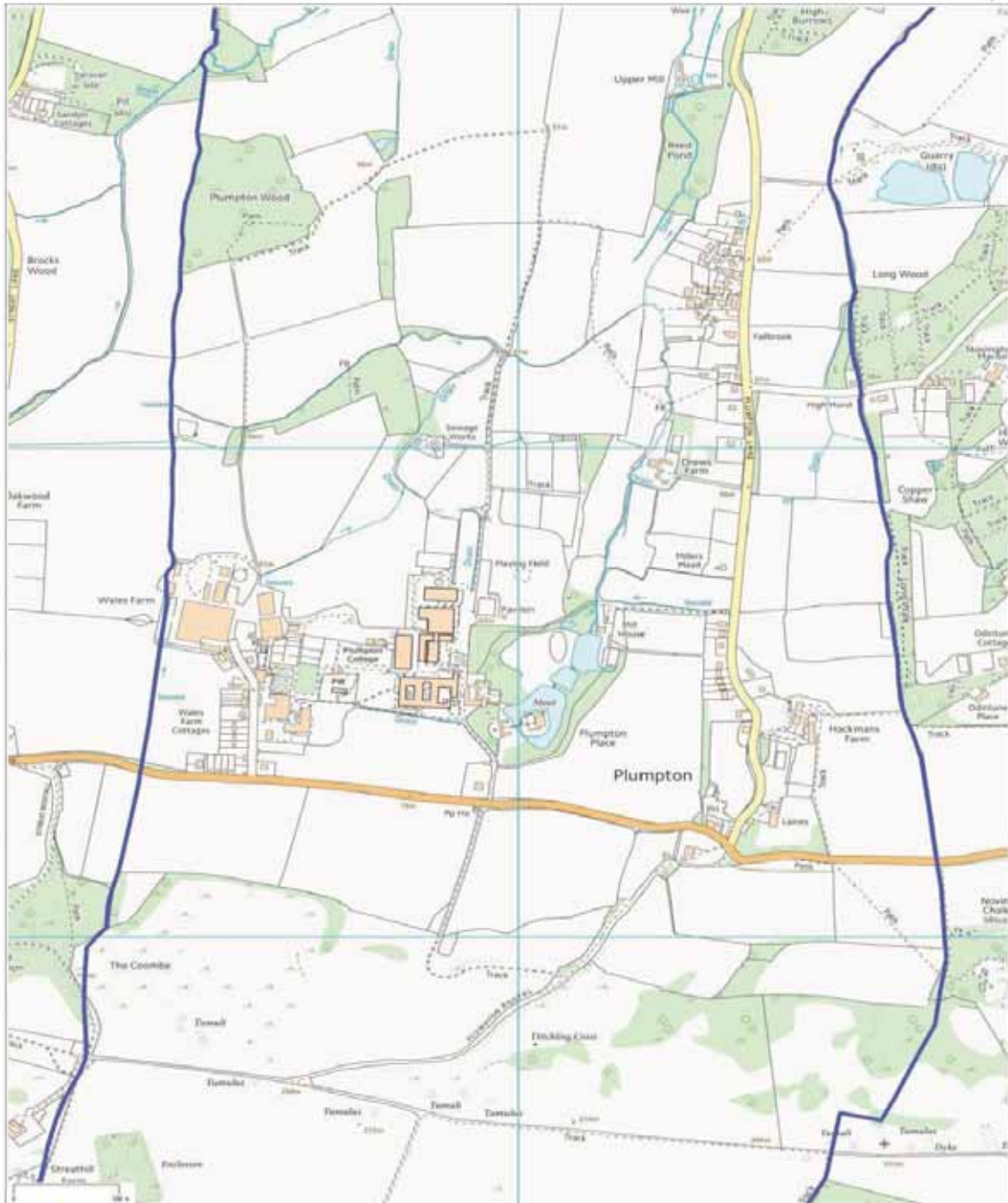
Development at Plumpton College should be masterplan/estate plan led. The masterplan/estate plan for this site should identify how the understanding and appreciation of the separation between the two areas to the east and west of St Michaels Church will be conserved and enhanced by any development.

- 5.70 Plumpton College is a major local employer. According to the survey of local businesses carried out for the PPNP, some 25 of its staff live in the parish. There are plans to expand, with the potential to create further employment. The survey also showed that the college uses local businesses in the parish.
- 5.71 The college has a history of being involved in the village through allowing the use of its extensive facilities for village activities and contributing to village events. The college is much valued by local residents, who wish to see it prosper and develop. This policy is intended to respond to the wishes of parishioners by supporting development and expansion and continued integration.
- 5.72 The policy reflects the above concerns and intends to draw attention to the relevant SDNPA policies, especially the need to consider any development plans at Plumpton College within an overall estate plan, rather than in isolation. In light of previously withdrawn planning applications, attention is specifically drawn to the importance of retaining the gap between the two areas of the college (to the east and west of the church), which acts to maintain the setting of the listed church as an important heritage asset, and also the landscape setting of the complex.

Map J: Plumpton College

ParishOnline

Plumpton CP



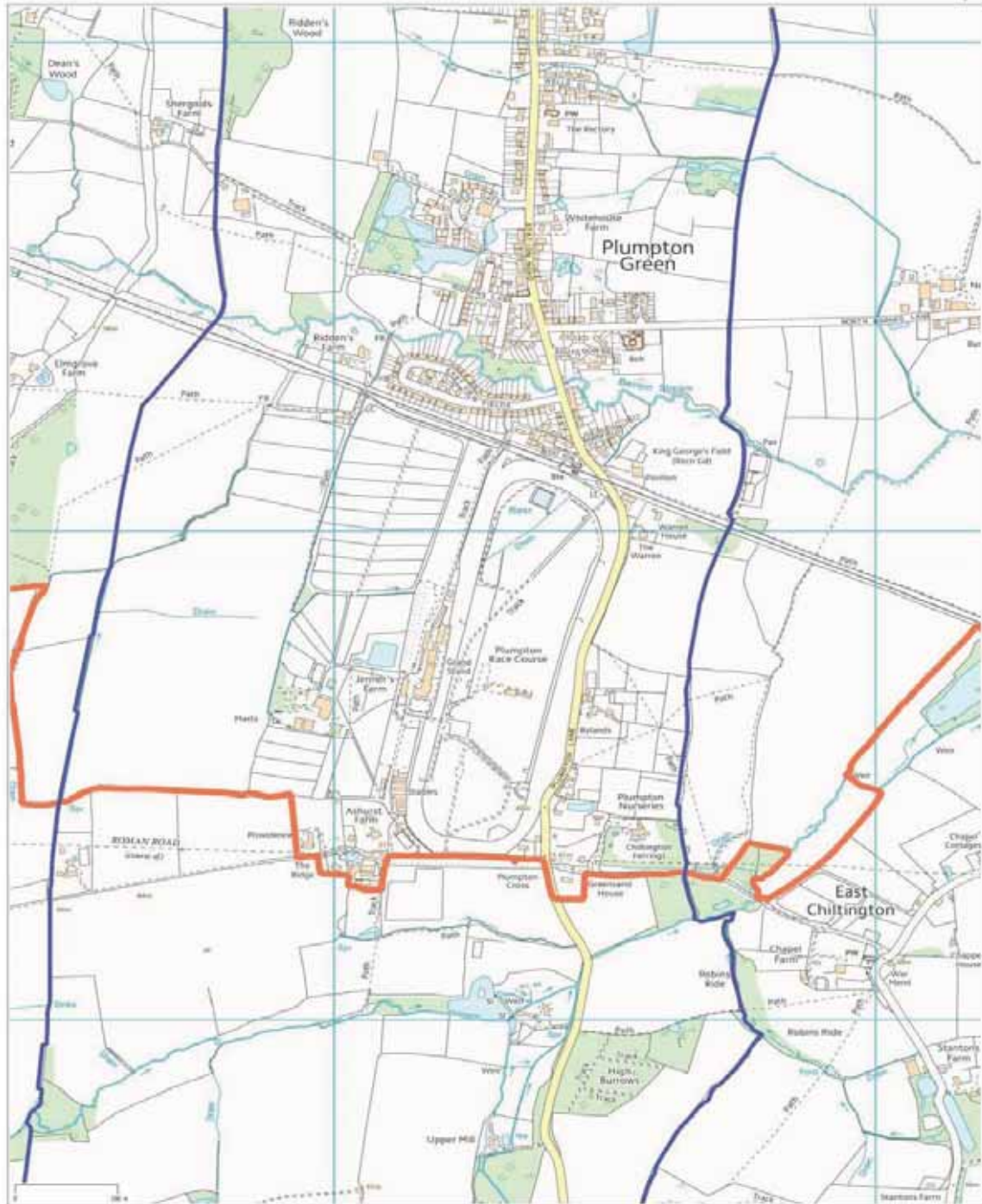
Date Created: 10-2-2016 | Map Centre (Easting/Northing): 535982 / 113676 | Scale: 1:9490 | © Crown copyright and database right. All rights reserved (0100052451) 2016

Policy 9: Plumpton Racecourse

Any development at Plumpton Racecourse will maintain, and if possible enhance, the valued Ashurst Farm Meadow Site of Nature Conservation Interest (SNCI) and preserve the special qualities and views of the SDNP.

- 5.73 Plumpton Racecourse is the second biggest local employer, albeit with a much smaller workforce than Plumpton College. Racedays bring a large number of people into the village and provide business for the village shop/post office and the local pubs. Many racegoers come by train and contribute to maintaining the station as an important stop on the London to Eastbourne line.
- 5.74 The racecourse also provides a base for Plumpton Rugby Club and has resources that it makes available from time to time for village events. PPC supports a masterplan-led approach to growth and development of the racecourse and its continued integration with the village.
- 5.75 The policy reflects the above concerns and intends to draw attention to the relevant SDNPA policies. PPC would like to see development plans at Plumpton Racecourse be considered within overall estate and business plans, rather than in isolation.

Map K: Plumpton Racecourse



Date Created: 10-2-2016 | Map Centre (Easting/Northing): 536298 / 115946 | Scale: 1:9490 | © Crown copyright and database right. All rights reserved (0100052451) 2016

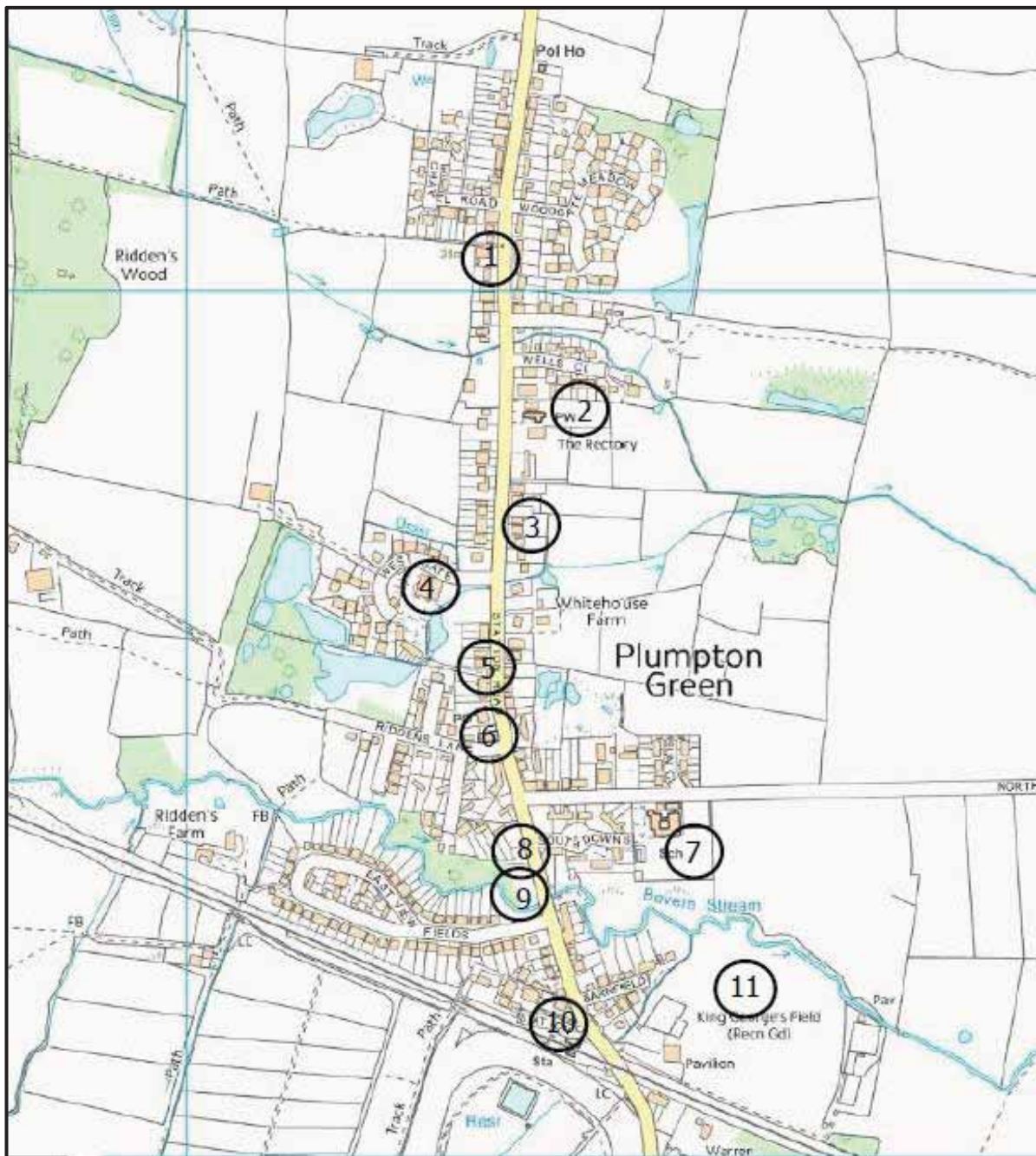
Policy 10: Community facilities

Proposals to improve the viability and current community use of the buildings and facilities identified in Map L will be supported. Extension or partial redevelopment of existing buildings will be supported, provided the design of the scheme and the resulting increase in use are appropriate in design terms and will not be detrimental to adjoining residential properties.

New development that will result in the loss of a facility will be resisted unless it can be demonstrated that its benefit to the community is no longer viable, relevant or necessary.

- 5.76 This policy serves two purposes: it first sets out which community facilities should be protected; and secondly it makes provision for their improvement to support their ongoing viability.
- 5.77 The facilities selected are all highly valued by the local community and collectively deliver a wide range of community benefits. Unless those benefits are no longer required by the community, then the policy requires they are protected.
- 5.78 In due course, the Parish Council will make applications to the District Council for the designation of some or all of these facilities as Assets of Community Value under a separate provision of the Localism Act, which will remove the permitted development right for certain changes of use. This allows the community time to put together a bid for any of these assets should they ever come up for sale.
- 5.79 The policy also encourages the improvement of community facilities to enable them to remain viable. This may require new development to extend an existing facility, and this will be supported in principle, provided any concerns about additional car parking or local amenities can be satisfactorily resolved.

Map L: Assets map



Assets map key

Asset (map reference)	Owned by
Pubs: Fountain Inn (1), Half Moon and Plough	Privately owned
All Saints Church and annex (2), St Michaels Church	Diocese of Chichester
Garages: Brighton Garage Services (3), RW Motor Engineering, Beetle Garage	Privately owned
Village Hall, car park and designated village green (4)	PPC
Red phone box (5)	PPC
Post Office and General Stores (6)	Privately owned
Plumpton Primary School (7)	East Sussex County Council (ESCC)
Parking area adjacent to allotments (8)	LDC
Allotments (9)	PPC
Station and adjoining car park (10)	Network Rail
King George V Playing Field, Pavilion, play area, woodland walk, basketball courts, skate park, and parking area (11)	PPC

Policy 11: Local Green Spaces

The PPNP designates Local Green Spaces (LGS) in the following locations (see green areas in Map M, p.59):

Site: LGS1 – King George V Playing Fields – a large area of amenity grassland to the east of Station Road, between the railway and the Bevern Stream;

Site: LGS2 – Bevernside Pocket Park and allotments – allotments and wooded wetland alongside and north of Bevern Stream, west of Station Road;

Site: LGS3 – Village Green – area of public land situated between the village hall and Station Road;

Site: LGS4 – Riddens Wood – a small area of woodland on the western border of the parish, adjacent to Little Inholmes Farm;

Site: LGS5 – Fields on Little Inholmes Farm to the north of West Gate.

The development of Local Green Spaces is ruled out other than in very special circumstances.

- 5.80 This policy proposes a number of important green spaces in the parish to be protected from development by their designation as Local Green Spaces in accordance with the NPPF.
- 5.81 In each case, the green spaces are an integral part of the parish and are therefore regarded as special to the local community. Once designated, the policy will resist all proposals for development unless it can be clearly demonstrated they are minor, or they are ancillary to a public recreation use or they are required for utilities development.
- 5.82 A list of proposed Local Green Spaces with a map and further information can be found in the Local Green Spaces and Green Infrastructure report. 'Map M: Policies Map' (p. 59) also shows all of the proposed Local Green Spaces listed above.

6. Neighbourhood Plan implementation

- 6.1 The PPNP will be implemented through the consideration and determination of planning applications for development in the parish by the relevant local planning authority.

Development management

- 6.2 Most of the policies contained in the PPNP will be delivered by landowners and developers. In preparing the PPNP, care has been taken to ensure, as far as possible, that the policies are achievable.
- 6.3 While the local planning authority will be responsible for the development management, the Parish Council will use the PPNP to frame its representations on submitted planning applications.

Community infrastructure projects

- 6.4 The Parish Council proposes some or all of the following projects for investment of future community infrastructure levy funding:

- a play space/play park if the need is identified;
- a larger play/sports area, possibly for all-weather use;
- a cycle path network to connect the railway station and South Downs National Park;
- additional footpaths at the north and south of the parish to provide safer pedestrian access where there are no pavements;
- a bridleway network at the north and south of the parish;
- additional facilities at the King George V playing fields, including a replacement sports pavilion;
- a community orchard;
- a site for additional allotments
- restoration of Novington Quarry, to provide a local nature reserve.

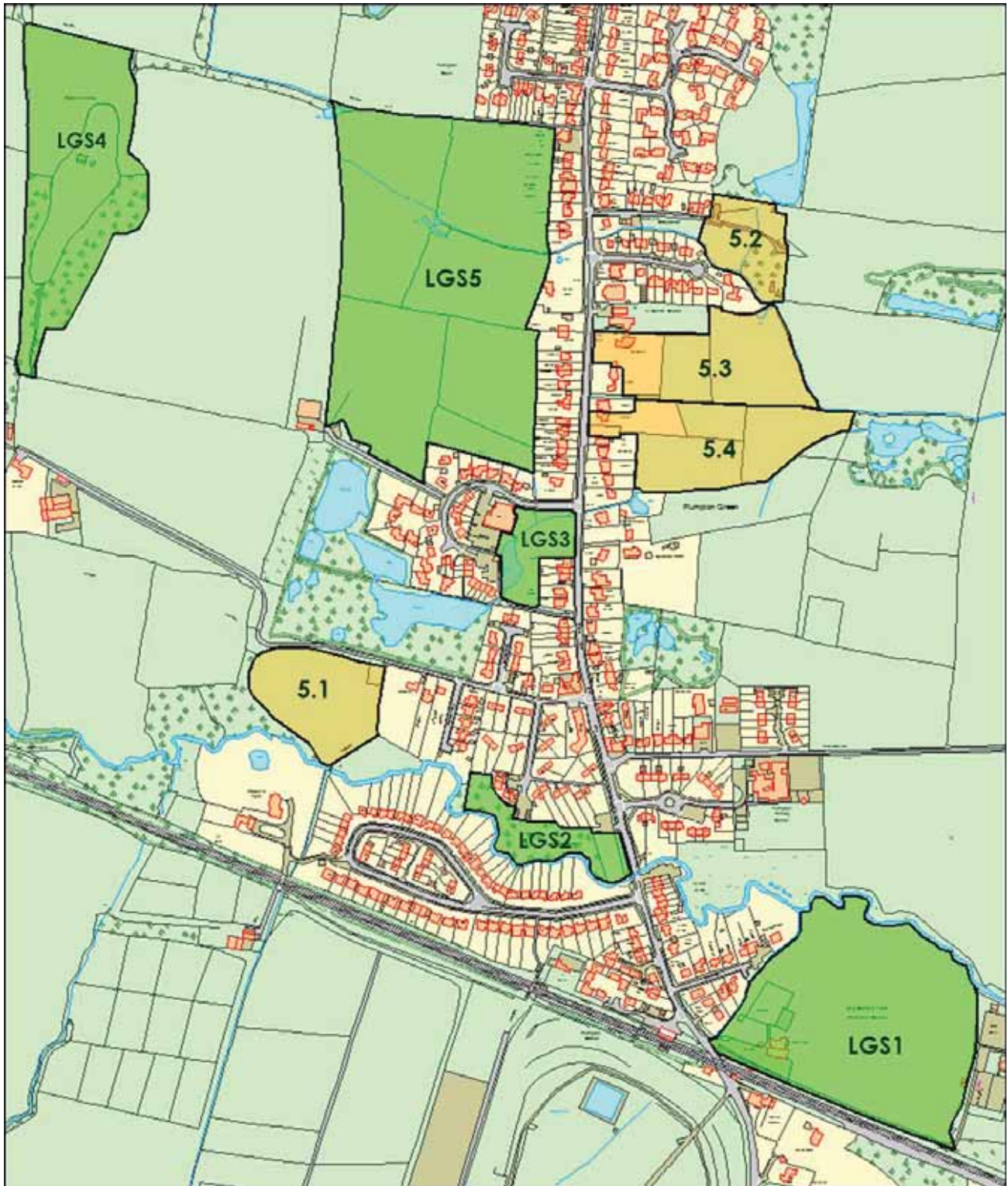
- 6.5 This provides an indication of the priorities for investing the funds to improve local infrastructure as a result of new development in the parish.

- 6.6 Once the PPNP is formally adopted, PPC will receive 25% of all Community Infrastructure Levy (CIL) receipts from development in the parish (against 15%, capped at £100 per council tax dwelling, per annum, without a Neighbourhood Plan in place). The Parish Council will have the opportunity to bid for additional CIL monies to match-fund local projects.

- 6.7 In addition, other policies of the Neighbourhood Plan require some planning obligations to be entered into as part of planning consents to finance and deliver specific infrastructure projects relating to the development scheme in order to make the scheme acceptable in planning terms in line with paragraphs 173 and 204 of the NPPF.

7. Map: M Policies map

Housing Sites (Policies 5 to 5.4) and **Local Green Spaces** (Policy 11)



8. Annex – Evidence base

The list below contains all the documents collected and reviewed in the process of preparing this report. All are available to view on Plumpton Parish Council's Neighbourhood Plan website (www.plumptonpc.co.uk/neighbourhood-plan)

PPNP Vision Paper (2014)

PPNP Village consultation April 2014 – summary report (2014)

PPNP Village consultation April 2014 – analysis of feedback (2014)

PPNP Village consultation event September 2014 – feedback (2014)

PPNP Village consultation event September 2014 – analysis of feedback (2014)

PPNP Village questionnaire: preliminary results (2015)

PPNP Village questionnaire – brief outline of results (2015)

PPNP Village questionnaire – complete raw data (2015)

PPNP Business and Employment Topic Group Report (2015)

PPNP Sustainability Appraisal Scoping Report (2015)

A Historic Landscape Characterisation of Plumpton Green, East Sussex (2016)

PPNP Design Statement (2016)

PPNP Community Evidence (2016)

Responses to Regulation 14 consultation (2016)

PPNP Local Green Spaces and Green Infrastructure (2017)

Evidence Report from the Landscape and Biodiversity Topic Group for the Plumpton Parish Neighbourhood Plan (2017)

PPNP Sustainability Appraisal (incorporating Strategic Environment Assessment) (2017)

PPNP Site Assessment Report (2017)

Responses to Regulation 14 consultation (2017)

Representation ID: REP/175/GT01Representor Details:

Representor ID:	REP/175
Name:	Jane Gane
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	GT01 - Land south of The Plough
<i>Do you consider the document to be:</i>	
Legally Compliant:	No
Sound:	No Not Positively Prepared Not Justified Not Effective Not Consistent with national policy
Representation:	
The proposed Travellers Site in Plumpton is unsound and unjustified on many grounds. I am a local resident and have no idea what language or grounds to use to sucessfully	

challenge this proposal. I simply ask that the Inspector hear, and consider, my objections.

The proposed site is on a green field site. We do not want further development, any development, in such a location. Most of us choose to live in Plumpton because we want to live in a small, rural village. We do not want further housing, industry or permanent camps built here. Our views should be considered.

The village has done its bit regarding development. We have developed a plan, we have accepted further development most of us didn't want. Why is it fair now to impose further development on us? This was not identified in the Neighbourhood Plan as being needed or wanted.

Furthermore, the site is patently unsuitable. Lewes's report claims there is already access to the field. It is, in fact, a single sized five bar gate. Access via this gate will not be easy off a narrow lane with fast moving traffic without significant destruction of hedges and widening of the entryway. This reduces the visual appeal of a pleasant rural location as well as destroying established hedgerows.

There ARE neighbours closeby whose enjoyment of their own properties would, presumably, be reduced by [REDACTED]. The village voted overwhelmingly in the village questionnaires to remain street light free and a "dark zone". How would that work on a permanent camp site?

In addition, there are a number of businesses in the Old Brickworks Industrial Estate next door to the proposed site. The lady who owns the site (I believe) stood up at the October 2018 Plumpton Parish Council meeting where three representatives from Lewes District Council were present and said ALL of the 21 businesses had said to her that they will leave if the Travellers Site goes ahead. I have no reason to believe the woman is not speaking the truth so I ask that the Inspector consider the impact to the village in terms of local employment and loss of revenue to the local shop if the site were to go ahead.

The site is further unsuitable in that:

There is no doctor or dentist in the village,

No footpath leading to the local primary school,

Station Road/Plumpton Lane is very narrow and winding in parts (only one and a half car widths at Green Cross) and without pavements - it does not lend itself to the frequent movement of heavy vehicles,

The proposed site is, I understand, prone to flooding.

Public Transport is infrequent. Buses are around three times a day and, I understand, the hourly rail service has recently been reduced.

There are few real amenities in the village - one small corner shop and that would be a lengthy walk from the proposed site.

The Lewes District Council representatives claimed at the 5th October 2018 Plumpton

Parish Council meeting that there was simply no other site suitable. I find that hard to accept.

They suggested that the landowner had agreed to sell the land and agreed in principle to a Travellers Site yet they could give no indication, even when pressed, how much the land would cost to buy. I formed the distinct impression that they really didn't care what it cost as, I gather, the money comes from the Government. And, if it really is "money no object" are we really supposed to believe there isn't another landowner out there, willing to sell what might actually be a more suitable site?

They also hinted, (although I accept this may have been intended to be helpful, rather than a veiled threat), that if the village didn't accept a Travellers Site that the Neighbourhood Plan might be set aside, with even more building. They also indicated they were willing to consider any other site that we might suggest.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public? No

Why do you feel it is necessary to participate at the Examination in Public?

Representation ID: REP/176/E1

Representor Details:

Representor ID:	REP/176
Name:	Susan Garcia
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	E1 - Land at East Quay, Newhaven Port
<p><i>Do you consider the document to be:</i></p> <p>Legally Compliant:</p> <p>Sound:</p>	
<p>Representation:</p> <p>I don't understand or comprehend what you are thinking of. This is going to ruin the the wildlife in the area. It's not looking at the environment at all, certainly not looking after the environment at all. Look around at everything that will be lost to everyone who uses the area. This i realise most of you don't care about. I'm totally disgusted with Lewes district council. In the end it all comes down to money and how much you get from it. Its not sustainable. Its a dedicated wildlife area. What about the biodiversity This will be loss.</p>	

What about the extra traffic and that brings into question air quality. Its quite obvious as a council you don't care

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public?

Why do you feel it is necessary to participate at the Examination in Public?

Hodgson, Lilly

From: sue garcia <[REDACTED]>
Sent: 09 October 2018 10:17
To: ldf
Subject: E1 Tidemills

Categories: LPP2 comment to code - stakeholder details have been added

I don't understand or comprehend what you are thinking of. This is going to ruin the the wildlife in the area. It's not looking at the environment at all, certainly not looking after the environment at all. Look around at everything that will be lost to everyone who uses the area. This i realise most of you don't care about. I'm totally disgusted with Lewes district council. In the end it all comes down to money and how much you get from it. Its not sustainable. Its a dedicated wildlife area. What about the biodiversity This will be loss. What about the extra traffic and that brings into question air quality. Its quite obvious as a council you don't care

Sent from my Samsung Galaxy smartphone.

Representation ID: REP/177/E1Representor Details:

Representor ID:	REP/177
Name:	Ruben Garcia-Dols
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:
Organisation:

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	E1 - Land at East Quay, Newhaven Port
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	
Representation: As a property owner and resident of Newhaven, I believe policy E1 should be modified and Tide Mills Beach protected as a local wildlife site for local people and visitors to enjoy. Please do not develop the area as an industrial site with the construction of the proposed concrete factory. It does not make sense to industrialise this much loved section of Seaford Bay, on the border of one of the few locations where the South Downs National Park meets the sea.	
What changes do you suggest to make the document legally compliant or sound?	

Do you consider it necessary to participate at the Examination in Public?
Why do you feel it is necessary to participate at the Examination in Public?

Hodgson, Lilly

From: Ruben Garcia Dols <[REDACTED]>
Sent: 02 November 2018 17:59
To: ldf
Subject: Please change policy E1 - Do not develop Tide Mills Beach in Newhaven

Categories: LPP2 comment to code - stakeholder details have been added

To whom it may concern,

As a property owner and resident of Newhaven, I believe policy E1 should be modified and Tide Mills Beach protected as a local wildlife site for local people and visitors to enjoy. Please do not develop the area as an industrial site with the construction of the proposed concrete factory. It does not make sense to industrialise this much loved section of Seaford Bay, on the border of one of the few locations where the South Downs National Park meets the sea.

Regards,
Ruben Garcia-Dols

Representation ID: REP/178/GT01Representor Details:

Representor ID:	REP/178
Name:	Frances and Phil Gazzard
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	GT01 - Land south of The Plough
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	
Representation: The proposed traveller's site for the North end of the village is totally unsuitable. There is no path access to the village and the traffic travels very fast down this stretch of road, making it a very dangerous place to walk, especially to the local shop and school. The site is right next to 21 businesses at the Old Brickworks, many who are used by residents in the village, especially the garage, and they have stated that they will move because of security issues. They will need to install extra security measures, such as	

secure fencing and lighting. This will impact on the local economy and many of the village people who work there.

We appreciate that travellers need permanent sites, but at their other sites we note they are placed further away from villages in more suitable plots.

Also how are the nos going to be controlled to just 5 plots? There is the problem of rubbish and access!!! What happens if they take over the whole area with higher nos, who regulates this??? We have had no community officer for several years!!! More expense for the Council!!!!

The whole idea is going to cause so much disruption in this lovely downland village. Therefore we are objecting to the proposed plans for a gypsy/travellers site.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public?

Why do you feel it is necessary to participate at the Examination in Public?

From: Frances Gazzard <[REDACTED]>
Sent: 04 November 2018 18:12
To: ldf
Subject: Travellers site Plumpton Green objection

Categories: LPP2 comment to code - stakeholder details have been added

Dear Sirs,

The proposed traveller's site for the North end of the village is totally unsuitable. There is no path access to the village and the traffic travels very fast down this stretch of road, making it a very dangerous place to walk, especially to the local shop and school.

The site is right next to 21 businesses at the Old Brickworks, many who are used by residents in the village, especially the garage, and they have stated that they will move because of security issues. They will need to install extra security measures, such as secure fencing and lighting. This will impact on the local economy and many of the village people who work there.

We appreciate that travellers need permanent sites, but at their other sites we note they are placed further away from villages in more suitable plots.

Also how are the nos going to be controlled to just 5 plots? There is the problem of rubbish and access!!! What happens if they take over the whole area with higher nos, who regulates this??? We have had no community officer for several years!!! More expense for the Council!!!!

The whole idea is going to cause so much disruption in this lovely downland village.

Therefore we are objecting to the proposed plans for a gypsy/travellers site.

Yours faithfully,

Frances and Phil Gazzard
[REDACTED]
[REDACTED]
[REDACTED]

Representation ID: REP/179/E1

Representor Details:

Representor ID:	REP/179
Name:	Tessa and Mike George and Boice
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	E1 - Land at East Quay, Newhaven Port
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	
Representation: <p>My husband Mike Boice and I strongly oppose any further development east of the Port Access Road and Bridge onto Tide Mills once the road and bridge are built. Our local environment, our coastline and Tide Mills are greatly valued, and should not be under threat. Any further loss of land at Tide Mills would have a catastrophic effect on the western end of Seaford Bay and must be resisted.</p>	
What changes do you suggest to make the document legally compliant or sound?	

Do you consider it necessary to participate at the Examination in Public?
Why do you feel it is necessary to participate at the Examination in Public?

Hodgson, Lilly

From: Tessa George [REDACTED]
Sent: 31 October 2018 16:45
To: ldf
Subject: East Beach and Tide Mills

Categories: LPP2 comment to code - stakeholder details have been added

My husband Mike Boice and I strongly oppose any further development east of the Port Access Road and Bridge onto Tide Mills once the road and bridge are built. Our local environment, our coastline and Tide Mills are greatly valued, and should not be under threat. Any further loss of land at Tide Mills would have a catastrophic effect on the western end of Seaford Bay and must be resisted.

Yours truly, Tessa George, [REDACTED]

Representation ID: REP/180/GT01Representor Details:

Representor ID:	REP/180
Name:	Martin Gilbert
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	GT01 - Land south of The Plough
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	
Representation:	<p>I wish to express my strong objection to your proposal for a traveller site in Plumpton Green.</p> <p>This proposal falls outside the Neighbourhood Plan and contradicts many of LDC's previously stated criteria for development in Plumpton Green, as already expressed in Plumpton Parish Council's response to the</p>

proposal. As you must be aware.

In addition, this is a strong community interwoven with numerous social and cultural societies and sporting clubs.

This leads to a powerful feeling of security and trust. The imposition of the proposed site would lead to

a feeling, either real or perceived, of insecurity within the community.

The businesses adjacent to the site have all said they would be more than likely to re-locate which would have a hugely detrimental effect on the economy of the village. The local shop, pubs and garage in particular.

The containment of the site will be extremely difficult to manage as it is within a much larger open field where unofficial incursion would be difficult to prevent.

As detailed by our Parish Council and no doubt expressed by countless other residents, this is a wholly unacceptable proposal for this community and should be discarded forthwith.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public?

Why do you feel it is necessary to participate at the Examination in Public?

From: Martin Gilbert [REDACTED]
Sent: 02 November 2018 14:59
To: ldf
Subject: Proposed gypsy/ traveller site in Plumpton Green
Categories: LPP2 comment to code - stakeholder details have been added

Dear sirs,

I wish to express my strong objection to your proposal for a traveller site in Plumpton Green.

This proposal falls outside the Neighbourhood Plan and contradicts many of LDC's previously stated criteria for development in Plumpton Green, as already expressed in Plumpton Parish Council's response to the proposal. As you must be aware.

In addition, this is a strong community interwoven with numerous social and cultural societies and sporting clubs.

This leads to a powerful feeling of security and trust. The imposition of the proposed site would lead to a feeling, either real or perceived, of insecurity within the community.

The businesses adjacent to the site have all said they would be more than likely to re-locate which would have a hugely detrimental effect on the economy of the village. The local shop, pubs and garage in particular.

The containment of the site will be extremely difficult to manage as it is within a much larger open field where unofficial incursion would be difficult to prevent.

As detailed by our Parish Council and no doubt expressed by countless other residents, this is a wholly unacceptable proposal for this community and should be discarded forthwith.

Yours faithfully,

Martin Gilbert
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Representation ID: REP/181/GT01Representor Details:

Representor ID:	REP/181
Name:	Mark Gilbert
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	GT01 - Land south of The Plough
<i>Do you consider the document to be:</i>	
Legally Compliant:	No
Sound:	No Not Positively Prepared
Representation: There has been woefully little engagement with the community of Plumpton about the proposed Gypsy site. Also their has been very little notice given to the local residence resulting in a process that is way too short. The Government's national Planning Policy for Traveller Sites states under Policy A: Using evidence to plan positively and manage development (paragraph 7):	

'In assembling the evidence base necessary to support their planning approach, local planning authorities should: pay particular attention to early and effective community engagement with both settled and traveller communities (including discussing travellers' accommodation needs with travellers themselves, their representative bodies and local support groups).'

1. The Parish council where only told about the GT01 development on the 5/9/18, this is not 'early and effective community engagement'.

2. There has only been one community meeting that I know of in relation to this development and unfortunately I was unable to attend, this is not 'early and effective community engagement'.

3. The proposed Gypsy development is an additional development that was not included in the neighbourhood plan, this is not 'early and effective community engagement'.

As an additional concern, Plumpton Green as a small rural community does not have many employers. My understanding is that a large percentage of the Businesses at the Brick Works will consider moving out of the village if the development goes ahead. This will reduce the opportunities for employment in the village.

What changes do you suggest to make the document legally compliant or sound?

Adhere to the Government's national Planning Policy for Traveller Sites states under Policy A

Do you consider it necessary to participate at the Examination in Public?

No

Why do you feel it is necessary to participate at the Examination in Public?