

LEWES DISTRICT LOCAL PLAN PART 2: SITE ALLOCATIONS AND  
DEVELOPMENT MANAGEMENT POLICIES DPD

# REGULATION 22(d) STATEMENT OF REPRESENTATIONS

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*Volume 2*

<b>Representation ID:</b> REP/182/E1
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Representor Details:

<b>Representor ID:</b>	REP/182
<b>Name:</b>	Ann Giles
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>E1 - Land at East Quay, Newhaven Port</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	Yes
<b>Sound:</b>	No Not Justified
<b>Representation:</b>  One of the requirements of such a plan is to maintain development whilst protecting the environment. Also to consider overall impact on the considered area. The suggestions for further development of this site, beyond the already agreed port road and port development is NOT justified. There are already areas in Newhaven marked for employment and housing that are not presently developed e.g. off the Brighton Road;	

the Chalk pit area near Court Farm Road; the area north of the railway line off the new port road. The coastline in East Sussex has been negligently destroyed along this stretch at Newhaven and it is detrimental to the nearby boundary of the National Park to allocate this section of the coast to further unnecessary development. There should be a protected barrier between the already agreed development and the National Park Boundary at Tide Mills. It should also be noted that the proposed area contains valuable fauna ,that thrives In the conditions here, that would be destroyed should unnecessary development take place.

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

A protective barrier should be maintained between already agreed development of the port road and agreed port expansion and the Boundary of the National Park at Tide Mills. This would act to maintain the local environment and remaining coastline for the wellbeing of residents and future generations.

**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?**

It is necessary to have views from residents of the area under consideration. As a long term resident of Newhaven and a past Town Councillor I am aware that too often the voice of the local resident has been ignored in favour of financial profit for private enterprise and indirectly the local authority. This has lead to the decline of Newhaven and the closure of much of the Newhaven coastline to the general public. This, in turn, has created a decline in the morale and confidence of residents, together with an overall deterioration in their living and working environment. Not the purpose of good planning .

**Representation ID: REP/183/RG01**Representor Details:

<b>Representor ID:</b>	REP/183
<b>Name:</b>	Nick Keeley
<b>Organisation:</b>	<b>Gleeson Strategic Land</b>
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Planning Consultant

Agent Details:

<b>Name:</b>	Mike Pickup
<b>Organisation:</b>	Town & Country Planning Solutions

Contact Details:

<b>Email Address:</b>	tcps@talk21.com
<b>Address:</b>	Sentinel House Ancells Business Park, Harvest Crescent Fleet GU51 2UZ

Representation:

<b>Policy/Section:</b>	<b>RG01 - Caburn Field</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	Yes
<b>Sound:</b>	No Not Positively Prepared Not Justified Not Effective
<b>Representation:</b>  This site has been allocated and considered appropriate for housing development (now for approximately 90 dwellings) for more than 15 years. It was first allocated for housing development as part of the Lewes District Local Plan (adopted in 2003) under Policy	



RG1.

However, the site is currently the home of Ringmer Football Club (and other associated uses including a social club) who have continued to occupy the site until the present day. Therefore, as the site is not of a sufficient size to accommodate the football club and any meaningful amount of housing development, any potential to redevelop this site for housing is intrinsically linked to securing a suitable new location for the Football Club, in order for them to be able to relocate and only then vacate Caburn Field. At present, no solution is in place for this relocation and therefore, the site is not available for housing developed at the present time. As a consequence, no planning application for housing has been submitted for the site (and it remains unclear how 90 dwellings can be satisfactorily accommodated given the size of the site and prevailing housing densities in the surrounding area).

It is noted however, that a planning application (no. LW/18/0789) was submitted on 9th October for the relocation of the football club to land to the rear of King's Academy Ringmer School and Ringmer Community College. Whilst this could potentially provide a suitable option for relocation, at the deadline of the Consultation Period, the application has not have been considered or determined by the Council. Therefore, there is no certainty that the planning application will be approved and even should it be approved, there is no certainty that it would be implemented or result in the relocation of the football club, due to any other potential constraints such as finance or logistics linked to any such relocation. There is also the likely lead in time which could be considerable for and such relocation to take place.

The Ringmer Development Boundary – Draft Inset Map 4 (Ringmer and Broyle Side)

Paragraph 2.119 – 1.121 (and Tables 3 and 4) calculate that notwithstanding the adoption of the Ringmer Local Plan (February 2016), there remains a need to allocate land for at least an additional 32 dwellings. While Caburn Field has been allocated for 90 dwellings, there can be no certainty that this additional amount of housing will be delivered within the Plan Period. Other land should therefore, also be allocated as a contingency measure, to ensure that at least 32 dwellings can be delivered at Ringmer.

Therefore, a suitable extension to the Ringmer Development Boundary should be made in order to accommodate sufficient housing development throughout the plan period. Due to environmental constraints however, such as safeguarding the gap between Ringmer and Broyle Side, and protecting the South Downs National Park, suitable opportunities are limited to the south eastern side of the village only

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

Extension of the Ringmer Development Boundary to include Land to the East of Harrisons Lane, Ringmer

Given that there can be no certainty that the site at Caburn Field (which has been allocated for housing development for over 15 years) will deliver any housing within the Plan Period, the Ringmer Development Boundary should be extended include sustainably located land suitable for housing development, in order to help meet future

housing needs.

#### Site Location

A proposed extension to the Development Boundary put forward on behalf of Gleeson Strategic Land is shown on Appendix 1 attached to this document.

The proposed Development Boundary extension is to the south east of the village and to the east of Harrisons Lane. The proposed site is well related to the existing developed part of the village and is located immediately to the south of Ringmer Primary and Nursery School.

The site is some 0.4 miles from the centre of the village and less than a 10 minute walk from Ringmer's main services, including Ringmer Primary and Nursery School and Ringmer Community College to the north and the shops, cafes and Anchor Inn public house as well as recreational and other facilities situated within the centre of the village. In addition, bus route 143 has a bus stop which is adjacent to the site at the primary school, which provides services to Lewes, Hailsham and Eastbourne. The bus stop at Kings Academy, some 0.3 miles to the north of the site provides regular services to Uckfield, Tunbridge Wells, Lewes and Brighton.

Therefore, the site is situated within a sustainable, edge of village location and the future residents of the site would not need have a sole reliance on the use of the private car.

#### Site Characteristics

The site comprises 3 hectares of land used as pastoral farmland. The site is relatively flat and is contained by mainly existing housing along the eastern side of Harrisons Lane, by the village primary school to the north and and elsewhere by trees and hedgerows, with an existing field access at the southern boundary off Potato Lane.

#### Proposed Housing Allocation

As illustrated by Appendix 2 attached, the site is of a sufficient size to be able to accommodate around 70 dwellings, whilst also providing substantial new landscape buffer planting to help assimilate the development within its setting and to screen and filter views from inside the South Downs National Park Boundary on the southern side of Potato Lane.

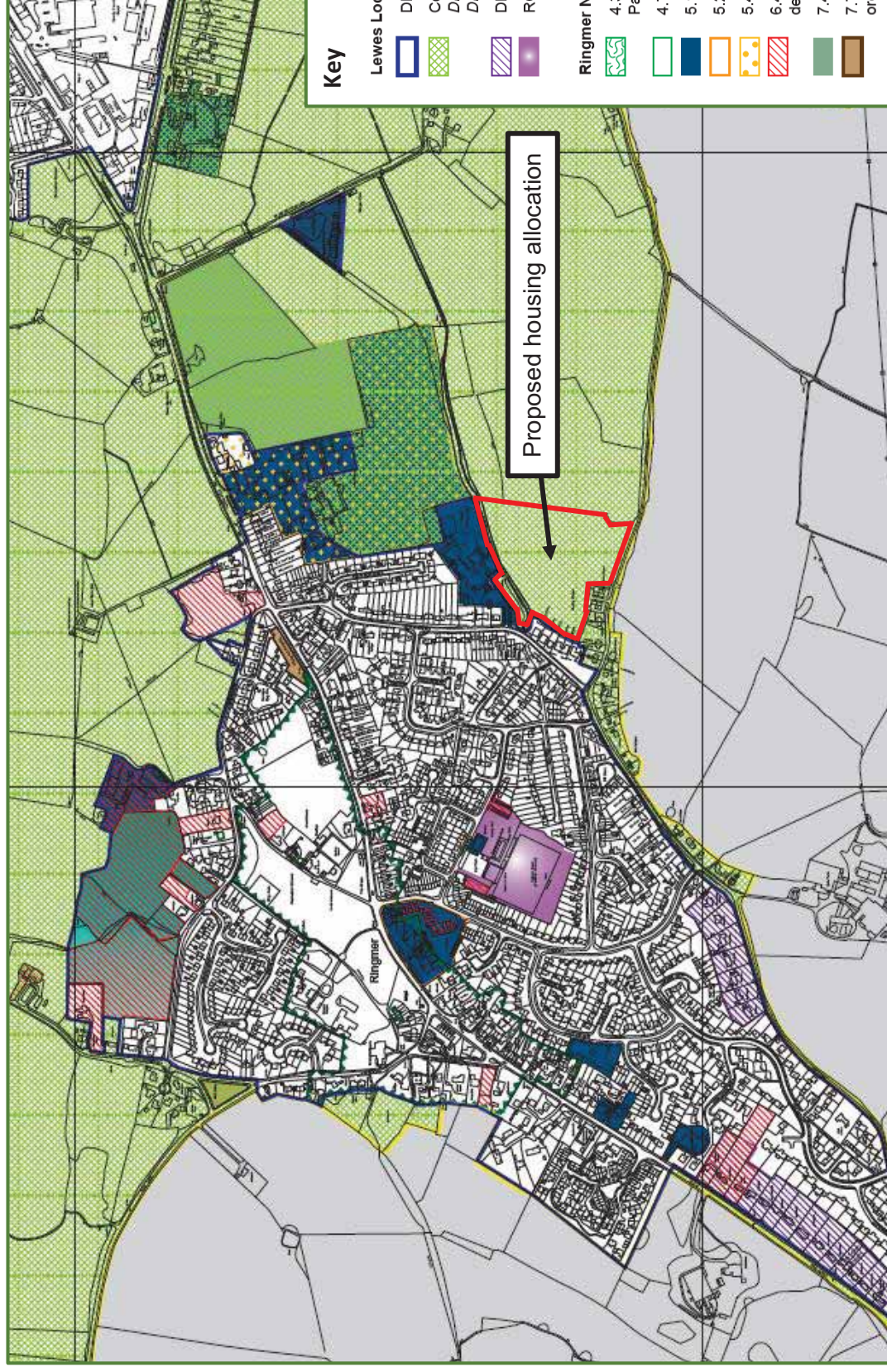
<b>Do you consider it necessary to participate at the Examination in Public?</b>	Yes
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#### **Why do you feel it is necessary to participate at the Examination in Public?**

Detailed representations are required in relation to the proposed Development Boundary extension to include the Land to the East of Harrisons Lane, Ringmer submissions will include supporting documents in support of these representations, which will benefit from being explained at a Hearing as part of the Examination

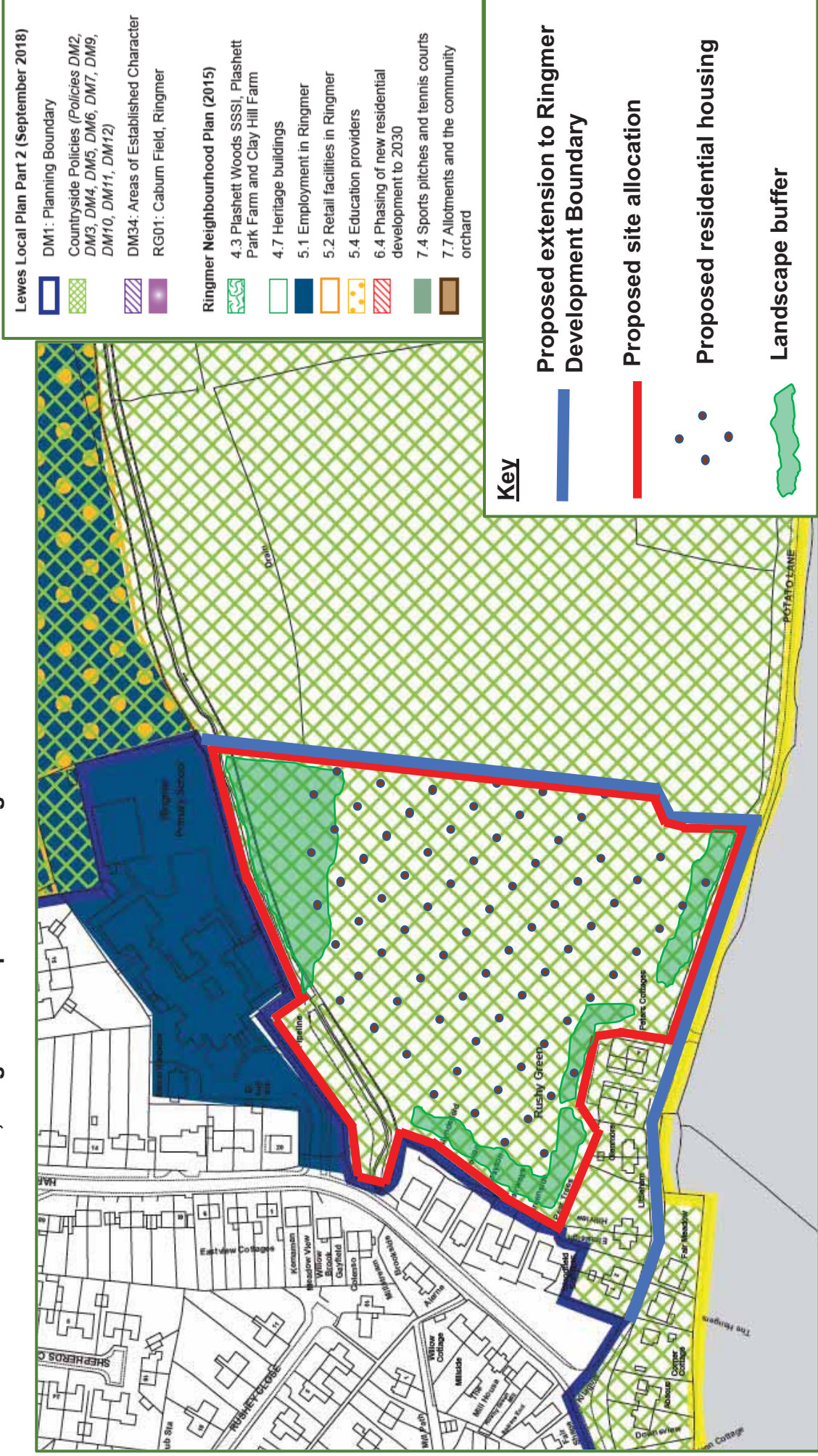


## Land East of Harrisons Lane, Ringmer - Proposed Housing Allocation





## Land East of Harrison's Lane, Ringmer - Proposed Housing Allocation



**Representation ID: REP/184/E1**Representor Details:

<b>Representor ID:</b>	REP/184
<b>Name:</b>	Timothy Good
<b>Organisation:</b>	<b>Mach4 Solutions Ltd</b>
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Local Business / employer

Agent Details:

<b>Name:</b>
<b>Organisation:</b>

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	Unit 19 Euro Business Park New Road Newhaven East Sussex BN9 0DQ

Representation:

<b>Policy/Section:</b>	<b>E1 - Land at East Quay, Newhaven Port</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	Yes
<b>Sound:</b>	No Not Effective
<b>Representation:</b>  As a local business owner I am appalled that the original agreement with the port owners wasn't also tied to infrastructure development surrounding this traffic beleaguered town. With no road development any new business just makes the present rush hour chaos even worse. With the convergence of 3 major routes, the swing bridge, and the level crossing, a minor problem can cause huge delays as things are. Lewes	

council's first duty should be to the residents and existing businesses in Newhaven, not to the French owners of the port. We have lost faith in the democratic process, and the honesty of the counsellors themselves. The protesters represent the voice of reason, this isn't some nimby style reaction from middle class homeowners worried about property prices.

**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?**

<b>Representation ID: REP/185/E1</b>
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Representor Details:

<b>Representor ID:</b>	REP/185
<b>Name:</b>	Emma Good
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>E1 - Land at East Quay, Newhaven Port</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	
<b>Sound:</b>	
<b>Representation:</b>	<p>I am writing to register my opposition to the plans to build on ground at Tide Mills.</p> <p>I have lived in Seaford all my life and have walked and watched wildlife at Tide Mills for over fifty years as did my father and his father before him. It is a beautiful, peaceful, desolate wild area rich with history sandwiched between two towns which is used and loved by so many. The area is rich with wildlife including rare birds and plants.</p> <p>A large chunk of the beautiful beach has already been gobbled up by the port expansion, a tragedy which cannot now be reversed.</p> <p>Why jeopardise another large area of beautiful natural wasteland enjoyed by so many for the sake of industry which could easily be sited elsewhere with far less impact on the</p>

environment?

Please listen to the voices of so many who are objecting to this awful proposal.

Please show support for the residents that you represent rather than the businesses who have little history in the area or loyalty to those who live there.

This is not progress, it is the irreversible destruction of something fragile, beautiful and precious.

Please do the right thing and stop this 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?**



**From:** Emma <[REDACTED]>  
**Sent:** 03 November 2018 17:45  
**To:** ldf  
**Subject:** Reference: E1

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

I am writing to register my opposition to the plans to build on ground at Tide Mills. I have lived in Seaford all my life and have walked and watched wildlife at Tide Mills for over fifty years as did my father and his father before him. It is a beautiful, peaceful, desolate wild area rich with history sandwiched between two towns which is used and loved by so many. The area is rich with wildlife including rare birds and plants. A large chunk of the beautiful beach has already been gobbled up by the port expansion, a tragedy which cannot now be reversed. Why jeopardise another large area of beautiful natural wasteland enjoyed by so many for the sake of industry which could easily be sited elsewhere with far less impact on the environment? Please listen to the voices of so many who are objecting to this awful proposal. Please show support for the residents that you represent rather than the businesses who have little history in the area or loyalty to those who live there. This is not progress, it is the irreversible destruction of something fragile, beautiful and precious. Please do the right thing and stop this development. Thank you.  
Emma Good [REDACTED]

Sent from my iPad

**Representation ID: REP/186/GT01**Representor Details:

<b>Representor ID:</b>	REP/186
<b>Name:</b>	James and Helen Grant
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>GT01 - Land south of The Plough</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	
<b>Sound:</b>	
<b>Representation:</b>	
<p>We strongly object to the above proposal for the following reasons:</p> <ul style="list-style-type: none"><li>- Negative effect on local businesses - all the businesses at The Old Brickworks have started they will leave, which would affect the property owners, the business owners and the community. The Plough has stated the have put development plans on hold until the know the result of this proposed development. The Village shop is the absolute heart of the village and it would be a travesty if they decided to leave. The Racecourse may be affected by potential lack of visitors.</li><li>- The effect of light pollution secondary to the need for increased security of The Old Brickworks</li></ul>	

- the likely negative effect on house prices for the whole village and potential issues to re-sell
- we feel the site would serve far more appropriate for actual housing and/or an area that would benefit the community, e.g. further commercial options, a park for children to play in, shops, leisure facilities, etc.

Please keep us updated with any 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?**

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

## Hodgson, Lilly

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**From:** helen blanchard <[REDACTED]>  
**Sent:** 04 November 2018 21:36  
**To:** ldf  
**Subject:** Proposed Permanent Gypsy and Traveller Pitches south of The Plough  
**Categories:** GT01, Vanessa to deal with

Dear sir/madam

Re: Proposed Permanent Gypsy and Traveller Pitches south of The Plough in Plumpton

We strongly object to the above proposal for the following reasons:

- Negative effect on local businesses - all the businesses at The Old Brickworks have started they will leave, which would affect the property owners, the business owners and the community. The Plough has stated the have put development plans on hold until the know the result of this proposed development. The Village shop is the absolute heart of the village and it would be a travesty if they decided to leave. The Racecourse may be affected by potential lack of visitors.
- The effect of light pollution secondary to the need for increased security of The Old Brickworks
- the likely negative effect on house prices for the whole village and potential issues to re-sell
- we feel the site would serve far more appropriate for actual housing and/or an area that would benefit the community, e.g. further commercial options, a park for children to play in, shops, leisure facilities, etc.

Please keep us updated with any developments.

Yours sincerely

James and Helen Grant  
[REDACTED]

Sent from my iPad

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**Representation ID: REP/187/E1**Representor Details:

<b>Representor ID:</b>	REP/187
<b>Name:</b>	Linda Green
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>E1 - Land at East Quay, Newhaven Port</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	
<b>Sound:</b>	
<b>Representation:</b>  I am writing to express my concern re policy E1 in the Newhaven neighbourhood plan .  I strongly believe that policy E1 should be changed to protect Seaford Bay for future generations. It needs to be protected as a local wildlife site, as an attractive place for tourists and as a resource for local residents. This policy does not take into account the promised ' clean green' regeneration of Newhaven. It makes absolutely no sense to industrialise this unique and much loved section of Seaford Bay, on the border of one of the few locations where the South Downs National Park meets the sea. The only people it will benefit are the port authority and East Sussex Council who mistakenly in my view and against the wishes of many have gone ahead with funding a very expensive flyover	

to this area of beach and given the go ahead to Brett Aggregates (disastrous) which I believe was agreed ages ago with the more recent views of local people being ignored. Please now see some common sense and stop any further development East. There is already plenty of room for development in the agreed sites. Please do not develop into E1. Lose this beautiful and unique area of coastline and it can never be replaced. Let's make the best use of our open spaces for the health and sanity of local residents and to encourage tourism. Please! please! please! Please don't get too hooked up on financial gain but see common sense in developing this area of Newhaven and Seaford as a wonderful place to visit and live!

**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:** Linda Green [REDACTED]  
**Sent:** 04 November 2018 17:39  
**To:** ldf  
**Subject:** E1 and Tide Mills beach

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

Dear Sir /Madam,

I am writing to express my concern re policy E1 in the Newhaven neighbourhood plan .

I strongly believe that policy E1 should be changed to protect Seaford Bay for future generations. It needs to be protected as a local wildlife site, as an attractive place for tourists and as a resource for local residents. This policy does not take into account the promised ' clean green' regeneration of Newhaven. It makes absolutely no sense to industrialise this unique and much loved section of Seaford Bay, on the border of one of the few locations where the South Downs National Park meets the sea. The only people it will benefit are the port authority and East Sussex Council who mistakenly in my view and against the wishes of many have gone ahead with funding a very expensive flyover to this area of beach and given the go ahead to Brett Aggregates (disastrous) which I believe was agreed ages ago with the more recent views of local people being ignored. Please now see some common sense and stop any further development East. There is already plenty of room for development in the agreed sites. Please do not develop into E1. Lose this beautiful and unique area of coastline and it can never be replaced. Let's make the best use of our open spaces for the health and sanity of local residents and to encourage tourism. Please! please! please! Please don't get too hooked up on financial gain but see common sense in developing this area of Newhaven and Seaford as a wonderful place to visit and live!

Yours faithfully

Linda Green.

<b>Representation ID:</b> REP/188/HPC/A
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Representor Details:

<b>Representor ID:</b>	REP/188
<b>Name:</b>	Nigel Greenhalgh
<b>Organisation:</b>	<b>Portgreen Properties Ltd</b>
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	Lucy Morris
<b>Organisation:</b>	PRP

Contact Details:

<b>Email Address:</b>	[REDACTED]
<b>Address:</b>	[REDACTED]

Representation:

<b>Policy/Section:</b>	<b>Housing Policy Context</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	No
<b>Sound:</b>	No
	Not Positively Prepared
	Not Justified
	Not Effective
	Not Consistent with national policy
<b>Representation:</b>	
(See attached PDF)	



<b>What changes do you suggest to make the document legally compliant or sound?</b>
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<b>Do you consider it necessary to participate at the Examination in Public?</b>	<b>Yes</b>
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<b>Why do you feel it is necessary to participate at the Examination in Public?</b>
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<b>Representation ID:</b> REP/188/HPC/B
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Representor Details:

<b>Representor ID:</b>	REP/188
<b>Name:</b>	Nigel Greenhalgh
<b>Organisation:</b>	<b>Portgreen Properties Ltd</b>
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	Lucy Morris
<b>Organisation:</b>	PRP

Contact Details:

<b>Email Address:</b>	[REDACTED]
<b>Address:</b>	[REDACTED] [REDACTED] [REDACTED]

Representation:

<b>Policy/Section:</b>	<b>Housing Policy Context</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	No
<b>Sound:</b>	No Not Positively Prepared Not Justified Not Effective Not Consistent with national policy
<b>Representation:</b>  (See attached PDF)	

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<b>What changes do you suggest to make the document legally compliant or sound?</b>
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(See attached PDF)

<b>Do you consider it necessary to participate at the Examination in Public?</b>	<b>Yes</b>
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<b>Why do you feel it is necessary to participate at the Examination in Public?</b>
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Architecture  
Urban Design  
Masterplanning  
Landscape  
Development Consultancy  
Planning  
Interiors  
Research

Planning Policy Team  
Lewes District Council  
Southover House  
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BN7 1AB

5 November 2018

10 Lindsey Street  
London  
EC1A 9HP  
020 7653 1200

Dear Sir/Madam,

**Lewes Local Plan Part 2 Regulation 19 Consultation****55 ALLINGTON ROAD, NEWICK**

I write in response to the consultation on the proposed submission draft Local Plan Part 2 for Lewes District Council ("LDC") under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012. PRP is acting as the agent on behalf of Village Developments Ltd for 55 Allington Road, Newick ("the Site").

The representations included in this letter can be summarised as follows:

- The timing of the submission of the Local Plan for examination.
- The Local Plan Parts 1 and 2 in relation to the 2012 NPPF and the revised NPPF (2018).
- The calculation of the Five Year Housing Land Supply Statement.
- The reliance on Neighbourhood Plans for delivering housing.
- The need for a review of the Newick Neighbourhood Plan and the Site.

Regulation 19 of the Planning and Compulsory Purchase Act 2004 states that:

- (1A) *Development plan documents must (taken as a whole) include policies designed to secure that the development and use of land in the local planning authority's area contribute to the mitigation of, and adaptation to, climate change.*
- (2) *In preparing a local development document the local planning authority must have regard to:*
- (a) *National policies and advice contained in guidance issued by the Secretary of State;*
  - (aa) *the local development documents which are to be development plan documents*

- (b) *the regional strategy for the region in which the area of the authority is situated, if the area is outside Greater London.*
- (c) *the spatial development strategy if the authority are a London borough or if any part of the authority's area adjoins Greater London;*
- (d) *the regional strategy for any region which adjoins the area of the authority;*
- (h) *any other local development document which has been adopted by the authority;*
- (3) *In preparing the local development documents (other than their statement of community involvement) the authority must also comply with their statement of community involvement.*
- (4) *But subsection (3) does not apply at any time before the authority have adopted their statement of community involvement.*
- (5) *The local planning authority must also:*
  - (a) *carry out an appraisal of the sustainability of the proposals in each development plan document;*
  - (b) *prepare a report of the findings of the appraisal.*

Regulation 20, subsection 2 of the Planning and Compulsory Purchase Act 2004 states that the Local Planning Authority ("LPA") **must not** submit a development plan document unless:

- (a) *They have complied with any relevant requirements contained in regulations under this Part, and*
- (b) *They think the document is ready for independent examination.*

The new National Planning Policy Framework ("NPPF") was published on 24 July 2018 and within Annex 1, paragraph 214, it states that (emphasis added):

*'The policies in the previous Framework will apply for the purpose of examining plans, where those plans are **submitted on or before 24 January 2019**. Where such plans are withdrawn or otherwise do not proceed to become part of the development plan, the policies contained in this Framework will apply to any subsequent plan produced for the area concerned.'*

It is understood that provided LDC submits its new Local Plan Part 2 for examination before the 24 January 2019, it will be assessed on the policies and guidance contained within the National Planning Policy Framework 2012 ("2012 NPPF").

## **TIMING OF SUBMISSION**

- 1.1 The six week Regulation 19 Consultation on the submission version of the Local Plan Part 2 is to close on 5 November 2018. LDC has confirmed that they intend to submit the plan to the Secretary of State before the 24 January 2019. It is understood that this is intended to avoid the plan being examined under the revised version of the NPPF (2018) and ensure that it is examined in the context of the 2012 version of the NPPF and with the Local Plan Part 1.
- 1.2 This gives LDC only little over 11 weeks to review and respond to the consultation responses, prepare the documents for submission and for the Council to approve the

document to be submitted at committee. Other LPAs consider that this can take up to 5 months and the preparation of the Local Plan Part 2 will also take place over the festive season. There is currently no full council meeting scheduled in January 2019, with the last cabinet meeting before the 24 January 2019 due to take place on 5 December 2018. This will further reduce the amount of time LDC has to fully prepare the plan for submission.

- 1.3 This raises questions as to whether the consultation responses have been considered adequately and if LDC believes the document is ready for independent examination in line with Regulation 20, subsection 2 of the Planning and Compulsory Purchase Act 2004.

#### LOCAL PLAN PART 1

- 1.4 Part 1 of the Lewes District Local Plan was adopted in May 2016 by LDC and South Downs National Park Authority ("SDNPA"). This set out a minimum housing requirement of 6,900 units between 2010 and 2030 for both LDC and SDNPA. This is the equivalent of 345dpa). This fell well short of the OAN set out in the Assessment of Housing Development Needs Study: Sussex Coast HMA (April 2014) which indicated a requirement of between 9,200 and 10,400 new dwellings over the plan period (460-520dpa).
- 1.5 It is acknowledged that as Part 1 has already been found sound by an Inspector and therefore Part 2 of the Local Plan seeks to only allocate housing sites for the adopted target. However it should be noted that the data which this target is based on is from 2014 and will be at least 6 years old when Part 2 of the Local Plan is adopted.
- 1.6 In addition, under 2018 NPPF guidelines (paragraph 11), LDC will be required to adopt the standard method housing target as a minimum from May 2021. Assuming that LDC can submit their Local Plan Part 2 before 24 January 2019 and the examination runs smoothly, it will be adopted in 2020, only a year before the standard method comes into play.
- 1.7 Although the plan is to be assessed against the 2012 NPPF, as part of the revised NPPF (2018) all LPAs will be required to review their Local Plans in line with paragraph 33 which states that [emphasis added]:

*'Policies in local plans and spatial development strategies should be reviewed to assess whether they need updating at least once every five years, and should then be updated as necessary. **Reviews should be completed no later than five years from the adoption date of a plan**, and should take into account changing circumstances affecting the area, or any relevant changes in national policy. Relevant strategic policies will need updating at least once every five years **if their applicable local housing need figure has changed significantly; and they are likely to require earlier review if local housing need is expected to change significantly in the near future.**'*

- 1.8 The change from a constraints based OAN to the standard method housing target would constitute a significant change in the LPAs housing need figure. LDC would therefore have to adopt their revised Local Plan by May 2021 and would need to start preparation for this review before Part 2 had been adopted. Once adopted, Part 2 would have to be revised in order to be compliant with Part 1 and the NPPF (2018).

- 1.9 LDC cannot currently demonstrate a five year housing land supply (4.92 years for the area outside SDNPA at 1 April 2018). Since the start of the plan period, LDC has delivered 1,520 units (an average of 190dpa). This is significantly below the disaggregated target of 275dpa set out in Part 1 of the Local Plan for areas outside the SDNPA.
- 1.10 When taken as a whole, LDC can demonstrate 4.99 years housing land supply. Since the start of the plan period, LDC (including SDNPA) has delivered 1,844 units (an average of 230dpa). Again, this is significantly below the Local Plan Part 1 target of 345dpa.
- 1.11 LDC's current housing land supply statement (August 2018) sets out the housing delivery performance of the district (including SDNPA) from the 2006/07 monitoring year within Table 3. This shows that LDC has only applied their Part 1 housing target from 2016/17 when the Local Plan was adopted. This is contrary to paragraph 2a-003-20140306 of the NPPG (2012 guidance) which states that [emphasis added]:
- 'Need for housing in the context of the guidance refers to the scale and mix of housing and the range of tenures that is likely to be needed in the housing market area **over the plan period** – and should cater for the housing demand of the area and identify the scale of housing supply necessary to meet that demand.'*
- 1.12 This is a clear requirement set out in the NPPG and when factored into the housing delivery performance, LDC has a current shortfall of 916 dwellings since the start of the plan period. LDC therefore need to address this undersupply and should consider allocating a greater number of sites to make up for this shortfall.

#### FIVE YEAR HOUSING LAND SUPPLY STATEMENT

- 1.13 LDC published their Housing Land Supply Statement in August 2018, after the publication of the revised NPPF (2018). The assessment of housing supply was taken against the 2012 NPPF rather than the revised NPPF (2018). Regardless of the timing of the adoption of the adopted Local Plan, housing land supply statements are required to be in line with the most recent national policy.
- 1.14 As part of the revised NPPF (2018), the definition of deliverable sites which form part of the housing land supply assessment has been more clearly defined. As set out on page 66 within Annex 2: Glossary, for a site to be considered deliverable there should be a realistic prospect that housing will be delivered on the site within 5 years. Sites with outline planning permission; have been allocated in the development plan; or have been identified on the brownfield register should only be considered developable where there is clear evidence that housing completions will begin on site within 5 years.
- 1.15 There is no clear evidence that this change in definition of deliverable sites has been taken into consideration when calculating the five year housing land supply. It is recommended that LDC revisit their calculation of their housing land supply in line with the requirements set out in the revised NPPF (2018).
- 1.16 It is worth noting that whilst the adopted Local Plan was assessed against the 2012 NPPF, any new applications will be assessed against the new NPPF (2018).

- 1.17 It is recommended that in the light of positive plan-making, it would be prudent to increase housing supply now in order to maintain a five year housing land supply throughout plan period.

## NEIGHBOURHOOD PLANS

- 1.18 The large majority of the residual housing target set out in the Local Plan Part 2 are to come through emerging Neighbourhood Plans. A breakdown of the residual target is set out overleaf.

Source	Number of units
Adopted Neighbourhood Plans	385 units
Emerging Neighbourhood Plans	865 units
Allocation through Local Plan Part 2	432 units
<b>Total</b>	<b>1682 units</b>

Figure 1

- 1.19 Figure 1 demonstrates that over half of LDC's residual housing target is to come from emerging Neighbourhood Plans. Neighbourhood Plans are subject to less scrutiny compared to Local Plans and subject to funding issues. This makes this spatial strategy a high risk one, particularly when LDC already has a shortfall from the start of the plan period.
- 1.20 Peacehaven and Telscombe Neighbourhood Plan for example, has just concluded its Call for Sites stage and are required to deliver a minimum of 255 units over the plan period. It is therefore unclear at this stage whether there is certainty that this number of units can be accommodated in this location.
- 1.21 It is recommended in the vein of positive plan-making in the first instance more sites are allocated to meet the undersupply of the last 8 years and to meet the uplift in housing that will be needed to meet the standard method target which will be applied from 2021.
- 1.22 Secondly, it is recommended that a policy such as the one proposed in South Oxfordshire District Council's ("SODC") emerging Local Plan is included in LDC's Local Plan Part 2.
- 1.23 Policy H4: Housing in the Larger Villages of the SODC emerging plan states that:

*A minimum of 1,041 homes will be collectively delivered through Neighbourhood Development Plans and Local Plan site allocations...*

*If a Neighbourhood Development Plan has not adequately progressed with allocating sites\* to meet these requirements within 12 months of adoption of this Local Plan planning applications for housing in the larger villages will be supported provided that proposals comply with the overall housing distribution strategy as set out in policy STRAT1.*

*\*the plan has reached submission stage and has allocated sufficient housing sites.*



- 1.24 These two steps will aid the delivery of housing in sustainable locations, in line with the NPPF (2012), and ensure that undersupply does not continue further into the plan period.

#### **NEWICK NEIGHBOURHOOD PLAN**

- 1.25 Newick Neighbourhood Plan was adopted in July 2015. This was before the adoption of the Local Plan Part 1 and is considered to be a rather dated Neighbourhood Plan. The Neighbourhood Steering Group is considering the way forward for a review of the plan. It is unclear if this review will be considered against the revised NPPF (2018) and will be therefore be out of step with the adopted Local Plan.
- 1.26 Out of the 100 units allocated in the Neighbourhood Plan, around 30 units are nearing completion. One site has a pending application and the other has not had a planning application made on the site. This is relatively slow progress and calls into question the deliverability of the existing site allocations.
- 1.27 In LDC's settlement hierarchy which includes settlements outside the district which influence the housing and economic patterns of Lewes, Newick is classed as a Rural Service Centre. When the settlements outside of the district are taken out of the settlement hierarchy, Newick is in the second most sustainable settlement category. Therefore it is a sustainable location for development and this should be reflected in the Local Plan Part 2.
- 1.28 Ringmer is also classed as being a Rural Service Centre, yet through its Neighbourhood Plan with Broyle (a Local Village) it has allocated a total of 215 units. It is not clear as to why over twice as many units have been allocated to a settlement in the same sustainability category as Newick.
- 1.29 It is recommended that, as a relatively old Neighbourhood Plan in need of a review and in light of the sustainable nature of the settlement, LDC demonstrates positive plan-making and allocates additional sites in Newick to meet LDC's ongoing shortfall in housing delivery.

#### **55 ALLINGTON ROAD**

- 1.30 As established through these representations it is considered that LDC need to allocate further sites in order to meet the shortfall in housing need. It is also likely that LDC will require sites that can deliver early in the plan period to make up the historic shortfall. We would therefore ask LDC to further consider the proposed site in Allington Road in light of this.
- 1.31 Newick is a village classed as a Rural Service Centre located in the west of the district. The village is located on the A272, 7 miles east of the town of Haywards Heath and 5 miles west of the town of Uckfield. The town of Lewes lies less than 9 miles to the south of the village.
- 1.32 The village has numerous services including two local stores, a primary school, a village hall, a number of pubs and restaurants and a pharmacy.
- 1.33 The Site extends to 1.2ha with a developable area of 0.6ha and is located in the south of the village off Allington Road. Newick Church of England Primary School lies to the west with residential development. Residential development lies to the north and east

of the Site. The Site is well bounded by vegetation on all sides which will ensure that the Site is screened from the wider landscape.

- 1.34 A bus stop is located 0.1 miles west of the Site with services to Lewes. Another bus stop 0.4 miles from the Site provides services to Uckfield and Cuckfield.
- 1.35 The Site is located adjacent to the planning boundary (DM1) with the majority of the Site lying within the countryside. There are no heritage assets on or near the Site.
- 1.36 The Site forms part of 21NW which was assessed within the 2018 SHLAA. It was considered to be suitable, available, achievable and deliverable. It is clear therefore that LDC consider this Site to be appropriate for residential development.
- 1.37 The northern part of the Site has capacity for 10 residential units. These units will be single storey will be designed to integrate with the surrounding residential development and the open countryside to the south. There is also the potential for a community use of the southern portion of the site such as playing fields or for the expansion of the neighbouring primary school. The proposal will also allow a connection to the existing Public Right of Way that runs along the south of the site. An illustrative layout is included in Appendix 1.

## CONCLUSION

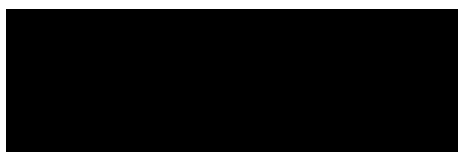
As demonstrated through these representations the Site has the ability to deliver much needed housing within the district in the short-term, The Site is considered to be suitable, available, achievable, developable and deliverable.

It is considered that the plan is not sound in its current form as a result of the consistent under-delivery of housing and the lack of positive plan-making to address this issue. There is a conflict in the spatial strategy between Part 1 of the Local Plan and Part 2 and LDC cannot currently demonstrate a five year housing land supply.

The reliance on Neighbourhood Plans to deliver much of the housing requirement is concerning and there is a large disparity in the current stages of the plan processes of each Neighbourhood Plan. The Newick Neighbourhood Plan is out of date and has not delivered its required housing numbers. Much of the housing requirement is to come through emerging Neighbourhood Plans which are subject to less scrutiny than Local Plans. It is evident that LDC needs to allocate a greater number of sites with the ability to deliver housing early on in the plan period to make up for persistent undersupply from the start of the Local Plan period in 2010.

I trust that the comments made in these representations will be taken into account in the preparation of the emerging Local Plan Part 2.

Yours faithfully,



Lucy Morris  
**Planner**

# Appendix 1

## 55 Allington Road, Newick Illustrative Layout



Scale: 1:500 @ A3



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**Representation ID: REP/189/GT01**Representor Details:

<b>Representor ID:</b>	REP/189
<b>Name:</b>	Susannah Griffin
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	GT01 - Land south of The Plough
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	
<b>Sound:</b>	
<b>Representation:</b>	
I would like to register that I feel that the site proposed is inappropriate for all concerned	
<b>What changes do you suggest to make the document legally compliant or sound?</b>	
<b>Do you consider it necessary to participate at the Examination in Public?</b>	
<b>Why do you feel it is necessary to participate at the Examination in Public?</b>	

## Hodgson, Lilly

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**From:** Susannah Jane [REDACTED]  
**Sent:** 31 October 2018 10:21  
**To:** ldf  
**Subject:** Proposed Traveller site at Plumpton  
  
**Categories:** LPP2 comment to code - stakeholder details have been added

Dear Sirs

I would like to register that I feel that the site proposed is inappropriate for all concerned  
Susannah Griffin

**Representation ID: REP/190/E1**Representor Details:

<b>Representor ID:</b>	REP/190
<b>Name:</b>	David Griffiths
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>E1 - Land at East Quay, Newhaven Port</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	
<b>Sound:</b>	
<b>Representation:</b>	<p>I object strongly to the proposed inclusion of the site covered within reference E1 in the Local Plan.</p> <p>Industrialisation of this area is wholly unwarranted and unnecessary, depriving the community as it does to a stretch of beach and access to these from the Downs. The lack of protection that will be afforded to future development in the area will inevitably be in favour of developers and contrary to the wishes of the local community.</p>

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I urge you to remove the proposed inclusion of E1 in 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?**

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

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## Hodgson, Lilly

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**From:** David Griffiths [REDACTED]  
**Sent:** 03 November 2018 09:17  
**To:** ldf  
**Subject:** Lewes District Local Plan reference E1  
  
**Categories:** LPP2 comment to code - stakeholder details have been added

Dear LDC

I object strongly to the proposed inclusion of the site covered within reference E1 in the Local Plan.

Industrialisation of this area is wholly unwarranted and unnecessary, depriving the community as it does to a stretch of beach and access to these from the Downs. The lack of protection that will be afforded to future development in the area will inevitably be in favour of developers and contrary to the wishes of the local community.

I urge you to remove the proposed inclusion of E1 in the Plan

Regards

David Griffiths

[REDACTED]

**Representation ID: REP/191/GT01**Representor Details:

<b>Representor ID:</b>	REP/191
<b>Name:</b>	D G Hadden
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>
<b>Organisation:</b>

Contact Details:

Email Address:	
Address:	

Representation:

<b>Policy/Section:</b>	<b>GT01 - Land south of The Plough</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	
<b>Sound:</b>	
<b>Representation:</b>	
<p>This email is from Mr and Mrs DG Hadden and these comments represent our joint views.</p> <p>We consider the allocation of a .069ha site immediately north of the Old Brickworks industrial estate to be wholly inappropriate for the following reasons:</p> <ul style="list-style-type: none"><li>* The proposed site is outside the established village boundary and recent, extensive consultations on the provision of new housing outside said boundary clearly established that further development beyond the boundary is unsustainable for numerous, already documented reasons, to which LDC must have regard;</li><li>* A gypsy encampment on the proposed site will seriously adversely affect local</li></ul>	

employment, with loss of jobs and businesses shutting down at the Old Brickworks;

\* It is our considered opinion that gypsy and traveller sites should be concentrated where such residents and visitors may socialize in groups. This site is isolated, rural, inadequately serviced and remote from all necessary social amenities, such as shop, school, church, playing fields and railway station. Over time, this will inevitably lead to a sense of isolation for those living on the site and [REDACTED];

\* The proposed site is on the only access road running north south through Plumpton and Plumpton Green, with access to the public highway where the maximum national speed limit applies. Having lived in the northern part of this village, adjacent to the highway for more than 30 years, we know how fast vehicles can travel along this section, heading to or from the direction of The Plough public house;

\* Along this section of highway, there is no discernible footpath for the whole length of the narrow verge, no street lighting, no pavement and no speed restriction. We know the objections given in 2012 by the Highways Authority and we assert these objections remain wholly valid;

\* Beyond the village boundary, both north and south, there is a natural beauty which frames Plumpton and Plumpton Green in a way which has recently been recognized by the new housing planning consents. The development as proposed on this site would destroy the natural beauty of this area and, without it being a planning consideration, it is inevitable the site will, over time, attract interest from other traveller groups, resulting in pressure to extend, despite inadequate services [REDACTED]

\* For the reasons given in 6 above, caravans and static homes are entirely out of keeping with the character of the locality and the only adequate screening would be 3m high fencing around a gated community – cf gypsy site north of Offham at junction of A275 with B2116. Is there a better option of extending the Offham site, instead of developing at Plumpton?

\* It is well known that sites of the nature proposed require [REDACTED] management; our village policeman was never replaced many years ago and, at the recent public meeting in Plumpton Village Hall, LDC was unable to give any assurances [REDACTED] To create such a site and leave it to its own devices is irresponsible and unsustainable.

**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 Hadden [REDACTED]  
**Sent:** 19 October 2018 16:20  
**To:** ldf  
**Subject:** Proposed Gypsy Site in Plumpton Green

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

This email is from Mr and Mrs DG Hadden and these comments represent our joint views.

We consider the allocation of a .069ha site immediately north of the Old Brickworks industrial estate to be wholly inappropriate for the following reasons:

1. The proposed site is outside the established village boundary and recent, extensive consultations on the provision of new housing outside said boundary clearly established that further development beyond the boundary is unsustainable for numerous, already documented reasons, to which LDC must have regard;
2. A gypsy encampment on the proposed site will seriously adversely affect local employment, with loss of jobs and businesses shutting down at the Old Brickworks;
3. It is our considered opinion that gypsy and traveller sites should be concentrated where such residents and visitors may socialize in groups. This site is isolated, rural, inadequately serviced and remote from all necessary social amenities, such as shop, school, church, playing fields and railway station. Over time, this will inevitably lead to a sense of isolation for those living on the site and [REDACTED];
4. The proposed site is on the only access road running north south through Plumpton and Plumpton Green, with access to the public highway where the maximum national speed limit applies. Having lived in the northern part of this village, adjacent to the highway for more than 30 years, we know how fast vehicles can travel along this section, heading to or from the direction of The Plough public house;
5. Along this section of highway, there is no discernible footpath for the whole length of the narrow verge, no street lighting, no pavement and no speed restriction. We know the objections given in 2012 by the Highways Authority and we assert these objections remain wholly valid;
6. Beyond the village boundary, both north and south, there is a natural beauty which frames Plumpton and Plumpton Green in a way which has recently been recognized by the new housing planning consents. The development as proposed on this site would destroy the natural beauty of this area and, without it being a planning consideration, it is inevitable the site will, over time, attract interest from other traveller groups, resulting in pressure to extend, despite inadequate services [REDACTED];
7. For the reasons given in 6 above, caravans and static homes are entirely out of keeping with the character of the locality and the only adequate screening would be 3m high fencing around a gated community – cf gypsy site north of Offham at junction of A275 with B2116. Is there a better option of extending the Offham site, instead of developing at Plumpton?
8. It is well known that sites of the nature proposed require [REDACTED] management; our village policeman was never replaced many years ago and, at the recent public meeting in Plumpton Village Hall, LDC was unable to give any assurances [REDACTED]. To create such a site and leave it to its own devices is irresponsible and unsustainable.




**Representation ID: REP/192/E1**Representor Details:

<b>Representor ID:</b>	REP/192
<b>Name:</b>	Diane Hall
<b>Organisation:</b>	<b>Newhaven Town Council</b>
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Councillor

Agent Details:

<b>Name:</b>
<b>Organisation:</b>

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>E1 - Land at East Quay, Newhaven Port</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	
<b>Sound:</b>	
<b>Representation:</b>	
<p>I wish to lodge my objection to the plans for TideMills area.</p> <p>NPP/.Lewes district Councils plans for development at TideMills does NOT contribute to 'sustainable development', but to loss of biodiversity.</p> <p>TideMills has internationally rare vegetated shingle, and what is proposed does NOT meet with the 'Clean Green Marine' title given to this area. We require LDC to preserve this designated local wildlife site, for nature and leisure activities. Every day, regardless of the weather, there are dozens and dozens of dog walkers, who use this entire area to exercise their dogs....myself and GSD Hollie included. I have lived at the top of Mount Pleasant, Newhaven for 42yrs, and all 7 of my German Shepherds have been exercised</p>	

there daily....rain or shine! I have met, and can name at least 20 dog owners, and their dogs names, (and we occasionally meet up for lunch!) such is the nature of our respective friendship!

On extremely windy days it is hard to park, as the Wind and Kite Surfers are there by the dozen, enjoying their sport, before they set off to work (most of them being self-employed). A personal trainer also uses this area for his clients, to run, exercise and stretch, and then run back to Seaford. There are a group of ladies who swim in the sea most days, all year round, again regardless of the weather!

THIS IS PROBABLY THE BEST USED AREA IN THE WHOLE COUNTY FOR MULTIPLE USE/ EXERCISING!! This makes it an ideal place to 'Promote' for fitness.

But not if LDC promote 'dirty' businesses, who pollute the air we breath with dust from aggregates, and pollution from the lorries which accompany these businesses.

What LDC is proposing to allow, will create volumes of lorry traffic (Brett Aggregates alone, some 100 lorries per 24hrs) causing more pollution and air quality problems.

What exactly do you propose this will bring to Newhaven? The money will go to French owned NPP! Very few local people will gain employment, as Brett Aggregates advised they would probably employ 15-20 people over 24hr work period....and I got that straight from Brett Aggregates operatives who were walking that area, before we ever heard of them .....and I was told they already "had planning permission granted" over 2yrs ago. Which leads me to believe we have corruption within our District and County Councils.

I urge this Council to promote Clean and Green Marine, and renewable Energy Cluster of the Port Masterplan, NOT pollution from sand, ballast and cement, and loss of the only piece of sandy beach, for many many miles of our Sussex coast.

**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:** Diane Hall <[REDACTED]>  
**Sent:** 31 October 2018 11:59  
**To:** ldf  
**Subject:** Planning Permission on TideMills

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

I wish to lodge my objection to the plans for TideMills area.

NPP/.Lewes district Councils plans for development at TideMills does NOT contribute to 'sustainable development', but to loss of biodiversity.

TideMills has internationally rare vegetated shingle, and what is proposed does NOT meet with the 'Clean Green Marine' title given to this area. We require LDC to preserve this designated local wildlife site, for nature and leisure activities. Every day, regardless of the weather, there are dozens and dozens of dog walkers, who use this entire area to exercise their dogs....myself and GSD Hollie included. I have lived at the top of Mount Pleasant, Newhaven for 42yrs, and all 7 of my German Shepherds have been exercised there daily....rain or shine! I have met, and can name at least 20 dog owners, and their dogs names, (and we occasionally meet up for lunch!) such is the nature of our respective friendship!

On extremely windy days it is hard to park, as the Wind and Kite Surfers are there by the dozen, enjoying their sport, before they set off to work (most of them being self-employed). A personal trainer also uses this area for his clients, to run, exercise and stretch, and then run back to Seaford. There are a group of ladies who swim in the sea most days, all year round, again regardless of the weather!

THIS IS PROBABLY THE BEST USED AREA IN THE WHOLE COUNTY FOR MULTIPLE USE/ EXERCISING!! This makes it an ideal place to 'Promote' for fitness.

But not if LDC promote 'dirty' businesses, who pollute the air we breath with dust from aggregates, and pollution from the lorries which accompany these businesses.

What LDC is proposing to allow, will create volumes of lorry traffic (Brett Aggregates alone, some 100 lorries per 24hrs) causing more pollution and air quality problems.

What exactly do you propose this will bring to Newhaven? The money will go to French owned NPP! Very few local people will gain employment, as Brett Aggregates advised they would probably employ 15-20 people over 24hr work period....and I got that straight from Brett Aggregates operatives who were walking that area, before we ever heard of them .....and I was told they already "had planning permission granted" over 2yrs ago. Which leads me to believe we have corruption within our District and County Councils.

I urge this Council to promote Clean and Green Marine, and renewable Energy Cluster of the Port Masterplan, NOT pollution from sand, ballast and cement, and loss of the only piece of sandy beach, for many many miles of our Sussex coast.

Thank you

Cllr. Diane Hall (Newhaven Town Councillor)

Sent from my iPad



---

**Representation ID: REP/193/GT01**Representor Details:

<b>Representor ID:</b>	REP/193
<b>Name:</b>	Thomas Hall
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	GT01 - Land south of The Plough
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	
<b>Sound:</b>	
<b>Representation:</b>	
<p>I am writing to register my objections to the proposed traveller site in Plumpton Green. I work on the Old Brick Works next to the proposed sitting [REDACTED].</p> <p>It has already been decided that should the proposed site go ahead then my employers will leave Plumpton and look for a new workshop. As I have to commute by bike I may well not be able to reach it and will be looking for another job. I hope that an alternative site can be found that will not threaten local small businesses so directly.</p>	
<b>What changes do you suggest to make the document legally compliant or sound?</b>	

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

## Hodgson, Lilly

---

**From:** Tom Hall [REDACTED]  
**Sent:** 04 November 2018 16:53  
**To:** ldf  
**Subject:** Plumpton Traveller site  
  
**Categories:** LPP2 comment to code - stakeholder details have been added

Dear Sir/Madame,

I am writing to register my objections to the proposed traveller site in Plumpton Green. I work on the Old Brick Works next to the proposed sitting [REDACTED]  
[REDACTED]

It has already been decided that should the proposed site go ahead then my employers will leave Plumpton and look for a new workshop. As I have to commute by bike I may well not be able to reach it and will be looking for another job. I hope that an alternative site can be found that will not threaten local small businesses so directly.

Yours sincerely,  
[REDACTED]

<b>Representation ID:</b> REP/194/BA01
--

Representor Details:

<b>Representor ID:</b>	REP/194
<b>Name:</b>	P, L & C Hamblin, Hamlin & Dean
<b>Organisation:</b>	<b>Mr P Hamblin, Ms L Hamblin, Ms C Dean</b>
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Developer/Landowner

Agent Details:

<b>Name:</b>	Mark Best
<b>Organisation:</b>	Parker Dann

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>BA01 - Land at Hillside Nurseries, High Street</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	Yes
<b>Sound:</b>	Yes
<b>Representation:</b>  Paragraph 2.46 has been updated in reference to land at Hillside Nurseries, High Street. It previously stated:  "The site is currently accessed by a track from the High Street which serves the two residential properties 'Hillside 'and 'Vine Slead'. Improvements to the junction and track are required to accommodate additional dwellings. The widening of the existing access track or the provision of passing places has been explored as potential solutions. Third party land is likely to be needed to achieve this. Discussions with adjacent landowners and the highway authority are ongoing to establish a suitable solution and delivery is considered achievable within the plan period."	

We met with the agents responsible for the promotion of this site on 5th May 2017 at the request of Lewes District Council and discussed how the sites (BA01 and BA02 could come forward in harmony. Should the third party land likely to be needed to achieve access involve the utilisation of my clients 'land, I can confirm that they are amenable to this subject to recognition on the part of the promoters of BA01 of the commercial reality of the situation. We remain open to further discussions although have had no contact since our meeting in May 2017. We share the Council's optimism that a suitable solution can be found and is achievable within the plan period.

This above quoted text has now been updated to indicate:

"The site is currently accessed by a track from the High Street which primarily provides vehicular access to the residential properties of 'Hillside 'and 'Vine Slead'. A small number of other adjacent properties have use of access via the track. Improvements to the junction and track are required to accommodate additional dwellings." (Paragraph 2.61)

Criterion a) of policy BA01 confirms:

"Access, including provision for pedestrians and cyclists, to be provided from High Street. Pedestrian links to the existing recreation field to also be provided."

This means access could not be provided, for example, through The Grange. It is therefore highly likely to involve a requirement for land owned by my clients to facilitate the improvements to the track and junction. We remain supportive of the development of this site and are happy to negotiate the provision of land to upgrade the access with the promoters of land at Hillside Nurseries, High Street should it be required to deliver their scheme.

**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?**

<b>Representation ID: REP/194/BA02</b>
--

Representor Details:

<b>Representor ID:</b>	REP/194
<b>Name:</b>	P, L & C Hamblin, Hamlin & Dean
<b>Organisation:</b>	<b>Mr P Hamblin, Ms L Hamblin, Ms C Dean</b>
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Developer/Landowner

Agent Details:

<b>Name:</b>	Mark Best
<b>Organisation:</b>	Parker Dann

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>BA02 - Land adjacent to the High Street</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	Yes
<b>Sound:</b>	Yes
<b>Representation:</b>  <p>We welcome the allocation of our clients '1.24 hectare site for approximately 25 net additional dwellings.</p> <p>Core Policy 2 of the LDLPP1 informs that development in villages will take place at a density of between 20 to 30 dwellings per hectare.</p> <p>Paragraph 7.27 expands on this and indicates that the average density for development taking place in village locations has been 25 dwellings per hectare (DPH) between April 2007 and March 2011.</p> <p>If the current approach as set out in policy BA02 is taken forward the site would only be likely to deliver 20.16 (DPH), significantly below the average for villages in the District.</p>	

Whilst within the range set by Core Policy 2, it is at the lowest end of this range. However, due to the use of "approximately" the density of development on site could be increased if it fits onto the site (accounting for constraints) in a manner that delivers high quality design.

We object to criterion b) of policy BA02 as it precludes a height of greater than two storeys. There has been no objective assessment of whether this specific site could accommodate in excess of two storeys or otherwise and no rationale is provided as to why this approach is taken. The provision of accommodation in excess of two storeys assists the efficient use of land and therefore this policy, in its current form, prevents the implementation of important national and local objectives. It is unnecessary given the provisions of Policy DM25: Design as emerging. Please refer to paragraph 59 of the NPPF which confirms:

"Design policies should avoid unnecessary prescription or detail." (Paragraph 59)

There is no harm that would arise from allowing future applicants for planning permission on the site to explore the possibility of accommodation in excess of two storeys. If it cannot be demonstrated that it is achievable without undue harm arising the scheme will not obtain planning permission.

We note reference to a maximum of two storey development is not present in policy BA01 or policy BA03.

Criterion b) relating to policy BA03 states:

"Development complements the character of the existing local built form, in terms of height, mass and design, and the site's village edge location"

We believe this wording is far superior and less prescriptive. It should be used amalgamated with criterion c) for policy BA02.

Criterion b) should be deleted from policy BA02. Reference to "no more than two storeys" should also be removed from the explanatory text at paragraph 2.68.

We'd suggest the wording of criterion d) is tightened up to avoid misinterpretation or confusion. At present it states:

"Development is subject to an appropriate assessment and evaluation of archaeological potential and mitigation measures implemented according."

We suggest this is revised to say:

"Development is subject to a suitable assessment and evaluation of archaeological potential and mitigation measures implemented according"

This change would avoid any misunderstanding that an Appropriate Assessment or 'Habitats Regulation Assessment' is required.

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

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



<b>Representation ID: REP/194/DM15</b>
--

Representor Details:

<b>Representor ID:</b>	REP/194
<b>Name:</b>	P, L & C Hamblin, Hamlin & Dean
<b>Organisation:</b>	<b>Mr P Hamblin, Ms L Hamblin, Ms C Dean</b>
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Developer/Landowner

Agent Details:

<b>Name:</b>	Mark Best
<b>Organisation:</b>	Parker Dann

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>DM15: Provision for Outdoor Playing Space</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	Yes
<b>Sound:</b>	Yes
<b>Representation:</b>  <p>Policy DM15 concerns provision of outdoor playing space. It indicates that where deficiency of outdoor playing space is identified 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.</p> <p>The Council should be clear as to how the required mitigation will be secured. At present the policy refers to either on-site provision or by the use of the Community Infrastructure Levy. On site provision is an 'extra 'cost the development must bear whereas the Community Infrastructure Levy is not.</p>	

When applying this policy, the Council should be cautious not to seek to remedy existing unsatisfactory provisions through over-inflated requirements for contributions / on site provision of outdoor play space. A development should only mitigate its own impacts.

**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?**

<b>Representation ID:</b> REP/194/DM16
--

Representor Details:

<b>Representor ID:</b>	REP/194
<b>Name:</b>	P, L & C Hamblin, Hamlin & Dean
<b>Organisation:</b>	<b>Mr P Hamblin, Ms L Hamblin, Ms C Dean</b>
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Developer/Landowner

Agent Details:

<b>Name:</b>	Mark Best
<b>Organisation:</b>	Parker Dann

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>DM16: Children's Play Space in New Housing Development</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	Yes
<b>Sound:</b>	Yes
<b>Representation:</b>  DM16 relates to children's play space in new housing development. It indicates that residential developments of 20 dwellings or more will only be permitted where children's playing space is provided on-site in accordance with the minimum standards set out in criteria (b) of Policy DM15.	

This does not reflect local circumstances which is seemingly acknowledged by the Council's own comments at paragraph 2.62 which assert "Barcombe Cross currently benefits from a surplus of informal children's play space."

Barcombe Cross already has a substantial recreation ground of nearly 3 hectares which is equipped with children's play equipment. Barcombe Parish has a population of 1,473 (see paragraph 2.56). Policy DM15 notes the Council will seek to achieve provision of outdoor playing space of 0.25 hectares per 1000 population for equipped/designated children's play space.

Policy DM16 references this. Based on this, Barcombe Parish has a need for approximately 2.4 hectares of outdoor sports, including playing pitches, tennis courts, and bowling greens. It requires roughly 0.37 hectares per 1000 population for equipped/designated children's play space.

Whilst there is no objection, in principle, on behalf of our client to contributing towards the improvement of these existing facilities it is not considered that there is a need for new ones to be provided on site. Policy DM16 should be updated to make clear that contributions / on site provision will only be sought where necessary.

We also note that as part of policy BA01 development is required to provide approximately 1600sqm of public amenity space along the northern boundary to allow for the provision of equipped and informal play space under the auspices of criterion b).

**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/194/HSA**Representor Details:

<b>Representor ID:</b>	REP/194
<b>Name:</b>	P, L & C Hamblin, Hamlin & Dean
<b>Organisation:</b>	<b>Mr P Hamblin, Ms L Hamblin, Ms C Dean</b>
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Developer/Landowner

Agent Details:

<b>Name:</b>	Mark Best
<b>Organisation:</b>	Parker Dann

Contact Details:

<b>Email Address:</b>
<b>Address:</b>

Representation:

<b>Policy/Section:</b>	<b>Housing Site Allocations</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	Yes
<b>Sound:</b>	Yes
<b>Representation:</b>  Barcombe Cross  In our representations on an earlier iteration of the Plan we canvassed that Paragraph 2.38 which indicated "Housing site allocations to deliver the minimum are identified below and will deliver 38 net additional dwellings" should be be updated to read: "Housing site allocations to deliver the minimum are identified below and will deliver a minimum of 38 net additional dwellings"  We did suggest that if this change was not embraced the use of the word approximately would be more appropriate.	

This text is now found at paragraph 2.53 and states:

"Housing site allocations to deliver the minimum are identified below and will deliver approximately 42 net additional dwellings"

We welcome the insertion of the word approximately and the Council's willingness to make useful amendments.

We welcome the Council's provision of approximately 42 dwellings which is in excess of the minimum provision for Barcombe Cross. We regard this as a positive and proactive approach from the Council, particularly with the Government's guidance to "boost significantly the supply of housing" in mind. We maintain the use of "a minimum of" would be better as it would reflect the requirements of Spatial Policy 2 of the Lewes District Local Plan Part 1 Joint Core Strategy 2010 2030 (LDLPP1).

**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?**

Our ref: PD/1884  
Your ref:



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

31<sup>st</sup> October 2018

Dear Sir / Madam,

**Lewes District Local Plan Part 2 Site Allocations and Development Management Policies Consultation - Pre-submission Version**  
**Land adjacent to High Street, Barcombe Cross, East Sussex**

Please find below our response to Lewes District Council's Local Plan Part 2 Site Allocations and Development Management Policies consultation on behalf of our clients Mr. Peter Hamblin, Ms. Lynette Hamblin and Ms. Caroline Dean. Our clients are the joint owners of the land adjacent to the High Street in Barcombe Cross allocated (in draft) under the auspices of policy BA02, a policy we support. The issues connected with the development of this site are the primary focus of our representations.

We understand the Council intends to submit for Examination prior to 24<sup>th</sup> January 2019 and therefore the Plan will be examined against the 'old' National Planning Policy Framework (NPPF) (2012).

Barcombe Cross

In our representations on an earlier iteration of the Plan we canvassed that Paragraph 2.38 which indicated "*Housing site allocations to deliver the minimum are identified below and will deliver 38 net additional dwellings*" should be updated to read:

*"Housing site allocations to deliver the minimum are identified below and will deliver a minimum of 38 net additional dwellings"*

We did suggest that if this change was not embraced the use of the word approximately would be more appropriate.

This text is now found at paragraph 2.53 and states:

"Housing site allocations to deliver the minimum are identified below and will deliver approximately 42 net additional dwellings"

We welcome the insertion of the word approximately and the Council's willingness to make useful amendments.

We welcome the Council's provision of approximately 42 dwellings which is in excess of the minimum provision for Barcombe Cross. We regard this as a positive and proactive approach



from the Council, particularly with the Government's guidance to "boost significantly the supply of housing" in mind. We maintain the use of "a minimum of" would be better as it would reflect the requirements of Spatial Policy 2 of the Lewes District Local Plan Part 1 Joint Core Strategy 2010 2030 (LDLPP1).

#### Policy BA01 – Land at Hillside Nurseries, High Street

Paragraph 2.46 has been updated in reference to land at Hillside Nurseries, High Street. It previously stated:

*"The site is currently accessed by a track from the High Street which serves the two residential properties 'Hillside' and 'Vine Slead'. Improvements to the junction and track are required to accommodate additional dwellings. The widening of the existing access track or the provision of passing places has been explored as potential solutions. Third party land is likely to be needed to achieve this. Discussions with adjacent landowners and the highway authority are ongoing to establish a suitable solution and delivery is considered achievable within the plan period."*

We met with the agents responsible for the promotion of this site on 5<sup>th</sup> May 2017 at the request of Lewes District Council and discussed how the sites (BA01 and BA02) could come forward in harmony. Should the third party land likely to be needed to achieve access involve the utilisation of my clients' land, I can confirm that they are amenable to this subject to recognition on the part of the promoters of BA01 of the commercial reality of the situation. We remain open to further discussions although have had no contact since our meeting in May 2017. We share the Council's optimism that a suitable solution can be found and is achievable within the plan period.

This above quoted text has now been updated to indicate:

*"The site is currently accessed by a track from the High Street which primarily provides vehicular access to the residential properties of 'Hillside' and 'Vine Slead'. A small number of other adjacent properties have use of access via the track. Improvements to the junction and track are required to accommodate additional dwellings."* (Paragraph 2.61)

Criterion a) of policy BA01 confirms:

*"Access, including provision for pedestrians and cyclists, to be provided from High Street. Pedestrian links to the existing recreation field to also be provided."*

This means access could not be provided, for example, through The Grange. It is therefore highly likely to involve a requirement for land owned by my clients to facilitate the improvements to the track and junction. We remain supportive of the development of this site and are happy to negotiate the provision of land to upgrade the access with the promoters of land at Hillside Nurseries, High Street should it be required to deliver their scheme.

#### Policy BA02 – Land adjacent to the High Street

We welcome the allocation of our clients' 1.24 hectare site for approximately 25 net additional dwellings.

Core Policy 2 of the LDLPP1 informs that development in villages will take place at a density of between 20 to 30 dwellings per hectare.

Paragraph 7.27 expands on this and indicates that the average density for development taking place in village locations has been 25 dwellings per hectare (DPH) between April 2007 and March 2011.

If the current approach as set out in policy BA02 is taken forward the site would only be likely to deliver 20.16 (DPH), significantly below the average for villages in the District. Whilst within the range set by Core Policy 2, it is at the lowest end of this range. However, due to the use of "approximately" the density of development on site could be increased if it fits onto the site (accounting for constraints) in a manner that delivers high quality design.

We object to criterion b) of policy BA02 as it precludes a height of greater than two storeys. There has been no objective assessment of whether this specific site could accommodate in excess of two storeys or otherwise and no rationale is provided as to why this approach is taken. The provision of accommodation in excess of two storeys assists the efficient use of land and therefore this policy, in its current form, prevents the implementation of important national and local objectives. It is unnecessary given the provisions of Policy DM25: Design as emerging. Please refer to paragraph 59 of the NPPF which confirms:

*"Design policies should avoid unnecessary prescription or detail."* (Paragraph 59)

There is no harm that would arise from allowing future applicants for planning permission on the site to explore the possibility of accommodation in excess of two storeys. If it cannot be demonstrated that it is achievable without undue harm arising the scheme will not obtain planning permission.

We note reference to a maximum of two storey development is not present in policy BA01 or policy BA03.

Criterion b) relating to policy BA03 states:

*"Development complements the character of the existing local built form, in terms of height, mass and design, and the site's village edge location"*

We believe this wording is far superior and less prescriptive. It should be used amalgamated with criterion c) for policy BA02.

Criterion b) should be deleted from policy BA02. Reference to "no more than two storeys" should also be removed from the explanatory text at paragraph 2.68.

We'd suggest the wording of criterion d) is tightened up to avoid misinterpretation or confusion. At present it states:

*"Development is subject to an appropriate assessment and evaluation of archaeological potential and mitigation measures implemented according."*

We suggest this is revised to say:

*"Development is subject to a suitable assessment and evaluation of archaeological potential and mitigation measures implemented according"*

This change would avoid any misunderstanding that an Appropriate Assessment or 'Habitats Regulation Assessment' is required.

#### Policy DM15: Provision for Outdoor Playing Space

Policy DM15 concerns provision of outdoor playing space. It indicates that where deficiency of outdoor playing space is identified 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.

The Council should be clear as to how the required mitigation will be secured. At present the policy refers to either on-site provision or by the use of the Community Infrastructure Levy. On site provision is an 'extra' cost the development must bear whereas the Community Infrastructure Levy is not.

When applying this policy, the Council should be cautious not to seek to remedy existing unsatisfactory provisions through over-inflated requirements for contributions / on site provision of outdoor play space. A development should only mitigate its own impacts.

#### Policy DM16: Children's Play Space in New Housing Development

DM16 relates to children's play space in new housing development. It indicates that residential developments of 20 dwellings or more will only be permitted where children's playing space is provided on-site in accordance with the minimum standards set out in criteria (b) of Policy DM15.

This does not reflect local circumstances which is seemingly acknowledged by the Council's own comments at paragraph 2.62 which assert "*Barcombe Cross currently benefits from a surplus of informal children's play space.*"

Barcombe Cross already has a substantial recreation ground of nearly 3 hectares which is equipped with children's play equipment. Barcombe Parish has a population of 1,473 (see paragraph 2.56). Policy DM15 notes the Council will seek to achieve provision of outdoor playing space of 0.25 hectares per 1000 population for equipped/designated children's play space.

Policy DM16 references this. Based on this, Barcombe Parish has a need for approximately 2.4 hectares of outdoor sports, including playing pitches, tennis courts, and bowling greens. It requires roughly 0.37 hectares per 1000 population for equipped/designated children's play space.

Whilst there is no objection, in principle, on behalf of our client to contributing towards the improvement of these existing facilities it is not considered that there is a need for new ones to be provided on site. Policy DM16 should be updated to make clear that contributions / on site provision will only be sought where necessary.

We also note that as part of policy BA01 development is required to provide approximately 1600sqm of public amenity space along the northern boundary to allow for the provision of equipped and informal play space under the auspices of criterion b).

I trust this is self-explanatory and acceptable but do let me know if you have any queries.

Yours sincerely,

**Mark Best BSc (Hons) MSc MRTPI**

Planning Consultant

For and on behalf of Parker Dann

[mark@parkerdann.co.uk](mailto:mark@parkerdann.co.uk)

**Representation ID: REP/195/E1**

Representor Details:

<b>Representor ID:</b>	REP/195
<b>Name:</b>	Laverne Hamill
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>E1 - Land at East Quay, Newhaven Port</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	No
<b>Sound:</b>	No Not Justified
<b>Representation:</b>  As I understand it current national policy is to protect the environment especially areas adjoining National Parks. Tide Mills is an exceptional area of wildlife and calm close to the busy A259. It is used by a wide variety of people, families accessing the only sandy beach for miles, birdwatchers, wind surfers, ramblers and dog walkers not to mention archaeologists. It's demise is causing a great deal of concern among local people. All of this is without the huge increase in traffic which would ensue in addition to the 114	

lorries per day (their figures not mine) from the Brett Aggregates cement works. Maria Caulfield MP is already concerned about the level of accidents on the A259 and I have written to her to express my disquiet about the impact such plans would have on this area.

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

As you must be aware I do not have the legal jargon required to complete this section but would beg you to reconsider your actions. Newhaven is not a dumping ground for any industrial premises that the people of Lewes would not appreciate in their locality. I am sure there are many other places in East Sussex (or even in Newhaven - the Parker Pen site for one) where an industrial site would not impact so hugely on the environment. We love Tide Mills and it is heartbreaking to think of it disappearing.

**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/196/E1**Representor Details:

<b>Representor ID:</b>	REP/196
<b>Name:</b>	Jonathan Hammond
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>E1 - Land at East Quay, Newhaven Port</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	No
<b>Sound:</b>	No
<b>Representation:</b>  You have already granted more than enough planning permission for commercial interests & industrial use of Tide Mills and, especially given Newhaven has long since been the dumping ground for anything Lewes wishes out of sight & mind, and the travesty & injustice of West Beach no longer being accessible, it is now incumbent & morally obliging on you to prioritise the enviromental & recreational interests of the remainder of Tide Mills & Seaford Bay. If you were to further ignore this it would	

severely impact my and all other local residents vested interests & quality of life.

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

I have no idea if the document is legally compliant or not. I am simply commenting on the prospect of further development on Tide Mills.

**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?**



<b>Representation ID:</b> REP/197/E1
--------------------------------------

Representor Details:

<b>Representor ID:</b>	REP/197
<b>Name:</b>	Robert Handy
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>E1 - Land at East Quay, Newhaven Port</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	Yes
<b>Sound:</b>	No Not Positively Prepared Not Justified Not Effective Not Consistent with national policy
<b>Representation:</b>	E1 fails to deliver on sustainable development and on the specific policies which relate to conservation and biodiversity within part 1 of the core strategy, and fails to safeguard a designated local wildlife site. This does not reflect the 'Clean, Green Marine' vision for

Newhaven development.

The assessment of development requirements does not provide evidence that can justify the development of a designated local wildlife site. The Employment land report highlights that there are numerous vacant buildings within the Newhaven Enterprise Zone so building on a site that recognised for biodiversity that includes internationally rare vegetated shingle is completely unjustified.

Policy E1, by allowing for industrialisation of a local wildlife site, fails to maximise the opportunities for this area, and does not reflect the widely agreed development vision for Newhaven specifically around maximising clean/ green/ marine renewable sectors and sustainable tourism.

This policy will negatively impact the existing issues with congestion and air quality, and will have an unacceptable cumulative impact in combination with the very high housing allocation.

This policy has been added far too late in the process for the consultation to be meaningful, and the consultation materials contained an error which has caused confusion - The map showing the E1 area in dark green appears to be much smaller than the true area which is covered in pink - this is misleading and could lead to residents thinking that the E1 area is much smaller than it really is.

**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/198/E1**Representor Details:

<b>Representor ID:</b>	REP/198
<b>Name:</b>	Kim Harlow
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>E1 - Land at East Quay, Newhaven Port</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	
<b>Sound:</b>	
<b>Representation:</b>	
<p>I am concerned that a large area of the Tide Mills is allocated for future development which will have a negative impact on the area for the following reasons;</p> <ul style="list-style-type: none"><li>- loss of biodiversity including internationally rare vegetated shingle.</li><li>- the impact of increased traffic in an already congested area.</li><li>- the impact on air quality due to increased traffic.</li><li>- with all the extra housing in Seaford, Newhaven and peace haven this will be</li></ul>	

overdevelopment. The area needs green spaces.

- the document does not explain how it contributes to sustainable development.
- the document does not reflect the clean marine vision of the enterprise zone or renewable energy cluster of the port masterplan
- the plans are not clear in the documents

Therefore please alter this document accordingly.

**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:** Kim Harlow [REDACTED]  
**Sent:** 04 November 2018 21:32  
**To:** ldf  
**Subject:** Lewes District Plan

**Categories:** Vanessa to deal with

Dear Sir/Madam,

I am concerned that a large area of the Tide Mills is allocated for future development which will have a negative impact on the area for the following reasons;

- loss of biodiversity including internationally rare vegetated shingle.
- the impact of increased traffic in an already congested area.
- the impact on air quality due to increased traffic.
- with all the extra housing in Seaford, Newhaven and peace haven this will be overdevelopment. The area needs green spaces.
- the document does not explain how it contributes to sustainable development.
- the document does not reflect the clean marine vision of the enterprise zone or renewable energy cluster of the port masterplan
- the plans are not clear in the documents

Therefore please alter this document accordingly.

Kind Regards

Kim Harlow

[REDACTED]

Sent from my iPad

**Representation ID: REP/199/GT01**Representor Details:

<b>Representor ID:</b>	REP/199
<b>Name:</b>	Gordon Harper
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>GT01 - Land south of The Plough</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	
<b>Sound:</b>	
<b>Representation:</b>	<p>I wish to object in the strongest possible manner to the Proposed Gypsy Traveller Site in Plumpton Green.</p> <p>My reasons for objecting are as follows:-</p> <p>1. The rural area of the Low Weald is an intimate landscape characterised by an irregular field pattern enclosed by thick hedgerows, shaws, areas of ancient woodland</p>

and rural settlements. Plumpton Green is one such area and should be protected from excessive development.

2. Housing Development has taken place over the years in Plumpton Green and the village has been allocated some 50 houses for continued development. To add a Gypsy and Traveller site would only further deteriorate the rural aspects of the village and village life

3. In the Lewes District Local Plan Part 1, Plumpton Green was placed in the Settlement Hierarchy as a Service Village. As such it is described as a village that has a basic level of services and facilities, public transport provision (possibly not frequent) and limited employment opportunities. To propose to add a Gypsy site on the extremity of the Plumpton Green flows against the basis of a Service Village

4. The proposed site is a green field site and is located in a quiet area. Any development of this site would be detrimental to the rural aspect of the Low Weald

5. The LDC Core Policy 3 – Gypsy and Traveller Accommodation Point 3 states "The site is well related to, or has reasonable access to settlements with existing services and facilities such as schools, health services and shops". The proposed site does not comply with Core Policy 3.

6. The LDC Core Policy 3 – Gypsy and Traveller Accommodation Point 4 states "there is safe and convenient vehicular access to the road network". The proposed site would exit on to a very busy road and would therefore not comply with Core Policy 3.

7. Access by foot to the proposed site would be unsafe as it fronts a busy road.

8. The Core Policy 3 – Gypsy and Traveller Accommodation Point 5 states "There is capacity to provide appropriate on-site physical and social infrastructure such as water, power, drainage, parking and amenity space". Your proposal has not demonstrated these facilities can be provided and as such would not comply with Core Policy 3.

9. It is not clear who would be responsible for maintaining the site should it be accepted.....ESCC, LDC or the Parish Council. I doubt the Parish Council would want to maintain such a site or provide for the cost of same.

10. There is a considerable distance from the proposed site to the limited facilities in the village. Foot access would be extremely dangerous on the busy road as there are no pavements along this road from the Old Brickworks until the village is reached, a distance of approximately 1 mile.

11. In the 2018 SHELAA report site 03PL was annotated lying between the Old Brickworks and the Plough Inn. On the Local Plan Part 2 Pre-submission document you show the proposed site at the southern end of site 03PL. The SHELAA has described the assessment of this site as being "Filtered – Fails Proximity Assessment". This would lead me to believe the site is not suitable for development or deliverable.

12. The proposed area of the site lies in a much larger site, viz, that shown as 03PL on the 2018 SHELAA. Whilst the proposed site talks of a limited population of 5 permanent pitches it is not inconceivable that planning creep would extend the limits of this site

given the probable area of the general site

13. It is my understanding that no agreement has been reached with the landowner and as such under SHELAA Definitions the site is "Not Deliverable"

14. The Plumpton Parish Neighbourhood Plan did not include this site for development.

15. There is very limited potential for employment in Plumpton Green and as such any residents on this site would have quite a distance to travel to any locations

for employment

16. The Old Brickworks currently houses some 21 businesses. They have advised the landowner that they will relocate if the proposed gypsy site goes forward.

This would have a detrimental effect on the village economy and lead to job losses for local residents employed in the 21 businesses.

**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:** Gordon Harper <[REDACTED]>  
**Sent:** 02 November 2018 12:57  
**To:** ldf  
**Cc:** plumptonactiongroup@gmail.com; anita.emery@plumptonpc.co.uk;  
clerk@wivelsfield.org.uk  
**Subject:** Objection to Proposed Gypsy and Traveller Site in Plumpton Green  
**Categories:** LPP2 comment to code - stakeholder details have been added

Dear Sir,

I wish to object in the strongest possible manner to the Proposed Gypsy Traveller Site in Plumpton Green.

My reasons for objecting are as follows:-

1. The rural area of the Low Weald is an intimate landscape characterised by an irregular field pattern enclosed by thick hedgerows, shaws, areas of ancient woodland and rural settlements. Plumpton Green is one such area and should be protected from excessive development.
2. Housing Development has taken place over the years in Plumpton Green and the village has been allocated some 50 houses for continued development. To add a Gypsy and Traveller site would only further deteriorate the rural aspects of the village and village life
3. In the Lewes District Local Plan Part 1, Plumpton Green was placed in the Settlement Hierarchy as a Service Village. As such it is described as a village that has a basic level of services and facilities, public transport provision (possibly not frequent) and limited employment opportunities. To propose to add a Gypsy site on the extremity of the Plumpton Green flows against the basis of a Service Village
4. The proposed site is a green field site and is located in a quiet area. Any development of this site would be detrimental to the rural aspect of the Low Weald
5. The LDC Core Policy 3 – Gypsy and Traveller Accommodation Point 3 states “The site is well related to, or has reasonable access to settlements with existing services and facilities such as schools, health services and shops”. The proposed site does not comply with Core Policy 3.
6. The LDC Core Policy 3 – Gypsy and Traveller Accommodation Point 4 states “there is safe and convenient vehicular access to the road network”. The proposed site would exit on to a very busy road and would therefore not comply with Core Policy 3.
7. Access by foot to the proposed site would be unsafe as it fronts a busy road.
8. The Core Policy 3 – Gypsy and Traveller Accommodation Point 5 states “There is capacity to provide appropriate on-site physical and social infrastructure such as water, power, drainage, parking and amenity space”. Your proposal has not demonstrated these facilities can be provided and as such would not comply with Core Policy 3.

9. It is not clear who would be responsible for maintaining the site should it be accepted.....ESCC, LDC or the Parish Council. I doubt the Parish Council would want to maintain such a site or provide for the cost of same.
10. There is a considerable distance from the proposed site to the limited facilities in the village. Foot access would be extremely dangerous on the busy road as there are no pavements along this road from the Old Brickworks until the village is reached, a distance of approximately 1 mile.
11. In the 2018 SHELAA report site 03PL was annotated lying between the Old Brickworks and the Plough Inn. On the Local Plan Part 2 Pre-submission document you show the proposed site at the southern end of site 03PL. The SHELAA has described the assessment of this site as being "Filtered – Fails Proximity Assessment". This would lead me to believe the site is not suitable for development or deliverable.
12. The proposed area of the site lies in a much larger site, viz, that shown as 03PL on the 2018 SHELAA. Whilst the proposed site talks of a limited population of 5 permanent pitches it is not inconceivable that planning creep would extend the limits of this site given the probable area of the general site
13. It is my understanding that no agreement has been reached with the landowner and as such under SHELAA Definitions the site is "Not Deliverable"
14. The Plumpton Parish Neighbourhood Plan did not include this site for development.
15. There is very limited potential for employment in Plumpton Green and as such any residents on this site would have quite a distance to travel to any locations for employment
16. The Old Brickworks currently houses some 21 businesses. They have advised the landowner that they will relocate if the proposed gypsy site goes forward.  
This would have a detrimental effect on the village economy and lead to job losses for local residents employed in the 21 businesses.

Thank you.

G S Harper



**Representation ID: REP/200/GT01**Representor Details:

<b>Representor ID:</b>	REP/200
<b>Name:</b>	Sally Harper
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>GT01 - Land south of The Plough</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	
<b>Sound:</b>	
<b>Representation:</b>	
<p>I am writing to object to the proposal by Lewes District Council to include a Permanent Travellers Site next to the Old Brickworks, Plumpton Green in the Lewes District Plan Part 2: Site Allocations and Development.</p> <p>1. The proposed site was not allocated in the Plumpton Neighbourhood Plan, which has been Made. This would therefore appear to override and indeed make a nonsense of the</p>	

the principal behind the use of Neighbourhood Plans. Indeed in his Budget Speech last Monday Philip Hammond strongly supported the use of Neighbourhood Plans. REP bringing in a proposal at this stage would appear to be contrary to Parliamentary thinking.

2. The local businesses located at The Old Brickworks have indicated that they would require much greater security to be installed should this site go ahead. This would be costly for them and they have indicated that they will be forced to relocate. This would have a detrimental effect on the economy of Plumpton/Plumpton Green which, being a rural economy would have a major effect.

3. This site is a greenfield site: the Old Brickworks was a brownfield site. It should not be necessary to allow 'creep' in such a rural location. It will also impact the rural nature of the village.

4. The site is quite some distance from the centre of Plumpton. There is no pavement or street lighting, which would raise the question of safety. Also the nearest bus stop is quite some distance away, again with no safe walking access, and indeed the bus service itself is limited.

5. In the 2018 SHELAA the only site identified adjacent to the Old Brickworks was categorised as .....Filtered – Fails Proximity Assessment.

6. No agreement has been reached with the landowner so this renders the site as not deliverable.

I would ask that these objections be taken into consideration 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:** Sally Harper <[REDACTED]>  
**Sent:** 01 November 2018 16:27  
**To:** ldf  
**Cc:** anita.emery@plumptonpc.co.uk  
**Subject:** Lewes District Plan Part 2: Site Allocations and Development..Proposed Permanent Travellers' Site Plumpton

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

Dear Sir,

I am writing to object to the proposal by Lewes District Council to include a Permanent Travellers Site next to the Old Brickworks, Plumpton Green in the Lewes District Plan Part 2: Site Allocations and Development.

1. The proposed site was not allocated in the Plumpton Neighbourhood Plan, which has been Made. This would therefore appear to override and indeed make a nonsense of the the principal behind the use of Neighbourhood Plans. Indeed in his Budget Speech last Monday Philip Hammond strongly supported the use of Neighbourhood Plans. LDC bringing in a proposal at this stage would appear to be contrary to Parliamentary thinking.
2. The local businesses located at The Old Brickworks have indicated that they would require much greater security to be installed should this site go ahead. This would be costly for them and they have indicated that they will be forced to relocate. This would have a detrimental effect on the economy of Plumpton/Plumpton Green which, being a rural economy would have a major effect.
3. This site is a greenfield site: the Old Brickworks was a brownfield site. It should not be necessary to allow 'creep' in such a rural location. It will also impact the rural nature of the village.
4. The site is quite some distance from the centre of Plumpton. There is no pavement or street lighting, which would raise the question of safety. Also the nearest bus stop is quite some distance away, again with no safe walking access, and indeed the bus service itself is limited.
5. In the 2018 SHELAA the only site identified adjacent to the Old Brickworks was categorised as .....Filtered – Fails Proximity Assessment.
6. No agreement has been reached with the landowner so this renders the site as not deliverable.

I would ask that these objections be taken into consideration please.

Sally Harper,  
[REDACTED]  
[REDACTED]  
[REDACTED].

<b>Representation ID:</b> REP/201/E1/A
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Representor Details:

<b>Representor ID:</b>	REP/201
<b>Name:</b>	David Harris
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>E1 - Land at East Quay, Newhaven Port</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	Yes
<b>Sound:</b>	No
<b>Representation:</b>  I wish to make representations in respect of your proposed land policy E1 as follows:-a) The proposal is premature as it does not take in to consideration the emerging local Newhaven Plan being put forward by the Town Council. The impact of this has not yet been considered, and should be given an opportunity to include your suggestion for public vote.b) 3.15 "Much of this area was previously allocated in Policy NH20 of the Lewes District Local Plan 2003", where it was regarded as port operational land. Legal submissions in the mid 1970s were that this land was operational railway land, notwithstanding the Newhaven Harbour Improvement Act of 1878. Privatization to Sealink British Ferries and Sea Containers in 1984 resulted in the land being sold but not the rights. It is unclear from your documentation as to whether or not you assume it	

is operational port land or whether a subsequent act of parliament has rescinded railway use. Only a later act of parliament can remove these rights.c) Your earlier allocated policy 8.16 states "buildings will be acceptable on the defined western area with minor structures only permitted on the eastern part for the purpose of basic staff facilities". This was further underpinned by the Newhaven Eastside Environmental Strategy Landscape Framework of East Sussex County Council which discriminated between the area of port expansion land to the west where built development was deemed acceptable and that to the east where "no build development on port expansion land" should occur. The map drew a line well to the west of your proposed easternmost E1 demarcation and made it quite clear that "The open countryside and coastal character of the Eastside Area as part of the strategic gap between Newhaven and Seaford must be preserved." Further (4.10) "It is probable that a reduced area for port expansion towards Tide Mills will provide sufficient scope for long term port needs in addition to the area allocated at East Pier (now approved for Brett Aggregates). This reduction could provide the environmental gain of a gap between the extended port and Tide Mills Village." this was considered essential because (5.50) B area South of the Railway:" With the continuing loss of the Eastbourne Crumbles to development there are now only three substantial semi - natural shingle areas left in East Sussex, of these the Tide Mills beach is the only one without protection or management (WHY?!). Apart for protection from development some areas behind the beach could be set aside as sanctuary areas, particularly during the bird breeding season." Given that a new port access road was always anticipated at the time these policies were agreed it is surprising there is no explanation in your current proposals as to why you now consider these comments should be superseded, more especially as The Department of the Environment ruled that the County's Newhaven Eastside Planning Guidelines be included in the Local Plan in order that they assume more weight.d) The "no build development on port expansion land" area that you now propose building on has become part of a receptor site and new nature reserve following application for the Rampion Wind Farm Application LW/15/0034. Your planning enforcement officer and I crossed swords over this one because Natural England should have been consulted about it (but weren't!) because an Environmental Impact Assessment was needed for this site. Their standing advice states quite clearly that mitigation plans are required for development projects that affect protected species, as part of getting planning permission, and that animals and plants should not normally be removed from development sites before that decision is made. Unfortunately none of this was complied with. Incredibly planning permission for this Rampion Project was granted with a condition that a mitigation plan had to be agreed beforehand. Moving the animals was the mitigation, and yet that Ecological Mitigation Management Plan was never produced, let alone agreed. Instead a retrospective Environmental Statement was produced for public consumption after the event, presumably because your council did not wish it to be known that the reason for the illegal hasty translocation was actually Brett Aggregates (LW/799/CM). Incidentally none of this Environmental Statement appears to have been followed in your suggestions either for Brett or for E1. Lamentable.e) The 1984 Sea Containers planning permission for port modernization at Newhaven included the construction of a new outer harbour (not a new berth and

slipway!). To support these plans East Sussex County Council agreed to provide £6.8 million of capital challenge credit and £1million of European Union INTERREG funding for a new road linking the planned outer port and deepened harbour with the national A26 / A259 trunk road network. All this was subject to a firm commitment being made to proceed with the outer harbour (the deepened harbour was only intended as an interim stage) and modernization of existing facilities to support cross channel ferry activities. Now the public are expected to stump up £23 million of public funding for a flyover for the benefit of private commerce (Brett) and put up with all manner of non - port related development (and traffic and air pollution, presumably in a forlorn attempt to somehow justify this ludicrous outlay from the public purse) from E1 if you agree your proposals. How does this square with your own council's comments at the time of the Brett application that 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 is minimised. In summary, please rethink your proposed policy to better reflect environmental considerations, long term port practicalities, local sentiment and heritage.

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

In summary, please rethink your proposed policy to better reflect environmental considerations, long term port practicalities, local sentiment and heritage.

**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?**



<b>Representation ID:</b> REP/201/E1/B
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Representor Details:

<b>Representor ID:</b>	REP/201
<b>Name:</b>	David Harris
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>E1 - Land at East Quay, Newhaven Port</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	
<b>Sound:</b>	
<b>Representation:</b>	<p>I wish to make representations in respect of your proposed land policy E1 as follows:-</p> <p>a) The proposal is premature as it does not take in to consideration the emerging local Newhaven Plan being put forward by the Town Council. The impact of this has not yet been considered, and should be given an opportunity to include your suggestion for public vote.</p> <p>b) 3.15 "Much of this area was previously allocated in Policy NH20 of the Lewes District Local Plan 2003", where it was regarded as port operational land. Legal submissions in the mid 1970s were that this land was operational railway land, notwithstanding the Newhaven Harbour Improvement Act of 1878. Privatization to Sealink British Ferries and</p>

Sea Containers in 1984 resulted in the land being sold but not the rights. It is unclear from your documentation as to whether or not you assume it is operational port land or whether a subsequent act of parliament has rescinded railway use. Only a later act of parliament can remove these rights.

c) Your earlier allocated policy 8.16 states "buildings will be acceptable on the defined western area with minor structures only permitted on the eastern part for the purpose of basic staff facilities". This was further underpinned by the Newhaven Eastside Environmental Strategy Landscape Framework of East Sussex County Council which discriminated between the area of port expansion land to the west where built development was deemed acceptable and that to the east where "no build development on port expansion land" should occur. The map drew a line well to the west of your proposed easternmost E1 demarcation and made it quite clear that "The open countryside and coastal character of the Eastside Area as part of the strategic gap between Newhaven and Seaford must be preserved." Further (4.10) "It is probable that a reduced area for port expansion towards Tide Mills will provide sufficient scope for long term port needs in addition to the area allocated at East Pier (now approved for Brett Aggregates). This reduction could provide the environmental gain of a gap between the extended port and Tide Mills Village." this was considered essential because (5.50) B area South of the Railway:" With the continuing loss of the Eastbourne Crumbles to development there are now only three substantial semi - natural shingle areas left in East Sussex, of these the Tide Mills beach is the only one without protection or management (WHY?!). Apart for protection from development some areas behind the beach could be set aside as sanctuary areas, particularly during the bird breeding season."

Given that a new port access road was always anticipated at the time these policies were agreed it is surprising there is no explanation in your current proposals as to why you now consider these comments should be superseded, more especially as The Department of the Environment ruled that the County's Newhaven Eastside Planning Guidelines be included in the Local Plan in order that they assume more weight.

d) The "no build development on port expansion land" area that you now propose building on has become part of a receptor site and new nature reserve following application for the Rampion Wind Farm Application LW/15/0034. Your planning enforcement officer and I crossed swords over this one because Natural England should have been consulted about it (but weren't!) because an Environmental Impact Assessment was needed for this site. Their standing advice states quite clearly that mitigation plans are required for development projects that affect protected species, as part of getting planning permission, and that animals and plants should not normally be removed from development sites before that decision is made. Unfortunately none of this was complied with. Incredibly planning permission for this Rampion Project was granted with a condition that a mitigation plan had to be agreed beforehand. Moving the animals was the mitigation, and yet that Ecological Mitigation Management Plan was never produced, let alone agreed. Instead a retrospective Environmental Statement was produced for public consumption after the event, presumably because your council did

not wish it to be known that the reason for the illegal hasty translocation was actually Brett Aggregates (LW/799/CM). Incidentally none of this Environmental Statement appears to have been followed in your suggestions either for Brett or for E1. Lamentable.

e) The 1984 Sea Containers planning permission for port modernization at Newhaven included the construction of a new outer harbour (not a new berth and slipway!). To support these plans East Sussex County Council agreed to provide £6.8 million of capital challenge credit and £1million of European Union INTERREG funding for a new road linking the planned outer port and deepened harbour with the national A26 / A259 trunk road network. All this was subject to a firm commitment being made to proceed with the outer harbour (the deepened harbour was only intended as an interim stage) and modernization of existing facilities to support cross channel ferry activities. Now the public are expected to stump up £23 million of public funding for a flyover for the benefit of private commerce (Brett) and put up with all manner of non - port related development (and traffic and air pollution, presumably in a forlorn attempt to somehow justify this ludicrous outlay from the public purse) from E1 if you agree your proposals.

How does this square with your own council's comments at the time of the Brett application that 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 is minimised.

In summary, please rethink your proposed policy to better reflect environmental considerations, long term port practicalities, local sentiment and heritage.

**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 HARRIS [REDACTED]

**To:** Planning ldc <Planning.ldc@lewes-eastbourne.gov.uk>

**CC:**

**Sent:** 03/11/2018 21:34:03

**Subject:** Lewes District Local Plan Part 2 Proposed Site Allocation Land at Tidemills, Newhaven

Dear Sirs,

I wish to make representations in respect of your proposed land policy E1 as follows:-

a) The proposal is premature as it does not take in to consideration the emerging local Newhaven Plan being put forward by the Town Council. The impact of this has not yet been considered, and should be given an opportunity to include your suggestion for public vote.

b) 3.15 "Much of this area was previously allocated in Policy NH20 of the Lewes District Local Plan 2003", where it was regarded as port operational land. Legal submissions in the mid 1970s were that this land was operational railway land, notwithstanding the Newhaven Harbour Improvement Act of 1878. Privatization to Sealink British Ferries and Sea Containers in 1984 resulted in the land being sold but not the rights. It is unclear from your documentation as to whether or not you assume it is operational port land or whether a subsequent act of parliament has rescinded railway use. Only a later act of parliament can remove these rights.

c) Your earlier allocated policy 8.16 states "buildings will be acceptable on the defined western area with minor structures only permitted on the eastern part for the purpose of basic staff facilities". This was further underpinned by the Newhaven Eastside Environmental Strategy Landscape Framework of East Sussex County Council which discriminated between the area of port expansion land to the west where built development was deemed acceptable and that to the east where "no build development on port expansion land" should occur. The map drew a line well to the west of your proposed easternmost E1 demarcation and made it quite clear that "The open countryside and coastal character of the Eastside Area as part of the strategic gap between Newhaven and Seaford must be preserved." Further (4.10) "It is probable that a reduced area for port expansion towards Tide Mills will provide sufficient scope for long term port needs in addition to the area allocated at East Pier (now approved for Brett Aggregates). This reduction could provide the environmental gain of a gap between the extended port and Tide Mills Village." this was considered essential because (5.50) B area South of the Railway." With the continuing loss of the Eastbourne Crumbles to development there are now only three substantial semi - natural shingle areas left in East Sussex, of these the Tide Mills beach is the only one without protection or management (WHY?!). Apart for protection from development some areas behind the beach could be set aside as sanctuary areas, particularly during the bird breeding season."

Given that a new port access road was always anticipated at the time these policies were agreed it is surprising there is no explanation in your current proposals as to why you now consider these comments should be superseded, more especially as The Department of the Environment ruled that the County's Newhaven Eastside Planning Guidelines be included in the Local Plan in order that they assume more weight.

d) The "no build development on port expansion land" area that you now propose building on has become part of a receptor site and new nature reserve following application for the Rampion Wind Farm Application LW/15/0034. Your planning enforcement officer and I crossed swords over this one because Natural England should have been consulted about it (but weren't!) because an Environmental Impact Assessment was needed for this site. Their standing advice states quite clearly that mitigation plans are required for development projects that affect protected species, as part of getting planning permission, and that animals and plants should not normally be removed from development sites before that decision is made. Unfortunately none of this was complied with. Incredibly planning permission for this Rampion Project was granted with a condition that a mitigation plan had to be agreed beforehand. Moving the animals was the mitigation, and yet that Ecological Mitigation Management Plan was never produced, let alone agreed. Instead a retrospective Environmental Statement was produced for public consumption after the event, presumably because your council did not wish it to be known that the reason for the illegal hasty translocation was actually

Brett Aggregates (LW/799/CM). Incidentally none of this Environmental Statement appears to have been followed in your suggestions either for Brett or for E1. Lamentable.

e) The 1984 Sea Containers planning permission for port modernization at Newhaven included the construction of a new outer harbour (not a new berth and slipway!). To support these plans East Sussex County Council agreed to provide £6.8 million of capital challenge credit and £1million of European Union INTERREG funding for a new road linking the planned outer port and deepened harbour with the national A26 / A259 trunk road network. All this was subject to a firm commitment being made to proceed with the outer harbour (the deepened harbour was only intended as an interim stage) and modernization of existing facilities to support cross channel ferry activities. Now the public are expected to stump up £23 million of public funding for a flyover for the benefit of private commerce (Brett) and put up with all manner of non - port related development (and traffic and air pollution, presumably in a forlorn attempt to somehow justify this ludicrous outlay from the public purse) from E1 if you agree your proposals.

How does this square with your own council's comments at the time of the Brett application that 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 is minimised.

In summary, please rethink your proposed policy to better reflect environmental considerations, long term port practicalities, local sentiment and heritage.

Yours faithfully,

David Harris,



**Representation ID: REP/202/GT01**Representor Details:

<b>Representor ID:</b>	REP/202
<b>Name:</b>	Charles Hartridge
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>GT01 - Land south of The Plough</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	Yes
<b>Sound:</b>	No Not Positively Prepared Not Justified Not Effective Not Consistent with national policy
<b>Representation:</b>	
This proposal is inappropriate and inconsistent with stated policies for a number of	

reasons.

It will generate additional traffic into and through the village, one reason why this and the larger adjacent site has already been considered unsuitable for additional dwellings. The walk on foot into the village to the shop or school is along a national speed limit lane with no footpath which is dangerous especially at times of peak traffic.

It will generate additional light and noise pollution which will significantly impact the immediate vicinity.

The adjacent business park will be adversely impacted e.g. additional security measures being required by insurers. There is a strong possibility that this will cause business owners to relocate taking with them their local business and employment opportunities.

**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/203/GT01**Representor Details:

<b>Representor ID:</b>	REP/203
<b>Name:</b>	Sheila Hartridge
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>GT01 - Land south of The Plough</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	Yes
<b>Sound:</b>	No Not Positively Prepared Not Justified Not Effective Not Consistent with national policy
<b>Representation:</b>	
It is not appropriate to build Traveller accommodation on a greenfield site. By changing the use of arable land to a residential site the rural character and nature of the area will	



be permanently altered adversely.

At a local meeting LDC officers stated that this site was very unlikely to get planning permission for traditional housing, therefore it would seem that lower criteria are being applied for its suitability for Traveller accommodation. This is unfair to both that community and local residents.

The proposed access to the village and its facilities via a new footpath to the bus stop 200m to the north of the site and therefore 850m from the outskirts of the village is totally impractical. The bus service is very infrequent and its future is in question. To suggest that you would walk away from the village to catch a bus to the shop, school or train station is fundamentally flawed. You would either walk along the main road with no pavement or travel by car thus increasing the traffic through the village.

The proposed site is part of a much larger field and if a Traveller site is established I would be concerned that as a precedent had been set the site could be expanded in the future which would be detrimental to the local 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?**

No

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

**Representation ID: REP/204/E1**

Representor Details:

<b>Representor ID:</b>	REP/204
<b>Name:</b>	Lyn Hartwell
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>E1 - Land at East Quay, Newhaven Port</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	No
<b>Sound:</b>	No
	Not Positively Prepared
	Not Justified
	Not Effective
	Not Consistent with national policy
<b>Representation:</b>	
<p>It will have adverse effect on Seaford and Newhaven towns. A259 cannot cope with all the additional traffic created is far too busy now. How would vehicles get out of Bishopstone? Pedestrians on that road going into town now is most unpleasant and sometimes unsafe increased traffic would make it worse. How about the archeological area. All going through because of the back handlers not what locals want</p>	

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

Do not do any of this, people from out of this area should not have input into the development they don't have to live with it. Should improve the one way system in Newhaven. I live in bishopstone and do not want to see a bridge over the railway or have increases traffic below on A259

**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/205/GT01**Representor Details:

<b>Representor ID:</b>	REP/205
<b>Name:</b>	Tracey Harwood
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>GT01 - Land south of The Plough</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	
<b>Sound:</b>	
<b>Representation:</b>	
<p>I am writing to strongly object to the proposal to locate a permanent Gypsy and Traveller site in Plumpton Green for the following reasons:</p> <p>1. It does not fit with the Plumpton Parish Neighbourhood Plan or the policies within that plan. It is outside of the Plumpton Planning Boundary. As a villager I engaged with the consultation and referendum on the plan and fully support the plan in its entirety.</p>	

2. It is not in keeping with the rural surroundings and is on a greenfield site. This area is used by wildlife, including deer.

3. LDC have already deemed the area not suitable for residential housing development. There is inadequate pedestrian access to the village from the site. Together with a lack of lighting due Plumpton Green being a "dark skies" parish with absolutely no desire to change this.

4. The local economy would be severely damaged if businesses no longer wished to be located in the Old Brickworks which they have said is the case if the site went ahead. The businesses chose this location due to the quiet rural location and soft security. The location of the gypsy traveller site would significantly change this.

I am in full support of all the comments submitted by Plumpton Parish Council in response to the consultation on Lewes District Local Plan 2: Site Allocations and Development Management Policies DPD - Pre Submission version and specifically GT01.

My view is that LDC should be considering a brownfield site which has less direct impact on a rural village or enlarging an existing gypsy/traveller site in the 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?**

**From:** Tracey Harwood [REDACTED]  
**Sent:** 04 November 2018 18:03  
**To:** ldf  
**Cc:** tracey nick  
**Subject:** Policy GT01 - Proposed Gypsy and Traveller Site - Plumpton Green

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

I am writing to strongly object to the proposal to locate a permanent Gypsy and Traveller site in Plumpton Green for the following reasons:

1. It does not fit with the Plumpton Parish Neighbourhood Plan or the policies within that plan. It is outside of the Plumpton Planning Boundary. As a villager I engaged with the consultation and referendum on the plan and fully support the plan in its entirety.
2. It is not in keeping with the rural surroundings and is on a greenfield site. This area is used by wildlife, including deer.
3. LDC have already deemed the area not suitable for residential housing development. There is inadequate pedestrian access to the village from the site. Together with a lack of lighting due Plumpton Green being a "dark skies" parish with absolutely no desire to change this.
4. The local economy would be severely damaged if businesses no longer wished to be located in the Old Brickworks which they have said is the case if the site went ahead. The businesses chose this location due to the quiet rural location and soft security. The location of the gypsy traveller site would significantly change this.

I am in full support of all the comments submitted by Plumpton Parish Council in response to the consultation on Lewes District Local Plan 2: Site Allocations and Development Management Policies DPD - Pre Submission version and specifically GT01.

My view is that LDC should be considering a brownfield site which has less direct impact on a rural village or enlarging an existing gypsy/traveller site in the area.

Tracey Harwood  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

**Representation ID: REP/206/GT01/A**Representor Details:

<b>Representor ID:</b>	REP/206
<b>Name:</b>	Nick Harwood
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>GT01 - Land south of The Plough</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	
<b>Sound:</b>	
<b>Representation:</b>	
<p>I would like to submit my objection the the site above for these reasons:</p> <p>It is not in keeping with the rural surroundings and is on a greenfield site. This area is used by wildlife, including deer.</p> <p>If LDC have already said the area not suitable for residential housing. There is inadequate pedestrian access to the village from the site and with no suitable lighting maybe construed as dangerous and asking for traffic and accident issues</p> <p>Local businesses will be affected as they are so close to this proposed site. I believe they have threatened to leave if this gets the go ahead. That would be a real shame and have knock on affects for us, the community, this proposed new group and of course</p>	

REP

It does not fit with the Plumpton Parish Neighbourhood Plan or the policies within that plan. It is outside of the Plumpton Planning Boundary. As a villager I engaged with the consultation and referendum on the plan and fully support the plan in its entirety.

I am in full support of all the comments submitted by Plumpton Parish Council in response to the consultation on Lewes District Local Plan 2: Site Allocations and Development Management Policies DPD - Pre Submission version and specifically GT01.

My view is that LDC should be considering a brownfield site which has less direct impact on a rural village or enlarging an existing gypsy/traveller site in the area. Thus giving this new group access to more schools, surgeries, social care, shops and transport

I trust you find this acceptable without being rude or condescending

**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/206/GT01/B**Representor Details:

<b>Representor ID:</b>	REP/206
<b>Name:</b>	Nick Harwood
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>GT01 - Land south of The Plough</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	Yes
<b>Sound:</b>	No Not Positively Prepared
<b>Representation:</b>  I believe you have not taken in the voices and feelings on the Community. The Community is the heart of any village or town. We live here with the best intentions for ourselves, our future and our (in some case new neighbours). Our Parish council provide what any village wants best for themselves and the Community. with freedom of speech, information, improve services for all groups. They encourage fetes, jumble sales, classes, day care centres, social media sites. Goods for sale and work for anyone. the list is endless	

This proposed site does not cover these areas above, it does not encourage joining in. By placing it there away from sight and prying eyes this new group is hidden away left alone thus encouraging a non community sense of being

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

the changes I would prefer are to encourage access to a welcoming Community, where the new group are encouraged to join in and be a apart of the Community. By being closer to urban life, social services, choice of schools, transport and not tuck them away

**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:** Tracey Nick [REDACTED]  
**Sent:** 05 November 2018 21:14  
**To:** ldf  
**Subject:** planning objection to proposed Travelers site in Plumpton  
**Categories:** GT01, Vanessa to deal with

Dear Sir/madam

I would like to submit my objection the the site above for these reasons:

It is not in keeping with the rural surroundings and is on a greenfield site. This area is used by wildlife, including deer.

If LDC have already said the area not suitable for residential housing. There is inadequate pedestrian access to the village from the site and with no suitable lighting maybe construed as dangerous and asking for traffic and accident issues

Local businesses will be affected as they are so close to this proposed site. I believe they have threatened to leave if this gets the go ahead. That would be a real shame and have knock on affects for us, the community, this proposed new group and of course LDC

It does not fit with the Plumpton Parish Neighbourhood Plan or the policies within that plan. It is outside of the Plumpton Planning Boundary. As a villager I engaged with the consultation and referendum on the plan and fully support the plan in its entirety.

I am in full support of all the comments submitted by Plumpton Parish Council in response to the consultation on Lewes District Local Plan 2: Site Allocations and Development Management Policies DPD - Pre Submission version and specifically GT01.

My view is that LDC should be considering a brownfield site which has less direct impact on a rural village or enlarging an existing gypsy/traveller site in the area. Thus giving this new group access to more schools, surgeries, social care, shops and transport

I trust you find this acceptable without being rude or condescending

Nick Harwood

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**Representation ID: REP/207/E1**Representor Details:

<b>Representor ID:</b>	REP/207
<b>Name:</b>	Frances Hasler
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>E1 - Land at East Quay, Newhaven Port</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	
<b>Sound:</b>	
<b>Representation:</b> <p>I want to add my voice to those challenging the inclusion of part of the Tide Mills site (E1 in the plans) as available for future development.</p> <p>This lovely area of beach, shingle and rough ground is one of our regular walks. It is adjacent to some important nesting sites for birds. The shingle has a wide range of established vegetation, all of it good for wildlife. There are some genuinely brownfield sites in Newhaven, you do not need to take over the beach. Tide Mills has been developed as an excellent spot for walkers, cyclists and birdwatchers. Please don't spoil it.</p>	

The proposal is not good for the environment. It does not add to a sustainable future for Newhaven. Please take E1 out of your 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?**

## Hodgson, Lilly

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**From:** Frances Hasler [REDACTED]  
**Sent:** 05 November 2018 19:15  
**To:** ldf  
**Subject:** Lewes District Local Plan Part 2 plans for Tide Mills  
**Categories:** Vanessa to deal with

Dear District Planners

I want to add my voice to those challenging the inclusion of part of the Tide Mills site (E1 in the plans) as available for future development.

This lovely area of beach, shingle and rough ground is one of our regular walks. It is adjacent to some important nesting sites for birds. The shingle has a wide range of established vegetation, all of it good for wildlife. There are some genuinely brownfield sites in Newhaven, you do not need to take over the beach. Tide Mills has been developed as an excellent spot for walkers, cyclists and birdwatchers. Please don't spoil it.

The proposal is not good for the environment. It does not add to a sustainable future for Newhaven. Please take E1 out of your plans.

Many thanks

Frances Hasler

[REDACTED]

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**Representation ID: REP/208/BA01**Representor Details:

<b>Representor ID:</b>	REP/208
<b>Name:</b>	Charlotte and David Hatchard
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>BA01 - Land at Hillside Nurseries, High Street</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	
<b>Sound:</b>	
<b>Representation:</b>  We are residents of The Grange in Barcombe and have two children. We have lived in Barcombe as a family for 13 years and we are contacting you to voice our concerns and objections to the proposed plan BA01 at the side of the Recreation Ground.  We believe that a proposal for a new badly-needed equipped playspace has been put forward and this is the only suitable space for this. As the size of Barcombe will inevitably grow due to other development plans over the coming years, it is essential that a suitable playspace is provided for children and future generations of children in the village.	

We strongly urge the council to use common sense instead of 'housing figures' to allow this site to be used for the good of the community.

If this opportunity is missed, it will be a sad and disappointing outcome for the families in this village, and one that can never be reversed.

Councils up and down the country are criticised for not always thinking of the communities they are supposed to represent...PLEASE DO THE RIGHT THING..

**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

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**From:** Charlotte Hatchard [REDACTED]  
**Sent:** 05 November 2018 10:05  
**To:** ldf  
**Subject:** PLAYSPACE FOR BARCOMBE

**Categories:** Vanessa to deal with

To Lewes District Council

We are residents of The Grange in Barcombe and have two children. We have lived in Barcombe as a family for 13 years and we are contacting you to voice our concerns and objections to the proposed plan BA01 at the side of the Recreation Ground.

We believe that a proposal for a new badly-needed equipped playspce has been put forward and this is the only suitable space for this. As the size of Barcombe will inevitably grow due to other development plans over the coming years, it is essential that a suitable playspace is provided for children and future generations of children in the village.

We strongly urge the council to use common sense instead of 'housing figures' to allow this site to be used for the good of the community.

If this opportunity is missed, it will be a sad and disappointing outcome for the families in this village, and one that can never be reversed.

Councils up and down the country are criticised for not always thinking of the communities they are supposed to represent...PLEASE DO THE RIGHT THING..

Charlotte and David Hatchard  
[REDACTED]

<b>Representation ID:</b> REP/209/E1
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Representor Details:

<b>Representor ID:</b>	REP/209
<b>Name:</b>	Sarah Hawkes
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Residents Association

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	E1 - Land at East Quay, Newhaven Port
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	No
<b>Sound:</b>	No Not Positively Prepared Not Consistent with national policy
<b>Representation:</b>	
It puts business interest before the needs of people and nature.	
<b>What changes do you suggest to make the document legally compliant or sound?</b>	
I simply want you to respect the wishes of people who want to keep the Tide Mills area	

intact,with no development further to that which has already been decided.It is vital that this piece of coastline is protected for our children,our grandchildren,and the sanity and wellbeing of people who need the peace and tranquility of this beautiful area.It is criminal to put profit before people and nature in this day and age.

**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/210/DM2**Representor Details:

<b>Representor ID:</b>	REP/210
<b>Name:</b>	Shirley Heapy
<b>Organisation:</b>	<b>Rentplus UK</b>
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Other group or organisation

Agent Details:

<b>Name:</b>
<b>Organisation:</b>

Contact Details:

<b>Email Address:</b>	sheapy@rentplus-uk.com
<b>Address:</b>	Floor 2, Sudios 5-11 5 Millbay Road Plymouth Devon PL1 3lf

Representation:

<b>Policy/Section:</b>	<b>DM2: Affordable Homes Exception Sites</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	
<b>Sound:</b>	No Not Effective Not Consistent with national policy
<b>Representation:</b>	
We represent Rentplus UK Ltd, an innovative company providing affordable rent to buy housing for working people aspiring to home ownership with an accessible route to achieve their dream through the rent - save - own model. This is achieved through a combination of a secure affordable rented period (whichever is the lower of 80% of open	

market rent, including any service charge, or Local Housing Allowance), giving time to save, and a 10% gifted deposit to enable tenants to buy their own home in 5, 10, 15 or 20 years.

We previously responded to the consultation draft SPD on New Affordable Housing, seeking a local review of the delivery of a wider array of affordable housing tenures to meet local needs. In the time since that consultation closing in January 2018 the Government has published a revised NPPF (and further consultation document on assessing housing need), with many changes within this relating to how developers and LPAs working in partnership can deliver a much greater supply of housing, and in particular of affordable housing.

Given the scale of change in national policy and the scale of the challenge in meeting affordable housing needs across the country and in Lewes District more specifically, it is important for the Council to consider how its policies will be used in determining planning applications in the longer term, and to modify this prior to examination where this will assist with its effectiveness over the long term.

There is significant unmet need for affordable housing across Lewes, and this is well recognised by the Council and highlighted in both the Part 1 and Part 2 Plans. Affordability is constraining access to home ownership, keeping many potential home owners locked in private rented accommodation or in other affordable tenures without support towards ownership. Access to a deposit remains one of the most challenging blockers to accessing home ownership which can only be resolved through a significant step change in delivery of all tenures, and in ensuring a supply of tenures that specifically address the inability of households to save for a deposit.

The exception site policy set out by the Council rightly seeks to address local housing needs at Lewes' rural communities but does this by placing an unnecessary blocker to delivering the wide range of tenures which those communities need. Policy DM2 should not seek to restrict all housing being delivered on exception sites in perpetuity as the NPPF allows for cross-subsidy by market housing, and supports the delivery of affordable housing for sale for those who cannot access the market.

It is important that policies such as these enable delivery of affordable housing for rent to rural communities in perpetuity, but also allow for rural communities to thrive by having a vibrant housing stock. Delivering shared ownership that is capable of being staircased to full ownership, and other forms of affordable housing including rent to buy, will ensure that those communities continue to be vibrant and viable – without new development many areas stagnate, and hard working families are forced to move elsewhere to afford a home. 2

This policy should therefore take a proactive approach to welcoming the delivery of the wider range of affordable tenures as set out in the revised Framework to encourage a more diverse housing stock and to improve the ability of all developers to deliver an appropriate and higher quantum of affordable housing across the district. Without such change, the Council is restricting developers to a narrow form of development, and communities to a narrow stock of housing that will not meet all needs.

Policy DM2 can readily be amended to allow for a wider tenure mix by the below wording:

Outside the planning boundaries, as defined on the Policies Map, proposals for affordable housing to meet local needs, including housing for sale and rent for those whose needs are not met by the market, will be permitted where the following criteria are met:

(4) the affordable housing for social and affordable rent is made available to, and will be retained in perpetuity for, households with a local connection;

The above changes are minor in scope but will ensure the policy can be found sound at examination by ensuring the policy adequately reflects the definition of affordable housing as now set out in the NPPF, remaining compliant with national policy and ensuring effectiveness over the long term.

The definition in the revised Framework includes affordable housing for sale, including rent to buy, which for the first time enables households with an aspiration for purchase to save for a mortgage deposit while living in that home. The Rentplus rent to buy model delivers a home for rent at an affordable rent for up to twenty years at a maximum of 80% of market rent (an affordable rent), with the ability to set a lower percentage where this would allow access to housing benefit.

All Rentplus dwellings are leased to Registered Providers at an affordable rent for up to 20 years – the RP manages and maintains each property, giving tenants the assurance of renting through a responsible housing provider. This builds resilience into local communities; each Rentplus development is sold on a phased basis every 5 years – those homes not sold at year 5 are re-let to tenants for a further 5 years.

This form of tenure and development enables partner Housing Associations to diversify local housing stock and for local households to find the right type of home for them. Rentplus developments delivered in partnership across England with housing associations have already delivered significant benefits to those people who could not previously access housing that was affordable to them. Case studies are set out on the Rentplus website (accessible via <http://www.rentplus-uk.com/about/case-studies>), highlighting the difference that a broad mix of affordable housing can make to communities – and that the delivery of rent to buy can make to people who could not access social or affordable rent, or shared ownership previously, or were able to move on and free up those homes for others in greater need.

The proposed changes will enable the Council to continue to seek affordable housing through exception sites that targets local housing needs, while enabling a wider range of households to access housing that meets their needs, retaining people within the rural communities' they are already connected to. The above changes will also enable the Council when acting as decision-maker to respond to and support planning applications that seek to deliver the wider range of affordable housing tenures without radical policy changes – or departure from the Framework.

By wording the policy in this way developments will be encouraged to come forward with

a greater diversity of tenures that reflect not only priority needs, but also those needs not currently met by the delivery of social and affordable rent, or intermediate tenures. The policy changes will ensure the plan remains justified against the identified housing needs, and consistent with national planning policy. This will safeguard the plan against becoming outdated in the short term and therefore at risk of failing to deliver critical numbers of affordable housing.

It is important for the Council to consider inclusion of a policy on entry-level exception sites where this will also assist in delivering a step change in supply of affordable housing across the District. 3

We would like to be notified when the Local Plan is submitted for Examination, and request attendance at the hearings for any session covering Policy DM2.

**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 ensure the Inspector has a full understanding of our comments and the need for a diverse supply of affordable housing.



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

Date: 5 November 2018  
Our Ref: MR M15/0715-231

By email only:  
[ldf@lewes.gov.uk](mailto:ldf@lewes.gov.uk)

Dear Sirs

**RE: LEWES DISTRICT LOCAL PLAN PART 2: SITE ALLOCATIONS AND DEVELOPMENT MANAGEMENT POLICIES DPD - PRE-SUBMISSION VERSION**

We represent **Rentplus UK Ltd**, an innovative company providing affordable rent to buy housing for working people aspiring to home ownership with an accessible route to achieve their dream through the rent - save - own model. This is achieved through a combination of a secure affordable rented period (whichever is the lower of 80% of open market rent, including any service charge, or Local Housing Allowance), giving time to save, and a 10% gifted deposit to enable tenants to buy their own home in 5, 10, 15 or 20 years.

We previously responded to the consultation draft SPD on New Affordable Housing, seeking a local review of the delivery of a wider array of affordable housing tenures to meet local needs. In the time since that consultation closing in January 2018 the Government has published a revised NPPF (and further consultation document on assessing housing need), with many changes within this relating to how developers and LPAs working in partnership can deliver a much greater supply of housing, and in particular of affordable housing.

Given the scale of change in national policy and the scale of the challenge in meeting affordable housing needs across the country and in Lewes District more specifically, it is important for the Council to consider how its policies will be used in determining planning applications in the longer term, and to modify this prior to examination where this will assist with its effectiveness over the long term.

There is significant unmet need for affordable housing across Lewes, and this is well recognised by the Council and highlighted in both the Part 1 and Part 2 Plans. Affordability is constraining access to home ownership, keeping many potential home owners locked in private rented accommodation or in other affordable tenures without support towards ownership. Access to a deposit remains one of the most challenging blockers to accessing home ownership which can only be resolved through a significant step change in delivery of all tenures, and in ensuring a supply of tenures that specifically address the inability of households to save for a deposit.

The exception site policy set out by the Council rightly seeks to address local housing needs at Lewes' rural communities but does this by placing an unnecessary blocker to delivering the wide range of tenures which those communities need. **Policy DM2** should not seek to restrict all housing being delivered on exception sites *in perpetuity* as the NPPF allows for cross-subsidy by market housing, and supports the delivery of affordable housing for sale for those who cannot access the market.

It is important that policies such as these enable delivery of affordable housing for rent to rural communities *in perpetuity*, but also allow for rural communities to thrive by having a vibrant housing stock. Delivering shared ownership that is capable of being staircased to full ownership, and other forms of affordable housing including rent to buy, will ensure that those communities continue to be vibrant and viable – without new development many areas stagnate, and hard working families are forced to move elsewhere to afford a home.



This policy should therefore take a proactive approach to welcoming the delivery of the wider range of affordable tenures as set out in the revised Framework to encourage a more diverse housing stock and to improve the ability of all developers to deliver an appropriate and higher quantum of affordable housing across the district. Without such change, the Council is restricting developers to a narrow form of development, and communities to a narrow stock of housing that will not meet all needs.

**Policy DM2** can readily be amended to allow for a wider tenure mix by the below wording:

Outside the planning boundaries, as defined on the Policies Map, proposals for affordable housing to meet local needs, including housing for sale and rent for those whose needs are not met by the market, will be permitted where the following criteria are met:

- (4) the affordable housing for social and affordable rent is made available to, and will be retained *in perpetuity* for, households with a local connection;

The above changes are minor in scope but will ensure the policy can be found sound at examination by ensuring the policy adequately reflects the definition of affordable housing as now set out in the NPPF, remaining compliant with national policy and ensuring effectiveness over the long term.

The definition in the revised Framework includes affordable housing for sale, including rent to buy, which for the first time enables households with an aspiration for purchase to save for a mortgage deposit while living in that home. The Rentplus rent to buy model delivers a home for rent at an affordable rent for up to twenty years at a maximum of 80% of market rent (an *affordable rent*), with the ability to set a lower percentage where this would allow access to housing benefit.

All Rentplus dwellings are leased to Registered Providers at an affordable rent for up to 20 years – the RP manages and maintains each property, giving tenants the assurance of renting through a responsible housing provider. This builds resilience into local communities; each Rentplus development is sold on a phased basis every 5 years – those homes not sold at year 5 are re-let to tenants for a further 5 years.

This form of tenure and development enables partner Housing Associations to diversify local housing stock and for local households to find the right type of home for them. Rentplus developments delivered in partnership across England with housing associations have already delivered significant benefits to those people who could not previously access housing that was affordable to them. Case studies are set out on the Rentplus website (accessible via <http://www.rentplus-uk.com/about/case-studies>), highlighting the difference that a broad mix of affordable housing can make to communities – and that the delivery of rent to buy can make to people who could not access social or affordable rent, or shared ownership previously, or were able to move on and free up those homes for others in greater need.

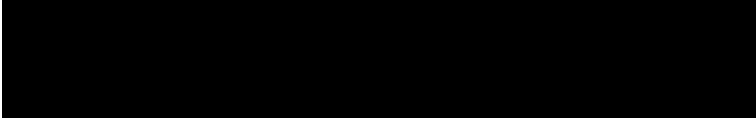
The proposed changes will enable the Council to continue to seek affordable housing through exception sites that targets local housing needs, while enabling a wider range of households to access housing that meets their needs, retaining people within the rural communities' they are already connected to. The above changes will also enable the Council when acting as decision-maker to respond to and support planning applications that seek to deliver the wider range of affordable housing tenures without radical policy changes – or departure from the Framework.

By wording the policy in this way developments will be encouraged to come forward with a greater diversity of tenures that reflect not only priority needs, but also those needs not currently met by the delivery of social and affordable rent, or intermediate tenures. The policy changes will ensure the plan remains justified against the identified housing needs, and consistent with national planning policy. This will safeguard the plan against becoming outdated in the short term and therefore at risk of failing to deliver critical numbers of affordable housing.

It is important for the Council to consider inclusion of a policy on entry-level exception sites where this will also assist in delivering a step change in supply of affordable housing across the District.

We would like to be notified when the Local Plan is submitted for Examination, and request attendance at the hearings for any session covering **Policy DM2**. Please notify **Tetlow King Planning** as agents of **Rentplus** by email only to [consultation@tetlow-king.co.uk](mailto:consultation@tetlow-king.co.uk).

Yours faithfully



**MEGHAN ROSSITER BSc (Hons.) MSc MRTPI**  
**PRINCIPAL PLANNER**  
For and On Behalf Of  
TETLOW KING PLANNING

[meghan.rossiter@tetlow-king.co.uk](mailto:meghan.rossiter@tetlow-king.co.uk)

**Representation ID: REP/211/GT01**Representor Details:

<b>Representor ID:</b>	REP/211
<b>Name:</b>	Katie Heath
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>GT01 - Land south of The Plough</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	
<b>Sound:</b>	
<b>Representation:</b>	
<p>I have received notification that the council propose to allow a permanent site for the travelling community adjacent to 'The old brickworks' in Plumpton Green.</p> <p>I object to this as a resident of the village. I believe that if this proposal is approved it will undermine the beautiful village that many work hard to maintain and promote.</p> <p>Given the recent housing plans going ahead I am sure that the construction companies willing to invest their money will not approve either. Potential buyers of not only the new properties but those already in existence will most certainly be put off investing their money in the village.</p>	

Will they be required to pay council tax? How much? What band will they be in?

I do not believe that whatever the positives to be achieved by this plan going ahead will out weigh the negatives that go inevitably go with members of these communities moving into an area?

Please record this as an objection to this plan, can you please provide the planning number so I am able to monitor this online.

**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

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**From:** Katie Heath [REDACTED]  
**Sent:** 26 September 2018 19:56  
**To:** ldf  
**Subject:** Objection to traveller site - Plumpton Green  
**Categories:** Vanessa to deal with

Good evening,

I have received notification that the council propose to allow a permanent site for the travelling community adjacent to 'The old brickworks' in Plumpton Green.

I object to this as a resident of the village. I believe that if this proposal is approved it will undermine the beautiful village that many work hard to maintain and promote.

Given the recent housing plans going ahead I am sure that the construction companies willing to invest their money will not approve either. Potential buyers of not only the new properties but those already in existence will most certainly be put off investing their money in the village.

Will they be required to pay council tax? How much? What band will they be in?

I do not believe that whatever the positives to be achieved by this plan going ahead will out weigh the negatives that go inevitably go with members of these communities moving into an area?

Please record this as an objection to this plan, can you please provide the planning number so I am able to monitor this online.

Kind Regards

Katie Heath  
[REDACTED]

---

**Representation ID: REP/212/E1**Representor Details:

<b>Representor ID:</b>	REP/212
<b>Name:</b>	Brian Henderson
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>
<b>Organisation:</b>

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>E1 - Land at East Quay, Newhaven Port</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	
<b>Sound:</b>	
<b>Representation:</b>  I have recently seen the proposed planning for the area east of the port at Newhaven which includes the area to Tidemills under Reference E1. I would like to object to this application on the grounds that this area is an important wild life habitat and should therefore be protected for future generations. The boundary also, I believe, would be adjacent to the South Downs Park and could, therefore, be in conflict with this important area.	
<b>What changes do you suggest to make the document legally compliant or sound?</b>	

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

## Thea Davis

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**From:** HENDERSON BRIAN [REDACTED]  
**Sent:** 03 November 2018 19:17  
**To:** ldf  
**Subject:** Fw: proposed planning at Tidemills, Seaford.  
**Categories:** LPP2 comment to code - stakeholder details have been added

I have recently seen the proposed planning for the area east of the port at Newhaven which includes the area to Tidemills under Reference E1. I would like to object to this application on the grounds that this area is an important wild life habitat and should therefore be protected for future generations. The boundary also, I believe, would be adjacent to the South Downs Park and could, therefore, be in conflict with this important area.  
Thank you  
Brian



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**Representation ID: REP/213/E1**Representor Details:

<b>Representor ID:</b>	REP/213
<b>Name:</b>	Linda Heyworth
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>E1 - Land at East Quay, Newhaven Port</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	
<b>Sound:</b>	
<b>Representation:</b>  There should be no development east of the port access road and bridge onto Tidemills once the road and bridge are built. Any such development would be catastrophic for this beautiful unique site with its biodiversity and nature conservation interest. It would also have grave consequences for the whole of Seaford Bay.	
<b>What changes do you suggest to make the document legally compliant or sound?</b>	
<b>Do you consider it necessary to participate at the Examination in Public?</b>	

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

**From:** Linda Heyworth [REDACTED]  
**Sent:** 31 October 2018 11:05  
**To:** ldf  
**Subject:** LDC LOCAL PLAN: RESIDENT'S COMMENT

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

There should be no development east of the port access road and bridge onto Tidemills once the road and bridge are built. Any such development would be catastrophic for this beautiful unique site with its biodiversity and nature conservation interest. It would also have grave consequences for the whole of Seaford Bay.

Linda Heyworth.

**Representation ID: REP/214/E1**Representor Details:

<b>Representor ID:</b>	REP/214
<b>Name:</b>	Georgina Hickey
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>E1 - Land at East Quay, Newhaven Port</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	No
<b>Sound:</b>	No Not Positively Prepared Not Justified
<b>Representation:</b>  I don't really know what a lot of this form means. I don't know if what is proposed is legally compliant. It strikes me that the language used here is exactly to put people like myself off from commenting for fear of the jargon.  Tide mills is a place I go to sea swim, a place I take my children to the beach, a place myself and my family walk and enjoy. What on earth are you doing building on such a	

place of natural beauty??? Newhaven has been consistently dumped on over the years, it has such enormous potential to be a vibrant, exciting town with so much to offer....a coastline, natural beauty, river, downs, coastal walks, a large community, the ferry link to France. WHY are you turning into a rubbish dump??? It needs investment. Positive investment for real change and great things. No one will come there. No one will want to go for their recreation and the poor people who do live in Newhaven have to deal with yet another ill considered, terribly damaging development on their doorstep which roars out "Newhaveners don't matter, Newhaven doesn't matter". We have a duty of care to our coastline, our seas, our natural habitat and our communities of fellow human beings. TAKE CARE. BE MINDFUL. This is not just a game of numbers, thousands of people will be affected in a negative way - and not just now, but in generations to come.

Do not continue to damage our precious coastline and resources with this development. Stop now.

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

Widen the consultation. And extend the time frame. Make it easier for people to comment and feel heard.

**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/215/BH01**Representor Details:

<b>Representor ID:</b>	REP/215
<b>Name:</b>	Pippa Hildick-Smith
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>BH01 - Land at The Nuggets, Valebridge Road</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	No
<b>Sound:</b>	No Not Consistent with national policy
<b>Representation:</b>  The planned development on the "Nuggets" site identifies many of the issues we are raising for Theobalds Road, which lies south of the Nuggets area and also links onto Valebridge Road.  The area is surrounded by ancient woodland and is habitat for owls, bats, dormice etc as stated.  Access for the new buildings on Nuggets needs to be made onto Valebridge Road, and	

in order to achieve this another adjacent property (Woodreeves) has been purchased..

The proposal that Theobalds might be a potential site for development is a non-starter as Theobalds is a SINGLE TRACK lane, which cannot be widened and it is therefore absolutely impossible to use Theobalds for new properties to access Valebridge Road.

The gradual "chipping away" of woodlands bordering onto the single row of housing already on Valebridge Road must recognise that the character of the area very much depends on the ancient trees around us. Sufficient woodland MUST be kept to retain the area's character.

**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?**

<b>Representation ID:</b> REP/215/DM1
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Representor Details:

<b>Representor ID:</b>	REP/215
<b>Name:</b>	Pippa Hildick-Smith
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>DM1: Planning Boundary</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	No
<b>Sound:</b>	No Not Positively Prepared Not Justified Not Consistent with national policy
<b>Representation:</b>	
Re 4.6	
'Theobalds Road is an ancient Bridleway - It is therefore of historic importance and the area surrounding it must surely fit with being designated as "land set aside to conserve national landscape"	



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

Planning boundaries should exclude land around Theobalds Road from any future housing development

**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?**

Unless voiced in person I have no confidence that EAST Sussex council will take into account my views as a WEST Sussex resident regarding Theobalds Road which is an ancient bridleway.

<b>Representation ID:</b> REP/215/DM4
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Representor Details:

<b>Representor ID:</b>	REP/215
<b>Name:</b>	Pippa Hildick-Smith
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>DM4: Residential Conversions in the Countryside</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	No
<b>Sound:</b>	No Not Positively Prepared Not Justified Not Consistent with national policy
<b>Representation:</b>  Manor Nursery site, on Theobalds Road has recently been cleared by a developer. This site was previously a nursery. It has never had a dwelling on it. There were some old sheds and the land was previously homw to bats and other animals - however the developer cleared the site so this biodiversity has been completely lost. The area has	

been decimated.

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

Any proposed plans to develop Manor Nursey as a residential site should be strongly opposed. Any such building would detract from the character and identity of the locality (Policy DM4 point 3). A residence on this site would detract from the rural setting (Policy DM4 point 5). There would be unacceptable impact on the current road network and there is NO satisfactory vehicular access ( Policy DM4 point 6).

**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 Theobalds Road area is a well loved community asset, an ancient bridleway, and a local amenity used by residents and locals. Proposals to permit development on land adjacent to the bridleway should NOT be permitted. This land should NOT sit in the area designated as part of the neighbourhood plan.

<b>Representation ID:</b> REP/215/DM17
--

Representor Details:

<b>Representor ID:</b>	REP/215
<b>Name:</b>	Pippa Hildick-Smith
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>DM17: Former Lewes/Sheffield Park Railway Line</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	Yes
<b>Sound:</b>	Yes
<b>Representation:</b>  <p>If the undeveloped area of the Lewes/Sheffield Park Railway line is to be protected in its status as a bridleway, why is it that Theobalds Road, an ancient bridleway in West Sussex running into East Sussex, is not to be afforded the same protection to allow it to remain a protected bridleway? I applaud that there is determination to promote recreational use of the un-developed areas of the railway line - but the same rights should be afforded to other bridleways.</p>	
<b>What changes do you suggest to make the document legally compliant or sound?</b>	

All bridleways should have this same level of protection. They are ancient recreational routes and should not be designated for housing development.

**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 plan discusses one bridleway in East Sussex which is to be protected whereas other areas with the SAME bridleway status seem to be designated as suitable for additional housing development. Why is this?

In fact Theobalds Road is a more ancient right of way than a disused railway line and so should have even higher priority for protection.

<b>Representation ID:</b> REP/215/DM19
--

Representor Details:

<b>Representor ID:</b>	REP/215
<b>Name:</b>	Pippa Hildick-Smith
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>DM19: Protection of Agricultural Land</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	No
<b>Sound:</b>	No Not Positively Prepared Not Justified Not Consistent with national policy
<b>Representation:</b>	
Theobalds Road is already prone to flooding due the housing development already present. The ancient ditches alongside the road have been gradually lost or actively filled in, and buildings have been put up on land created by filling in ancient ponds. This type of development should not be permitted. Any further development of Theobalds	

Road will add increased pressure of flooding risk to the whole area.	
<b>What changes do you suggest to make the document legally compliant or sound?</b>	
No planning permission for new housing developments on Theobalds Road due to flooding risk.	
<b>Do you consider it necessary to participate at the Examination in Public?</b>	No
<b>Why do you feel it is necessary to participate at the Examination in Public?</b>	

<b>Representation ID:</b> REP/215/DM24
--

Representor Details:

<b>Representor ID:</b>	REP/215
<b>Name:</b>	Pippa Hildick-Smith
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>DM24: Protection of Biodiversity and Geodiversity</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	No
<b>Sound:</b>	No Not Positively Prepared Not Justified Not Consistent with national policy
<b>Representation:</b>	<p>There must be proper consideration given to protection of wildlife corridors.</p> <p>Theobalds Road creates a wildlife corridor between Bedelands nature reserve in West Sussex and the fields to the East of Theobalds Farm and Antye house. Deer, foxes, many species of birds, bats, newts, toads, slow-worms, squirrels and more are all</p>



regularly seen on Theobalds road. It is a small sanctuary. It is an ancient bridleway.

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

Please do not allow development of land in the area around Theobalds Road. It would have a hugely detrimental effect on the wildlife habitat.

**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?**

<b>Representation ID:</b> REP/215/DM30
--

Representor Details:

<b>Representor ID:</b>	REP/215
<b>Name:</b>	Pippa Hildick-Smith
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>DM30: Backland Development</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	Yes
<b>Sound:</b>	Yes
<b>Representation:</b>  <p>Theobalds Road is a residential area crossing the boundary between West Sussex and East Suusex, with housing plots using this ancient bridleway to access Valebridge Road in West Sussex.</p> <p>The nature of Theobalds Road, with single houses on large plots, would be significantly altered if "tandem development" were to be permitted on Theobalds Road. Such development would lead to loss of privacy to existing homes and gardens, and would substantially alter the nature of the road.</p>	

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

Please rule out any tandem development proposals for Theobalds Road

**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?**

<b>Representation ID:</b> REP/215/DM33
--

Representor Details:

<b>Representor ID:</b>	REP/215
<b>Name:</b>	Pippa Hildick-Smith
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>DM33: Heritage Assets</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	Yes
<b>Sound:</b>	Yes
<b>Representation:</b>  re 4.108. Historic environment.  Theobalds Road is an ancient bridleway - in fact it is one of the earliest recorded bridleways in the country. It is used daily by those on horseback. It is used by dog-walkers, joggers, those wanting to walk along a green corridor from West Sussex to East Sussex, and even by some cyclists although there is no real cycle path beyond the end of Theobalds Road.  Theobalds Road absolutely fulfills the criteria of 4.108 which defines a heritage asset as	

a site, place, area or landscape identified as having a degree of significance meriting consideration in planning conditions, because of heritage interest.

There can be no justification for development being permitted which has an impact upon the current nature and use of Theobalds Road.

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

Theobalds Road bridleway should be designated as a historic asset and therefore any proposed development which would have an impact on the current use and nature of Theobalds Road should be dismissed and not considered.

**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 only way to protect our heritage sites is to speak up for their protection.

<b>Representation ID:</b> REP/215/DM35
--

Representor Details:

<b>Representor ID:</b>	REP/215
<b>Name:</b>	Pippa Hildick-Smith
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>DM35: Footpath, Cycle and Bridleway Network</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	No
<b>Sound:</b>	No
	Not Positively Prepared
	Not Justified
	Not Consistent with national policy
<b>Representation:</b>	
<p>Theobalds Road is an ancient bridleway which connects West Sussex to Wivelsfield. It starts at the western end in West Sussex leading off Valebridge Road, and is a bridleway route which has residential housing along part of its length.</p> <p>Any proposals to create housing developments which link onto Theobalds Road would</p>	

have a harmful effect on the safety of users of the bridleway. Those on horseback have priority on a bridleway and this must be protected. Any increase in vehicle traffic on Theobalds Road would have harmful effect on the amenity.

Such proposed development cannot be mitigated as the route is a single track with there being no possibility of widening the route, and therefore vehicle access is significantly limited with no option to "improve" this - indeed any such proposal would be hugely detrimental to the area.

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

The afford full bridleway protection to Theobalds Road

**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?**

It is hugely important that we protect our heritage and speak up to do so.

**Representation ID: REP/215/HPC**Representor Details:

<b>Representor ID:</b>	REP/215
<b>Name:</b>	Pippa Hildick-Smith
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>Housing Policy Context</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	No
<b>Sound:</b>	No Not Positively Prepared Not Justified Not Consistent with national policy
<b>Representation:</b>	<p>East Sussex proposals identify "edge of Burgess Hill (within Wivelsfield Parish)" as suitable for additional housing. Within this area Theobalds Road, an ancient Bridleway is being targeted for additional housing with access onto Theobalds Road proposed.</p> <p>This completely misses the point that Theobalds is an ancient Bridleway, where those</p>



on foot and on horseback have PRIORITY over those on bicycles or in vehicles. Any additional development which proposes to use the single track of Theobalds to gain access to WEST SUSSEX (via Valebridge road) will increase traffic on the bridleway. The exit onto Valebridge road is on the brow of a hill and is already quite a dangerous turning. ANY additional traffic would exacerbate this.

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

Development should not be considered if the proposal includes access via Theobalds onto Valebridge Road.

If surrounding land is used for additional housing then access to main roads should be placed elsewhere.

**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?**

Unless this is explained in person I have no confidence that this view will be listened to

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**Representation ID: REP/215/HSA**Representor Details:

<b>Representor ID:</b>	REP/215
<b>Name:</b>	Pippa Hildick-Smith
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>Wivelsfield Green</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	No
<b>Sound:</b>	No Not Positively Prepared Not Justified Not Effective Not Consistent with national policy
<b>Representation:</b>  You have included NO DIAGRAMS of the Wivelsfield Plan but this area is of EXTREME INTEREST to me as a resident of Theobalds Road. How can I comment on something you have given so few details on??	

My understanding is that Theobalds Road was not previously included in the neighbourhood plan but East Sussex has unilaterally redrawn the boundary lines so that plots adjacent to Theobalds Road are now, I understand, included. How can it be possible for this to be in any way democratic? There are massive arguments showing the area is unsuitable for development on many levels - lack of access as Theobalds is a single lane bridleway being a major one which East Sussex council seems to be choosing to overlook. In addition the bridleway's ancient rights gives those on horseback priority over those in vehicles, so any development which increases traffic on Theobalds would be detrimental to this ancient bridleway which needs preserving. It is a resource used by residents and locals for walking, horseriding, etc and needs to be maintained in its current state and not altered.

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

Theobalds Road should not be included in the neighbourhood plan as a potential site for housing development. It is entirely unsuitable and should be being protected by the council as an ancient and historic bridleway, not touted as a possible site for development on the edge of East Sussex boundary.

**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/215/QE**Representor Details:

<b>Representor ID:</b>	REP/215
<b>Name:</b>	Pippa Hildick-Smith
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>Protecting and enhancing the distinctive quality of the environment</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	No
<b>Sound:</b>	No Not Positively Prepared Not Justified Not Consistent with national policy
<b>Representation:</b>	<p>There are many areas with diverse wildlife. Theobalds Road ancient bridleway is a route used not just by residents but also by wildlife - foxes, deer and smaller animals. The ancient trees lining the road are home for bats and owls.</p>

'Manor Nursery, a plot untouched for over 30 years was recently completely cleared. Trees felled, stumps ground out, the whole area of land scraped clear by diggers. About three weeks after the clearance the developer instructed an "environmental survey" - well after there would have been ANY remaining evidence of the varied and diverse wildlife present on the plot for years previously.

'I can only imagine that this survey showing "no evidence of wildlife" will be submitted as part of a proposal to develop the land on Manor Nursery for housing development. Not only is the access to this land completely unsuitable for heavy machinery and lorries, but development of a plot in an area of ancient heritage, which was previously home to bats and other wildlife, should not even be considered.

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

Identify areas of historic interest - listen to the community regarding this! Such areas need to be protected from housing development, and instead should be promoted as a recreational facility.

**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?**

In order for my point of view to be heard and not ignored

<b>Representation ID:</b> REP/215/DTC
---------------------------------------

Representor Details:

<b>Representor ID:</b>	REP/215
<b>Name:</b>	Pippa Hildick-Smith
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>Duty to Co-operate</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	Yes
<b>Sound:</b>	No Not Justified Not Consistent with national policy
<b>Representation:</b>	
<p>1.15 states that the only cross-border issues relate to Travellers/. This is not correct.</p> <p>Theobalds Road is a Bridleway which starts in West Sussex (from Valebridge Road) and continues eastward into East Sussex. Any decision made regarding this bridleway is therefore obviously a cross-boundary issue. East Sussex cannot and should not be allowed to make decisions for the eastern end of this bridleway without consulting West</p>	

Sussex authorities. Decisions on Theobalds in the neighbourhood plan appear to be being pushed forward by East Sussex without due regard for this.

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

Firstly recognition that Theobalds should be considered a cross-boundary issue.

Secondly that the nature of the ancient Bridleway should be protected, and this means that East Sussex councils should find alternative areas for development.

**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?**

It seems to me that East Sussex, having made a large central area a national park, are now pressing for development on the edges of their area with no regard for the protection these other areas deserve.

I have no confidence that this view will be listened to unless it is lobbied for.

**Representation ID: REP/215/HRA**Representor Details:

<b>Representor ID:</b>	REP/215
<b>Name:</b>	Pippa Hildick-Smith
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>Habitats Regulation Assessment</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	No
<b>Sound:</b>	No Not Positively Prepared Not Justified Not Consistent with national policy
<b>Representation:</b>	
Land at Manor Nursery (adjoining the bridleway of Theobalds Road) was habitat for bats, deer, owls and had ancient trees on it. A developer completely cleared the site a couple of months ago and AFTERWARDS got an ecological survey done - which clearly is not going to show any evidence of all the wildlife which used to reside on this land. So	



much for any "habitat" assessment!

It is impossible to explain just how much devastation this action caused. The site has NEVER had residential housing on it and whilst the developer may make an application for this any heavy plant machinery would find access to the site extremely difficult if not impossible.

This site adjacent to our ancient bridleway is not being protected by the council currently.

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

Protection of land adjacent to the ancient bridleway of Theobalds Road is urgently needed.

**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 don't feel that East Sussex have the slightest interest in areas on their periphery (such as Theobalds Road) apart from proposing that such land is suitable for housing without even considering the impact and consequences of their suggestions.

**Representation ID: REP/216/GT01**Representor Details:

<b>Representor ID:</b>	REP/216
<b>Name:</b>	Paul and Jane Hildyard
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>
<b>Organisation:</b>

Contact Details:

Email Address:	
Address:	

Representation:

<b>Policy/Section:</b>	<b>GT01 - Land south of The Plough</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	
<b>Sound:</b>	
<b>Representation:</b>	
<p>As long standing residents of Plumpton Green, we are writing to object to the proposal of the Gypsy and Traveller site GT01.</p> <p>Plumpton recognises the need to grow and provide additional accommodation, and we have worked hard to create our Neighbourhood Plan. As you are aware, this is to have small pockets of development around the centre of the village. This is to maintain the village feel and provide easy and safe access to the amenities – shop, school, station etc. Sites that were to the north and south of the village were rejected. It would appear that this is an insult to the traveller community that they would be offered a site rejected for housing for all the reasons stated.</p>	

Plumpton has few opportunities for businesses to develop and offer employment for locals. However there is a successful site at the Old Brickworks, which is adjacent to the proposed traveller site. These businesses have made it clear that they will relocate to more suitable premises if the proposal is adopted. This would be a huge loss to Plumpton.

The proposed site is a greenfield site and part of the agricultural legacy and tradition of the village and forms part of the green corridor into the village enjoyed by the residents and vital to the wildlife.

After attending the PPC meeting last month it was obvious to us that LDC themselves do not consider this site to be suitable, but in the absence of alternatives wish to go ahead. This would be a detrimental to Plumpton and an insult to the traveller community who deserve better.

**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

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**From:** Jane Hildyard [REDACTED]  
**Sent:** 05 November 2018 07:31  
**To:** ldf  
**Subject:** Proposed Gypsy and Traveller site in Plumpton

**Categories:** GT01, Vanessa to deal with

Dear Sir

As long standing residents of Plumpton Green, we are writing to object to the proposal of the Gypsy and Traveller site GT01.

Plumpton recognises the need to grow and provide additional accommodation, and we have worked hard to create our Neighbourhood Plan. As you are aware, this is to have small pockets of development around the centre of the village. This is to maintain the village feel and provide easy and safe access to the amenities – shop, school, station etc. Sites that were to the north and south of the village were rejected. It would appear that this is an insult to the traveller community that they would be offered a site rejected for housing for all the reasons stated.

Plumpton has few opportunities for businesses to develop and offer employment for locals. However there is a successful site at the Old Brickworks, which is adjacent to the proposed traveller site. These businesses have made it clear that they will relocate to more suitable premises if the proposal is adopted. This would be a huge loss to Plumpton.

The proposed site is a greenfield site and part of the agricultural legacy and tradition of the village and forms part of the green corridor into the village enjoyed by the residents and vital to the wildlife.

After attending the PPC meeting last month it was obvious to us that LDC themselves do not consider this site to be suitable, but in the absence of alternatives wish to go ahead. This would be a detrimental to Plumpton and an insult to the traveller community who deserve better.

Yours faithfully

Paul and Jane Hildyard

Sent from [Mail](#) for Windows 10

<b>Representation ID:</b> REP/217/E1
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Representor Details:

<b>Representor ID:</b>	REP/217
<b>Name:</b>	Martin Hill
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>E1 - Land at East Quay, Newhaven Port</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	Yes
<b>Sound:</b>	Yes
<b>Representation:</b>  If you continue to agree to companies that put building applications on the land of the Tide Mill site and further east towards Seaford will destroy the area,the tranquillity , and The Seaford tourist industry.  It will be another area spoilt forever !	

<b>What changes do you suggest to make the document legally compliant or sound?</b>
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<b>Do you consider it necessary to participate at the Examination in Public?</b>	Yes
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<b>Why do you feel it is necessary to participate at the Examination in Public?</b>
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Because you don't appear to be listening to the public . Or people of the town of Seaford !!
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**Representation ID: REP/218/GT01**Representor Details:

<b>Representor ID:</b>	REP/218
<b>Name:</b>	Coral Hinbest
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>GT01 - Land south of The Plough</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	
<b>Sound:</b>	
<b>Representation:</b>	<p>We are very concerned that you are considering a traveller site at the edge of our rural village in the South Downs National Park.</p> <p>* Plumpton Lane/Station Road (PL/SR) has particularly dangerous junction at both ends, i.e. The Plough and Half Moon. I have witnessed accidents and near accidents on multiple occasions. The council are aware of this but have done little to improve both junctions.</p>

\* PL/SR has multiple parked cars all the way through and outside of the village, making it particularly difficult to navigate in and out of the village, including the bend near The Old Brick Works, the hump of the hill outside the Village Shop and the narrow road by the main entrance to Plumpton Race Course, where I was once hit by a speeding car not noticing the narrow warning sign. Again, these hazards are known by the Local Council, but nothing has been done to improve the road, I believe lack of funds to be the reason.

\* We regularly have horse boxes, horses, tractors, buses, school buses, learner commercial vehicles based at Plumpton Race Course, cycling groups with more than 10 cyclists a time, sponsored cycle events (hundreds of cyclists), hikers and kids/scouts doing activities such as Duke of Edinburgh, not to mention hundreds of vehicles arriving/leaving Plumpton Race Course, throughout their many race/fun days. There are no paths outside of the village, making pedestrian access difficult for the people/groups who already use the lane.

\* PL/SR cannot cope with any more vehicles, especially towed caravans and commercial vehicles that come with a traveller community.

\* When we lived in Yorkshire, there was a traveller site a few miles away [REDACTED]

[REDACTED] with good road access for their commercial vehicles.

\* The proposed site was not allocated in the Neighbourhood Plan and you will be fully aware that a traveller site is very contentious and the locals would be against such a proposal

\* How the business at the Old Brick Works will survive having the proposed travelling site next to it, is questionable and they may feel forced to relocate which in turn could mean job losses for local people

\* You are considering building this on a green field site, which would have a huge impact on a rural village and would permanently change the character of the village.

\* This will impact on the village school [REDACTED]

[REDACTED] Small village schools did not have the capacity to adapt to these extra challenges.

I have many elderly neighbours who are distraught at the thought of this happening but are unable to voice their opinions and we do have quite a large number of elderly people in the village. I found it impossible to find how to comment on your website and understand that objections will be received up to midnight on 5th November, so please include my email with the objections.

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



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

## Thea Davis

---

**From:** coral hinbest <[REDACTED]>  
**Sent:** 05 November 2018 18:50  
**To:** ldf  
**Subject:** Proposed Gypsy and Traveller site - Policy GT01 - Plumpton

**Categories:** GT01, Vanessa to deal with

We are very concerned that you are considering a traveller site at the edge of our rural village in the South Downs National Park.

1. Plumpton Lane/Station Road (PL/SR) has particularly dangerous junction at both ends, i.e. The Plough and Half Moon. I have witnessed accidents and near accidents on multiple occasions. The council are aware of this but have done little to improve both junctions.
2. PL/SR has multiple parked cars all the way through and outside of the village, making it particularly difficult to navigate in and out of the village, including the bend near The Old Brick Works, the hump of the hill outside the Village Shop and the narrow road by the main entrance to Plumpton Race Course, where I was once hit by a speeding car not noticing the narrow warning sign. Again, these hazards are known by the Local Council, but nothing has been done to improve the road, I believe lack of funds to be the reason.
3. We regularly have horse boxes, horses, tractors, buses, school buses, learner commercial vehicles based at Plumpton Race Course, cycling groups with more than 10 cyclists a time, sponsored cycle events (hundreds of cyclists), hikers and kids/scouts doing activities such as Duke of Edinburgh, not to mention hundreds of vehicles arriving/leaving Plumpton Race Course, throughout their many race/fun days. There are no paths outside of the village, making pedestrian access difficult for the people/groups who already use the lane.
4. PL/SR cannot cope with any more vehicles, especially towed caravans and commercial vehicles that come with a traveller community.
5. When we lived in Yorkshire, there was a traveller site a few miles away [REDACTED] with good road access for their commercial vehicles.
6. The proposed site was not allocated in the Neighbourhood Plan and you will be fully aware that a traveller site is very contentious and the locals would be against such a proposal
7. How the business at the Old Brick Works will survive having the proposed travelling site next to it, is questionable and they may feel forced to relocate which in turn could mean job losses for local people
8. You are considering building this on a green field site, which would have a huge impact on a rural village and would permanently change the character of the village.
9. This will impact on the village school [REDACTED] Small village schools did not have the capacity to adapt to these extra challenges.

I have many elderly neighbours who are distraught at the thought of this happening but are unable to voice their opinions and we do have quite a large number of elderly people in the village. I found it impossible to find how to comment on your website and understand that objections will be received up to midnight on 5<sup>th</sup> November, so please include my email with the objections.

Coral and Steve Hinbest  
[REDACTED]

Coral and Steve.

Sent from [Mail](#) for Windows 10

<b>Representation ID:</b> REP/219/E1
--------------------------------------

Representor Details:

<b>Representor ID:</b>	REP/219
<b>Name:</b>	David Hoare
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	E1 - Land at East Quay, Newhaven Port
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	Yes
<b>Sound:</b>	No Not Positively Prepared
<b>Representation:</b>  Additional land has been included in the development envelope without proper consultation. As the area is vegetated shingle wider consultation, particularly with statutory bodies such as Natural England and conservation bodies, such as Wildlife Trusts, should be undertaken prior to inclusion in the development envelope.	
<b>What changes do you suggest to make the document legally compliant or sound?</b>	

Provide the required consultation period. Ensure there is an Environmental Impact Assessment. Undertake an Phase Two habitat survey of the area and in adjoining areas to ensure habitat fragmentation does not threaten the viability of remaining species due to reduced size of remaining populations.

**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?**

<b>Representation ID: REP/220/HPC</b>
---------------------------------------

Representor Details:

<b>Representor ID:</b>	REP/220
<b>Name:</b>	KEITH HOARE
<b>Organisation:</b>	<b>High Weald Lewes Havens CCG</b>
<b>Consultation Body:</b>	Specific
<b>Stakeholder Type:</b>	Infrastructure/service providers

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	keith.hoare@nhs.net
<b>Address:</b>	36-38 FRIARS WALK LEWES BN7 2PB

Representation:

<b>Policy/Section:</b>	<b>Housing Policy Context</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	
<b>Sound:</b>	
<b>Representation:</b>	<p>In response to Lewes District Council's consultation on the Local Plan I am e-mailing on behalf of High Weald Lewes Havens CCG and GP practices covered by the plan.</p> <p>In summary we note the following key elements of the plan which are of relevance for local healthcare services:</p> <ul style="list-style-type: none"> <li>* Lewes District - 5494 houses planned / required               <ul style="list-style-type: none"> <li>o 2216 of these are already built or committed</li> </ul> </li> </ul>

o 1073 are identified for strategic sites

\* Two strategic sites in Newhaven for 324 houses

\* No strategic sites in Peacehaven

o Small number planned via other routes

o 1660 houses are still required and plans for these will be identified in local neighbourhood plans

\* Newhaven allocation of 425 houses

\* Peacehaven and Telscombe allocation of 255

\* Newhaven – total of 749 houses planned or required (on top of those already built or committed)

\* Peacehaven – total of 255 required (on top of those already built or committed e.g. Lower Hodden Farm)

The plan would benefit from a reference to the need for required improvement in access to health care infrastructure in response to the expected increase in the local population. General medical (GP) services in the area are already under pressure and any additional demands will have an adverse impact. The CCG has already engaged with the local authority's representatives on the proposals for the Newhaven Town Centre regeneration, which include plans for a new health hub, and would welcome building on these discussions to ensure the health needs of new and existing residents are met across the area covered by the Local Plan.

The two GP practices in Peacehaven have specific concerns over capacity and infrastructure. They suggest that while 255 homes on top of what is committed is not high compared to Newhaven, the current access to the town, only from the East and the West, means the current traffic congestion can only increase, something the local plan should reflect. Equally, their view is that public transport in Peacehaven is poor compared to other areas, with no trains, only one bus routed north, no buses direct from central Peacehaven to Newhaven or to Lewes and no direct buses from Telscombe to Peacehaven. They advise that the A259 is gridlocked in the morning Eastwards, and in the evening Westwards, with a specific bottleneck at Rottingdean. As such the plan would benefit from articulating clearly how local transport issues are to be addressed, as these not only impact on residents but also on the recruitment to key health care roles by healthcare services including GP practices within the town.

With regard to specific patient need, the lack of nursing and care home provision for local residents places additional pressures on GPs and community nurses. As such, the plan presents a useful opportunity to encourage increased nursing and care home development in Newhaven and Peacehaven.

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

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

**From:** HOARE, Keith (NHS HIGH WEALD LEWES HAVENS CCG) <keith.hoare@nhs.net>  
**Sent:** 02 November 2018 16:41  
**To:** ldf  
**Subject:** Lewes DC Local Plan

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

Hello

In response to Lewes District Council's consultation on the Local Plan I am e-mailing on behalf of High Weald Lewes Havens CCG and GP practices covered by the plan.

In summary we note the following key elements of the plan which are of relevance for local healthcare services:

- Lewes District - 5494 houses planned / required
  - o 2216 of these are already built or committed
  - o 1073 are identified for strategic sites
    - Two strategic sites in Newhaven for 324 houses
    - No strategic sites in Peacehaven
  - o Small number planned via other routes
  - o 1660 houses are still required and plans for these will be identified in local neighbourhood plans
    - Newhaven allocation of 425 houses
    - Peacehaven and Telscombe allocation of 255
- Newhaven – total of 749 houses planned or required (on top of those already built or committed)
- Peacehaven – total of 255 required (on top of those already built or committed e.g. Lower Hodden Farm)

The plan would benefit from a reference to the need for required improvement in access to health care infrastructure in response to the expected increase in the local population. General medical (GP) services in the area are already under pressure and any additional demands will have an adverse impact. The CCG has already engaged with the local authority's representatives on the proposals for the Newhaven Town Centre regeneration, which include plans for a new health hub, and would welcome building on these discussions to ensure the health needs of new and existing residents are met across the area covered by the Local Plan.

The two GP practices in Peacehaven have specific concerns over capacity and infrastructure. They suggest that while 255 homes on top of what is committed is not high compared to Newhaven, the current access to the town, only from the East and the West, means the current traffic congestion can only increase, something the local plan should reflect. Equally, their view is that public transport in Peacehaven is poor compared to other areas, with no trains, only one bus routed north, no buses direct from central Peacehaven to Newhaven or to Lewes and no direct buses from Telscombe to Peacehaven. They advise that the A259 is gridlocked in the morning Eastwards, and in the evening Westwards, with a specific bottleneck at Rottingdean. As such the plan would benefit from articulating clearly how local transport issues are to be addressed, as these not only impact on residents but also on the recruitment to key health care roles by healthcare services including GP practices within the town.

With regard to specific patient need, the lack of nursing and care home provision for local residents places additional pressures on GPs and community nurses. As such, the plan presents a useful opportunity to encourage increased nursing and care home development in Newhaven and Peacehaven.

Thank you.

**Keith Hoare**  
**Lead Manager**



**Community Care & Patient Transport Service (Sussex)**  
**Alliance South Directorate**  
**Brighton and Hove & High Weald Lewes Havens Clinical Commissioning Groups**  
**Part of the Central Sussex and East Surrey Commissioning Alliance**

T: 01273 403610 | M: 07584 642177 | [keith.hoare@nhs.net](mailto:keith.hoare@nhs.net)  
36-38 Friars Walk, Lewes, BN7 2PB  
<http://www.highwealdleweshavensccg.nhs.uk/>

Freedom of Information Act - please re-direct your request to [hwlhccg.foi@nhs.net](mailto:hwlhccg.foi@nhs.net)



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**Representation ID: REP/221/E1**Representor Details:

<b>Representor ID:</b>	REP/221
<b>Name:</b>	Kim Hogan
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>
<b>Organisation:</b>

Contact Details:

Email Address:	
Address:	

Representation:

<b>Policy/Section:</b>	<b>E1 - Land at East Quay, Newhaven Port</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	
<b>Sound:</b>	
<b>Representation:</b>	
<p>I would like to email regarding E1 plans. I do not agree that they should go ahead for many reasons such as:</p> <ul style="list-style-type: none"><li>-Local plans by law must 'contribute to sustainable development' which this doesn't. - we may lose biodiversity (including internationally rare vegetated shingle)</li><li>- I have worries about traffic and air quality</li><li>- with all the housing already allocated for Newhaven, it would be too much development</li><li>- there is a need to preserve this designated Local Wildlife Site for nature</li><li>- the policy does not reflect the 'clean green marine' vision of the enterprise zone or</li></ul>	

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'renewable energy cluster' of the port masterplan.

**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?**

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## Hodgson, Lilly

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**From:** kim wenham [REDACTED]  
**Sent:** 04 November 2018 20:35  
**To:** ldf  
**Subject:** E1 plans

**Categories:** Vanessa to deal with

Hi there,

I would like to email regarding E1 plans. I do not agree that they should go ahead for many reasons such as:

- Local plans by law must 'contribute to sustainable development' which this doesn't. - we may lose biodiversity (including internationally rare vegetated shingle)
- I have worries about traffic and air quality
- with all the housing already allocated for Newhaven, it would be too much development
- there is a need to preserve this designated Local Wildlife Site for nature
- the policy does not reflect the 'clean green marine' vision of the enterprise zone or 'renewable energy cluster' of the port masterplan.

Many thanks  
Kim hogan

Sent from my iPhone

<b>Representation ID:</b> REP/222/E1
--------------------------------------

Representor Details:

<b>Representor ID:</b>	REP/222
<b>Name:</b>	Steve holder
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>E1 - Land at East Quay, Newhaven Port</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	Yes
<b>Sound:</b>	No Not Positively Prepared
<b>Representation:</b>  On behalf of myself , family and all friends with whom we have discussed the issue, without exception. The planning "E1" East side/ Tidemills ,Newhaven. The proposal to extend further to the East of the already overdeveloped and unnecessarily destroyed area of an invaluable leisure and wildlife area of the East side/ Tidemills green area. This whole area is teeming with both resident and migratory bird species as well as protected nesting estuary birds, along with stunning wild plants and associated insect life. It is the	

last remaining area of its kind within "practicle" reach of the Newhaven, Denton , Bishopstone and Seaford area. It is widely and regularly used by the whole range of leisure and research activities and greatly admired by all visitors as an outstanding area of beautiful countryside , beach and wildlife haven. This can be supported by simply observing the airie view, whereby you can see the obvious signs of a much respectably used asset to the whole area. This area supports the only link of green belt from the shoreline to the South downs and provides a much needed break between concrete sprawl and busy road systems.

'It is "imperative" to halt this waste of such a valuable and very rare asset. This piece of land in its current form is a far greater asset to the local surrounds and economy in terms of encouraging future success and prosperity, instead of the alternative loss of space, restrictive fencing and concrete panel disgrace. As already started to spread as "cancer,s" do, with the eventual demise of the entire area, economically, visually and healthily.

Please save this area for our future , and that of future generations.

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

Re-designate the area to a high level of protection and use this area productively to promote our fantastic but distressed wildlife and fauna.

**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 understand how such a "hideous" plan or proposal can be justified, and on what research and support .

**Representation ID: REP/223/E1**Representor Details:

<b>Representor ID:</b>	REP/223
<b>Name:</b>	Karen Holmes
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>E1 - Land at East Quay, Newhaven Port</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	
<b>Sound:</b>	
<b>Representation:</b>	
<p>I wish to object to the new policy E1 which allocates an area of Tide Mills beach for future development.</p> <p>The grounds for my objections are as follows :</p> <p>Local plans must contribute to sustainable development which is not the case.</p> <p>The need to preserve the designated local wildlife site.</p> <p>Despite residents concerns about the development earlier this year, it was extremely disappointing that approval was granted for the Brett application. It is hoped that our concerns about Policy E1 are listened to this time and that permission is refused.</p>	

The whole area is becoming over developed for industrial use which in turn is destroying an area of beauty and biodiversity.

The policy also does not reflect the clean green marine vision of the enterprise zone.

We regularly walk around the Tide Mills area and it would be an absolute tragedy for such an amazing area to be decimated by future development.

I do hope that our concerns are taken seriously and common sense prevails this 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:** Karen Holmes [REDACTED]  
**Sent:** 03 November 2018 11:29  
**To:** ldf  
**Subject:** Policy E1  
  
**Categories:** LPP2 comment to code - stakeholder details have been added

Dear Sirs

I wish to object to the new policy E1 which allocates an area of Tide Mills beach for future development.

The grounds for my objections are as follows :

Local plans must contribute to sustainable development which is not the case.

The need to preserve the designated local wildlife site.

Despite residents concerns about the development earlier this year, it was extremely disappointing that approval was granted for the Brett application. It is hoped that our concerns about Policy E1 are listened to this time and that permission is refused.

The whole area is becoming over developed for industrial use which in turn is destroying an area of beauty and biodiversity.

The policy also does not reflect the clean green marine vision of the enterprise zone.

We regularly walk around the Tide Mills area and it would be an absolute tragedy for such an amazing area to be decimated by future development.

I do hope that our concerns are taken seriously and common sense prevails this time.

Regards

Karen Holmes  
[REDACTED]

**Representation ID: REP/224/HSA**Representor Details:

<b>Representor ID:</b>	REP/224
<b>Name:</b>	Peter Home
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	Ringmer and Broyle Side
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	No
<b>Sound:</b>	No Not Effective
<b>Representation:</b>  I am unsure of Legal Compliance so have clicked the No box as the document does not allow a N/A option as It should do. I am not a lawyer simply a resident.  1 - Covenants. I am unsure of the impact of the covenants on the land on Anchor Field. The Covenants shown on the Land Registry for title ESX235414 that has the address	

Ringmer Football Field, Ringmer, Lewes and whose land shows as covering the majority of the proposed site has a number of restrictive covenants. Has the plan taken account of such covenants and if so in which manner. These should be included in the document for legal clarity.

2 - Density. The density is much higher than the local Ringmer housing. The plan does not detail how this number is achieved (given the 2003 figure was as per the document 60) and residents will be concerned if the plans use accommodation that is not fitting with the current housing styles (e.g. maximum 2 storey, houses with gardens and not apartments) or do not provide sufficient parking facilities. The promotion of walking, cycling and Bus use will not preclude the ownership of cars given that:

- Commuters cannot rely upon buses to get to areas of employment given the time taken for such journeys E.g. Tunbridge Wells is 30 mins by car 1 hr 45 mins by Bus (to arrive by 8:30 a.m.).

- Cycling is usually only achievable by younger people, without accompanying young children.

There is limited parking available in the centre of Ringmer already. Cars are parked in front of houses in the area and a number of spaces set for access to the shops are blocked out for long periods by people who cannot park elsewhere. Any failure to provide adequate car parking in any new development would exacerbate the current issues as would the removal of the garages shown on the plan.

3 - Playing Fields. The map shows that the playing fields are included in the plans, without details as to any new facilities. The loss of any play area in the middle of the village would reduce the quality of current and future residents. The details should be included in this document.

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

Explain how the increased density is met without affecting current Ringmer house styles.

State what the housing styles are expected to be

State what off road car parking for new and current housing will be

Explain in detail the continuing provision of playing areas.

Also explain why the proposal provides more housing than that demanded. The section explaining this is not well written and is confusing.

Explain why the Local Highway authority has decided that the increased number of properties can be catered for when previously they allowed for a lower maximum number.

#### **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 am unsure as to whether I need or wish to be involved as have not explained what this

process is. Examination in public? What is this?

As I cannot search the whole document electronically to find out the meaning I cannot answer this question.

<b>Representation ID: REP/225/HPC</b>
---------------------------------------

Representor Details:

<b>Representor ID:</b>	REP/225
<b>Name:</b>	Bellway Homes Ltd
<b>Organisation:</b>	<b>Bellway Homes Ltd</b>
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Developer/Landowner

Agent Details:

<b>Name:</b>	Samantha Gibbs
<b>Organisation:</b>	Savills

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>Housing Policy Context</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	
<b>Sound:</b>	
<b>Representation:</b>	
(See attached PDF)	
<b>What changes do you suggest to make the document legally compliant or sound?</b>	
<b>Do you consider it necessary to participate at the Examination in Public?</b>	Yes
<b>Why do you feel it is necessary to participate at the Examination in Public?</b>	
YES – WE CONSIDER IT MAY BE NECESSARY TO PARTICIPATE AT THE	

EXAMINATION IN ORDER TO ENSURE THAT DUE REGARD IS GIVEN TO  
ALLOCATION OF THE SITE.

5 November 2018



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

By Email: [LDF@lewes.gov.uk](mailto:LDF@lewes.gov.uk)

Kieran Wheeler  
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33 Margaret Street W1G 0JD  
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[savills.com](http://savills.com)

Dear Sir / Madam,

**REPRESENTATIONS TO THE PRE-SUBMISSION LEWES LOCAL PLAN PART 2: SITE ALLOCATIONS AND DEVELOPMENT MANAGEMENT POLICIES DPD (REGULATION 19)  
FORMER NEWLANDS SCHOOL, EASTBOURNE ROAD, SEAFORD**

On behalf of our client, Bellway Homes Limited, please accept this letter as a formal representation to the current consultation on the Local Plan Part 2: Site Allocations and Development Management Policies DPD, Regulation 19 Pre Submission consultation which closes on 5 November 2018.

This representation is accompanied by the requisite response form.

**Background**

This representation is prepared in respect of the redevelopment proposals for the Former Newlands School, Eastbourne Road, Seaford. This is a brownfield site located within an existing settlement. The site is within close proximity to the town centre, including various local shops and services, a supermarket and a train station. This site is considered sustainable and accessible.

Outline Planning Permission was granted at the site on 5 June 2018 (reference LW/16/0800) for up to 183 new homes. Bellway has acquired the site and is currently in the process of preparing a Reserved Matters submission for delivery of 183 new homes. This will include a considerable area of green space at the front of the site which will be publically accessible. It will also include new pedestrian and footpath links creating greater permeability in the area.

The site has been reviewed in the Council's Strategic Housing Land Availability Assessment (SHLAA) 2018 as being suitable, available, achievable and deliverable for 183 homes (site reference 28SF). Bellway fully agree with these conclusions and intends to deliver the scheme quickly and to a high standard. This will enable the scheme to contribute to early delivery of much needed new homes over the Plan Period which is particularly relevant given that Appendix 3 of the SHLAA clearly identifies that the Council, at April 2018, has no 5 year housing land supply (4.92 years).

**Deliverability**

The outline planning permission has demonstrated that there are no major constraints that would otherwise prevent a development from coming forward. Technical evidence, including tree and ecology surveys, a heritage assessment and transport assessment, have demonstrated that the site can be developed without any unacceptable harm being caused to features of interest or the local area.

The below timetable also demonstrates that the scheme can be delivered within the early stages of the LPP2 thus helping at an early stage to meet housing needs in this area:

- Pre-reserved matters tasks – December 2018;
- Submission of reserved matters – December 2018 / January 2019;
- Pre-commencement conditions and obligations – Summer 2019;
- Commencement on site – Summer 2019; and
- Delivery of housing – Spring 2020.

This is an important material planning consideration particularly when considering the context of the emerging Plan.

### **Policy Position**

Owing to the Pre Submission stage of the Local Plan Part 2 (herein referred to as “LPP2”) it is necessary for these representations to address whether the Plan can be considered sound at examination. The test of soundness are set out in the National Planning Policy Framework (NPPF) both the original March 2012 version and updated July 2018 version (para 35). These are:

*“a) **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;*

*b) **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;*

*c) **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*

*d) **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework.”*

The emerging LPP2 suggests that it will be submitted for examination in January 2019. It is not clear whether this will be before or after the 24 January 2019 which is the cut-off date for transitional arrangements set out in the NPPF 2018. In either event the NPPF, either 2012 or 2018 version, remains relevant particularly in light of part d) above. Therefore relevant sections applicable to the Newlands School site will be referred to in this representation.

### **Observations on the Pre-Submission Local Plan Part 2**

#### **Section 2**

Section 2 of the LPP2 relates specifically to residential site allocations and identifies that Spatial Policy 1 of the Core Strategy required 6,900 new dwellings over the Period 2010-2030 (including in the South Downs National Park). Core Strategy Spatial Policy 2 specifically refers to the “planned growth” in settlements and for Seaford, this is stated as “a minimum of 185 net additional dwellings”. Beyond this, the policy requires “about 200 net additional units in locations to be determined”.

The policy further states that “For the housing growth identified in sections (2 and 3) above, individual sites to meet the planned levels of housing provision will be identified in either the District Council’s Site Allocations and Development Management Policies DPD, or the National Park Authority’s Local Plan. Neighbourhood Plans could also be used to identify the individual sites.” (*own emphasis*)

The Core Strategy, following the NPPF, is clear that these housing targets are to be regarded as a minimum.



Table 2 of LPP2 states that as a result of strategic allocations, windfall sites and commitments, a residual requirement of 1,660 new dwellings arises, reducing to only 432 dwellings when all adopted and emerging Neighbourhood Plans are taken into account.

The Core Strategy is clear that sites to meet the planned level of housing will be identified within LPP2. However, LPP2 proposes to allocate sites only in locations where a Neighbourhood Plan is not progressing. Whilst the Core Strategy does not preclude this, it is also clear that the original requirement was for LPP2 to play a vital role in the allocation of sites to meet the Council's housing needs.

In principle, this approach broadly follows national guidance on Neighbourhood Planning. However, there is no guarantee that emerging Neighbourhood Plans will come forward quickly, or that they will allocate sufficient sites to meet the minimum requirement of the Core Strategy, particularly in the short term. There may well be unexpected local circumstances that cause delays or prevent a greater supply of homes from coming forward. Therefore, LDC should be looking to support Neighbourhood Plans but also seek to allocate a reasonable proportion of alternative housing sites where possible and justified. This would also provide an important fall-back position in the event that Neighbourhood Plans do not come forward within the next 2 to 3 years.

With regard to the former Newlands School site, a Neighbourhood Plan is being progressed for Seaford, but is not yet made. At paragraphs 2.41 and 2.42, LDC make it clear that they will not be allocating sites in this location due to the emerging Neighbourhood Plan. This is despite the Neighbourhood Plan carrying limited weight, as per the NPPF, and despite there being no certainty that the Emerging Neighbourhood Plan will ensure delivery of at least the Core Strategy requirement.

The former Newlands School site is recognised within the emerging Neighbourhood Plan as is the outline planning permission. However, the site is also not allocated.

In order for LPP2 to be positively prepared and compliant with national policy, it is requested that LDC allocates the former Newlands School site for 183 new homes, reflecting the outline planning permission. LPP2 recognises sites with planning permission as forming commitments, contributing towards housing delivery in specified locations. The Newlands School site, by virtue of the outline planning permission should also be regarded as a commitment for the town of Seaford. Both the proposed allocations in section 2, and associated policies and Proposals Map should also be updated to reflect this accordingly.

The allocation of the site will provide certainty over the delivery of these much needed new homes. Bellway's acquisition of the site provides further certainty that the 183 new homes will be constructed and delivered quickly, contributing to housing provision during early stages of the Plan. This cannot be said for any Emerging Neighbourhood Plan or their proposed allocations.

There is also nothing in the NPPF or National Planning Practice Guidance (PPG) that prevents sites from being allocated by a Local Authority in a Neighbourhood Plan Area.

LDC need to ensure that LPP2 includes sufficient flexibility to adapt to change and to ensure that any delay in the production of Neighbourhood Plans does not prevent housing needs from being met in any given area, particularly in the short term. We consider that paragraph 2.6 is therefore incorrect in stating that LPP2 is only required to identify housing growth "in the remaining settlements" where Neighbourhood Plans are not being progressed; this also does not reflect Strategic Policy 2 of the Core Strategy as outlined above.

Given that housing requirements are a minimum it is also surprising that LDC has not sought to allocate this previously developed site inside of a sustainable settlement. Rather, LDC propose that the deliverable number of new homes at this site is taken off the 200 unit requirement "to be determined" in alternative locations. The site is however a known site, with a reliable source of new homes coming forward. Surely, to ensure the Plan is flexible going forward, this 200 unit windfall allowance should be retained and Newlands School site should be allocated as a secure source of delivery. Such an approach would be positive by ensuring that LDC presents a strategy which as a minimum seeks to address the housing needs of the area, is justified in terms of evidence to support the allocation of the site, and effective in delivering new homes during the early stages of the Plan.

An amendment to LPP2 in this manner, and recognition of the benefits this site provides to the delivery of much needed homes in the District, would provide a positive step towards being found sound at examination through advancing the NPPF stance of boosting significantly the supply of housing, and particularly so in locations that are or can be made sustainable.

As part of this, we would also request that the site is appropriately identified on the proposals map for Seaford as a residential allocation.

#### Definitions

LPP2 includes definitions of affordable housing and Previously Developed Land. These should comply with those definitions provided in the NPPF and PPG.

#### Conclusions

The site benefits from planning permission for a development of up to 183 homes. The SHLAA 2018 has identified the site as being deliverable, available, suitable and achievable. Yet, it is not allocated.

Whilst LDC is clearly trying to support local decisions and Plan making, there is nothing in the NPPF or PPG that prevent additional sites from being allocated in an area where a Neighbourhood Plan is being progressed but is not yet made. In this case, both the LPP2 and Seaford draft Neighbourhood Plan identify the site's ability to deliver 183 homes following the outline planning permission. Following LDC's approach in LPP2, the site should therefore be regarded as a commitment for Seaford.

Furthermore, to provide certainty in the delivery of these much needed new homes, LDC should allocate the site in LPP2. This is a brownfield site within an existing settlement. It is accessible with local public transport facilities, including the train station, a short distance away. The allocation of a site in such a location is supported by the NPPF.

We would ask that the above representations are taken into account as part of the Plan making process, along with the technical detail forming part of the approved outline planning application at this site (LW/16/0800).

I trust the forgoing is in order. Please contact me should you require any further information in relation to the site and representations which can assist in supporting a positive allocation of the site for 183 homes.

Yours Faithfully,



Kieran Wheeler  
**Director**

CC: Julian Goodban, Bellway Homes Ltd.

<b>Representation ID: REP/226/GT01</b>
--

Representor Details:

<b>Representor ID:</b>	REP/226
<b>Name:</b>	Tim Honess
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>GT01 - Land south of The Plough</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	
<b>Sound:</b>	
<b>Representation:</b>	<p>This site (0.69ha), as shown on figure 11 below, is allocated for the development of 5 net additional permanent Gypsy and Traveller pitches, subject to compliance with all appropriate development plan policies and the following criteria:</p> <ul style="list-style-type: none"> <li>* Access, including provision for pedestrians and cyclists, to be provided from Station Road;</li> <li>* Development should be levelled and laid out to provide sufficient room to allow for vehicles to turn around within the site;</li> <li>* Development should use the natural topography in screening the site from wider, sensitive landscape views and designed to minimise the perception of urbanisation in</li> </ul>

this location, particularly with regards to hardstanding and amenity buildings;

- \* Development is subject to an appropriate assessment and evaluation of archaeological potential and mitigation measures implemented accordingly;

- \* An ecological impact assessment is undertaken and appropriate measures identified and implemented accordingly to mitigate potential adverse impacts on biodiversity. Development allows for the protection of biodiversity and enhancement where possible;

- \* Appropriate flood risk assessment and surface water drainage strategy and mitigation is agreed with the appropriate body and implemented accordingly; and

- \* The development should be occupied by only those that fulfil the definition of a Gypsy or Traveller.

My Comments below

As a local resident I will to express my objections to the Proposed Gypsy & Traveller site on the approach to Plumpton Green for the following reasons:-

Local neighbourhood plan was only adopted this year following public consultation with no reference to a traveller site requirement. What has changed in such a short space of time? Compromises for the village were agreed as part of the consultation and this site should have been part of that process (or was it and discounted as not being suitable). The neighbourhood plan also agreed that the village would expand East/West (and not North/South) to lessen the impact on development within this rural location – this development is at the upmost north end of the village and contrary to the agreed village expansion plans.

The proposed traveller site will give a loss of green field space and spoil the whole vista appeal of the countryside approach into the village

I am not aware of any relevant needs assessment being carried out that identifies the site for travellers at this Rural location?

There has been a total lack of formal consultation with local resident, businesses, clubs & societies and the wider communities to the village.

The proposed site in within a field that is prone to flooding (in fact my wife grew up in the neighbouring Chicken Farm now referred to as the Old Brickworks, and is fully aware of the flooding that occurs on a regularly. When the site floods the impact has also been that raw sewerage is evident due to number of cesspit tanks in the area.

The proposed Gypsy site will set a precedent for future development within the local area and I can the fields between the Plough and the current North end of the village being built upon (again outside the agreed local plan). Plus the proposed site once developed would be subject to further expansion and grow as a traveller encampment for further static units.

[REDACTED]

There is no safe pedestrian access to the nearest public transport (bus stop)

There is no safe pedestrian access to village shop & amenities and train station

The site access is dangerous with no safe road access as it is at the bottom of a steep hill with vehicles approaching blind at speed.

A previous housing proposal was turned down as the site was deemed unsuitable. what's changed now for this proposal?

The original proposal was for 5 permanent pitches but this has now grown to 10 pitches (5 static and 5 caravans on concrete pitches) plus space for travelling caravans! It's easy to do the maths and work out an average of 4 persons on each pitch. Total of 40 people living on the site plus unauthorised visitors

The proposals will have a detrimental effect on the local area as it is in close proximity of local residential houses

The proposals will have a detrimental effect on local business next door in the old brickworks (where it is known that the businesses will move out if the site goes ahead) and will also have a detrimental effect on the local Plough public house.

There will be a significant Impact village and local house prices. – I have a work colleague who has been looking to move into Plumpton however, when I mentioned a couple of weeks ago that I was going to meeting about a proposed traveller site, he immediately has withdrawn his plans to move into the village and is now looking elsewhere. That's just one case I know of, but the same will apply to other local property within the area.

Plumpton is a unspoilt gateway into the South Downs National Park. The Traveller site proposals will have a significant affect onto the greenfield outlook as you approach the village.

I am therefore in total disagreement with this 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:** Tim Honess [REDACTED]  
**Sent:** 29 October 2018 08:24  
**To:** ldf  
**Subject:** Local Plan Consultation  
  
**Categories:** LPP2 comment to code - stakeholder details have been added

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Local Plan Consultation

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

**Gypsy and Traveller Accommodation**

Policy GT01 - Land south of The Plough

This site (0.69ha), as shown on figure 11 below, is allocated for the development of 5 net additional permanent Gypsy and Traveller pitches, subject to compliance with all appropriate development plan policies and the following criteria:

1. Access, including provision for pedestrians and cyclists, to be provided from Station Road;
2. Development should be levelled and laid out to provide sufficient room to allow for vehicles to turn around within the site;
3. Development should use the natural topography in screening the site from wider, sensitive landscape views and designed to minimise the perception of urbanisation in this location, particularly with regards to hardstanding and amenity buildings;
4. Development is subject to an appropriate assessment and evaluation of archaeological potential and mitigation measures implemented accordingly;
5. An ecological impact assessment is undertaken and appropriate measures identified and implemented accordingly to mitigate potential adverse impacts on biodiversity. Development allows for the protection of biodiversity and enhancement where possible;
6. Appropriate flood risk assessment and surface water drainage strategy and mitigation is agreed with the appropriate body and implemented accordingly; and
7. The development should be occupied by only those that fulfil the definition of a Gypsy or Traveller.

**My Comments below**

As a local resident I will to express my objections to the Proposed Gypsy & Traveller site on the approach to Plumpton Green for the following reasons:-

Local neighbourhood plan was only adopted this year following public consultation with no reference to a traveller site requirement. What has changed in such a short space of time? Compromises for the village were agreed as part of the consultation and this site should have been part of that process (or was it and discounted as not being suitable). The neighbourhood plan also agreed that the village would expand East/West (and not North/South) to lessen the impact on development within this rural location – this development is at the upmost north end of the village and contrary to the agreed village expansion plans.

The proposed traveller site will give a loss of green field space and spoil the whole vista appeal of the countryside approach into the village

I am not aware of any relevant needs assessment being carried out that identifies the site for travellers at this Rural location?

There has been a total lack of formal consultation with local resident, businesses, clubs & societies and the wider communities to the village.

The proposed site is within a field that is prone to flooding (in fact my wife grew up in the neighbouring Chicken Farm now referred to as the Old Brickworks, and is fully aware of the flooding that occurs on a regularity. When the site floods the impact has also been that raw sewerage is evident due to number of cesspit tanks in the area.

The proposed Gypsy site will set a precedent for future development within the local area and I can the fields between the Plough and the current North end of the village being built upon (again outside the agreed local plan). Plus the proposed site once developed would be subject to further expansion and grow as a traveller encampment for further static units.

[REDACTED]

There is no safe pedestrian access to the nearest public transport (bus stop)

There is no safe pedestrian access to village shop & amenities and train station

The site access is dangerous with no safe road access as it is at the bottom of a steep hill with vehicles approaching blind at speed.

A previous housing proposal was turned down as the site was deemed unsuitable. what's changed now for this proposal?

The original proposal was for 5 permanent pitches but this has now grown to 10 pitches (5 static and 5 caravans on concrete pitches) plus space for travelling caravans! It's easy to do the maths and work out an average of 4 persons on each pitch. Total of 40 people living on the site plus unauthorised visitors

The proposals will have a detrimental effect on the local area as it is in close proximity of local residential houses

The proposals will have a detrimental effect on local business next door in the old brickworks (where it is known that the businesses will move out if the site goes ahead) and will also have a detrimental effect on the local Plough public house.

There will be a significant Impact village and local house prices. – I have a work colleague who has been looking to move into Plumpton however, when I mentioned a couple of weeks ago that I was going to meeting about a proposed traveller site, he immediately has withdrawn his plans to move into the village and is now looking elsewhere. That's just one case I know of, but the same will apply to other local property within the area.

Plumpton is a unspoilt gateway into the South Downs National Park. The Traveller site proposals will have a significant affect onto the greenfield outlook as you approach the village.

I am therefore in total disagreement with this proposal

Tim Honess MCIOB MIET  
[REDACTED]

<b>Representation ID:</b> REP/227/GT01
--

Representor Details:

<b>Representor ID:</b>	REP/227
<b>Name:</b>	Tim Honess
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	GT01 - Land south of The Plough
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	No
<b>Sound:</b>	No Not Justified Not Effective Not Consistent with national policy
<b>Representation:</b>	
The local plan for Plumpton Green was agreed earlier this year- there was no mention of a Traveller site within the local plan that has already been adopted. This application is therefore unlawful as it is misrepresentation of the plan already agreed earlier this year.	



There has been a total lack of consultation as this new site is being considered through the back door!!

The proposed Traveller site is within a known flood zone (my wife lived in The Old Brickworks for over 20 years). I can confirm that site floods regularly in the winter. There is limited mains drains in the vicinity and raw sewerage is often evident after periods of flooding when cesspit tanks overflow.

The site is outside of the agreed local plan, any future development in Plumpton has been agreed as expansion in a East/West direction only. This proposed site is to the North of the village and would set a precedent for future infill development to the North of the village. Totally in conflict to the already agreed plan for the village.

The Local plan states that 5 Traveller units will be built however I attended a recent meeting in the village where we were informed that in fact there would be 10 pitches (5 permanent plus 5 additional caravan pitches) the submission also states the site would additionally allow for travelling caravans which increases the site well in excess of the proposals.

There is no safe pedestrian access to the local bus stop.

There is no safe pedestrian access to the local village amenities.

The vehicle access to the proposed site is the bottom of a steep hill (over a blind brow). This site was previously deemed unsuitable access for housing development, so what has changed now.

The close proximity of local business will be affected, It is known and has been reported by the local business community that they will not remain in Plumpton if this Traveller site goes head, having a detrimental affect on the local economy.

Heading South into Plumpton from the North of the village is a gateway into the Southdowns National Park. This proposal will have significant impact on the surrounding natural beauty of the area and spoil the vista into the National Park.

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

Remove the section regarding the Traveller site being located in Plumpton Green as the proposals are suitable for reasons adapted 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?**

<b>Representation ID: REP/228/E1</b>
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Representor Details:

<b>Representor ID:</b>	REP/228
<b>Name:</b>	Matthew Honnor
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>E1 - Land at East Quay, Newhaven Port</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	
<b>Sound:</b>	
<b>Representation:</b>  <p>I am writing to protest against any proposals to build in this area (E1).</p> <p>This is because it effectively reduces the area used by the fauna of the nature reserve as well as destroying the overall outlook over Seaford Bay. Destroying this can only reduce the attraction to tourists who provide a large income to the Seaford Business Community.</p> <p>Furthermore, development here will only exacerbate the traffic problems that are making the entire area regularly gridlocked.</p>	
<b>What changes do you suggest to make the document legally compliant or sound?</b>	

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

## Hodgson, Lilly

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**From:** Matthew Honnor [REDACTED]  
**Sent:** 03 November 2018 11:31  
**To:** ldf  
**Subject:** Ref E1  
  
**Categories:** LPP2 comment to code - stakeholder details have been added

I am writing to protest against any proposals to build in this area (E1).

This is because it effectively reduces the area used by the fauna of the nature reserve as well as destroying the overall outlook over Seaford Bay. Destroying this can only reduce the attraction to tourists who provide a large income to the Seaford Business Community.

Furthermore, development here will only exacerbate the traffic problems that are making the entire area regularly gridlocked.

Yours sincerely,

Matthew Honnor

**Representation ID: REP/229/GT01**Representor Details:

<b>Representor ID:</b>	REP/229
<b>Name:</b>	Neal Hovey
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>GT01 - Land south of The Plough</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	
<b>Sound:</b>	
<b>Representation:</b>	
<p>I write in connection with the proposal to site a Gypsy and Traveller Site in Station Road, Plumpton and would like to lodge the following objections</p> <p>The site was rejected for housing yet is good enough for the Traveller site. I consider this demeaning to the Travelling community</p> <p>The council admitted at the public meeting that the site was not satisfactory, that it was the only one they had and therefore had to pursue it unless anyone at the meeting could</p>	

come up with a site that was better

The site will impact on the Old Brickworks industrial site and the economy / employment in the village which is already precarious

The site could be expanded in the future therefore exacerbating the problem

It is a greenfield site outside the village boundary

There is no footpath or street lighting - for children to get to school they would invariably end up using private cars as the public transport is inaccessible especially in the winter having to walk along a road with grass verges in the dark. The road is derestricted and therefore dangerous. To put a footpath along the road is not a satisfactory answer - road side footpaths do not exist in the middle of the countryside and extending the village speed limit beyond the village boundary unacceptable as well

I would concur with the Parish Councils objections already lodged with yourselves

I would be most grateful if you could keep me advised of progress, any public meeting etc in 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?**

**From:** Neal Hovey <[REDACTED]>  
**Sent:** 05 November 2018 09:24  
**To:** ldf  
**Cc:** sarah.osborne2@lewes.gov.uk  
**Subject:** Proposed Gipsy and Traveller Site, Station Road, Plumpton

**Categories:** GT01, Vanessa to deal with

I write in connection with the proposal to site a Gipsy and Traveller Site in Station Road, Plumpton and would like to lodge the following objections

The site was rejected for housing yet is good enough for the Traveller site. I consider this demeaning to the Travelling community

The council admitted at the public meeting that the site was not satisfactory, that it was the only one they had and therefore had to pursue it unless anyone at the meeting could come up with a site that was better

The site will impact on the Old Brickworks industrial site and the economy / employment in the village which is already precarious

The site could be expanded in the future therefore exacerbating the problem

It is a greenfield site outside the village boundary

There is no footpath or street lighting - for children to get to school they would invariably end up using private cars as the public transport is inaccessible especially in the winter having to walk along a road with grass verges in the dark. The road is derestricted and therefore dangerous. To put a footpath along the road is not a satisfactory answer - road side footpaths do not exist in the middle of the countryside and extending the village speed limit beyond the village boundary unacceptable as well

I would concur with the Parish Councils objections already lodged with yourselves

I would be most grateful if you could keep me advised of progress, any public meeting etc in this matter

Kind regards

C Neal H Hovey

[REDACTED]

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**Representation ID: REP/230/E1**Representor Details:

<b>Representor ID:</b>	REP/230
<b>Name:</b>	Julia Howe
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>E1 - Land at East Quay, Newhaven Port</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	
<b>Sound:</b>	
<b>Representation:</b>  I'm writing to register my opposition to the proposed Policy E1 development on Tide Mills Beach and to ask for the removal of this Policy. Tide Mills is an important local wildlife site (formerly SNCI) and must be protected for the benefit of wildlife and leisure, recreation and tourism.  Policy E1 is based on a previous saved policy which is no longer appropriate for the area. It goes against both the agreed vision for the area, as well as community wishes, and is not justified by employment needs. Furthermore, Policy E1 has not been fully and explicitly included in previous consultation drafts, allowing the local community to register our concerns.	



If you are intending to keep Policy E1, then the area needs to be i) substantially reduced and ii) include nothing to the east of the new port access road, and the minimal amount to the west. Policy E1 needs to be amended so that new wording reflects the original intent of saved policy NH20 - in other words, be directly related to port expansion only due to increased ferry activity, and restrict development to clean/green/marine/renewable and/or sustainable tourism ( reflecting the vision for Newhaven expressed in the Core Strategy Part 1, the Port Masterplan, the Draft South Downs Local Plan, the Neighbourhood Plan and the Enterprise one regeneration plans for the area.)

Tide Mills needs protecting. It's a gateway to the Downs, next to the South Downs National Park at one of the few locations where the South Downs meet the shore. The draft South Downs Local Plan identifies Newhaven as a sustainable tourism gateway. The site is widely used for leisure, recreation and tourism, forming part of the UN-designated Living Coast Biosphere.

#### Sustainability

Furthermore, Tide Mills is a designated local wildlife site, with internationally important habitat including vegetated shingle and species such as great crested newts, invertebrates, reptiles and 86 species of birds. These must be protected under the local plan for management as a wildlife area, and in accordance with the July 2018 National Planning Policy Framework which requires local authorities to 'identify, map and safeguard components of the local ecological networks, including ... locally designated sites of importance for biodiversity.'

This application fails to address the following objectives and targets for the vegetated shingle habitat identified in the Habitat action plan for Sussex:

- \* '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.'

Given all of the above, Policy E1 fails to deliver on sustainable development and on specific policies relating to conservation and biodiversity in part 1 of the Core Strategy, thus failing to safeguard a designated local wildlife site.

#### Employment

The summary of consultation responses for this plan state that: '... In quantitative terms, the Council's latest monitoring data demonstrates that Newhaven has sufficient employment space to meet the business needs arising from future growth scenarios to 2030' (Newhaven Employment Land Review July 2017.)

It is inconsistent to argue that NH20 (which policy E1 is based on) should be carried forward, given the greater sensitivity and importance of this site for recreation and biodiversity. There is no evidence provided that the land is needed for employment. The

Employment Land Review identifies a substantial number of sites, many in the Newhaven Enterprise Zone (EZ), covering 8 sites over 79 hectares. The land in policy E1 is not in the EZ, so doesn't receive any benefit from EZ's development incentives.

The Employment Land Review also points out that implementation of the EZ will provide an increase of approx 55,000 sq metres of new commercial floor space, and refurbishing a further 15,000 sq metres. This is clearly more than adequate to meet the need identified up to 2030 under any scenario, and that is without E1. Therefore its inclusion cannot be justified.

The Employment Land Review identifies numerous vacant undeveloped sites within the EZ, including the vacant Eastside North and Eastside South, two new industrial estates. They are both far more suitable for development. Furthermore, in Newhaven, an Article 4 Direction, taking place this month, there will be a withdrawal of permitted development rights for change of use from offices/light industrial to residential. This further reduces the need for policy E1 as all sites within the EZ will be safeguarded under this policy.

#### Flood Risk & Unstable Ground

Since policy NH20 was drafted in 2003, flood risks have increased due to rising sea levels. Tide Mills is next to the sea. Flood risks are identified in the Employment Land Report as an important barrier to commercial development, and the unstable ground, also identified as a barrier, is a particular issue in Tide Mills as it is mainly shingle. Additionally, shingle acts as a flood barrier, so development in this area could impact flood risk for other areas.

In conclusion, the assessment of development requirements does not provide evidence to justify the development of a designated local wildlife site.

#### Failure to reflect the agreed priorities for regeneration in Newhaven

Policy E1 does not capture the vision for Newhaven in part 1 of the local plan or in other key strategies: 'regeneration at Newhaven associated with the existing port and opportunities offered by the renewable energy sector, creating a sustainable tourism economy that takes advantage of the district's key attractions' (p 37) On page 96 it has a vision of 'the town developing as a centre for green industries and innovation'.

The Port Master Plan has a clear vision for the town's development based on expansion of freight passenger use, 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.'

The South Downs (draft) local plan wants to see Newhaven develop based on sustainable tourism as the gateway to the South Downs. Preserving Tide Mills as a local wildlife site, with its footpaths and access to the only remaining sandy beach in Newhaven, represents a key opportunity to realise that vision. The proposed employment use in E1 would work directly against it.

In conclusion, by allowing industrialisation of a local wildlife site, E1 fails to maximise the opportunities for this area, and does not reflect the development vision for Newhaven to

maximise clean/green/marine renewable sectors and sustainable tourism.

#### Air Quality & Cumulative Impact

Newhaven and the surrounding A26, A27 and A259 are already highly congested, with traffic bottlenecks including the town centre gyratory (an Air Quality Management Area) and opening swing bridge. Part 1 of the Core Plan is about relieving congestion and air quality issues faced in Newhaven, namely: 'Core Policy 9 - Air Quality: The local planning authority will seek to improve air quality, having particular regard to any Air Quality Management Area designations.' On page 113 the same section also stresses the need to consider the cumulative impact on air quality of the increase in housing. '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.'

Part 2 of the Core Plan already includes a very high housing allocation for Newhaven which will negatively impact on the air quality, congestion and infrastructure issues identified in the area. Despite the importance of this air quality issue, there is no evidence that this has been investigated when adding new policy E1.

In conclusion, this policy will negatively impact existing issues with congestion and air quality, and together with very high housing allocation, will have an unacceptable cumulative impact.

#### E1 compared to the saved policy NH20

Policy E1 is adapted from a 'saved policy' NH20 which was designed to allow for the upgrading and expansion of the port - specifically ferry operations. However, regarding E1, there is no planned passenger ferry expansion. Newhaven in 2003 did not have the current serious issues with air quality, traffic congestion and additional housing as outlined above. The rare habitat within this local wildlife site has increased in value since 2003, particularly since areas of similar habitat have been lost, such as areas of vegetated shingle. This should underline the importance and value of Tide Mills. Therefore, any adaptation of policy E1 must be in favour of additional protection for this important wildlife site, but instead the wording has been changed to afford it less protection. Instead of the specific term 'upgrading and expansion of the port', the wording is much more general, allowing for uses which are 'associated' with Newhaven port: 'Land ... is allocated for employment uses associated with Newhaven Port.'

In conclusion if policy E1 is retained, it must: i) be strictly limited to port-related activity and the additional clause regarding non-port related activity must be deleted ii) the type of employment use permitted must be changed to reflect the agreed vision for the area (clean/green/marine/renewables and port related iii) if 'port related' is used as a term, there must be a clear definition of what is actually meant by this wording, restricting its development strictly to passenger ferry expansion to reflect NH20's original intention. At the very least it should give the definition used when permitting development at ports in the Town and Country Planning Act.

It would be a very grave dereliction of duty by your planning department that, given the compelling reasons outlined above to remove Policy E1, considerations for short-term

profit were put above the very real arguments for conserving this important wildlife site for our, and future generations, to enjoy.

**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 Howe [REDACTED]  
**Sent:** 02 November 2018 14:33  
**To:** ldf  
**Subject:** Policy E1 - proposed development on Tide Mills Beach  
  
**Categories:** LPP2 comment to code - stakeholder details have been added

Dear Lewes District local planners

I'm writing to register my opposition to the proposed Policy E1 development on Tide Mills Beach and to ask for the removal of this Policy. Tide Mills is an important local wildlife site (formerly SNCI) and must be protected for the benefit of wildlife and leisure, recreation and tourism.

Policy E1 is based on a previous saved policy which is no longer appropriate for the area. It goes against both the agreed vision for the area, as well as community wishes, and is not justified by employment needs. Furthermore, Policy E1 has not been fully and explicitly included in previous consultation drafts, allowing the local community to register our concerns.

If you are intending to keep Policy E1, then the area needs to be i) substantially reduced and ii) include nothing to the east of the new port access road, and the minimal amount to the west. Policy E1 needs to be amended so that new wording reflects the original intent of saved policy NH20 - in other words, be directly related to port expansion only due to increased ferry activity, and restrict development to clean/green/marine/renewable and/or sustainable tourism ( reflecting the vision for Newhaven expressed in the Core Strategy Part 1, the Port Masterplan, the Draft South Downs Local Plan, the Neighbourhood Plan and the Enterprise one regeneration plans for the area.)

Tide Mills needs protecting. It's a gateway to the Downs, next to the South Downs National Park at one of the few locations where the South Downs meet the shore. The draft South Downs Local Plan identifies Newhaven as a sustainable tourism gateway. The site is widely used for leisure, recreation and tourism, forming part of the UN-designated Living Coast Biosphere.

### Sustainability

Furthermore, Tide Mills is a designated local wildlife site, with internationally important habitat including vegetated shingle and species such as great crested newts, invertebrates, reptiles and 86 species of birds. These must be protected under the local plan for management as a wildlife area, and in accordance with the July 2018 National Planning Policy Framework which requires local authorities to 'identify, map and safeguard components of the local ecological networks, including ... locally designated sites of importance for biodiversity.'

This application fails to address the following objectives and targets for the vegetated shingle habitat identified in the Habitat action plan for Sussex:

- '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.'

Given all of the above, Policy E1 fails to deliver on sustainable development and on specific policies relating to conservation and biodiversity in part 1 of the Core Strategy, thus failing to safeguard a designated local wildlife site.

## Employment

The summary of consultation responses for this plan state that: '... In quantitative terms, the Council's latest monitoring data demonstrates that Newhaven has sufficient employment space to meet the business needs arising from future growth scenarios to 2030' (Newhaven Employment Land Review July 2017.)

It is inconsistent to argue that NH20 (which policy E1 is based on) should be carried forward, given the greater sensitivity and importance of this site for recreation and biodiversity. There is no evidence provided that the land is needed for employment. The Employment Land Review identifies a substantial number of sites, many in the Newhaven Enterprise Zone (EZ), covering 8 sites over 79 hectares. The land in policy E1 is not in the EZ, so doesn't receive any benefit from EZ's development incentives.

The Employment Land Review also points out that implementation of the EZ will provide an increase of approx 55,000 sq metres of new commercial floor space, and refurbishing a further 15,000 sq metres. This is clearly more than adequate to meet the need identified up to 2030 under any scenario, and that is without E1. Therefore its inclusion cannot be justified.

The Employment Land Review identifies numerous vacant undeveloped sites within the EZ, including the vacant Eastside North and Eastside South, two new industrial estates. They are both far more suitable for development. Furthermore, in Newhaven, an Article 4 Direction, taking place this month, there will be a withdrawal of permitted development rights for change of use from offices/light industrial to residential. This further reduces the need for policy E1 as all sites within the EZ will be safeguarded under this policy.

## Flood Risk & Unstable Ground

Since policy NH20 was drafted in 2003, flood risks have increased due to rising sea levels. Tide Mills is next to the sea. Flood risks are identified in the Employment Land Report as an important barrier to commercial development, and the unstable ground, also identified as a barrier, is a particular issue in Tide Mills as it is mainly shingle. Additionally, shingle acts as a flood barrier, so development in this area could impact flood risk for other areas.

In conclusion, the assessment of development requirements does not provide evidence to justify the development of a designated local wildlife site.

## Failure to reflect the agreed priorities for regeneration in Newhaven

Policy E1 does not capture the vision for Newhaven in part 1 of the local plan or in other key strategies: 'regeneration at Newhaven associated with the existing port and opportunities offered by the renewable energy sector, creating a sustainable tourism economy that takes advantage of the district's key attractions' (p 37) On page 96 it has a vision of 'the town developing as a centre for green industries and innovation'.

The Port Master Plan has a clear vision for the town's development based on expansion of freight passenger use, 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.'

The South Downs (draft) local plan wants to see Newhaven develop based on sustainable tourism as the gateway to the South Downs. Preserving Tide Mills as a local wildlife site, with its footpaths and access to the only remaining sandy beach in Newhaven, represents a key opportunity to realise that vision. The proposed employment use in E1 would work directly against it.



In conclusion, by allowing industrialisation of a local wildlife site, E1 fails to maximise the opportunities for this area, and does not reflect the development vision for Newhaven to maximise clean/green/marine renewable sectors and sustainable tourism.

### Air Quality & Cumulative Impact

Newhaven and the surrounding A26, A27 and A259 are already highly congested, with traffic bottlenecks including the town centre gyratory (an Air Quality Management Area) and opening swing bridge. Part 1 of the Core Plan is about relieving congestion and air quality issues faced in Newhaven, namely: 'Core Policy 9 - Air Quality: The local planning authority will seek to improve air quality, having particular regard to any Air Quality Management Area designations.' On page 113 the same section also stresses the need to consider the cumulative impact on air quality of the increase in housing. '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.'

Part 2 of the Core Plan already includes a very high housing allocation for Newhaven which will negatively impact on the air quality, congestion and infrastructure issues identified in the area. Despite the importance of this air quality issue, there is no evidence that this has been investigated when adding new policy E1.

In conclusion, this policy will negatively impact existing issues with congestion and air quality, and together with very high housing allocation, will have an unacceptable cumulative impact.

### E1 compared to the saved policy NH20

Policy E1 is adapted from a 'saved policy' NH20 which was designed to allow for the upgrading and expansion of the port - specifically ferry operations. However, regarding E1, there is no planned passenger ferry expansion. Newhaven in 2003 did not have the current serious issues with air quality, traffic congestion and additional housing as outlined above. The rare habitat within this local wildlife site has increased in value since 2003, particularly since areas of similar habitat have been lost, such as areas of vegetated shingle. This should underline the importance and value of Tide Mills. Therefore, any adaptation of policy E1 must be in favour of additional protection for this important wildlife site, but instead the wording has been changed to afford it less protection. Instead of the specific term 'upgrading and expansion of the port', the wording is much more general, allowing for uses which are 'associated' with Newhaven port: 'Land ... is allocated for employment uses associated with Newhaven Port.'

In conclusion if policy E1 is retained, it must: i) be strictly limited to port-related activity and the additional clause regarding non-port related activity must be deleted ii) the type of employment use permitted must be changed to reflect the agreed vision for the area (clean/green/marine/renewables and port related iii) if 'port related' is used as a term, there must be a clear definition of what is actually meant by this wording, restricting its development strictly to passenger ferry expansion to reflect NH20's original intention. At the very least it should give the definition used when permitting development at ports in the Town and Country Planning Act.

It would be a very grave dereliction of duty by your planning department that, given the compelling reasons outlined above to remove Policy E1, considerations for short-term profit were put above the very real arguments for conserving this important wildlife site for our, and future generations, to enjoy.

Yours sincerely

Julia Howe

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**Representation ID: REP/231/GT01**Representor Details:

<b>Representor ID:</b>	REP/231
<b>Name:</b>	Caroline Hoy
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>
<b>Organisation:</b>

Contact Details:

Email Address:	
Address:	

Representation:

<b>Policy/Section:</b>	<b>GT01 - Land south of The Plough</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	
<b>Sound:</b>	
<b>Representation:</b> <p>I wish to voice my objection to the proposed development of a greenfield site GT01 south of the Plough Public House in Plumpton Green. I am a Plumpton Green resident and have no issue with the sites agreed in the Neighbourhood plan as they were well thought out and the most suitable places put forward for development, all of which do not mean developing open green spaces along the main road through the village spoiling both the aesthetics of the village and providing poor access to an already linear village layout.</p> <p>I object to development on Green field sites as we should be looking to brownfield sites for development of housing and/or travellers sites. The site proposed has no footpath</p>	



into the village, extremely poor visibility if you were trying to turn left or right onto the road in a vehicle/lorry/caravan etc. Whoever you were to house there would have inadequate access into the village and the area is assessed as being at increased risk of flood. I fail to see how this could be viewed as suitable for any residential development.

I look forward to hearing from 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:** Caroline Hoy [REDACTED]  
**Sent:** 05 November 2018 21:21  
**To:** ldf  
**Subject:** Objection to GT01  
  
**Categories:** GT01, Vanessa to deal with

For the attention of the Planning Officer,

I wish to voice my objection to the proposed development of a greenfield site GT01 south of the Plough Public House in Plumpton Green. I am a Plumpton Green resident and have no issue with the sites agreed in the Neighbourhood plan as they were well thought out and the most suitable places put forward for development, all of which do not mean developing open green spaces along the main road through the village spoiling both the aesthetics of the village and providing poor access to an already linear village layout.

I object to development on Green field sites as we should be looking to brownfield sites for development of housing and/or travellers sites. The site proposed has no footpath into the village, extremely poor visibility if you were trying to turn left or right onto the road in a vehicle/lorry/caravan etc. Whoever you were to house there would have inadequate access into the village and the area is assessed as being at increased risk of flood. I fail to see how this could be viewed as suitable for any residential development.

I look forward to hearing from you.

Caroline Hoy.

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**Representation ID: REP/232/GT01**Representor Details:

<b>Representor ID:</b>	REP/232
<b>Name:</b>	Sally Huband
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>
<b>Organisation:</b>

Contact Details:

Email Address:	
Address:	

Representation:

<b>Policy/Section:</b>	<b>GT01 - Land south of The Plough</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	
<b>Sound:</b>	
<b>Representation:</b>  I am writing to express my dismay at the proposal for a permanent site for Gypsies and Travellers in Plumpton. This is a rural community and we are already faced with the development of at least 56 houses in the village.  As you are aware, Plumpton only has one road passing through it and it is already congested at certain times of day with cars parked at the side of the road and cars going to the station, the school and work. When the development commences in Plumpton, we will undoubtedly have large lorries passing through and an increased amount of traffic. Travellers will bring caravans and lorries to an already congested road. The turn off at the North end of Plumpton by the Plough Inn, is already dangerous as the visibility is	

poor. The turn off at the Southern End by the Half Moon Pub is equally dangerous.

The proposed field has a gate leading into St Helena Lane, if used as access to the site would also be very dangerous as the lane is narrow and windy and not fit for large vehicles. The increase in heavy traffic [REDACTED] is unacceptable.

[REDACTED]

There is a foot path running through the proposed site and locals use this to walk their dogs and enjoy the surrounding countryside. This peaceful area could be totally destroyed by having the site there.

Will the travellers be paying Council Tax and will there be increased rubbish disposal plans in place if this is to go ahead?

I appreciate that the Council has a duty to provide sites for Travellers/Gypsies but I do not think that Plumpton is a suitable choice, particularly as the site is currently a green space. Plumpton is a rural village with an excellent community spirit which is appreciated by all who live here. I do think there are other sites in the District which would be better suited. There are brown field sites which have not been developed and also areas with better road systems to cope with more 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**

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**From:** Sally Huband [REDACTED]  
**Sent:** 25 September 2018 18:52  
**To:** ldf  
**Subject:** proposed Gypsy and Travellers site in Plumpton

**Categories:** Vanessa to deal with

Dear Sir,

I am writing to express my dismay at the proposal for a permanent site for Gypsies and Travellers in Plumpton. This is a rural community and we are already faced with the development of at least 56 houses in the village.

As you are aware, Plumpton only has one road passing through it and it is already congested at certain times of day with cars parked at the side of the road and cars going to the station, the school and work. When the development commences in Plumpton, we will undoubtedly have large lorries passing through and an increased amount of traffic. Travellers will bring caravans and lorries to an already congested road. The turn off at the North end of Plumpton by the Plough Inn, is already dangerous as the visibility is poor. The turn off at the Southern End by the Half Moon Pub is equally dangerous.

The proposed field has a gate leading into St Helena Lane, if used as access to the site would also be very dangerous as the lane is narrow and windy and not fit for large vehicles. The increase in heavy traffic [REDACTED]

[REDACTED] is unacceptable.

[REDACTED]

There is a foot path running through the proposed site and locals use this to walk their dogs and enjoy the surrounding countryside. This peaceful area could be totally destroyed by having the site there.

Will the travellers be paying Council Tax and will there be increased rubbish disposal plans in place if this is to go ahead?

I appreciate that the Council has a duty to provide sites for Travellers/Gypsies but I do not think that Plumpton is a suitable choice, particularly as the site is currently a green space. Plumpton is a rural village with an excellent community spirit which is appreciated by all who live here. I do think there are other sites in the District which would be better suited. There are brown field sites which have not been developed and also areas with better road systems to cope with more heavy traffic.

Yours sincerely, Sally Huband

**Representation ID: REP/233/GT01**Representor Details:

<b>Representor ID:</b>	REP/233
<b>Name:</b>	Howard Hughes
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>GT01 - Land south of The Plough</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	
<b>Sound:</b>	
<b>Representation:</b>	
<p>I wish to object to the proposed travellers site in Plumpton Green.</p> <p>i This site was not included in the Neighbourhood Plan. In this plan it was felt that new developments should be central to the village, to reduce car traffic and to enable safe pedestrian movements via pavements. The positioning of this site is totally at odds with these considerations.</p> <p>ii The businesses adjacent to the proposed development have indicated that they will leave if this goes ahead. Plumpton Green has few jobs that don't require lengthy commuting. To compromise these local jobs seems a hugely retrograde step.</p> <p>iii The proposed site is a green field site. Not only will inevitably compromise the rural</p>	

feel to this area,there can be no assurances that the site wouldn't develop further.

Also,how would this site be contained and managed long term?

I trust that the committee will recognise that an isolated rural field is unsuitable for the site under discussion and refuse permission for 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?**

**From:** Howard Hughes [REDACTED]  
**Sent:** 29 October 2018 16:40  
**To:** ldf  
**Subject:** Proposed traveller site Plumpton Green  
  
**Categories:** LPP2 comment to code - stakeholder details have been added

I wish to object to the proposed travellers site in Plumpton Green.

- i This site was not included in the Neighbourhood Plan. In this plan it was felt that new developments should be central to the village, to reduce car traffic and to enable safe pedestrian movements via pavements. The positioning of this site is totally at odds with these considerations.
- ii The businesses adjacent to the proposed development have indicated that they will leave if this goes ahead. Plumpton Green has few jobs that don't require lengthy commuting. To compromise these local jobs seems a hugely retrograde step.
- iii The proposed site is a green field site. Not only will inevitably compromise the rural feel to this area, there can be no assurances that the site wouldn't develop further.  
Also, how would this site be contained and managed long term?

I trust that the committee will recognise that an isolated rural field is unsuitable for the site under discussion and refuse permission for it.

Howard Hughes



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**Representation ID: REP/234/GT01**Representor Details:

<b>Representor ID:</b>	REP/234
<b>Name:</b>	Linda Hughes
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>
<b>Organisation:</b>

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>GT01 - Land south of The Plough</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	
<b>Sound:</b>	
<b>Representation:</b>  Dear Sirs,  I wish to object to the proposed Gypsy Site in Plumpton Green.  Due to the fact that access to the site on foot would be extremely dangerous as it is on a very fast road without pavements, this would inevitably mean more traffic. My understanding is that Lewes District Council would give preference to sites that were not wholly dependent on cars. The choice of this site would seem to be at odds with that.  Local businesses adjacent to the proposed site have indicated that they will relocate if this site goes ahead, which would damage the local economy.	

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I fear that this would be the "thin end of the wedge" and the number of units would increase, and this could be an eyesore in a predominantly rural area.

I urge you to refuse this application as it is totally inappropriate.

Thank you.

Linda Hughes (Mrs)

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

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

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

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## Hodgson, Lilly

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**From:** Linda Mant [REDACTED]  
**Sent:** 29 October 2018 17:25  
**To:** ldf  
**Subject:** Proposed Gypsy Site in Plumpton Green  
  
**Categories:** LPP2 comment to code - stakeholder details have been added

Dear Sirs,

I wish to object to the proposed Gypsy Site in Plumpton Green.

Due to the fact that access to the site on foot would be extremely dangerous as it is on a very fast road without pavements, this would inevitably mean more traffic. My understanding is that Lewes District Council would give preference to sites that were not wholly dependent on cars. The choice of this site would seem to be at odds with that.

Local businesses adjacent to the proposed site have indicated that they will relocate if this site goes ahead, which would damage the local economy.

I fear that this would be the "thin end of the wedge" and the number of units would increase, and this could be an eyesore in a predominantly rural area.

I urge you to refuse this application as it is totally inappropriate.

Thank you.

Linda Hughes (Mrs)

Sent from my iPhone

**Representation ID: REP/235/GT01**Representor Details:

<b>Representor ID:</b>	REP/235
<b>Name:</b>	Tom Hughes
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>GT01 - Land south of The Plough</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	
<b>Sound:</b>	
<b>Representation:</b>	
Regarding the traveller site next to The old brickworks if this goes ahead then our tenants will be leaving and i fear i will lose my job as the site will have to be shut down	
<b>What changes do you suggest to make the document legally compliant or sound?</b>	
<b>Do you consider it necessary to participate at the Examination in Public?</b>	
<b>Why do you feel it is necessary to participate at the Examination in Public?</b>	

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## Hodgson, Lilly

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**From:** . [REDACTED]  
**Sent:** 25 October 2018 09:23  
**To:** ldf  
**Subject:** Proposed Gypsy & Traveller Site in Plumpton  
**Categories:** LPP2 comment to code - stakeholder details have been added

Regarding the traveller site next to The old brickworks if this goes ahead then our tenants will be leaving and i fear i will lose my job as the site will have to be shut down

**Representation ID: REP/236/E1**Representor Details:

<b>Representor ID:</b>	REP/236
<b>Name:</b>	Ruth Hume
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>E1 - Land at East Quay, Newhaven Port</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	
<b>Sound:</b>	
<b>Representation:</b>	
I wish to express my deep concern at the following:	
Policy E1: Land at East Quay, Newhaven Port	
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 is minimised.	
A large part of the land in question is currently beach and nature reserve which does not	

seem to have been recognised by the plan. Recent planning consent has already committed adjacent land to highly polluting heavy-industrial building and I strongly believe that the policy in its current wording would allow if not encourage similar development. It is my belief that this should be prevented as the beach and nature reserve provide valuable habitats for many different species of wildlife and should be protected.

**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:** Ruth Hume [REDACTED]  
**Sent:** 05 November 2018 20:47  
**To:** ldf  
**Subject:** Local plan part 2 - policy E1

**Categories:** Vanessa to deal with

Dear Sirs,

I wish to express my deep concern at the following:

**Policy E1: Land at East Quay, Newhaven Port**

**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 is minimised.**

A large part of the land in question is currently beach and nature reserve which does not seem to have been recognised by the plan. Recent planning consent has already committed adjacent land to highly polluting heavy-industrial building and I strongly believe that the policy in its current wording would allow if not encourage similar development. It is my belief that this should be prevented as the beach and nature reserve provide valuable habitats for many different species of wildlife and should be protected.

Regards  
Ruth Hume

**Representation ID: REP/237/E1**Representor Details:

<b>Representor ID:</b>	REP/237
<b>Name:</b>	Rona Hunnisett
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>E1 - Land at East Quay, Newhaven Port</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	No
<b>Sound:</b>	No Not Justified
<b>Representation:</b>	
<b>What changes do you suggest to make the document legally compliant or sound?</b>	
Our beaches are already cluttered with pollution, and developing the Tidemills Beach would create an environmental impact above and beyond the immediate Newhaven	

area. We have a marine protection zone off the coast which is under constant threat already,
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<b>Do you consider it necessary to participate at the Examination in Public?</b>	No
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<b>Why do you feel it is necessary to participate at the Examination in Public?</b>
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**Representation ID: REP/238/E1**Representor Details:

<b>Representor ID:</b>	REP/238
<b>Name:</b>	David and Ann Hunt
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>E1 - Land at East Quay, Newhaven Port</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	
<b>Sound:</b>	
<b>Representation:</b> <p>I strongly protest any further development of this area. Enough is enough, permission has already been granted for development of one portion which is bad enough, but to extend it further would add insult to injury. Not only would this part of the beach and adjoining land be lost, but the nature of the development would be to the detriment of the whole nature reserve around Tide Mills and its wildlife and flora. In addition, the air quality of the surrounding area would be seriously effected. Proposed construction on the edge of this national park must surely not be allowed, and can only be viewed as the thin end of a wedge.</p> <p>Thank you for your consideration</p>	

<b>What changes do you suggest to make the document legally compliant or sound?</b>
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<b>Do you consider it necessary to participate at the Examination in Public?</b>
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<b>Why do you feel it is necessary to participate at the Examination in Public?</b>
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## Hodgson, Lilly

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**From:** David and Ann Hunt [REDACTED]  
**Sent:** 30 October 2018 12:50  
**To:** ldf  
**Subject:** PolicyE1 Proposed future development area on Tide Mills beach  
  
**Categories:** LPP2 comment to code - stakeholder details have been added

Dear Sir / Madam

I strongly protest any further development of this area. Enough is enough, permission has already been granted for development of one portion which is bad enough, but to extend it further would add insult to injury. Not only would this part of the beach and adjoining land be lost, but the nature of the development would be to the detriment of the whole nature reserve around Tide Mills and its wildlife and flora. In addition, the air quality of the surrounding area would be seriously effected. Proposed construction on the edge of this national park must surely not be allowed, and can only be viewed as the thin end of a wedge.

Thank you for your consideration

David & Ann Hunt

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**Representation ID: REP/239/E1**Representor Details:

<b>Representor ID:</b>	REP/239
<b>Name:</b>	Paul Hurst
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>
<b>Organisation:</b>

Contact Details:

Email Address:	
Address:	

Representation:

<b>Policy/Section:</b>	<b>E1 - Land at East Quay, Newhaven Port</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	
<b>Sound:</b>	
<b>Representation:</b> <p>I would like to register my objection to the E1 policy of the Lewes District Plan. It is about time councillors and planning departments listened to the people. It may be called a consultation but only if views are taken into account and not disregarded and we will do what we want anyway, which is what has happened in the last few years.</p> <p>This policy will be a blight on the beautiful landscape on the doorstep of our National Park. Planners have dumped unwanted construction on Newhaven over the years and say we are regenerating the area. I am sure the voice of the local people will be ignored by politicians who don't live in the area and this policy will go through. I would be grateful if you prove me wrong.</p>	

<b>What changes do you suggest to make the document legally compliant or sound?</b>
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<b>Do you consider it necessary to participate at the Examination in Public?</b>
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<b>Why do you feel it is necessary to participate at the Examination in Public?</b>
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**From:** Paul Hurst [REDACTED]  
**Sent:** 02 November 2018 12:11  
**To:** ldf  
**Subject:** Reference E1

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

I would like to register my objection to the E1 policy of the Lewes District Plan. It is about time councillors and planning departments listened to the people. It may be called a consultation but only if views are taken into account and not disregarded and we will do what we want anyway, which is what has happened in the last few years.

This policy will be a blight on the beautiful landscape on the doorstep of our National Park. Planners have dumped unwanted construction on Newhaven over the years and say we are regenerating the area. I am sure the voice of the local people will be ignored by politicians who don't live in the area and this policy will go through. I would be grateful if you prove me wrong.

Paul Hurst

**Representation ID: REP/240/E1**Representor Details:

<b>Representor ID:</b>	REP/240
<b>Name:</b>	Marion Hutt
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>E1 - Land at East Quay, Newhaven Port</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	Yes
<b>Sound:</b>	No Not Justified
<b>Representation:</b>  Ref E1 These proposals are vague and wide open to abuse by developers. As it stands, it's open to any/all types of industrial activity including hazardous operations. No reference to "green" operations. The area adjoins the South Downs National Park, Tide Mills and the WW1 Seaplane Base (which has no protection at present and should be listed). This would complete the wreckage of the beautiful, wild area of Seaford Bay which should be regarded as a positive aspect for Newhaven and Seaford, not an empty	

piece of land to be offered to the highest bidder.

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

I cannot comment on the legality of the document, only a lawyer would know. But as to it being "sound", what is your definition? For me that would indicate that it contains clear well-thought out proposals naming specific activities/developments in specific places, and explaining why it is thought necessary to encroach upon an unspoiled beach with conservation issues and close to supposedly protected sites.

**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/241/GT01**Representor Details:

<b>Representor ID:</b>	REP/241
<b>Name:</b>	David Ince
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>GT01 - Land south of The Plough</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	
<b>Sound:</b>	
<b>Representation:</b>  It has come to my notice that you are planning to allow a permanent Gypsy site adjacent to the Old Brickworks in Plumpton Green . I strongly object to this as it will lead the spoiling of our beautifull environment .  There has to be a more suitable brown field site available rather than putting one almost in the national  Please keep me advised on this matter	
<b>What changes do you suggest to make the document legally compliant or sound?</b>	

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

## Hodgson, Lilly

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**From:** David Ince <[REDACTED]>  
**Sent:** 27 September 2018 16:35  
**To:** ldf  
**Subject:** TRAVELLERS SITE PLUMPTON GREEN

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

Dear Lewes Council

It has come to my notice that you are planning to allow a permanent Gypsy site adjacent to the Old Brickworks in Plumpton Green . I strongly object to this as it will lead the spoiling of our beautiful environment . [REDACTED]

[REDACTED] There has to be a more suitable brown field site available rather than putting one almost in the national

Please keep me advised on this matter

Yours

David Ince

**Representation ID: REP/242/GT01**Representor Details:

<b>Representor ID:</b>	REP/242
<b>Name:</b>	Allison Ingram
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>GT01 - Land south of The Plough</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	
<b>Sound:</b>	
<b>Representation:</b> <p>I am writing to object to the proposal, termed GT01, to provide 5 permanent pitches for Gypsy Traveller and/or Travelling Showpeople at land south of the The Plough at the north end of Station Road, Plumpton Green,</p> <p>An application for much needed social housing was refused at this location due to the absence of any pavements on what is a road with the national speed limit.</p> <p>How can it be acceptable to have a Travellers site at this location and not social housing?</p>	

I understand it is a government overarching aim to ensure fair and equal treatment for travellers in accessing education, health, welfare and employment infrastructure. How can the proposed location meet this aim? It is remote from any shops and the nearest bus stop can only be accessed by walking along a 60mph road. The local primary school is over 2km away and can only be accessed by car or by walking along a road with the national speed limit and two blind corners.

I believe the Draft Plan should delete the proposed site on the basis that it does not comply with Government policy on providing fair and equal treatment for Travellers and 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?**

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



## **Kemp, Emma**

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**From:** Allison Ingram [REDACTED]  
**Sent:** 05 November 2018 20:13  
**To:** Idf  
**Subject:** Lewes District Council Local Plan Part 2  
**Categories:** GT01, Vanessa to deal with

I am writing to object to the proposal, termed GT01, to provide 5 permanent pitches for Gypsy Traveller and/or Travelling Showpeople at land south of the The Plough at the north end of Station Road, Plumpton Green,  
An application for much needed social housing was refused at this location due to the absence of any pavements on what is a road with the national speed limit. How can it be acceptable to have a Travellers site at this location and not social housing?  
I understand it is a government overarching aim to ensure fair and equal treatment for travellers in accessing education, health, welfare and employment infrastructure. How can the proposed location meet this aim? It is remote from any shops and the nearest bus stop can only be accessed by walking along a 60mph road. The local primary school is over 2km away and can only be accessed by car or by walking along a road with the national speed limit and two blind corners.  
I believe the Draft Plan should delete the proposed site on the basis that it does not comply with Government policy on providing fair and equal treatment for Travellers and is unsound

Yours sincerely,  
Allison Ingram  
[REDACTED]

**Representation ID: REP/243/E1**Representor Details:

<b>Representor ID:</b>	REP/243
<b>Name:</b>	lynne ismail
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>E1 - Land at East Quay, Newhaven Port</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	Yes
<b>Sound:</b>	Yes
<b>Representation:</b>	<p>I highly value the coastal land between Newhaven East quay and Seaford Bay and therefore do not want more development in this area. There has to be a balance between the economic concerns of an area and wildlife/nature/wellbeing of its Inhabitants. It is enough that the present plans are going ahead. I object strongly to the further plans for the area.</p>
<b>What changes do you suggest to make the document legally compliant or sound?</b>	

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

**Representation ID: REP/244/E1**Representor Details:

<b>Representor ID:</b>	REP/244
<b>Name:</b>	Peter Isted
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>E1 - Land at East Quay, Newhaven Port</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	Yes
<b>Sound:</b>	Yes Not Justified
<b>Representation:</b>  There is not the infrastructure to support this or other developments, there will be a vast increase in the Polylevels caused by the many lorry movements that will be involved in the construction & traffic movements when this & other developments are completed, both the Brett's developments & this planned development will cause a massive increase in Pollution which is already extremely high in Newhaven, you need to consider all of the implications before permitting this destruction of a very important &	

diverse area which borders the National Park, for once consider the implications for us Newhavers.

**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/245/GT01**Representor Details:

<b>Representor ID:</b>	REP/245
<b>Name:</b>	Romney and Sandie Jackson
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>GT01 - Land south of The Plough</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	
<b>Sound:</b>	
<b>Representation:</b>	
<p>We wish to register our objections to the proposed permanent traveller site on the northern edge of The Old Brickworks Business Units, Plumpton Green.</p> <p>The following comments largely refer to the guidance note of the Department for Communities and Local Government August 2015 "Planning policy for traveller sites [<a href="https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/457420/Final_planning_and_travellers_policy.pdf">https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/457420/Final_planning_and_travellers_policy.pdf</a>] " ("the Guidance").</p>	

"4(i) - to reduce tensions between settled and traveller communities in plan-making and planning decisions."

"4(k) - for local planning authorities to have due regard to the protection of local amenity and local environment."

"14. When assessing the suitability of sites in rural or semi-rural settings, local planning authorities should ensure that the scale of such sites does not dominate the nearest settled community."

The proposed traveller site adversely impacts our local community significantly and goes against the above Guidance (4(k)) for the following reasons:

\* According to the adopted Neighbourhood Plan, new developments should "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." The proposed traveller site will spoil the rural nature of our village and be located where planning has been refused in the past. It will be one of the first things any visitor to the village will notice. Plumpton is a quiet, downland village surrounded by farmland and visible from the South Downs National Park.

\* The proposed site is directly adjoining the Old Brickworks business park. Every one of the 21 businesses have stated that in the case of any development on this site they will be seeking to relocate as soon as possible [REDACTED]

\* As residents, we have fought to maintain our position as a dark skies village and security lighting would fly in the face of this. Dark Skies is also a policy of the South Downs National Park Authority.

\* Our family uses several of the businesses at the Old Brickworks and many Plumpton residents are employed there. These businesses also contribute to the local shop and the pubs. We have already lost one pub (The Winning Post) in the village as well as a general store, a hairdresser, the garage by the station and the butcher.

\* The custom brought into the village by these businesses is significant and to lose even a proportion of them would be a severe blow.

Tensions between settled and traveller communities (4(i))

\* With the above comments in mind, it is clear that there would be a real adverse effect on the settled community, in particular those adjacent or very close to the proposed site. [REDACTED]

\* The norm for a permanent traveller site has, until now, been outside the village apron. The two examples of sites "within villages in East Sussex" (Maresfield and Roberstbridge) cited at the Parish Council Meeting were completely erroneous. In both those cases a major road acts as a separator between the village and the site, there are no nearby houses and there are further separations, in Maresfield a Recycling Centre

and in Roberstbridge a high level of landscaping and trees. The proposed Plumpton Site would be unique within East Sussex.

\* It should be noted that the European Convention on Human Rights (included in UK law by the Human Rights Act 1988) confers rights on the settled community as well as on travellers.

The Neighbourhood Plan states "to plan for new development in the highly sustainable locations."

The proposed site is exactly 1 mile from the local primary school and just under 1 mile from the shop. There is no pavement from the proposed site in any direction and the national speed limit of 60mph is in force along that part of Station Road. There is inadequate public transport with infrequent buses and bus services which are under threat. This will result in a significant increase in traffic to and from the local school at peak times and further parking problems.

Domination of the nearest settled community (14)

Five permanent sites which include a mobile home and a touring caravan and parking and toilet blocks(s) will dominate the nearest settled community. This site is within only a few metres of one house and very near to eleven others.

Inadequate notice:

The notice given falls short of "early and effective community engagement". We knew nothing of this proposal until one week prior to the Parish Council meeting. We found out through Facebook despite the fact that we live close to the proposed site. This suggests a deliberate lack of transparency. In view of this we request the consultation period to be extended.

**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  
LDF@lewes.gov.uk

Romney and Sandie Jackson

24<sup>th</sup> October 2018

Ref: Local Plan Part 2: Proposal for a permanent site of five pitches for travellers and gypsies in Plumpton Green

**We wish to register our objections to the proposed permanent traveller site on the northern edge of The Old Brickworks Business Units, Plumpton Green.**

The following comments largely refer to the guidance note of the Department for Communities and Local Government August 2015 "[Planning policy for traveller sites](#)" ("the Guidance").

*"4(i) - to reduce tensions between settled and traveller communities in plan-making and planning decisions."*

*"4(k) - for local planning authorities to have due regard to the protection of local amenity and local environment."*

*"14. When assessing the suitability of sites in rural or semi-rural settings, local planning authorities should ensure that the scale of such sites does not dominate the nearest settled community."*

**The proposed traveller site adversely impacts our local community significantly and goes against the above Guidance (4(k)) for the following reasons:**

- According to the adopted Neighbourhood Plan, new developments should "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." The proposed traveller site will spoil the rural nature of our village and be located where planning has been refused in the past. It will be one of the first things any visitor to the village will notice. Plumpton is a quiet, downland village surrounded by farmland and visible from the South Downs National Park.
- The proposed site is directly adjoining the Old Brickworks business park. Every one of the 21 businesses have stated that in the case of any development on this site they will be seeking to relocate as soon as possible [REDACTED]
- As residents, we have fought to maintain our position as a dark skies village and security lighting would fly in the face of this. Dark Skies is also a policy of the South Downs National Park Authority.

- Our family uses several of the businesses at the Old Brickworks and many Plumpton residents are employed there. These businesses also contribute to the local shop and the pubs. We have already lost one pub (The Winning Post) in the village as well as a general store, a hairdresser, the garage by the station and the butcher.
- The custom brought into the village by these businesses is significant and to lose even a proportion of them would be a severe blow.

#### **Tensions between settled and traveller communities (4(i))**

- With the above comments in mind, it is clear that there would be a real adverse effect on the settled community, in particular those adjacent or very close to the proposed site. [REDACTED]
- The norm for a permanent traveller site has, until now, been outside the village apron. The two examples of sites “within villages in East Sussex” (Maresfield and Roberstbridge) cited at the Parish Council Meeting were completely erroneous. In both those cases a major road acts as a separator between the village and the site, there are no nearby houses and there are further separations, in Maresfield a Recycling Centre and in Roberstbridge a high level of landscaping and trees. The proposed Plumpton Site would be unique within East Sussex.
- It should be noted that the European Convention on Human Rights (included in UK law by the Human Rights Act 1988) confers rights on the settled community as well as on travellers.

#### **The Neighbourhood Plan states “to plan for new development in the highly sustainable locations.”**

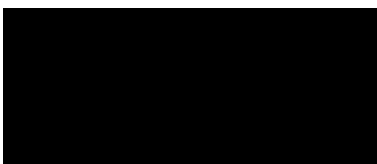
The proposed site is exactly 1 mile from the local primary school and just under 1 mile from the shop. There is no pavement from the proposed site in any direction and the national speed limit of 60mph is in force along that part of Station Road. There is inadequate public transport with infrequent buses and bus services which are under threat. This will result in a significant increase in traffic to and from the local school at peak times and further parking problems.

#### **Domination of the nearest settled community (14)**

Five permanent sites which include a mobile home and a touring caravan and parking and toilet blocks(s) will dominate the nearest settled community. This site is within only a few metres of one house and very near to eleven others.

#### **Inadequate notice:**

The notice given falls short of “early and effective community engagement”. We knew nothing of this proposal until one week prior to the Parish Council meeting. We found out through Facebook despite the fact that we live close to the proposed site. This suggests a deliberate lack of transparency. In view of this we request the consultation period to be extended.



Romney and Sandie Jackson

**Representation ID: REP/246/E1**Representor Details:

<b>Representor ID:</b>	REP/246
<b>Name:</b>	Audrey Jarvis
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>E1 - Land at East Quay, Newhaven Port</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	
<b>Sound:</b>	
<b>Representation:</b>	
<p>I am writing to protest against the proposal to allow future development of Tide Mills Beach.</p> <p>I feel strongly that policy E1 must be changed to protect this area as an important local wildlife site.</p> <p>Industrial development of the site is surely against our local Enterprise Zone ideals for a "clean green marine": and would result in a loss of biodiversity since this is an area of internationally rare vegetated shingle. As you must know, the site is also on the border of one of the few places where the South Downs National Park meets the sea.</p> <p>I urge you, on behalf of all residents and visitors, to change the policy to protect the area</p>	

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for wildlife, leisure and natural beauty.

**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?**

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## Thea Davis

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**From:** AUDREY JARVIS [REDACTED]  
**Sent:** 02 November 2018 11:25  
**To:** ldf  
**Subject:** Response to consultation E1: Tide Mills Beach  
  
**Categories:** LPP2 comment to code - stakeholder details have been added

Dear Sir or Madam,

I am writing to protest against the proposal to allow future development of Tide Mills Beach. I feel strongly that policy E1 must be changed to protect this area as an important local wildlife site. Industrial development of the site is surely against our local Enterprise Zone ideals for a "clean green marine": and would result in a loss of biodiversity since this is an area of internationally rare vegetated shingle. As you must know, the site is also on the border of one of the few places where the South Downs National Park meets the sea. I urge you, on behalf of all residents and visitors, to change the policy to protect the area for wildlife, leisure and natural beauty. .

Yours faithfully,  
Audrey Jarvis

**Representation ID: REP/247/GT01**Representor Details:

<b>Representor ID:</b>	REP/247
<b>Name:</b>	Carl Jenkins
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>
<b>Organisation:</b>

Contact Details:

Email Address:	
Address:	

Representation:

<b>Policy/Section:</b>	<b>GT01 - Land south of The Plough</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	
<b>Sound:</b>	
<b>Representation:</b>	
I received notice of the proposed traveller site adjacent to The Old Brickworks in Plumpton.	
I wish to appeal against this proposal for the following reasons:-	
There is no pedestrian access to the village amenities, which could be extremely dangerous for both pedestrians and road users.	
There is very poor access onto Station Road, and with its 60mph speed limit this would be an accident waiting to happen.	
The complete lack of services, especially the lack of mains drainage means its not a	

habitable site.

This proposed site is outside the development of a greenfield site and well outside the village planning envelope.

We have only just moved the business from Scaynes Hill to The Old Brickworks, bringing in new trade and jobs for the local community, but sadly [REDACTED] [REDACTED] we would not be prepared to stay on if the proposal were to go ahead, and would have to relocate our business elsewhere.

We have spoken at length to other tenants at The Old Brickworks, and others too have voiced their intention to leave. This would have a marked effect on the economy of the local 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?**

**From:** Carl [REDACTED]  
**Sent:** 04 October 2018 09:46  
**To:** ldf  
**Subject:** Proposed Traveller Site Adjacent to The Old Brickworks at Plumpton  
**Categories:** LPP2 comment to code - stakeholder details have been added

Dear Sir\Madam

I received notice of the proposed traveller site adjacent to The Old Brickworks in Plumpton.

I wish to appeal against this proposal for the following reasons:-

There is no pedestrian access to the village amenities, which could be extremely dangerous for both pedestrians and road users.

There is very poor access onto Station Road, and with its 60mph speed limit this would be an accident waiting to happen.

The complete lack of services, especially the lack of mains drainage means its not a habitable site.

This proposed site is outside the development of a greenfield site and well outside the village planning envelope.

We have only just moved the business from Scaynes Hill to The Old Brickworks, bringing in new trade and jobs for the local community, but sadly [REDACTED] we would not be prepared to stay on if the proposal were to go ahead, and would have to relocate our business elsewhere.

We have spoken at length to other tenants at The Old Brickworks, and others too have voiced their intention to leave. This would have a marked effect on the economy of the local area.

Yours sincerely

Carl Jenkins



**Representation ID: REP/248/GT01**Representor Details:

<b>Representor ID:</b>	REP/248
<b>Name:</b>	Simon Jones
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>GT01 - Land south of The Plough</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	No
<b>Sound:</b>	No Not Justified Not Effective Not Consistent with national policy
<b>Representation:</b>	The proposed gypsy and traveller accommodation : Policy GT01 Land South of the Plough fails to address the needs assessment (which is out of date) and the harm to the neighbouring village is significant.

The site remain outside of village confines and it conflicts with the neighbourhood plan which was adopted in May 2018.

It is out with the character and appearance of the village and will impact on the settling and appearance of the location.

It will require a change of use for the land in question, as it is currently agricultural land and would set a precedent for onward and further development.

Previous applications to develop this site have failed.

The site itself fails in achieving key sustainability criteria and the plan itself is incorrect insofar as it suggests safe pedestrian access along station road. This road does not provide a safe pedestrian foot path and the site is not within reasonable and safe walking distance to local amenities.

The site itself is prone to flooding.

It is also noted that the needs assessment is significantly out of date with a base date of 1st February 2014 and therefore cannot be relied upon.

There are no record of any unauthorised encampment or unauthorised development in the vicinity.

It is also noted that Bridies Tan the local transit provision is rarely over 50% capacity and as such more appropriate provision exists elsewhere.

This proposed location is outside of current national guidance for site allocation for gypsy and traveller accommodation.

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

The provision for traveller accommodation should be addressed only after an up to date needs assessment is completed. The expansion of the Bridies Tan transit provision remains the most appropriate, suitable and cost effective location.

**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 would like to ensure that all components of the plan comply with both national guidance and policy. Furthermore I wish to ensure that all elements of harm are considered during the examination process.

<b>Representation ID:</b> REP/249/GT01
--

Representor Details:

<b>Representor ID:</b>	REP/249
<b>Name:</b>	Ron Jury
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	GT01 - Land south of The Plough
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	
<b>Sound:</b>	
<b>Representation:</b>	
Having just moved to into Plumpton Village, we were (and still are) very disappointed to hear about the above proposal.	
Having moved from Buckinghamshire, [REDACTED]	
[REDACTED]	
[REDACTED].	
Please reconsider the impact on the local community that attracted us to this village.	
If this site goes ahead we will seriously review staying here, albeit that we have just	

moved in!

We attended the recent parish council meeting in the village hall and must echo and support the concerns that were raised during that meeting.

**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

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**From:** Ron Jury [REDACTED]  
**Sent:** 29 October 2018 19:47  
**To:** ldf  
**Subject:** Proposed Gypsy / Traveller Site in Plumpton  
  
**Categories:** LPP2 comment to code - stakeholder details have been added

TO WHOM IT MAY CONCERN

Having just moved to into Plumpton Village, we were (and still are) very disappointed to hear about the above proposal.

Having moved from Buckinghamshire, [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

Please reconsider the impact on the local community that attracted us to this village.

If this site goes ahead we will seriously review staying here, albeit that we have just moved in!

We attended the recent parish council meeting in the village hall and must echo and support the concerns that were raised during that meeting.

Ron Jury

<b>Representation ID:</b> REP/250/CH03
--

Representor Details:

<b>Representor ID:</b>	REP/250
<b>Name:</b>	Lucy Kalogerides
<b>Organisation:</b>	<b>Mid Sussex Area Bridleways Group (MSABG)</b>
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Local group or organisation

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>CH03 - Land adjacent to Mill Lane</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	Yes
<b>Sound:</b>	Yes
<b>Representation:</b>  CH 03 - This development is close to BW Chailey 51a, which provides access from mill Lane for riders from Chiltington to the South and Plumpton to the West. The development should not impact the bridleway however we request the LDC considers the safety and ongoing access requirements of bridleways users during the period of development of site CH03. We request that developers are reminded of the bridleway location and instructed to ensure safe access is provided to horse riders at all times	

during the construction 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?** No

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

**Representation ID: REP/250/DM17**

Representor Details:

<b>Representor ID:</b>	REP/250
<b>Name:</b>	Lucy Kalogerides
<b>Organisation:</b>	<b>Mid Sussex Area Bridleways Group (MSABG)</b>
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Local group or organisation

Agent Details:

<b>Name:</b>
<b>Organisation:</b>

Contact Details:

<b>Email Address:</b>	[REDACTED]
<b>Address:</b>	[REDACTED]

Representation:

<b>Policy/Section:</b>	<b>DM17: Former Lewes/Sheffield Park Railway Line</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	Yes
<b>Sound:</b>	Yes
<b>Representation:</b>  We wholeheartedly agree with DM17 that seeks to protect the existing non-vehicular route or the disused railway. We support that 'development which prejudice such uses will not be permitted unless proposal are accompanied by alternative route provision'.  'MSABG would like to add that the existing 'undeveloped parts 'of the railway line should be preserved rather than DM17 apply to an ever decreasing area of 'undeveloped parts	



'as proposals are considered and potentially allowed.

'Should developments be proposed in the area of the disused railway, MSABG would like the option of reviewing such 'alternative routes 'for the disused railway, if proposed, from the perspective of the horse rider.

**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?**

<b>Representation ID:</b> REP/250/DM35
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Representor Details:

<b>Representor ID:</b>	REP/250
<b>Name:</b>	Lucy Kalogerides
<b>Organisation:</b>	<b>Mid Sussex Area Bridleways Group (MSABG)</b>
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Local group or organisation

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>DM35: Footpath, Cycle and Bridleway Network</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	Yes
<b>Sound:</b>	Yes
<b>Representation:</b>  MSABG fully support Policy DM35, which means that all developments are assessed in terms of the effect on a current Right of Way, used by horses and the route either preserved with the same degree of safety or an alternative safe route provided.  'In addition, we request that, in terms of the 'impact on the convenience, safety and amenity value of.....the bridleway network....', Impact should be assessed in terms of	

potential 'busy-ness' of roads and lanes that provide the essential access to the bridleway network, and not just the network itself.

'While we would prefer roads not to become busier and therefore unsafe, we would like to see alternative safe routes established in parallel where routes are impacted by additional traffic, including temporarily during construction.

**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/250/INT**Representor Details:

<b>Representor ID:</b>	REP/250
<b>Name:</b>	Lucy Kalogerides
<b>Organisation:</b>	<b>Mid Sussex Area Bridleways Group (MSABG)</b>
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Local group or organisation

Agent Details:

<b>Name:</b>
<b>Organisation:</b>

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>What is the Lewes District Plan</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	Yes
<b>Sound:</b>	Yes
<b>Representation:</b>  The MSABG thanks LDC for the opportunity to submit comments on the Pre-Submission version of the Lewes District Local Plan Part 2. We have particular comments to make on the second stated objective of 'setting out detailed (non-strategic) development management policies to guide development and change'.  'We would like to see the public bridleway network and non vehicular routes preserved	

for the safety of the users, particularly horse and riders, into 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?** No

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

**Representation ID: REP/251/DM1**Representor Details:

<b>Representor ID:</b>	REP/251
<b>Name:</b>	John Kay
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>DM1: Planning Boundary</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	No
<b>Sound:</b>	No Not Justified Not Effective Not Consistent with national policy
<b>Representation:</b>	
The proposed new planning boundary for Ringmer is neither logical nor justified nor compatible with the policies of the Ringmer Neighbourhood Plan, and does not	

accurately reflect changes since the planning boundary was last drawn in 2003.

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

The proposed new Broyleside planning boundary appears intended to reflect residential and employment allocations made in the 2016 Ringmer Neighbourhood Plan but does not do so accurately.

The proposed new Ringmer village planning boundary appears intended to reflect residential allocations made in the 2016 Lewes Joint Core Strategy and the 2016 Ringmer Neighbourhood Plan but does not do so in a sensible way. It is completely illogical and unjustified to continue to exclude the house called 'Culverden', Norlington Lane, now that it is surrounded on three sides by established and proposed new residential development, all of which is proposed for inclusion within the new planning boundary. This section of the planning boundary should simply run down Norlington Lane.

It is also illogical for the proposed new Ringmer village planning boundary to continue to exclude the row of houses on the south side of Gote Lane and Rushey Green, which are clearly part of Ringmer village, and which on the Proposals Map are sandwiched between the South Downs National Park boundary (new since the planning boundary was last revised) and the current and proposed new Ringmer Village planning boundary. Everywhere else (except on Norlington Lane, as noted above) the Ringmer village planning boundary follows the actual boundary of the houses, other premises and curtilages of Ringmer village. These houses were excluded in 2003 with the intention of controlling extensions so as to protect public views from the public highway up towards the Downs. However this has proved completely ineffective, because it has never been enforced. In the intervening years several of these houses have had substantial extensions approved, and other developments such as tall fences which have blocked the views that this exclusion was intended to protect have been permitted. In no case has the 'saved' 2003 policy that supposedly restricted the size of such extensions been applied when considering the relevant applications, and this policy is no longer proposed for inclusion in the same form in the new Local Plan part 2. In addition this intention has been frustrated at several other locations by the residents growing tall hedges against the lanes to protect their privacy and their property against the impact of motor traffic. This section of the Ringmer Village planning boundary should thus be moved to coincide with the South Downs National Park boundary, as it is around the rest of the village's southern and north-western boundaries against the National Park.

**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?**

This would enable me to explain and justify in detail to the Inspector the changes that I propose.

**Representation ID: REP/252/E1**Representor Details:

<b>Representor ID:</b>	REP/252
<b>Name:</b>	Jane Keane
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>E1 - Land at East Quay, Newhaven Port</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	
<b>Sound:</b>	
<b>Representation:</b>  I wish to protest against the new policy E1 allocating a chunk of Tidemills Beach for future development. It is an absolute outrage that this development will lead to loss of biodiversity (including rare vegetated shingle).  This local Wildlife site should be preserved for posterity and for the enjoyment of both local people and visitors. My family and I often walk in this area and future development will have a devastating effect on this amazing beautiful natural area.  Local plans should by law 'contribute to sustainable development' and this plan does not.  I am very concerned about pollution with traffic and air quality, particularly in light of	



extra housing already allocated for Newhaven.

This policy does not reflect the 'clean green marine' vision of the enterprise zone or 'renewable energy cluster' of the port master plan.

With the public not being able to use the beach at West Quay it is absolutely imperative that local people are still able to enjoy this wonderful wildlife site, rather than being devoured by unsustainable development.

The views of local people must be taken into account when considering this new 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?**

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

**From:** Jane Keane [REDACTED]  
**Sent:** 04 November 2018 19:15  
**To:** ldf  
**Subject:** E1 Policy and Tidemills Beach  
  
**Categories:** LPP2 comment to code - stakeholder details have been added

To whom it may concern

I wish to protest against the new policy E1 allocating a chunk of Tidemills Beach for future development. It is an absolute outrage that this development will lead to loss of biodiversity (including rare vegetated shingle).

This local Wildlife site should be preserved for posterity and for the enjoyment of both local people and visitors. My family and I often walk in this area and future development will have a devastating effect on this amazing beautiful natural area.

Local plans should by law 'contribute to sustainable development' and this plan does not.

I am very concerned about pollution with traffic and air quality, particularly in light of extra housing already allocated for Newhaven.

This policy does not reflect the 'clean green marine' vision of the enterprise zone or 'renewable energy cluster' of the port master plan.

With the public not being able to use the beach at West Quay it is absolutely imperative that local people are still able to enjoy this wonderful wildlife site, rather than being devoured by unsustainable development.

The views of local people must be taken into account when considering this new policy.

Yours sincerely

Jane Keane

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**Representation ID: REP/253/E1**Representor Details:

<b>Representor ID:</b>	REP/253
<b>Name:</b>	Kathryn Kennedy
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>E1 - Land at East Quay, Newhaven Port</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	
<b>Sound:</b>	
<b>Representation:</b> <p>I would like to object to yet more land of natural beauty being snatched by money grabbing councillors. There will be no beach left, this is a nice tranquil area. The infrastructure is not built for even more traffic. Newhaven and Seaford already get snarled up because there is too much traffic on too little road to accommodate it. You seem to be able to find money when it comes to these kinds of projects, but are having trouble funding traffic lights at the junction of Bishopstone Road and Hill Rise where 3 accidents have happened in one week recently one which was a fatality, and there have been more accidents since.</p> <p>Newhaven has had to have the incinerator (where the quality of the air is debatable) and</p>	

even now even more traffic fumes will pollute the air. Where is this environmentally friendly. It seems as if the rest of the country is become more environmentally friendly but Newhaven is the area that all the pollution is being dumped. Come on Councillors you are selling Newhaven down the river for your own ends where is your conscience, and your loyalty to the people that voted you in?

**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

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**From:** barry hayes [REDACTED]  
**Sent:** 05 November 2018 09:37  
**To:** ldf  
**Subject:** East Beach and Tidemills

**Categories:** Vanessa to deal with

I would like to object to yet more land of natural beauty being snatched by money grabbing councillors. There will be no beach left, this is a nice tranquil area. The infrastructure is not built for even more traffic. Newhaven and Seaford already get snarled up because there is too much traffic on too little road to accommodate it. You seem to be able to find money when it comes to these kinds of projects, but are having trouble funding traffic lights at the junction of Bishopstone Road and Hill Rise where 3 accidents have happened in one week recently one which was a fatality, and there have been more accidents since.

Newhaven has had to have the incinerator (where the quality of the air is debatable) and even now even more traffic fumes will pollute the air. Where is this environmentally friendly. It seems as if the rest of the country is become more environmentally friendly but Newhaven is the area that all the pollution is being dumped. Come on Councillors you are selling Newhaven down the river for your own ends where is your conscience, and your loyalty to the people that voted you in?  
Sent from my iPad

Regards Kathryn Kennedy  
[REDACTED]

**Representation ID: REP/254/GT01**Representor Details:

<b>Representor ID:</b>	REP/254
<b>Name:</b>	Mr and Mrs Kenyon
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>GT01 - Land south of The Plough</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	
<b>Sound:</b>	
<b>Representation:</b>	
Policy GT1 - Land south of The Plough	
Please find below a response from my wife and I to Lewes District Council's Local Plan Part 2 Site Allocations and Development Management Policies consultation on the Pre-submission version of the Plan. I wish to register my strong opposition to Policy GT1 – Land south of The Plough. My home at	

██████████ is directly opposite the proposed permanent Gypsy and Traveller site for five pitches at a distance of approximately 30 metres. My property is shown in red below divorced from the edge of the Village. The proposed Gypsy and Traveller site is shown in brown.

Figure 1: The proposed Gypsy and Traveller site in relation to my property.

Paragraph 2.134 of the emerging Plan informs that:

"Core Policy 3 sets out criteria to be considered in any future assessment of subsequent potential Gypsy and Traveller pitch allocations made through Local Plan Part 2."

The preamble to Core Policy 3 identifies key two strategic objectives. These are:

- "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."

Given the site's divorced location from everyday goods and services and the incongruous intrusion the development of the site would subject the countryside to, I cannot fathom how the Council's proposal could possibly be construed as accommodating (alleged) growth requirements in the most sustainable way. Further, the proposed site is greenfield, not previously developed land, is not in a sustainable location as I have canvassed above, let alone a highly sustainable one and it would have a substantial adverse impact on the character of the area due to the consolidation of loose knit development which makes up the prevailing pattern of development at this end of the village.

The allocation of the proposed site will clearly fail to meet the two key two strategic objectives of Core Policy 3.

Paragraph 2.136 indicates the site is 650 metres north of Plumpton Green village. This is deceptive on the Council's behalf. Having measured, I believe it is 720 metres along Station Road to the edge of the more dense development in the village. More importantly, the site is 1500 metres from the post office and village store which the Council itself acknowledges "the site is not within a reasonable walking distance of these facilities". The Council has deliberately provided a lower distance to make the site appear like a more attractive proposition but if one walks 650 metres from the proposed site one will find nothing useful in terms of shops or facilities. Only 3 buses run per day, do not stop near the access and they are about to be removed.

Policy GT01 refers to the provision of access to be provided from Station Road whilst paragraph 2.137 refers to an existing agricultural access. This means two accesses will exist from Station Road as access will still be required to the land that is not encompassed within the proposed site. Paragraph 2.137 also informs that the access delivery is dependent on land outside of the County Council's ownership and also

outside of the ownership of the landowner. It is therefore questionable as to whether the site could be delivered in any event. I attended a meeting at which Leigh Palmer of Lewes – Eastbourne Council indicated East Sussex County Council had agreed to the access however this information has not been placed in the public domain. Local residents should have an opportunity to comment on the information.

On the subject of delivery, the Council has had no discussion with the Landowner regarding purchase price. It is entirely plausible that the Council are being used by the landowner as a pawn in a game to drive up the perceived value of his land in the hope that someone offers him over the odds for it. It may also reduce local opposition if an alternative form of development were to be proposed on the land. The site should not be considered deliverable until a firm agreement is in place between the landowner and the Council. Policy CP3 specifically requires the site is "deliverable" but the Council in truth has no idea as to whether delivery is achievable.

In terms of the other criteria required by Policy CP3, the site fails criteria 2, 3, 4, and 6.

As I have explained above, the site is not well related to, nor has it reasonable access to the Plumpton Green's services and facilities in variance to criterion 2.

The proposal would compromise landscape designations as the site is designated as countryside which is to be protected from development. The intrinsic character and beauty of the countryside should be recognised. The proposed site does not comply with criterion 3.

Criterion 4 is not complied with as it has not been demonstrated safe and convenient access is deliverable as I explain above. If this is now considered achievable, the public should have opportunity to comment on the Council's proposals.

The derestricted speed of the road means heavy vehicles from either direction breaking directly opposite / at the access point to turn into the works causes fast moving cars / other commercial vehicles to use the full width of the road so any pedestrian particularly children would be in unnecessary danger – certainly with 13 years' experience it is at times impossible to walk out and along this part of the road due to traffic and at night dangerous. Highways must know this and note the wear caused by heavy breaking / skidding at the exact point of access to the site.

Criterion 6 is caused offence as adequate levels of privacy would not be secured for residents of the site. I will be able to directly overlook them from my bedroom window. This will be impossible to landscape out unless 10 metre high evergreen trees are put in. This is demonstrated by Figure 2 below. Also night time there will be excessive light pollution from such density of human activity in one spot again directly at my property.

Figure 2: A view over the proposed site from a bedroom window at Downshurst.

Further, in reference to criterion 5 which requires capacity to provide appropriate on-site physical and social infrastructure such as water, power, drainage, parking and amenity space; there is little doubt this can be provided for 5 pitches in 0.69 hectares, it begs the question why so much space is required even allowing for vehicle turning. [REDACTED]



<div style="background-color: black; height: 30px; width: 100%;"></div> <div style="background-color: black; height: 20px; width: 25%; margin-top: 5px;"></div> <p>I am also concerned about odours, <span style="background-color: black; color: black;">[REDACTED]</span> (banned on the adjacent Works site) drainage (foul and surface water), <span style="background-color: black; color: black;">[REDACTED]</span> the negative impact on The Old Brickworks as a local employment centre, and the containing of the site to just that which has been allocated and any further expansion in the future.</p> <p>Any previous planning applications have been refused – see your records.</p> <p>Fundamentally, the Council has taken the easy way out. Rather than acknowledge that no suitable sites are available within the District, or at least that it has been unable to find them, it is waiting to be told by the Planning Inspectorate that the only site it has unearthed is inappropriate. It obviously deems this to be an easier task than explaining to the Inspector why it has been unable to find a suitable site. Rather than picking the best site out of a bad bunch, the Council has plumped for a bad site out of no bunch. Policy GT1 should be deleted and the Council instructed to undertake an exhaustive search for a site that complies with the requirements of Policy CP3 on the proviso that the alleged need is established.</p>
<b>What changes do you suggest to make the document legally compliant or sound?</b>
<b>Do you consider it necessary to participate at the Examination in Public?</b>
<b>Why do you feel it is necessary to participate at the Examination in Public?</b>

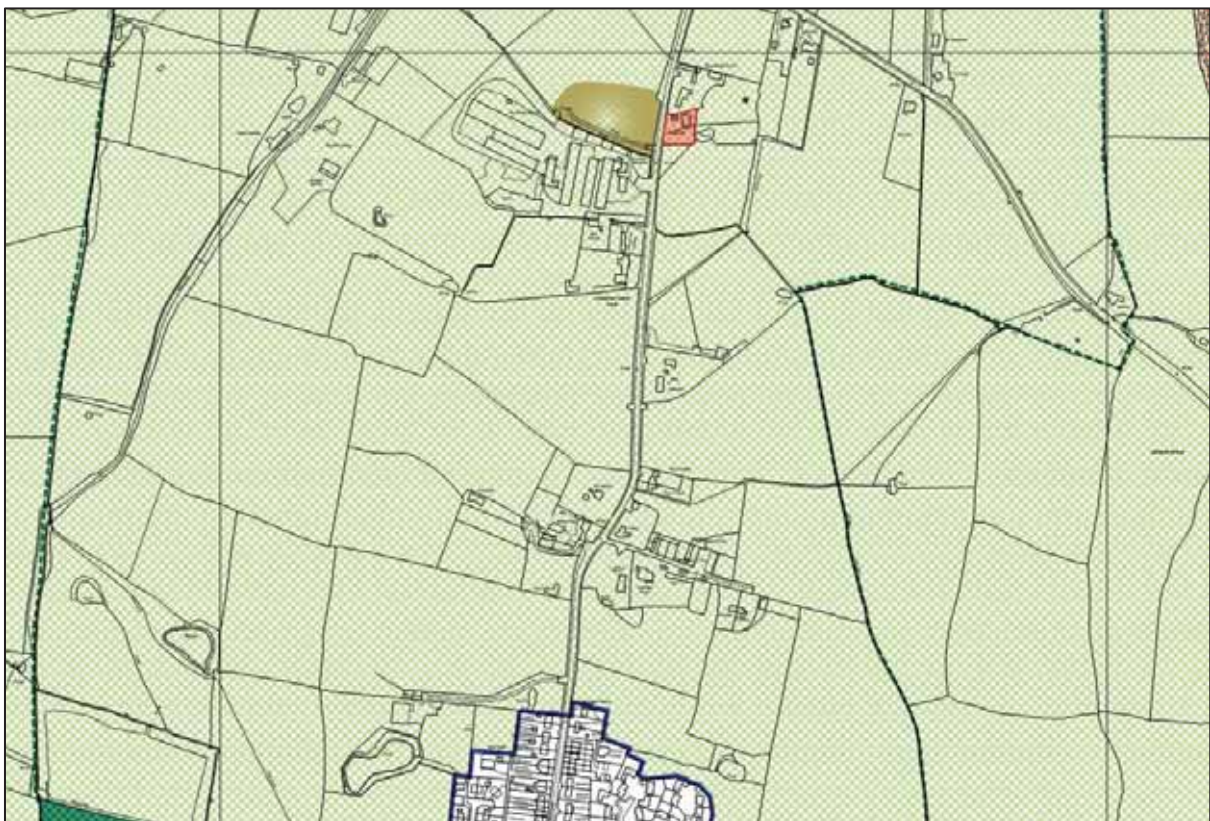
Planning Policy Team  
Lewes District Council  
Southover House  
Southover Road  
Lewes  
East Sussex  
BN7 1AB

29<sup>th</sup> October 2018

Dear Sir / Madam,

**Lewes District Local Plan Part 2 Site Allocations and Development Management Policies Consultation - Pre-submission version**  
**Policy GT1 - Land south of The Plough**

Please find below a response from my wife and I to Lewes District Council's Local Plan Part 2 Site Allocations and Development Management Policies consultation on the Pre-submission version of the Plan. I wish to register my strong opposition to Policy GT1 – Land south of The Plough. My home at [REDACTED] is directly opposite the proposed permanent Gypsy and Traveller site for five pitches at a distance of approximately 30 metres. My property is shown in red below divorced from the edge of the Village. The proposed Gypsy and Traveller site is shown in brown.



**Figure 1:** The proposed Gypsy and Traveller site in relation to my property.

Paragraph 2.134 of the emerging Plan informs that:

*"Core Policy 3 sets out criteria to be considered in any future assessment of subsequent potential Gypsy and Traveller pitch allocations made through Local Plan Part 2."*

The preamble to Core Policy 3 identifies key two strategic objectives. These are:

- *"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."*

Given the site's divorced location from everyday goods and services and the incongruous intrusion the development of the site would subject the countryside to, I cannot fathom how the Council's proposal could possibly be construed as accommodating (alleged) growth requirements in the **most** sustainable way. Further, the proposed site is greenfield, not previously developed land, is not in a sustainable location as I have canvassed above, let alone a **highly** sustainable one and it would have a substantial adverse impact on the character of the area due to the consolidation of loose knit development which makes up the prevailing pattern of development at this end of the village.

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As I have explained above, the site is not well related to, nor has it reasonable access to the Plumpton Green's services and facilities in variance to criterion 2.

The proposal would compromise landscape designations as the site is designated as countryside which is to be protected from development. The intrinsic character and beauty of the countryside should be recognised. The proposed site does not comply with criterion 3.

Criterion 4 is not complied with as it has not been demonstrated safe and convenient access is deliverable as I explain above. If this is now considered achievable, the public should have opportunity to comment on the Council's proposals.

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**Figure 2:** A view over the proposed site from a bedroom window at Downshurst.



Further, in reference to criterion 5 which requires capacity to provide appropriate on-site physical and social infrastructure such as water, power, drainage, parking and amenity space; there is little doubt this can be provided for 5 pitches in 0.69 hectares, it begs the question why so much space is required even allowing for vehicle turning. [REDACTED]

I am also concerned about odours, [REDACTED] (banned on the adjacent Works site) drainage (foul and surface water), [REDACTED], the negative impact on The Old Brickworks as a local employment centre, and the containing of the site to just that which has been allocated and any further expansion in the future.

Any previous planning applications have been refused – see your records.

**Fundamentally, the Council has taken the easy way out. Rather than acknowledge that no suitable sites are available within the District, or at least that it has been unable to find them, it is waiting to be told by the Planning Inspectorate that the only site it has unearthed is inappropriate. It obviously deems this to be an easier task than explaining to the Inspector why it has been unable to find a suitable site. Rather than picking the best site out of a bad bunch, the Council has plumped for a bad site out of no bunch. Policy GT1 should be deleted and the Council instructed to undertake an exhaustive search for a site that complies with the requirements of Policy CP3 on the proviso that the alleged need is established.**

Yours sincerely

Mr and Mrs Kenyon

[REDACTED]

**Representation ID: REP/255/GT01**Representor Details:

<b>Representor ID:</b>	REP/255
<b>Name:</b>	Peta King
<b>Organisation:</b>	<b>Gorgeous Things Ltd &amp; Kings Framers</b>
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Local Business / employer

Agent Details:

<b>Name:</b>
<b>Organisation:</b>

Contact Details:

Email Address:	
Address:	

Representation:

<b>Policy/Section:</b>	<b>GT01 - Land south of The Plough</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	
<b>Sound:</b>	
<b>Representation:</b>  I am writing to you regarding the proposal for the development of a travellers site in Plumpton Green.  We have been trading since 1993, and we are an established business on the Lewes High Street.  I have a workshop space in the Old Brickworks, which is located right beside this proposed site and am extremely worried about the possibility that the proposal may go through, as this would mean, due to the nature of our business [REDACTED], our immediate relocation away from the Old Brickworks.  This would cause our business and its employees considerable upheaval and huge	

disruption to our services, and to our customers.

This comes at an already dreadfully insecure time for those of us trading on the High Street, I am not at all sure we would survive it.

I implore those in a position of decision making to rethink this 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?**

## Thea Davis

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**From:** Pilfold, Russell  
**Sent:** 02 October 2018 16:57  
**To:** ldf  
**Cc:** Cllr Stephen Catlin ( )  
**Subject:** FW: Proposed Traveller Site in Plumpton Green

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

Hi

Please find attached an objection relating to the proposed travellers site in Plumpton green

Kind regards

Russell Pilfold

Team Leader (Planning Administration)

Phone: 01273 471600 ext. 5318  
Email: [russell.pilfold@lewes-eastbourne.gov.uk](mailto:russell.pilfold@lewes-eastbourne.gov.uk)  
Web: [lewes-eastbourne.gov.uk](http://lewes-eastbourne.gov.uk)  
Lewes District Council  
Southover House  
Southover Road  
Lewes  
East Sussex  
BN7 1AB

---

**From:** Cllr Stephen Catlin  
**Sent:** 02 October 2018 16:54  
**To:** Pilfold, Russell  
**Subject:** Fw: Proposed Traveller Site in Plumpton Green

Sent via the [BlackBerry Hub for Android](#)

---

**From:** ( )  
**Sent:** 2 October 2018 15:33  
**To:** [maria.caulfield.mp@parliament.co.uk](mailto:maria.caulfield.mp@parliament.co.uk); [Sarah.Osborne@lewes.gov.uk](mailto:Sarah.Osborne@lewes.gov.uk); [anita.emery@plumptonpc.co.uk](mailto:anita.emery@plumptonpc.co.uk); [Sam.Adeniji@lewes.gov.uk](mailto:Sam.Adeniji@lewes.gov.uk); [Graham.Amy@lewes.gov.uk](mailto:Graham.Amy@lewes.gov.uk); [simon.barnes@lewes.gov.uk](mailto:simon.barnes@lewes.gov.uk); [nancy.bikson@lewes.gov.uk](mailto:nancy.bikson@lewes.gov.uk); [liz.borrmann@lewes.gov.uk](mailto:liz.borrmann@lewes.gov.uk); [wayne.botting@lewes.gov.uk](mailto:wayne.botting@lewes.gov.uk); [bill.bovington@lewes.gov.uk](mailto:bill.bovington@lewes.gov.uk); [Julie.Carr@lewes.gov.uk](mailto:Julie.Carr@lewes.gov.uk); [joanna.carter@lewes.gov.uk](mailto:joanna.carter@lewes.gov.uk); [stephen.catlin@lewes.gov.uk](mailto:stephen.catlin@lewes.gov.uk); [mike.chartier@lewes.gov.uk](mailto:mike.chartier@lewes.gov.uk); [sharon.davey@lewes.gov.uk](mailto:sharon.davey@lewes.gov.uk); [johnnydennis@lewes.gov.uk](mailto:johnnydennis@lewes.gov.uk); [Will.Elliott@lewes.gov.uk](mailto:Will.Elliott@lewes.gov.uk); [nigel.enever@lewes.gov.uk](mailto:nigel.enever@lewes.gov.uk); [Paul.Franklin@lewes.gov.uk](mailto:Paul.Franklin@lewes.gov.uk); [Peter.Gardiner@lewes.gov.uk](mailto:Peter.Gardiner@lewes.gov.uk); [Stephen.Gauntlett@lewes.gov.uk](mailto:Stephen.Gauntlett@lewes.gov.uk); [bill.giles@lewes.gov.uk](mailto:bill.giles@lewes.gov.uk); [jaqueline.harrison-hicks@lewes.gov.uk](mailto:jaqueline.harrison-hicks@lewes.gov.uk); [olivia.honeyman@lewes.gov.uk](mailto:olivia.honeyman@lewes.gov.uk); [vic.ient@lewes.gov.uk](mailto:vic.ient@lewes.gov.uk); [Tom.Jones@lewes.gov.uk](mailto:Tom.Jones@lewes.gov.uk); [alex.lambert@lewes.gov.uk](mailto:alex.lambert@lewes.gov.uk); [isabel.linnington@lewes.gov.uk](mailto:isabel.linnington@lewes.gov.uk); [andy.loraine@lewes.gov.uk](mailto:andy.loraine@lewes.gov.uk); [Ron.Maskell@lewes.gov.uk](mailto:Ron.Maskell@lewes.gov.uk); [Elayne.Merry@lewes.gov.uk](mailto:Elayne.Merry@lewes.gov.uk); [susan.murray@lewes.gov.uk](mailto:susan.murray@lewes.gov.uk); [david.neave@lewes.gov.uk](mailto:david.neave@lewes.gov.uk); [Tony.Nicholson@lewes.gov.uk](mailto:Tony.Nicholson@lewes.gov.uk); [roklewes@lewes.gov.uk](mailto:roklewes@lewes.gov.uk); [Sarah.Osborne@lewes.gov.uk](mailto:Sarah.Osborne@lewes.gov.uk); [julian.peterson@lewes.gov.uk](mailto:julian.peterson@lewes.gov.uk); [Robbie.Robertson@lewes.gov.uk](mailto:Robbie.Robertson@lewes.gov.uk); [Tony.Rowell@lewes.gov.uk](mailto:Tony.Rowell@lewes.gov.uk); [Steve.Saunders@lewes.gov.uk](mailto:Steve.Saunders@lewes.gov.uk); [Jim.Sheppard@lewes.gov.uk](mailto:Jim.Sheppard@lewes.gov.uk); [Andy.Smith@lewes.gov.uk](mailto:Andy.Smith@lewes.gov.uk); [richard.turner@lewes.gov.uk](mailto:richard.turner@lewes.gov.uk); [linda.wallraven@lewes.gov.uk](mailto:linda.wallraven@lewes.gov.uk); [maria.caulfield.mp@parliament.uk](mailto:maria.caulfield.mp@parliament.uk)  
**Subject:** Proposed Traveller Site in Plumpton Green



Good Afternoon,

I am writing to you regarding the proposal for the development of a travellers site in Plumpton Green.

We have been trading since 1993, and we are an established business on the Lewes High Street.

I have a workshop space in the Old Brickworks, which is located right beside this proposed site and am extremely worried about the possibility that the proposal may go through, as this would mean, due to the nature of our business and the security we must offer our clients, our immediate relocation away from the Old Brickworks.

This would cause our business and its employees considerable upheaval and huge disruption to our services, and to our customers.

This comes at an already dreadfully insecure time for those of us trading on the High Street, I am not at all sure we would survive it.

I implore those in a position of decision making to rethink this proposal.

Peta King  
Director

Gorgeous Things LTD & Kings Framers  
57 High Street, Lewes, East Sussex, BN7 1XE  
01273 481020  
[REDACTED]

[WWW.GORGEousthingsLTD.COM](http://WWW.GORGEousthingsLTD.COM)  
[WWW.KINGSFRAMERS.COM](http://WWW.KINGSFRAMERS.COM)



BESPOKE FRAMING • ONLINE PRINT GALLERY • ARTWORK CONSULTANCY • LEWES SHOP

**Representation ID: REP/256/E1/A**Representor Details:

<b>Representor ID:</b>	REP/256
<b>Name:</b>	Geoffrey King
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Other

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>E1 - Land at East Quay, Newhaven Port</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	No
<b>Sound:</b>	No Not Justified
<b>Representation:</b>	
In response to the public consultation I wish to make the following comments:- There are many errors/contradictions between this Part 2 document and the Part 1 document Firstly, this document refers to land labelled Area E1 as land at East Quay Newhaven	

Port. This is inaccurate as the land is actually land at Tide Mills and not the East Quay.

3.11 Talks about safeguarded berths etc. for minerals importation and processing implying that East Quay is such a safeguarded berth. The safeguarded berth in the ESCC Waste and Minerals Plan is North Quay.

3.12 Talks about the NPP Masterplan which promotes Clean, Green activities and Renewable Energy. Newhaven has the Rampion operation but the pre-existing scrap metal mountain and now the Brett aggregates and ready mixed concrete activities are far from Clean, Green activities or anything to do with Renewable Energy.

3.13 Talks about the harbour expansion plans which are now underway south of the East Quay, however the statement is incorrect in that the planning permission was not 2016, it was 2015 - LW/15/0034

3.14 Talks about the large undeveloped area of land north east of the current harbour expansion as being considered suitable for future expansion of port related activities.

However, neither LDC Local Plan Part 1 or Part 2 offer any definition of Port Related Activities.

The phrase that Newhaven is a working port is often used by many people.

I have no problem with Newhaven being a working port, Ships, Fishing Boats, Cargo and Passengers. The problem NPP have is that it doesn't know if it's a port or an industrial estate. Since when was Ready Mixed Concrete a Port Related Activity for example.

3.15 Talks about much of the area being previously allocated in Policy NH20. I would suggest that this is a misleading statement as it was a far smaller area adjacent to the existing harbour that was previously referred to and did not extend south to the beach as Area E1 does.

The closing paragraph Policy E1: Land at East Quay Newhaven Port closes by stating that - All development proposals should ensure that the visual impact on the landscape and scenic beauty of the SDNP is minimised.

#### IN SUMMARY

We are the custodians of our local environment for the benefit of future generations and should be very mindful of this responsibility when it comes to protecting our unspoilt coastline. Any development at the western end of Seaford Bay on the land known as Tide Mills, Area E1, will impact heavily on the visual and amenity aspects of Seaford Bay as a whole. Any such development would have a clear visual impact when viewed from the west at Newhaven Fort and the West Quay or from any vantage point to the east along Seaford Bay and Seaford Seafront.

This land on Tide Mills, Area E1, was for many years designated as a Site of Nature Conservation Importance, more recently reclassified as a Local Wildlife Site. The area should be protected for its environmental benefits, its wild life biodiversity and local amenity value. There is also the internationally recognised Vegetated Shingle at the

southern end of Area E1

Given that no development has taken place anywhere along the available land adjacent to the already completed section of the new Port Access Road, even ASDA pulled out of that, there can be no justification to allocate even more land to the east of Newhaven as potential development land.

It is understood that NPP have said that once the new Port Access Road and Bridge are built and the link roads are built to access the existing harbour, NPP proposed to move the existing eastern boundary fence to enclose the new link roads into the harbour and that they don't propose any development further east than the new roads into the harbour.

Given the wildlife and environmental amenity aspects of this land, the history and archaeology of the seaplane base/radio station, the proximity to the SDNP, the negative visual and environmental impact any development would have and given that NPP don't propose any development further east than the new roads into the harbour there can be no justification for this land at Area E1 to remain in the LDC Local Plan Part 2 as potential development land..

Policy E1 should be removed from the Lewes District Council Local Plan Part 2

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

Policy E1 should be removed from the Lewes District Council Local Plan Part 2

**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?**

Firstly to ensure that my comments/concerns are acknowledged and secondly to ensure that there are no - behind closed doors - decisions made. The process should be open and transparent.

<b>Representation ID:</b> REP/256/E1/B
--

Representor Details:

<b>Representor ID:</b>	REP/256
<b>Name:</b>	Geoffrey King
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Other

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>E1 - Land at East Quay, Newhaven Port</b>
<i>Do you consider the document to be:</i> <b>Legally Compliant:</b> <b>Sound:</b>	
<b>Representation:</b>  I am emailing in response to the public consultation on the Lewes DC Local Plan Part 2 and in particular the Land at East Quay, Newhaven Port as set out below. The Lewes DC Pre- Submission version follows my comments for clarity as to which part of the Lewes DC Local Plan Part 2 I am commenting on.  LDC Local Plan Part 2 - Land at East Quay Newhaven Port	

In response to the public consultation I wish to make the following comments:-

There are many errors/contradictions between this Part 2 document and the Part 1 document

Firstly, this document refers to land labelled Area E1 as land at East Quay Newhaven Port. This is inaccurate as the land is actually land at Tide Mills and not the East Quay.

3.11 Talks about safeguarded berths etc. for minerals importation and processing implying that East Quay is such a safeguarded berth. The safeguarded berth in the ESCC Waste and Minerals Plan is North Quay.

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I have no problem with Newhaven being a working port, Ships, Fishing Boats, Cargo and Passengers. The problem NPP have is that it doesn't know if it's a port or an industrial estate. Since when was Ready Mixed Concrete a Port Related Activity for example.

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The closing paragraph Policy E1: Land at East Quay Newhaven Port closes by stating that – All development proposals should ensure that the visual impact on the landscape and scenic beauty of the SDNP is minimised.

#### IN SUMMARY

We are the custodians of our local environment for the benefit of future generations and should be very mindful of this responsibility when it comes to protecting our unspoilt coastline. Any development at the western end of Seaford Bay on the land known as Tide Mills, Area E1, will impact heavily on the visual and amenity aspects of Seaford Bay as a whole. Any such development would have a clear visual impact when viewed from the west at Newhaven Fort and the West Quay or from any vantage point to the east along Seaford Bay and Seaford Seafront.

This land on Tide Mills, Area E1, was for many years designated as a Site of Nature Conservation Importance, more recently reclassified as a Local Wildlife Site. The area should be protected for its environmental benefits, its wild life biodiversity and local amenity value. There is also the internationally recognised Vegetated Shingle at the southern end of Area E1

Given that no development has taken place anywhere along the available land adjacent to the already completed section of the new Port Access Road, even ASDA pulled out of that, there can be no justification to allocate even more land to the east of Newhaven as potential development land.

It is understood that NPP have said that once the new Port Access Road and Bridge are built and the link roads are built to access the existing harbour, NPP proposed to move the existing eastern boundary fence to enclose the new link roads into the harbour and that they don't propose any development further east than the new roads into the harbour.

Given the wildlife and environmental amenity aspects of this land, the history and archaeology of the seaplane base/radio station, the proximity to the SDNP, the negative visual and environmental impact any development would have and given that NPP don't propose any development further east than the new roads into the harbour there can be no justification for this land at Area E1 to remain in the LDC Local Plan Part 2 as potential development land..

Policy E1 should be removed from the Lewes District Council Local Plan Part 2

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

Land at East Quay, Newhaven Port

3.11 Newhaven is a relatively small port but provides important maritime links to mainland Europe. It also plays a vital role in the operation and maintenance of the Rampion offshore wind farm, which is located 13km of the Sussex coast, and the importation of marine aggregates. Its wharves and railheads are safeguarded for the existing and future mineral imports and processing by the East Sussex, South Downs and Brighton & Hove Waste and Minerals Plan (Policy WMP15) and the Waste and Minerals Sites Plan (Policy SP2).

3.12 The port is owned and operated by Newhaven Port and Properties (NPP), who published a masterplan in 2012 to provide a strategic framework for the development of the port over the next 20-30 years. Lewes District Council, East Sussex County Council and Newhaven Town Council have agreed to work with NPP to achieve the implementation of this masterplan in recognition that Newhaven needs a higher level of economic activity in order for both the town and the port to have a sustainable future.

3.13 In 2016, NPP were granted planning permission for the expansion of the existing working port area, including the refurbishment of the existing multi-purpose berth at East Quay, the construction of a new berth and slip way to the south, and new space for

associated offices, warehouses and workshops. It is anticipated this development 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.

3.14 The further expansion and enhancement of Newhaven Port is supported by Core Policy 4 (Economic Development and Regeneration) of the adopted Local Plan Part 1 in order to help revitalise the economy of the coastal area. An extensive area of largely undeveloped land in the ownership of NPP exists to the north-east of the proposed port expansion and new berth and slipway and this area is considered suitable for the future expansion of port-related activities.

3.15 Much of this area was previously allocated in Policy NH20 of the Lewes District Local Plan 2003. However, development of this site has previously been constrained by its poor vehicular access, which is currently via Railway Road and Beach Road. The construction of the final section of the new Newhaven Port access road is anticipated to unlock capacity for new employment space in this part of Newhaven and significantly enhance the development potential of the site.

3.16 The first phase of the Newhaven Port access road was completed in 2015, with the construction of the final phase due to be completed by 2020. The new road will then carry traffic by a bridge over the Newhaven to Seaford railway line and Mill Creek, providing a direct vehicular access from the A259 to both the allocated employment site and the remainder of the port land.

3.17 The viability of employment development on the site will be further enhanced through the current investment in new flood defences in Newhaven by the Environment Agency and the two Local Enterprise Partnerships (Coast to Capital LEP and South East LEP). This flood alleviation scheme will provide a 1-in-200-year standard of protection for the town and the port, taking into account the effects of climate change, and is due to be completed by the autumn 2019.

#### Policy E1: Land at East Quay, Newhaven Port

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 is minimised.

Figure 12 Land at East Quay employment site 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?** Yes

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



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<b>Representation ID:</b> REP/256/E1/C
--

Representor Details:

<b>Representor ID:</b>	REP/256
<b>Name:</b>	Geoffrey King
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Other

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>E1 - Land at East Quay, Newhaven Port</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	
<b>Sound:</b>	
<b>Representation:</b>	<p>Support for Newhaven TC Response on Policy E1 of the Lewes DC Local Plan</p> <p>I write to fully endorse and support all that is said in the Newhaven Town Council response to the consultation on the Lewes DC Local Plan regarding Policy E1.</p> <p>I echo the view that there should be no development east of the Newhaven Port Access Road once the road and bridge are built onto Tide Mills to access Newhaven Harbour.</p>

<b>What changes do you suggest to make the document legally compliant or sound?</b>
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<b>Do you consider it necessary to participate at the Examination in Public?</b>	<b>Yes</b>
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<b>Why do you feel it is necessary to participate at the Examination in Public?</b>
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**Representation ID: REP/256/E1/D**Representor Details:

<b>Representor ID:</b>	REP/256
<b>Name:</b>	Geoffrey King
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Other

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>E1 - Land at East Quay, Newhaven Port</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	
<b>Sound:</b>	
<b>Representation:</b>	
Response to consultation on the LDC Local Plan Part 2	
I am emailing in response to the consultation on the LDC Local Plan Part 2 , in particular Policy E1, Land at East Quay, Newhaven.	
I am attaching a petition with over 4000 signatures against any development on this land which is actually Tide Mills, not East Quay. Policy E1 should be removed from the LDC	

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Local Plan Part 2.

**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/256/E1/E**Representor Details:

<b>Representor ID:</b>	REP/256
<b>Name:</b>	Geoffrey King
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Other

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>E1 - Land at East Quay, Newhaven Port</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	No
<b>Sound:</b>	No Not Consistent with national policy
<b>Representation:</b>	
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.

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

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.

**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 that the process is open and transparent



## Thea Davis

---

**From:** Geoff [REDACTED]  
**Sent:** 30 October 2018 10:42  
**To:** ldf  
**Subject:** Support for Newhaven TC Response on Policy E1 of the Lewes DC Local Plan  
**Attachments:** NTC response on e1-converted oct 2018.docx  
  
**Importance:** High  
  
**Categories:** LPP2 comment to code - stakeholder details have been added

To  
Lewes DC

From  
[REDACTED]

Support for Newhaven TC Response on Policy E1 of the Lewes DC Local Plan

I write to fully endorse and support all that is said in the Newhaven Town Council response to the consultation on the Lewes DC Local Plan regarding Policy E1.

I echo the view that there should be no development east of the Newhaven Port Access Road once the road and bridge are built onto Tide Mills to access Newhaven Harbour.

Kind Regards

Geoff King



# News from the Office

## Issue No 816

Friday 26<sup>th</sup> October 2018

### NTC Response to LDC's Local Plan Part 2

Following discussion at Newhaven Town Council's Full Council meeting on the 16<sup>th</sup> 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 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 NH20 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 'lukewarm' 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, along an 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 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 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 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.

**From:** Geoff [REDACTED]  
**Sent:** 29 October 2018 10:52  
**To:** ldc@lewes.gov.uk; ldf  
**Subject:** Response to LDC Local Plan Consultaion Process  
  
**Importance:** High  
  
**Categories:** LPP2 comment to code - stakeholder details have been added

**To - Lewes District Council**

**From – Geoff King,** [REDACTED]

I am emailing in response to the public consultation on the Lewes DC Local Plan Part 2 and in particular the Land at East Quay, Newhaven Port as set out below. The Lewes DC Pre-Submission version follows my comments for clarity as to which part of the Lewes DC Local Plan Part 2 I am commenting on.

### **LDC Local Plan Part 2 - Land at East Quay Newhaven Port**

In response to the public consultation I wish to make the following comments:-

There are many errors/contradictions between this Part 2 document and the Part 1 document

Firstly, this document refers to land labelled Area E1 as land at East Quay Newhaven Port. This is inaccurate as the land is actually land at Tide Mills and not the East Quay.

3.11 Talks about safeguarded berths etc. for minerals importation and processing implying that East Quay is such a safeguarded berth. The safeguarded berth in the ESCC Waste and Minerals Plan is North Quay.

3.12 Talks about the NPP Masterplan which promotes Clean, Green activities and Renewable Energy. Newhaven has the Rampion operation but the pre-existing scrap metal mountain and now the Brett aggregates and ready mixed concrete activities are far from Clean, Green activities or anything to do with Renewable Energy.

3.13 Talks about the harbour expansion plans which are now underway south of the East Quay, however the statement is incorrect in that the planning permission was not 2016, it was 2015 – LW/15/0034

3.14 Talks about the large undeveloped area of land north east of the current harbour expansion as being considered suitable for future expansion of port related activities.

However, neither LDC Local Plan Part 1 or Part 2 offer any definition of Port Related Activities.

The phrase that Newhaven is a working port is often used by many people.

I have no problem with Newhaven being a working port, Ships, Fishing Boats, Cargo and Passengers. The problem NPP have is that it doesn't know if it's a port or an industrial estate. Since when was Ready Mixed Concrete a Port Related Activity for example.

3.15 Talks about much of the area being previously allocated in Policy NH20. I would suggest that this is a misleading statement as it was a far smaller area adjacent to the existing harbour that was previously referred to and did not extend south to the beach as Area E1 does.

The closing paragraph Policy E1: Land at East Quay Newhaven Port closes by stating that – All development proposals should ensure that the visual impact on the landscape and scenic beauty of the SDNP is minimised.

## IN SUMMARY

We are the custodians of our local environment for the benefit of future generations and should be very mindful of this responsibility when it comes to protecting our unspoilt coastline. Any development at the western end of Seaford Bay on the land known as Tide Mills, Area E1, will impact heavily on the visual and amenity aspects of Seaford Bay as a whole. Any such development would have a clear visual impact when viewed from the west at Newhaven Fort and the West Quay or from any vantage point to the east along Seaford Bay and Seaford Seafront.

This land on Tide Mills, Area E1, was for many years designated as a Site of Nature Conservation Importance, more recently reclassified as a Local Wildlife Site. The area should be protected for its environmental benefits, its wild life biodiversity and local amenity value. There is also the internationally recognised Vegetated Shingle at the southern end of Area E1

Given that no development has taken place anywhere along the available land adjacent to the already completed section of the new Port Access Road, even ASDA pulled out of that, there can be no justification to allocate even more land to the east of Newhaven as potential development land.

It is understood that NPP have said that once the new Port Access Road and Bridge are built and the link roads are built to access the existing harbour, NPP proposed to move the existing eastern boundary fence to enclose the new link roads into the harbour and that they don't propose any development further east than the new roads into the harbour.



Given the wildlife and environmental amenity aspects of this land, the history and archaeology of the seaplane base/radio station, the proximity to the SDNP, the negative visual and environmental impact any development would have and given that NPP don't propose any development further east than the new roads into the harbour there can be no justification for this land at Area E1 to remain in the LDC Local Plan Part 2 as potential development land..

Policy E1 should be removed from the Lewes District Council Local Plan Part 2

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

Land at East Quay, Newhaven Port

3.11 Newhaven is a relatively small port but provides important maritime links to mainland Europe. It also plays a vital role in the operation and maintenance of the Rampion offshore wind farm, which is located 13km of the Sussex coast, and the importation of marine aggregates. Its wharves and railheads are safeguarded for the existing and future mineral imports and processing by the East Sussex, South Downs and Brighton & Hove Waste and Minerals Plan (Policy WMP15) and the Waste and Minerals Sites Plan (Policy SP2).

3.12 The port is owned and operated by Newhaven Port and Properties (NPP), who published a masterplan in 2012 to provide a strategic framework for the development of the port over the next 20-30 years. Lewes District Council, East Sussex County Council and Newhaven Town Council have agreed to work with NPP to achieve the implementation of this masterplan in recognition that Newhaven needs a higher level of economic activity in order for both the town and the port to have a sustainable future.

3.13 In 2016, NPP were granted planning permission for the expansion of the existing working port area, including the refurbishment of the existing multi-purpose berth at East Quay, the construction of a new berth and slip way to the south, and new space for associated offices, warehouses and workshops. It is anticipated this development 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.

3.14 The further expansion and enhancement of Newhaven Port is supported by Core Policy 4 (*Economic Development and Regeneration*) of the adopted Local Plan Part 1 in order to help revitalise the economy of the coastal area. An extensive area of largely undeveloped land in the ownership of NPP exists to the north-east of the proposed port expansion and new berth and slipway and this area is considered suitable for the future expansion of port-related activities.

3.15 Much of this area was previously allocated in Policy NH20 of the Lewes District Local Plan 2003. However, development of this site has previously been constrained by its poor vehicular access, which is currently via Railway Road and Beach Road. The construction of the final section of the new Newhaven Port access road is anticipated to unlock capacity for new employment space in this part of Newhaven and significantly enhance the development potential of the site.

3.16 The first phase of the Newhaven Port access road was completed in 2015, with the construction of the final phase due to be completed by 2020. The new road will then carry traffic by a bridge over the Newhaven to Seaford railway line and Mill Creek, providing a direct vehicular access from the A259 to both the allocated employment site and the remainder of the port land.

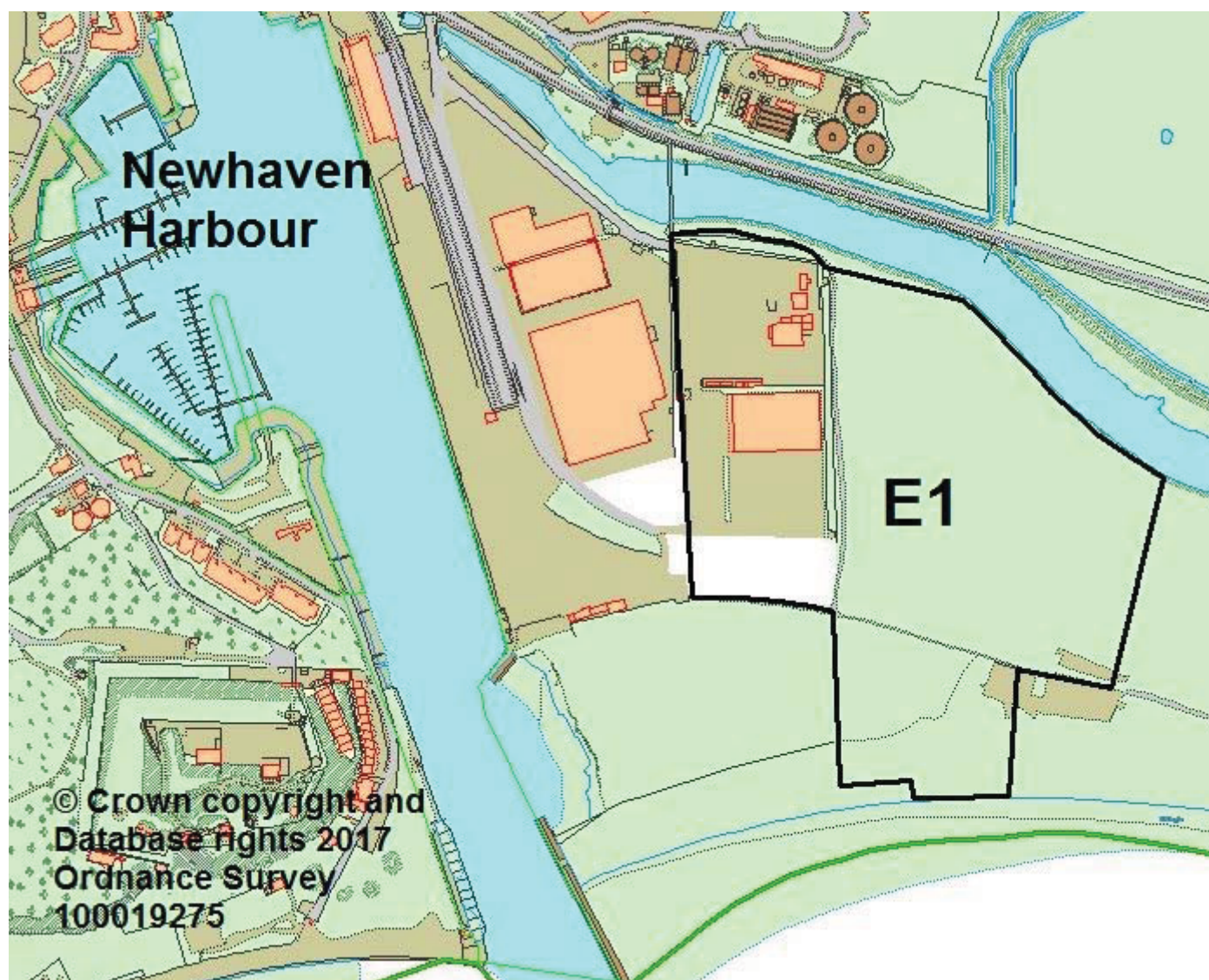
3.17 The viability of employment development on the site will be further enhanced through the current investment in new flood defences in Newhaven by the Environment Agency and the two Local Enterprise Partnerships (Coast to

Capital LEP and South East LEP). This flood alleviation scheme will provide a 1-in-200-year standard of protection for the town and the port, taking into account the effects of climate change, and is due to be completed by the autumn 2019.

#### **Policy E1: Land at East Quay, Newhaven Port**

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 is minimised.

**Figure 12 Land at East Quay employment site allocation**



## Thea Davis

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**From:** Geoff [REDACTED]  
**Sent:** 29 October 2018 15:26  
**To:** ldf  
**Subject:** Response to consultation on the LDC Local Plan Part 2  
**Attachments:** save-the-western-end-of-tide-mills-and-seaford-bay petition at oct 2018.docx  
**Importance:** High  
**Categories:** LPP2 comment to code - stakeholder details have been added

To  
Lewes District Council

From  
Geoff King  
[REDACTED]

Response to consultation on the LDC Local Plan Part 2

I am emailing in response to the consultation on the LDC Local Plan Part 2 , in particular Policy E1, Land at East Quay, Newhaven.

I am attaching a petition with over 4000 signatures against any development on this land which is actually Tide Mills, not East Quay. [Policy E1 should be removed from the LDC Local Plan Part 2.](#)

Kind regards

Geoff King

# Save the Western End of Tide Mills and Seaford Bay

## To: Lewes District Council

Prevent the destruction of the Western End of Tide Mills and Seaford Bay by refusing inappropriate development and dirty, low value, low tech, environmentally and ecologically unfriendly industries such as ready mixed concrete and concrete block making.

Preserve the Western End of Seaford Bay and Tide Mills by maintaining and enhancing the unspoilt coast line.

Why is this important?

The Western End of Tide Mills and Seaford Bay is under threat following East Sussex County Councils plans to build a road and bridge over the railway and creek and onto Tide Mills to access Newhaven Harbour.

The associated lorry and transport movements such a road and bridge will create together with any industrialisation of the Western End of Tide Mills and Seaford Bay will create industrial pollution, traffic noise, traffic pollution and cause additional traffic congestion problems on our already inadequate road system.

Any development of Area E1 would destroy the Western End of Tide Mills and Seaford Bay and alter the Western End of Seaford Bay not only from the visual perspective but environmentally and ecologically with far reaching consequences for both wild life and plant life. Once lost, this unspoilt coast line will be gone for ever.

The proximity of Area E1 to the South Downs National Park must also be considered with regard to any visual, environmental and ecological impact any development of Area E1 would have.

There is also the public health issue associated with proposing such activities so close to the residential areas of Newhaven and also given the prevailing south westerly winds, any pollution would be blown directly to Seaford.

**Signed by 4,123 people as of 28<sup>th</sup> October 2018:**

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Julie Jones	
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Sarah Sellers	
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Jason Lewendon	
Sam Ford	
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Jacqueline Gravell	
Gabi Wright	
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Diana Kershaw	
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Colin Owen	
Richard Taylor	
Damien Brennan	
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Name	Postcode
Roz Powney	
John Mockler	
Ally Preece	
Martin Cornforth	
Claire Hamilton	
Tonia Tree	
Samantha Dawes	
Helena Fisher	
Monica Goodall	
Julian Abrams	
Lisa Osmond	
Victoria Palmer	
Kate Harrison	
Jackie Williams	
Patrick Moore	
Jackie Reeve	
Ann Giles	
Mark Phillips	
Jane Waterman	
Alan McCaig	
Theresa McFarlane	
M T McGuire	
Delia Ives	
Michael Naunton	
Jo Prior	
Joanne Naunton	
Elise Holliman	
Gina Hart	
Philip Cooke	
Iain Allan	
peter giles	
Adrian Mann	



Name	Postcode
Valerie Mullan	
Robert Mllan	
Ronald Giles	
Ian Everest	
Philip Ward	
Rosie Whittaker	
Bren Hall	
Janet Going	
Gordon Taylor	
Helena Jones	
Christopher McBrien	
Glynis Chorley	
Richard Harvey	
Susan Rowland	
Nicola Walker	
Debbie Vidler	
Glenn O'Neill kane	
Frances Harrison	
Connor Smith	
Susan Finnie	
Stephen Wheatley	
Andrew HOLBORN	
Sarah Metcalfe	
Peter Whitcomb	
Alfred Cook	
Alan Heseltine	
Simon Smith	
Doug Newland	
Colin Tyson	
jenny watson	
Ian Owings	

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Sue Taylor		
justine randall		
graham matthews		
Marion Goodwin Dave Boddington		
Alastair Gray		
Graham Hale		
John Cheesman Phil Edwards		
Denise Woodham		
Anna Edwards		
KRISTINE HOPKINS		
Dave Leggett		
Becky Stopps		
Teresa O'Brien		
Ewan Urquhart David Underwood		
Ralph S sean chapman		
Carolyn Docwra L Boxall		
Sarah Smithers Robert Young		
Vanessa Martin-cramp		
Joanne Davis		
Penny Cooper		
keith Bannerman		
Sarah Mitchell Louise Woollard		
Clare Taylo John Blackman		

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Fiona Higham	
Vivien Kite	
Sandy C	
Hannah Birch	
Chloe Sands	
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Lynn Lawson	
robert lawson	
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Victor Finch	
DANIEL WITTENBERG	
Antonia Tolhurst	
Vanessa Jones	
Suzanne Armsden	
Linda Holm	
Debbie Bishop	
Denise Shorer	
V Mather	
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Helen Shipley	
Emily Hart	
Luke rees	
Katharine le Roux	
Ralph Erle	
H Cox	
Linda Hitchen	
Edwina Goldsmith	
Amelia Philpott	
Greg Blake	
Vicky Cosstick	
Roland Satchell	

Name	Postcode
tara begley	
Kevin Woodbridge	
Jeremy Lazarus	
david vye	
Roberta Salmon	
John Duffy	
T Coleman	
Kim Penfold	
Lindsey Jones	
Clair Drew	
Samantha Baker	
Anna Crabtree	
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Iryna Relf	
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Carmel Swann	
Jean Elizabeth Sheppard	
Hilary sorrell	
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Darren Lumley	
Terry Sands	
D A Martin	
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Denise Moore	
julie meades	
Ian Cairns	
Crispin Rose-Innes	
Louise Clark	
valerie butler	

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Pamuline Curl	
Sylvia Aston ray baker	
Sylvia Newson simon watkins	
Tamsin Ricci Victoria Wilson	
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Lisa Sutton Carol Foster	
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Paul Waller		
Rachel Waller		
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janice Goodwin		
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Bryan Van Namen	
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Meriel Ensom	
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paul cooper	
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Alison Earle	
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Tony McCord	
Alison Soudain	
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Rita Ellis	
Carole Becker	

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Ginny Smith	
Alison Akehurst	
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S Ward	
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Esme Rowland	
Alison Mowbray	
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Iiz andrews	
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audrey penny	
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Paul Shine	
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Wendy Spencer	
Maggie Grinyer	
Charles Mansfield	
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stuart simkins	
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Tanya Richardson	
Marilyn Arnott	
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Pamela Linnett	
Ronald Linnett	
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Nicola Miles	
shirley brooks	
iain paxon	
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Brett Banks	
Sue Shephard	
Lidia Machado	
Lucy Dance	
Sandra Newns	
Catherine Huntley	

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Christopher Huntley	
Jonathan Collins	
Ellie Drage	
Joanna Carter	
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Gail Wayman	
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Helen Reynolds	
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Donna Reid	
Cameron Conn	
Sally Nicholl	
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Peter Kiss	
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Alex Lacey	
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INGRID VENUS	
Paolo Marimon	
Geoff Cheetham	
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Paul Facer	
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heather booth	
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suzanne nartin	
Alun Tlusty-Sheen	
Kirste Glen	
Jacob Sheen	
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Deborah Forrester	
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Vicky Crombie	
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Glynis Bakewell	
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Anthony Spencer	
linda Feldwicke	
Mark Turner	
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Peggy McKenzie	

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Linda Rose	
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Tyler Vacher	
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Sandra Sexton	
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Anne Moynihan	
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Suzanne Bird	
Laura McDermott	
Ray Dye	
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Owen O'Donnell	
Katie Fickweiler	
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Sue Cherriman	
Rebecca Bearn	
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Averil Hume	
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Heather Scott	
Carla Wells	
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David Wells	
Jeremy Marshall	
Peter Grabowski	
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jeanette sullivan	
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Lisa Robinson	
Lisa Bibby-Larsen	
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Sydney Batt	
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Maddie Bolt	
Ian Gibson	

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Kirsty Elson	
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Sara Waterson	
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Pete Bemmer	
Nicola Robard	
Isobel Shankland	
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Victoria Webster	
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Caitriona Donohoe	
Katie Stevens	
Oliver Prentice	
Kirston Plummer	
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Dave Plummer	
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Ria Davis	
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Magz Roberts	
Becky Blue	
Zoe Stevenson	
Andrea Moscatelli	
Tom Oakey	
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Megan Bennett	
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Leona Russell	
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Esther Lenthall	
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Joanne Nutt	
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Gill Bastedo	
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Lizzie Gretton	
mark Hayward	
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Olivia Barker	
Neil Kitching	
Roy Fellingham	

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richard valdambrini		
Emma Roby		
Claire Thorpe		
Andrew Pringle		
Susan Brooks		
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Megan Tanner		
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Linda Cook	
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Claire De Clemente	
Emma West	
Lorna Gordon	
Max Hilbourne	
Royland Sevilla	
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Alison West	
Olie Spink	
Diana Crook	
Chris Frost	
Lucy Wilson	
Katherine Plows	
Linda Dobson	
Derek Haggard	
Guy Meyer	
A Ho	
Nick Hill	
Natalia Znatkova	
Tracey Stalberg	
Abigail Hitchins	
Jo Blackwell	
Angela Asplin	
Shaun Blackwell	
Holly Blackwell	
Francesca Lambert	
Hannah Breach	
Harry Rogers	

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Harry Flude	
Paul Watson	
Maria Brown	
Hannah Rowsell	
Maria Blatchley	
Julie French	
Clair Crooks	
Charlotte Boan	
Malcolm Garner	
Graham Catt	
tracy pickard	
Gillian Lowles	
Jenny Maidment	
Gabrielle Wellesley	
Sarah Mann	
Jonathan Bacon	
Paul Baxter	
Judith Rankin	
Rachel Holmes	
Rachel Rumble	
Jo Hart	
Neil Tuner	
Lorraine Trenchard	
Miranda Waugh	
Hayley Cox	
Sara Buckner	
Alison Hughes	
Simon Leppard	
Sarah Chrisp	
Jo Fowler	
Sally Armitage	

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Cheryl Wood	
Michael Fraser	
Nicky Stoner	
Rosa Botterill	
Graham Stoner	
Alison Harris	
Terry Green	
Nicola Corcoran	
Marilyn Goatman	
Lorraine Heaysman	
Helen Dunman	
Marilyn Dewberry	
Rachel Nelson	
Rebecca Evans	
Alison Meekins	
sian Attwood	
Susan Sullivan	
Rebecca McDonald	
Emma Godden	
Ruth Colcombe	
David O'Neill	
Janelle Rskow	
Charles Humphries	
maca smith	
Lindsay Hamilton	
Lorna Drake	
Monika Carter	
Julia Brook	
Mark Kingston	
Elizabeth Fenn	
Roger Fenn	

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Frank Bond	
Natalie Culshaw	
lillian curtis	
Michael Bishop	
Helen Derbyshire	
Penny Clarkson	
Sophie Cameron	
Sallie Sullivan	
James Wong	
Julia Roberts	
Katy Martin	
Amber Wieland	
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Geraldine Warner	
Stuart Foster	
Susie Jennings	
Carolyn Sutton	
Emma Owens	
Kelly anne Platt	
Linda Woolgar	
Fiona Wellings	
Judy Preece	
Rhiannon Reice	
Trevor Curry	
John Roberts	
Irene Evens-Gilham	
Anne Roberts	
Gail Leach	
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Gabriel Josipovici	
Steve Mitchelmore	

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gary coe		
Rob Foster		
Penelope Halmshaw		
Crystal Hards John Rayner		
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John Hall		
Louise Mayhew Mary Guy		
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Ric Blow		
Jasmin Rowson Ian Everest		
Philip Bell		
hannah tullett		
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Diane Pryce		
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chriss smith Caroline Baker		
Matt Huntly		
Sue Bartholomew		
Richard Anthony Feather		
Heather Hickman		
Natasha Stone		
Roy Rogers		
Terry Clements B Coleman		
judith ravenicroft		
Rebecca Herriott		

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Marc Thimas	
Carole Clarke	
Philip Stone	
Neil Feist	
Peter French	
Rose Line	
Lindsay Freeman	
Susan Holt	
Margaret Millgate	
Emma Lloyd	
Alison Morris	
Joy Tatem	
Melissa Gould	
Natalie Katona	
Craig Brooks	
Caroline Jones	
Christine Nash	
Philippa Challis	
Rita Goodey	
Joan MacGregor	
Robert Petch	
S Smith	
Louise Burbidge	
Donna Burrows	
Petra Rinne lovelock	
Theresa Bristow	
D Morri	
Julia Nobakhsh	
Sharon Giles	
Jane Groom	
Paula Guest	
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Name	Postcode
Veronica Sanz	
Kristin Hansen	
Emma Alford	
Tracy Jackson	
Geraldine O'Brien	
nannette Aldred	
Henry Tait-Winter	
Louise Roberts	
Amie Noone	
Aless Foster	
Lucy Day	
Carol Powell	
Caroline Blackett	
Johnny Denis	
Paul Wills	
Paul McDonald	
Gemma Bennett	
Elaine Goodman	
Amanda Bolt	
Ali Wicks	
Wil Wardle	
Alison Payne	
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De'anne Herriott	
Clare Wratten	
Victoria Trenhaile	
Dev Jaffe	
Julia Neal	
Stephanie Stanyard	
Andrea Heverin	
Janet McCormick	
Anna Tait	

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vicky bagley	
Tracey Price	
Michael King	
Susan Bird	
Gary Coyston	
Tracy Coyston	
Roy Clay	
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Jonathan Tait	
Kate Latter	
Vicky Emptage	
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Belinda Perkins	
James Oxborrow	
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Eve Wood	
tracey gilchrist	
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kirsty bruce	
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Valerie Raynor	
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nina lockwood	
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e osborne	
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ray gibson	
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fiona Neda	
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Nada Hewitt	
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Rachael Toner	
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Erin Goonan	
Ern Goo	
Enn Goo	
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terry jones	
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e Simmons	
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nick bush	
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colin fish	
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michele turner	
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Derik P	
jaqi sitko	
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J Pobitzer	

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Michael Aldridge	
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C Knight	
jim Jones	
Barry Taylor	
Linda Taylor	
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kerry jackson	
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Susan Mayo	
Susan Chapman	
D Pearson	
tish macqueen	
Pam Clutterbuck	
roger avey	
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Zbigniew Chwialkowski	
Steve Saunders	
Graham Oliver	
Msrtyn Bristow	
Mary Goodhew	
Kira Coldicott	
Mark Birbeck	
Melody Brown	
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Marie Wharrie	
Chris Gwynn	
ami smithson	
Keith Baker	
Nanette Kirk	
Siou Hannam	
Clare Skeats	
Virginia Farman	
Pincus Coran	
David Wharrie	
Sophie Collins	
julia bush	
nick bush	
Kate Laird	
Sara Paul	
David Ashdown	
T A M Brennan	
Matt Hillier	
Oliver Matthews	
Julie Phillips	
Nicholas Royle	
Corinne Stewart	
Diane Nash	

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Terry Mackie	
Alex Saunders	
jack rumbold	
joan cox	
John Scaife	
Sidney Hall	
sol wondrausch	
Neil Strother	
francis pulham	
Donna Burr ridge	
nikola upton	
Chloe Herbert	
Lesley Homer	
Sally Swift	
Patricia Robertson	
Alan Terrill	
William Cranham	
Rachel Richley	
Caroline Maguire	
Tim Maguire	
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Sherryl MacPhee	
Claire Newins	
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Nick Martin	
Dennis Gillespie	
Rachel Fryer	

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B COLEMAN	
Rowan mconegal	
Sandie Namihas	
Vivienne Taylor	
Vivien Haggis	
Joe Sanders	
Deirdre Stevens	
Sarah Wicks	
tom bunstead	
David Swanb	
Lucy Jones	
Spike Hallissey	
Richard Mackenzie	
Lucy Boize	
Piers Moore-Ede	
jodene Street	
Jenny Gabriel	
Jocy James	
Catherine Noyce	
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Bridgeen Boize	
Emma Donovan	
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Grace Collins	
Jonathan Bonnici	
Matt Huntly	
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janice bunstead	



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Rachel Chilton	
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Michelle Rees	
ewa johnston	
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Zoe Poole	
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Jane Baird	
Carla Leslie	
Malcolm Boother	
phillip anderson	
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Paul Felgate	
Jake Clark	
Andrew Farley	
Claire Sumners	
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adam bushell	
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William Pile	
Mark Tallon	
isabel mills	

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Toby Compton	
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Charlie Ward	
Oana Iolea	
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Reem A	
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Mattock	
Darren Soanes	
Maureen Sheldon	
Toni Sandford	
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Shirleyann Varney	
niamh baldock	
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Jude Brown	
Yvonne Marshall	
sue beach	
gemima pope	
Charlotte	
Mcgarrie	
Patrica Howe	
Stuart Procter	
Stuart Walker	
Shakira Englefield	
Layla Pope	
Charlotte Boize	

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nigel graham	
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Hayley Chinnery	
Lucy Sargent	
Ellen Baldock	
Margaret Te5	
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Glen Bates	
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Toni Lehman	
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Colleen Hamilton	
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Rolando Hutchinson	
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clare harris	
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Sara Grisewood	
Steven Munday	
pauline still	
jill Phillips	
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Sue Horne	
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kevin green	
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Sue Dowd	
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david harris	
Joanna Simmons	

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Daniel Rafferty	
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John Miller	
Dave Pullen	
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Mel Owtram	
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Jacqui Moy	
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Sue Wood	
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Karen Aslett	
Joy Lewis	
Katie ely	
Jill Noyes	
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Joy Mercer	
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Lucinda Fouch	
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Carly Norris	
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Michael Chambers	
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Marcus Taylor	
Laura Peerless	
Eveline Bamber	
kathy lewis	
James Fay	
Ricky Mella	
Stephen Gibson	
Eleanor Austin	
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Jean McGarrie	
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Vivian Leong	
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TERINA NOTZ	
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Grita Rose-Innes		
Julie Taylor		
Matthew Belton		
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Geoff Harris		
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philip parker		
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Tim Morgan		
Outi holmes		
Charlotte Irtelli		
Andrew Dandridge		
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Roy Barnes	
BARRY HAYES	
paula ross	
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Justin Early	
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jane daley	
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Vanessa Lover	

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Sharon Giles		

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Ginny Pasquale		
Narguis Keshavjee		
Gerry Zarb Kate Simner		
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martin haswell	
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darian leader	
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TPenelope Woodward	
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Eleanor Farror	
David Hare	
Ella Dennis	
Vanessa Jennings	
Angie Morphy	
michael deacon	
Mrs Simmons	
Claire Harries	
Teresa Everest	
Stuart Vine	
Keith Ramshaw	

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Clive Hodges	
Barrie Kibble	
K Power	
Susan mead	
Dean Oakwell	
Yvonne Fuller	
Viktoria Webber	
Angie Botting	
Abi Blanshard	
Gavin Park	
Martine Carruthers	
Jane Upton	
Lynda Samuel	
Craig Poulter	
Christopher Westcott	
Saul Fowler	
Wendy Fowler	
Johnny Denis	
Tom Potts	
Luanne Tyler	
Carole Walden	
Niccola O'	
Angela Edgar	
Tina Smith	
Vicki Bowes	
Colin Mitchell	
Jennifer Howells	
Fay Pead	
Pam Follett	
Martin King	
Craig Gosling	

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Lisa Savage	
Catherine Tucker	
Roberta Salmon	
Chris Allen	
annette gates	
Judy Heard-White	
John Browning	
Mary Woodfield	
Vince Weeding	
Danielle Farrant	
Sheila Osullivan	
Tanya Sadourian	
Kate O'Neill	
Ann Butterfield	
Tammie-Leigh McClatchie	
Steven Tapp	
Nuala Calvi	
Jason Howes	
Susan Stone- Grundy	
Perry Kingsland	
Lucy H	
Jenny Roberts	
Richard Hanson	
Beverley Hinton	
Kevin Pugh	
Ian Woodfield	
Angela Jane Swinn	
Lisa Cooper	
Stuart Digby- Clarke	
Sue Day	

Name	Postcode
Mary Day	
Veronica Stevenson	
Craig S	
Jane Hanbury	
Liliya Trott	
Jonathan Tooley	
Paul Sharman	
John Locke	
Michael Land	
Barbara Lack	
Angela Wright	
Diane M	
Virginia Winch	
Deana Harkness	
John Moreton	
Peter Barnes	
Susana Vazquez	
Elizabeth Boxall	
Lauren Chamberlain	
Lauren Leiper	
Malcolm Clear	
David Rix	
Kay Russell	
Timothy Upfield	
Miles Holford	
Adam Gladden	
Gillian McKenna	
Linda Stace	
jeffrey southgate	
Mary-Jane Wilkins	
Sylvia Upfield	

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Louise Gerber	
Norma Park	
Sue Fasquelle	
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Carole Ogden	
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Lisa Ford	
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Jon Bushaway	
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Elizabeth Forbes	
sabine portela	
Kenneth Toop	
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mark edwards	
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michael hanson	
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MIHIKa Acharya	
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Elizabeth Mandeville	
Ian Foy	
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steven town	
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Jane Keel	
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Michael Tweed	
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Karine Wright	
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Denise Hamill		
Denise Hagger Graham Carter		
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Derek Glasson	
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Jackie Frost	
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Russell Leftley	
geoff Ackland	
Jeremy Cole	
Marek Palme	



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Lauretta Hudson	
John Ives	
lynne ismail	
Lukas Kalinke	
rowan forestier-walker	
Deborah Seacombe	
Maximus Smith	
Maria-Helena Santamaria	
S Hudson	
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Kirsty Silvester	
Roger Jones	
nicholas sexton	
Emily Eaton	
Daniel Rehahn	
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Linds Godfrey	
Sian Bishop	
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Maureen Keywood	
Georges Perec	
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Yvette Sullivan	
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Marcus Oppenheim	

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T K	
Rodney Feist	
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Jane Holmes	
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Herbert Jones	
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ian paul lee	
Twig Hall	
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Jessica Anscombe	
Shelley Phythian	
Simon Thomas	
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Anna Sampson	
Christine Tompsett	
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Anita Skeel	
Vicki Gardner	
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Chantal Symons	
Rachel Jordan	
Rachel Haney	
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Linda Carr	

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Brian Lyle	
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James Hartley	
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Zoé Cann	
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Marilyn Hopson	
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Theo Sheppard Hannh Cameron	
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William Seed	
Philip Kimberley	
Tania Cunningham	
Stella Clifford	
Gallit Shaltiel	
Jo Hedger	
Sue Westergaard Neill Jupp	
Karen Juniper	
David Wright	

Name	Postcode
Bill Edmunds	
Jean Woodward	
Jenny Chambers	
Roger Gardner	
H Curl	
Kirsty Chatfield	
Jan Sinclair	
Kirsty c Harwood	
Filipa Santos	
christopher davis	
Sandra Williams	
Evelin Kovari	
Stephen Espley	
Michele Vardy	
Annie Derrick	
Sue Patr	
Helen Smith	
Godfrey Thomas	
Gill Veck	
Wendt Veck	
Katie Gowers	
paul jakeman	
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Bernadette Day	
Emma Davis	
sue webb	
chris webb	
Sharan Brydon	
Sam Farnsworth	
Ellie Johnson-Bullock	
paula wallace	

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Lisa Marshall	
Brenda Sayce	
Peter Webb	
Duncan Clark	
Nathan Milenkovic	
Giles Warren	
Frederic Kalinke	
Evelyn Evans	
Dave Sheppard	
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Tracy Partridge	
Elizabeth Teague	
Anthony Cork	
Lesley Lawrence	
Jane Gant	
Grace Wainwright	
Pamela Milne	
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Den Goldsmith	
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Sharon Davies	
Haydn Davies	
Sandria Artingstall	
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Johanna Chamberlain	
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Laura Jackson	
Lawry Tilbury	
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Paul Jeffery	
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P Taweeporn	
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sheila o'sullivan	
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jacki cromwell	
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AMANDA MILES	
sylvia j gray	

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Cath Diomedou		
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Sharon Voice	
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S Boyd		
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karen rigby-faux		
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Rachel Levy		
Richard Eves		
Virginia Cockburn		
Jennifer Labib		
Terence Weldon		
David Harker		
trevor jones		
Clarissa Stowell		



<b>Representation ID:</b> REP/257/E1
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Representor Details:

<b>Representor ID:</b>	REP/257
<b>Name:</b>	Todd Kingsley-Jones
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	E1 - Land at East Quay, Newhaven Port
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	
<b>Sound:</b>	
<b>Representation:</b>	<p>As a resident of Newhaven, I STRONGLY object to the plan with the above reference for the following reasons:</p> <p>It involves destroying a huge chunk of our local wildlife site and the fauna and flora inhabiting it.</p> <p>It is also an area of beach and natural vegetation that is very popular with locals and visitors, and dog walkers, and swimmers and sunbathers, and industrializing it makes a mockery of the claim by the Council to promote a clean green Newhaven.</p> <p>It is a specious claim that it will benefit the local community by creating more jobs [a limited number perhaps] and attract investment in Newhaven. But how long will it take</p>

before any revenue generated will begin to compensate for the 23 million pounds of our money that has been spent on building the flyover bridge? Not to mention the added pollution and effect on our health of the increased traffic, and the already untenable traffic jams at the roundabout on the A259.

I do appreciate that Lewes District Council is under pressure to find ways of generating income to make up for Government cut-backs, but isn't it supposed to care about the welfare, health and opinions of the local population who are legally required to pay Council Tax? I have yet to come across anyone locally who thinks the Reference E1 plan will benefit us who actually live here, though it will undoubtedly make the private owners of the Port a fortune, and also potential investors in the outcome of the Plan.

Just for once, could the Council PLEASE restore our faith that it will genuinely take our concerns seriously in making decisions on our behalf, and act accordingly. After all, we pay a pretty hefty council tax, and as we are paying you, we should be entitled to expect you to make decisions based on our protests and objections to plans, which unfortunately has not been the case up to now.

**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:** Todd Kingsley-Jones [REDACTED]  
**Sent:** 03 November 2018 20:26  
**To:** ldf  
**Subject:** Reference E1

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

As a resident of Newhaven, I STRONGLY object to the plan with the above reference for the following reasons:

It involves destroying a huge chunk of our local wildlife site and the fauna and flora inhabiting it.

It is also an area of beach and natural vegetation that is very popular with locals and visitors, and dog walkers, and swimmers and sunbathers, and industrializing it makes a mockery of the claim by the Council to promote a clean green Newhaven.

It is a specious claim that it will benefit the local community by creating more jobs [a limited number perhaps] and attract investment in Newhaven. But how long will it take before any revenue generated will begin to compensate for the 23 million pounds of our money that has been spent on building the flyover bridge? Not to mention the added pollution and effect on our health of the increased traffic, and the already untenable traffic jams at the roundabout on the A259.

I do appreciate that Lewes District Council is under pressure to find ways of generating income to make up for Government cut-backs, but isn't it supposed to care about the welfare, health and opinions of the local population who are legally required to pay Council Tax? I have yet to come across anyone locally who thinks the Reference E1 plan will benefit us who actually live here, though it will undoubtedly make the private owners of the Port a fortune, and also potential investors in the outcome of the Plan.

Just for once, could the Council PLEASE restore our faith that it will genuinely take our concerns seriously in making decisions on our behalf, and act accordingly. After all, we pay a pretty hefty council tax, and as we are paying you, we should be entitled to expect you to make decisions based on our protests and objections to plans, which unfortunately has not been the case up to now.

Sincerely,

Todd Kingsley-Jones



Virus-free. [www.avast.com](http://www.avast.com)

**Representation ID: REP/258/DM32**Representor Details:

<b>Representor ID:</b>	REP/258
<b>Name:</b>	Andrew Kniveton
<b>Organisation:</b>	<b>BT Openreach</b>
<b>Consultation Body:</b>	Specific
<b>Stakeholder Type:</b>	Infrastructure/service providers

Agent Details:

<b>Name:</b>
<b>Organisation:</b>

Contact Details:

<b>Email Address:</b>	andrew.kniveton@openreach.co.uk
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>DM32: Telecommunications Infrastructure</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	
<b>Sound:</b>	
<b>Representation:</b>	
<p>I thought you may find the following helpful in terms of New Site developments and Openreach policy.</p> <p>Background detail</p> <p>Openreach are responsible for the copper wires and fibre network that connect homes and businesses to local telephone exchanges. Our customers are the 580 plus communications providers who rely on us to deliver the telephone, internet, data and TV services that households and businesses buy from them. We're working on behalf of communications providers when we visit their customers' homes and businesses to carry out installations or repair work.</p>	

Openreach policy on New Sites. We will deploy FTTP (Fibre To The Premise), free of charge, into all new housing developments of 30 or more homes, this new policy took affect for all New Sites registered from November 2016. This means that at least 9 out of 10 new build homes could have access to free FTTP infrastructure if property developers register their scheme and contract with Openreach.

Meanwhile any developments with two or more homes will have access to our existing copper or planned fibre infrastructure, either funded entirely by Openreach or with the help of developer co-funding where FTTP is required.

Since we launched our new proposition for fibre broadband at new developments back in February 2016, we have reduced this threshold where we deploy FTTP for free. Initially it was free for developments of 250 homes or more, then in May 2016 we reduced it to 100 homes and from November 2016 it was reduced again to 30 homes.

For each new development, our dedicated New Sites Reception team will work with developers, and give a clear recommendation on the infrastructure that should be built. Once contracted, a dedicated field based coordinator will work with the Developer to lead them through the plan and build process.

We've reduced the free FTTP threshold to 30 or more homes to make it even easier for developers to have access to Ultrafast broadband. We know that consumers are passionate about the speed and reliability of the broadband service that their communication provider can offer them, and for some the availability of ultrafast speeds will strongly influence their decision on which new property to buy.

Openreach's FTTP infrastructure is open to all communication service providers and we're working hard with industry to encourage greater adoption, so customers have much wider choice and more customers can benefit from the faster speeds of up to 1Gbps this is ultrafast Broadband via FTTP, and not to be confused with FTTC (Fibre To The Cabinet) technology. This allows everyone in their homes to do whatever they want to do online. They can simultaneously stream 4K films and music, catch up on TV on demand, make HD video calls, play online games, upload photos and video clips to social media sites and send emails.

The lower threshold for free FTTP deployment has been warmly received by industry bodies.

I've attached the following link to our developer web page which has been designed to help and support developers not only register their sites with us but also provide additional useful information regarding our network.

<https://www.ournetwork.openreach.co.uk/>

I have also attached the ultrafast Fibre To The Premises guide for you to view.

I trust that the information provided above is helpful, If I can be of any further help please contact me.

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

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

## Thea Davis

---

**From:** andrew.kniveton@openreach.co.uk  
**Sent:** 26 September 2018 12:18  
**To:** ldf  
**Subject:** RE: [LPP2\_R19] Lewes District Local Plan Part 2: Site Allocations and Development Management Policies DPD - Pre-Submission version - Invitation to Join  
**Attachments:** why\_ultrafast\_for\_new\_builds.pdf  
**Categories:** LPP2 comment to code - stakeholder details have been added

Eastbourne Borough Council

I thought you may find the following helpful in terms of New Site developments and Openreach policy.

### Background detail

Openreach are responsible for the copper wires and fibre network that connect homes and businesses to local telephone exchanges. Our customers are the 580 plus communications providers who rely on us to deliver the telephone, internet, data and TV services that households and businesses buy from them. We're working on behalf of communications providers when we visit their customers' homes and businesses to carry out installations or repair work.

**Openreach policy on New Sites.** We will deploy FTTP (Fibre To The Premise), free of charge, into all new housing developments of 30 or more homes, this new policy took affect for all New Sites registered from November 2016. This means that at least 9 out of 10 new build homes could have access to free FTTP infrastructure if property developers register their scheme and contract with Openreach.

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make HD video calls, play online games, upload photos and video clips to social media sites and send emails.

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I have also attached the ultrafast Fibre To The Premises guide for you to view.

I trust that the information provided above is helpful, If I can be of any further help please contact me.

Kind Regards

*Andy Kniveton*

Senior Strategic Relationship Manager - London and the South West

Openreach

Telephone: 07802 190002

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Web: [openreach.co.uk](https://openreach.co.uk)

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**British Telecommunications plc**

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Registered in England no. 1800000



# Ultrafast speeds with fibre infrastructure

A guide to installing fibre infrastructure in new residential developments



“

Future proof your new development with fibre infrastructure. Bring home the benefits of ultrafast speeds.

**Donna Leeding**  
Client Management, Openreach

”



# New ultrafast fibre infrastructure for your development

**Let Openreach bring an ultrafast fibre access network direct to your new property developments.**

Add real value to your new development by providing ultrafast speeds to your customers.

Access to the fastest Broadband speeds available in the UK with Openreach infrastructure that can deliver speeds of up to 1Gbps. This will allow everyone in the home to do their thing online, all at the same time – stream HD films and music, catch up on TV on demand, make HD video calls, play online games, upload photos and video clips to social network sites, you name it!

Your customers will even be able to work from home in exactly the same way as they do in the office, with secure access to the same systems, information and applications.



# How do you get ultrafast fibre infrastructure from us?

Work with the Openreach infrastructure solutions developer relations team, and we will be with you every step of the way. Once you've registered your site one of our field based co-ordinators will come to your site to offer guidance at each stage, as you build the infrastructure at your site needed for us to deliver fibre to your homes.

It's our joint ambition to deliver connectivity ahead of customers moving in their new homes, as we know customers want to get connected straight away and we're committed to working with you to deliver this expectation.

We'll also appoint an end to end manager who will look at right across the project and the Openreach network, right up to the Openreach equipment in the house or apartment. They will be in a position to work with your field based co-ordinator to resolve any problems.

We've already successfully installed many fibre infrastructure in developments throughout the UK including the Berkeley Group development at Imperial Square North Finchley, so you can be sure you're in experienced hands.

Chris Gilbert. Managing Director at Berkeley Homes said:

"Berkeley Group is actively adopting fibre to the premise (FTTP) technology in practically all its new developments. We want to be able to offer homes that are capable of getting the very fastest broadband now and in the future, using a fibre technology that's reliable. Consumers are increasingly interested in selecting property where high speed broadband is in place and we want them to have a great experience when they move into a Berkeley home."



# Choosing a fibre infrastructure

**Building a fibre infrastructure, and providing data cabling to key locations in your houses and apartments, will add real value to your development.**

Prospective home buyers and leaseholders are looking for ultrafast speeds to support their on-line activities and it's likely to increasingly be a deciding factor in choosing their home. They will be able to access the fastest broadband speeds available in the UK with Openreach infrastructure that can deliver speeds of up to 1Gbps (dependent upon the homeowners' chosen communications provider) this will allow everyone in the home to do their thing online, all at the same time.

With an ultrafast fibre infrastructure delivering 1Gbps customers can download a two hour HD film in 90 seconds or a forty five minute HD TV Show in 16 seconds.

Your customers will recognise that fibre is the future and they will want to make sure that when they buy their home they won't be left behind when it comes to future broadband speeds. Openreach over the last four years has seen a 40% year on year growth in customer's data requirements, a trend we expect to continue.

An Openreach fibre network offers open access to all the companies that supply ultrafast broadband services – now and in the future. This creates real choice.

## Cabling for high speed applications

If your residents are looking to connect their TV to get the new generation of ultra-high definition TV, or are keen online gamers, they'll need to plug their equipment into a physical connection.

Wireless offers great connectivity for smart portable devices. But when it comes to streaming high bandwidth in a highly reliable manner, the user experience can only be maintained through a prewired socket. And that means providing voice and data sockets to create what's often referred to as the 'connected home'.

Doing this will mean your customers can connect their TV to get the new generation of ultra-high definition TV and 4K television and beyond, or if they are keen online gamers, they'll need to plug their equipment into a physical connection. Similarly those working from their home office will want a physical connection for rock solid voice and video over internet protocol.

We'd recommend as a minimum cabling rooms likely to benefit most from a physical connection, like the room with the main TV and the home office.



# Let Openreach invest in a fibre infrastructure for your development

For large developments and increasingly for smaller sites we supply free all of the building materials, the fibre, and the electronic equipment needed to provide a fibre access network in each home.

You can take control and install fibre with a plug and play connector and attach some of the electronics for us inside the home, this has the advantage of one fewer Openreach visits to site to manage, and allows you to schedule the fitting of the electronic components that fits in with your build cycle as you will already have your electricians on site.

For sites with less than 30 units we may ask you to make a contribution to the cost of installing a fibre infrastructure.

## Design considerations

We need to bear in mind that the equipment your customers use to access their ultrafast broadband services, while compact, is not the standard telephone socket traditionally installed in a domestic environment.

We'll agree with you a convenient place for the equipment to be installed (which incorporates the, optical network connection, power supply and battery back-up).

As an example, one development of multiple one-bedroom apartments these boxes were on hidden shelf unit in the kitchenette.







# The benefits of ultrafast fibre broadband

**Your customers increasingly expect access to high speed internet services in their homes, and this could differentiate your development from those of your competitors.**

When your customers are ready to order an ultrafast broadband service they will have complete choice over their communications provider, everything will be in place, and their service can be provided quickly.

## **Imagine a typical household with heavy internet users.**

Whatever they're into, fibre will make it quicker and easier. It isn't just about doing one thing online much faster. It's about everyone in the home being able to do their own thing online, all at the same time. Depending on the broadband package offered by your preferred communications provider, you may be able to enjoy:

### **Virtual storage**

Store photos, documents, music and videos online – in the cloud – rather than on the computer at home.

### **Home media hub. Anywhere**

Access everything you need – telephone, TV, internet radio, videos, photos and files – whether you're in the home, visiting friends or off on holiday.

### **Video calling**

Fibre opens up the world of HD video calling – include friends and family around the world and get together for a chat.

### **Online multiplayer gaming**

Fast speeds mean budding games players can share the experience by talking and exchanging video with other players.

### **Working from home**

Whether you work from home full-time, part-time or just now and again, you'll be able to work as effectively as you would in the office.

### **Video on demand**

Watch 4K TV, Stream HD or 3D movies to your TV, watch catch-up services, like BBC iPlayer and access YouTube video channels, online photo albums, live events and personalised radio stations.

### **Social networking**

User generated content (UGC) is set to be the next big thing online, and upload speeds with an ultrafast service makes sharing quick and easy.



# Choose Openreach

We're proud of the quality, reliability and resilience of our fibre network. We're the UK's primary infrastructure provider. Our heritage stretches back more than 150 years, to the days when the telephone was first invented.

Your residents will value the open access on offer from Openreach. They can choose from a range of communications providers, which promotes healthy competition.

We spent years learning from international fibre deployments and have incorporated the best of that learning in our own rollout, utilising only tried and trusted technology.

We've been installing fibre in the UK since 2008, honing our skills along the way. You can also be confident that all our deployments are compliant with National Joint Utilities Group guidelines.

We take our environmental responsibilities very seriously. We're committed to building and deploying fibre equipment that meets stringent power consumption limits. We source our energy renewably or from low carbon sources. And we're making significant changes to cut the carbon footprint of our fleet of vehicles.







# We'd like to work with you

We want to work with you from the earliest possible stage of your new development. Make sure you register your site with us as soon as possible and we'll help you with your fibre network deployment so you get the equipment, plant and support you need, when you need it.

To find out more go to:

[www.openreach.co.uk/propertydevelopments](http://www.openreach.co.uk/propertydevelopments)



Openreach is Britain's digital network business. We connect homes, mobile phone masts, schools, shops, banks, hospitals, libraries, broadcasters, governments and businesses – large and small – to the world.

**[www.openreach.co.uk](http://www.openreach.co.uk)**

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Registered office: 81 Newgate Street, London EC1A 7AJ.

PHME 81034

<b>Representation ID:</b> REP/259/GT01/A
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Representor Details:

<b>Representor ID:</b>	REP/259
<b>Name:</b>	Rob Lane
<b>Organisation:</b>	<b>Koop Furniture</b>
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Local Business / employer

Agent Details:

<b>Name:</b>
<b>Organisation:</b>

Contact Details:

<b>Email Address:</b>	info@koopfurniture.co.uk
<b>Address:</b>	Unit 53, The Old Brickworks st plumpton East Sussex BN7 3DF

Representation:

<b>Policy/Section:</b>	<b>GT01 - Land south of The Plough</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	Yes
<b>Sound:</b>	Yes
<b>Representation:</b>	<div><div></div><div></div></div>

Being an open estate it is also a very pleasant place to work with a friendly and open atmosphere,

Other concerns are the lack of services to the field.

Lack of sewage facilities

Access is often flooded in the winter

Distance from the local school along a 60mph road with no footpath seems extremely hazardous and completely lacks safe pedestrian access, as residents must walk along a national speed limit minor road to reach the village.

We are also aware of the impact on the natural environment as this is a greenfield site with varied habitat living there, so building a toilet complex and parking facilities will have a serious impact.

To summarise, this seems a totally inappropriate site for Gypsy's and Travellers and in our opinion needs careful reconsideration.

Inevitably we would probably end up leaving the old brickworks. Currently we spend Around £300 a month in the local village shop, we also use the Plough and the Fountain for business meetings and employ people from the neighbouring area who may not be able to travel to a new workshop site due to distance.

**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/259/GT01/B**Representor Details:

<b>Representor ID:</b>	REP/259
<b>Name:</b>	Rob Lane
<b>Organisation:</b>	<b>Koop Furniture</b>
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Local Business / employer

Agent Details:

<b>Name:</b>
<b>Organisation:</b>

Contact Details:

<b>Email Address:</b>	info@koopfurniture.co.uk
<b>Address:</b>	Unit 53, The Old Brickworks st plumpton East Sussex BN7 3DF

Representation:

<b>Policy/Section:</b>	<b>GT01 - Land south of The Plough</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	No
<b>Sound:</b>	No Not Effective
<b>Representation:</b>	
<b>What changes do you suggest to make the document legally compliant or sound?</b>	

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



**Representation ID: REP/260/E1**

Representor Details:

<b>Representor ID:</b>	REP/260
<b>Name:</b>	Nick Lawden
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>E1 - Land at East Quay, Newhaven Port</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	Yes
<b>Sound:</b>	No Not Consistent with national policy
<b>Representation:</b>  <p>I fail to see how the plans for area E1 on the East Quay of Newhaven contributes to sustainable development - when on the existing plan (Inset_2_Newhaven_v3.pdf) the area is already highlighted as a local wildlife site or nature reserve. We have already lost the fight against Brett Aggregates, and the bridge over the railway. If the policy for the area is to be changed to include employment uses, then this will inevitable have an impact on the special land in and around the area, including the rare vegetated shingle,</p>	

and rare birds.

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

I believe that the designation for area E1 should remain unchanged.

**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/261/E1**Representor Details:

<b>Representor ID:</b>	REP/261
<b>Name:</b>	Lynn Lawson
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>E1 - Land at East Quay, Newhaven Port</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	Yes
<b>Sound:</b>	No
<b>Representation:</b>  I wish to object strongly to the proposed further development of this irreplaceable area of land between Seaford and Newhaven. I have lived in Seaford since I was a small child, and like many of today's children spent many hours on the sandy beach at Tidemills , which is so much safer than the shelving shingle at Seaford . Now in my sixties, I still walk regularly along this small stretch of coastline, appreciating its unique environment which provides a wildlife haven for so many species of plants, animals and birds,	

including stone curlews and avocets. The coast between Seaford and Brighton is heavily built up, but this tiny area remains a natural and unspoilt oasis, and it is therefore vital that it remains undisturbed. I cannot see that there is a need to sacrifice the western end of Tidemills when there are other, more suitable, sites which could be used for development in Newhaven, and sincerely hope that this beautiful, tranquil area and its wildlife will be preserved intact for 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?** No

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

**Representation ID: REP/262/E1**Representor Details:

<b>Representor ID:</b>	REP/262
<b>Name:</b>	robert lawson
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>E1 - Land at East Quay, Newhaven Port</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	Yes
<b>Sound:</b>	No Not Justified Not Effective
<b>Representation:</b>	<p>This proposed business plan is in my opinion totally unjustified. The area to the west of the very important ecological area of Tide Mills is crucial to the environmental and recreational well being of Seaford Bay.</p>

I have lived in Sussex all my life having been to school in Newhaven and now reside in Seaford. Tide Mills is one of the last natural habitats left on the coastal strip between Portsmouth and Seaford and is a well used recreational area. It is becoming increasingly important as a sanctuary and nesting place for birds. Last February and March two pairs of Avocets (the symbol of the RSPB) were visitors as was the rare Stone-Curlew.

I have worked in Newhaven harbour for most of my career.. Any tour of the Newhaven area will reveal the large amount of brown field sites. These areas should be redeveloped before allowing access to land close to the beach and Tide Mills.

I am sure the owners of Newhaven Port and Properties would grab the chance to take revenue from a retail or warehouse park that I'm sure would result from access to the proposed land but at what cost/benefit to Newhaven or Seaford.

There would seem little economic benefit to the local residents that could not be achieved by redeveloping other brown field sites. However, the ecological and environmental costs of spoiling Seaford Bay would be high.

I urge the Councils to reject any further development to the east of the land allocated for Brett Aggregates. Local people have overwhelmingly opposed this plan.

Generating jobs for the young people of the area is essential . Redevelop Newhaven's derelict 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/263/GT01**Representor Details:

<b>Representor ID:</b>	REP/263
<b>Name:</b>	Bob Leeds
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>GT01 - Land south of The Plough</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	
<b>Sound:</b>	
<b>Representation:</b>	
<p>I should like to object to the proposal for a permanent site for Gypsies and Travellers in Plumpton Green.</p> <p></p> <p>Additionally, I have looked at other permanent sites around the area; these are invariably an eyesore, with rubbish piled up and old cars seemingly abandoned.</p> <p>To have this site in Plumpton would alter the character of the village, and I would suggest that it would be better to have the site away from any village or town.</p>	

<b>What changes do you suggest to make the document legally compliant or sound?</b>
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<b>Do you consider it necessary to participate at the Examination in Public?</b>
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<b>Why do you feel it is necessary to participate at the Examination in Public?</b>
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## Hodgson, Lilly

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**From:** Bob Leeds [REDACTED] >  
**Sent:** 02 October 2018 12:12  
**To:** ldf  
**Subject:** Plan for gypsy/travellers site in Plumpton  
**Categories:** LPP2 comment to code - stakeholder details have been added

I should like to object to the proposal for a permanent site for Gypsies and Travellers in Plumpton Green.

[REDACTED]  
[REDACTED] Additionally, I have looked at other permanent sites around the area; these are invariably an eyesore, with rubbish piled up and old cars seemingly abandoned.

To have this site in Plumpton would alter the character of the village, and I would suggest that it would be better to have the site away from any village or town.

Regards

Bob Leeds  
[REDACTED]  
[REDACTED]

**Representation ID: REP/264/E1**Representor Details:

<b>Representor ID:</b>	REP/264
<b>Name:</b>	Sophie Levey
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>E1 - Land at East Quay, Newhaven Port</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	
<b>Sound:</b>	
<b>Representation:</b>	
<p>I am writing to express my strong feelings about the proposed development at Tide Mills, Newhaven- E1.</p> <p>This is a precious area which deserves protection both for the wild life that thrives there and as a community amenity. Newhaven deserves a future which is 'green and clean' and which attracts investment into the area. The proposed development brings neither of these. Neither does it bring significant employment. Newhaven does not need E1. In fact we will be selling Newhaven 'down the river' if this goes ahead. A monstrosity rising at the end of our lovely beach.</p> <p>Send this plan to the bin, without a thought of recycling it.</p>	

<b>What changes do you suggest to make the document legally compliant or sound?</b>
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<b>Do you consider it necessary to participate at the Examination in Public?</b>
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<b>Why do you feel it is necessary to participate at the Examination in Public?</b>
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## Thea Davis

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**From:** Sophie Levey [REDACTED]  
**Sent:** 04 November 2018 19:32  
**To:** ldf  
**Subject:** Planning ref E1  
  
**Categories:** Vanessa to deal with

Dear Elected Representatives of the Local Community I am writing to express my strong feelings about the proposed development at Tide Mills, Newhaven- E1.

This is a precious area which deserves protection both for the wild life that thrives there and as a community amenity. Newhaven deserves a future which is 'green and clean' and which attracts investment into the area. The proposed development brings neither of these. Neither does it bring significant employment. Newhaven does not need E1. In fact we will be selling Newhaven 'down the river' if this goes ahead. A monstrosity rising at the end of our lovely beach.

Send this plan to the bin, without a thought of recycling it.

Sincerely, Sophie Levey

Sent from my iPhone

**Representation ID: REP/265/GT01**Representor Details:

<b>Representor ID:</b>	REP/265
<b>Name:</b>	Teresa Lewington
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	GT01 - Land south of The Plough
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	
<b>Sound:</b>	
<b>Representation:</b>	
Object Object Object	
Disgusting that your looking to put gypsy site in Plumpton, [REDACTED]	
[REDACTED]	
I live just away from Plumpton on a small holding [REDACTED]	
[REDACTED]	

[REDACTED] The brick works will be closed within the year as no one will want to have their business their [REDACTED]

[REDACTED]

Problem is you don't care about the people already living in that area, who ever thought suggesting this should be fired!

**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

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**From:** Teresa Lewington <[REDACTED]>  
**Sent:** 04 November 2018 15:10  
**To:** ldf

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

Object Object Object

Disgusting that your looking to put gypsy site in Plumpton, [REDACTED]  
[REDACTED]  
[REDACTED].

I live just away from Plumpton on a small holding and already [REDACTED]  
[REDACTED]  
[REDACTED]

The brick works will be closed within the year as no one will want to have their business their  
[REDACTED]  
[REDACTED]

[REDACTED]  
[REDACTED]

Problem is you don't care about the people already living in that area, who ever thought suggesting this should be fired!

one annoyed and disgusted

Teresa Lewington

**Representation ID: REP/266/HPC**Representor Details:

<b>Representor ID:</b>	REP/266
<b>Name:</b>	Simon and Hew Lincoln
<b>Organisation:</b>	<b>G. Lincoln &amp; Sons</b>
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Developer/Landowner

Agent Details:

<b>Name:</b>	David Hill
<b>Organisation:</b>	David W Hill & Co

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	Home Farm Slugwash Lane Haywards Heath RH17 7RQ

Representation:

<b>Policy/Section:</b>	<b>Housing Policy Context</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	
<b>Sound:</b>	
<b>Representation:</b>	<p>These representations to the Lewes District Local Plan Part 2: Site Allocations and Development Management Policies DPD ("Local Plan Part 2") are submitted by Simon and Huw Lincoln, who own land within Lewes District Council to the south of Haywards Heath which also falls within the boundary of the Wivelsfield neighbourhood plan. Spatial Policy 1 of the Core Strategy sets a minimum housing target of 6,900 additional dwellings (345 net dwelling per year) over the Plan period. This includes housing provision for the South Downs National Park. As part of the Local Plan Part 2, the</p>



Council has disaggregated its housing target to account for the 1,432 dwellings identified in the Core Strategy that are within the South Downs National Park. This equates to a disaggregated minimum housing target of 5,494 net additional dwellings for the rest of the District.

The Local Plan Part 2 sets out how the Council proposes to meet its housing need (Table 2). It also identifies how the residual housing requirement of 1,660 will be met at Table 4.

It is our view that the main weakness with the Council's proposed housing strategy, is the overreliance in housing provision that is expected to be delivered through neighbourhood plans that are at an early stage of preparation (of the 1,660 additional units to be brought forward, 52% (825 units) are proposed through emerging neighbourhood plans).

There is a real risk that some neighbourhood plans will not come forward as expected and there is also the possibility of substantial delays for a number of reasons including legal challenge, which may jeopardise future housing delivery. There is no information provided within the Local Plan as to the current status of each neighbourhood plan or any indication as to when they are likely to be 'made'. As a consequence, there is currently no certainty that the housing requirement for each of these areas will be met.

Officer's attention is directed to the Peacehaven & Telscombe and Newhaven Neighbourhood Plans (which are expected to deliver 680 dwellings) both of which have not progressed beyond Regulation 7 stage (designation of a Neighbourhood Plan Area). The designation of these areas occurred back in 2013 in both cases and it appears there has been limited progress in the subsequent five year period.

It is also noted that the Seaford Neighbourhood Plan will be subject to a further Regulation 14 consultation due to issues raised in respect to its Sustainability Appraisal Strategic Environmental Assessment during the last Regulation 14 consultation. It is clear that the Plan therefore has some way to go before it will be made. The Council states at page 18 of the Local Plan Part 2 that "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 issues). 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".

Noting the progress of the Peacehaven and Telscombe and Newhaven Neighbourhood Plans since 2013, we would strongly recommend that now is the appropriate time for the Council to recover the role of identifying allocations.

Furthermore, the Council is planning to only meet the minimum housing requirement (i.e. the sources of supply only meet the minimum 5,494 requirement), with no contingency in the event that these sources of supply (including committed sites) do not come forward as expected.

The need to provide greater certainty is emphasised by the fact that the Council is

currently unable to demonstrate a five year land supply (4.92 years supply as at 1 April 2018) and as a result, its housing land supply policies are out-of-date.

Given the Council's current position with five year land supply and the uncertainty regarding the emerging neighbourhood plans, the Council should take a pro-active approach to allocate additional sites now to provide greater flexibility and certainty as to how its housing supply will be met.

It is therefore submitted that the Local Plan Part 2 is currently unsound as it has not been positively prepared and to address this, there is a need for the Plan to identify additional housing allocations through the current process in order to provide greater flexibility in housing delivery - as required by Paragraph 11 - and to create greater certainty that the housing target can be met.

Whilst it is acknowledged that Wivelsfield has a made neighbourhood plan which allocates sites in line with the Core Strategy housing target; it is relevant that these targets are expressed as a minimum; and in respect to the Core Strategy targets, paragraph 2.7 of the Local Plan Part 2 makes it clear that "It should be borne in mind that the figures contained within Spatial Policy 2 are expressed as minimums and where appropriate growth should exceed this minimum figure". Sustainable sites should therefore be considered, particularly in the context of the concerns raised.

It is relevant that Wivelsfield's Neighbourhood Plan will be over two years old in December 2018, with the result that the more restrictive NPPF Paragraph 14 will not apply. There is no indication as to when a review of the Wivelsfield Neighbourhood Plan might commence or be completed. Given the Council's stated five year land supply position and the fact that the Wivelsfield Neighbourhood Plan 's housing policies will shortly be out-of-date, there is a clear case to support the allocation of additional land in Wivelsfield on suitable sustainable sites now, to ensure a genuinely plan-led system to provide greater certainty in the Council's housing supply and to support the NPPF requirement to positively seek opportunities to meet the development needs of their area , and be sufficiently flexible to adapt to rapid change.

It is notable that the Government's current standardised method identifies a housing requirement for Lewes District of 483 dwellings per annum which is significantly above the Council's adopted figure of 345 dwellings (it is acknowledged that there is currently a consultation on the application of the methodology, albeit, the Government's intention is clear) although this again shows the level of need in the area, such that the Council should be doing all that it can to allocate additional sites, rather than the current strategy of allocating the bare minimum.

We trust that these representations will be considered duly made and taken into account in amending and progressing 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?**

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

# G. Lincoln & Sons.

## Agricultural Contractors & Engineers

Home Farm, Slugwash Lane, Haywards Heath, West Sussex, RH17 7RQ  
Phone: 01444 452539 Mobiles: Simon 07973 286455. Paul 07966 247210. Huw 07973 560785  
email: simon-lincoln@sky.com

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

05 November 2018

Dear Sirs

**Re: Lewes District Local Plan Part 2: Site Allocations and Development Management Policies  
DPD – Regulation 19 Representations**

These representations to the Lewes District Local Plan Part 2: Site Allocations and Development Management Policies DPD ("Local Plan Part 2") are submitted by Simon and Huw Lincoln, who own land within Lewes District Council to the south of Haywards Heath which also falls within the boundary of the Wivelsfield neighbourhood plan.

Spatial Policy 1 of the Core Strategy sets a **minimum** housing target of 6,900 additional dwellings (345 net dwelling per year) over the Plan period. This includes housing provision for the South Downs National Park. As part of the Local Plan Part 2, the Council has disaggregated its housing target to account for the 1,432 dwellings identified in the Core Strategy that are within the South Downs National Park. This equates to a disaggregated **minimum** housing target of 5,494 net additional dwellings for the rest of the District.

The Local Plan Part 2 sets out 2 how the Council proposes to meet its housing need (Table 2). It also identifies how the residual housing requirement of 1,660 will be met at Table 4.

It is our view that the main weakness with the Council's proposed housing strategy, is the over-reliance on housing provision that is expected to be delivered through neighbourhood plans that are at an early stage of preparation (of the 1,660 additional units to be brought forward, 52% (825 units) are proposed through emerging neighbourhood plans).

There is a real risk that some neighbourhood plans will not come forward as expected and there is also the possibility of substantial delays for a number of reasons including legal challenge, which may jeopardise future housing delivery. There is no information provided within the Local Plan as to the current status of each neighbourhood plan or any indication as to when they are likely to be 'made'. As a consequence, there is currently no certainty that the housing requirement for each of these areas will be met.

Officer's attention is directed to the Peacehaven & Telscombe and Newhaven Neighbourhood Plans (which are expected to deliver 680 dwellings) both of which have not progressed beyond Regulation 7 stage (designation of a Neighbourhood Plan Area). The designation of these areas occurred back in 2013 in both cases and it appears there has been limited progress in the subsequent five year period.

It is also noted that the Seaford Neighbourhood Plan will be subject to a further Regulation 14 consultation due to issues raised in respect to its Sustainability Appraisal / Strategic Environmental Assessment during the last Regulation 14 consultation. It is clear that the Plan therefore has some way to go before it will be made.

The Council states at page 18 of the Local Plan Part 2 that "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".*

Noting the progress of the Peacehaven and Telscombe and Newhaven Neighbourhood Plans since 2013, we would strongly recommend that now is the appropriate time for the Council to recover the role of identifying allocations.

Furthermore, the Council is planning to only meet the minimum housing requirement (i.e. the sources of supply only meet the minimum 5,494 requirement), with no contingency in the event that these sources of supply (including committed sites) do not come forward as expected.

The need to provide greater certainty is emphasised by the fact that the Council is currently unable to demonstrate a five year land supply (4.92 years supply as at 1 April 2018) and as a result, its housing land supply policies are out-of-date.

Given the Council's current position with five year land supply and the uncertainty regarding the emerging neighbourhood plans, the Council should take a pro-active approach to allocate additional sites now to provide greater flexibility and certainty as to how its housing supply will be met.

It is therefore submitted that the Local Plan Part 2 is currently unsound as it has not been positively prepared and to address this, there is a need for the Plan to identify additional housing allocations through the current process in order to provide greater flexibility in housing delivery – as required by Paragraph 11 - and to create greater certainty that the housing target can be met.

Whilst it is acknowledged that Wivelsfield has a made neighbourhood plan which allocates sites in line with the Core Strategy housing target; it is relevant that these targets are expressed as a minimum; and in respect to the Core Strategy targets, paragraph 2.7 of the Local Plan Part 2 makes it clear that *"It should be borne in mind that the figures contained within Spatial Policy 2 are expressed as minimums and where appropriate growth should exceed this minimum figure"*. Sustainable sites should therefore be considered, particularly in the context of the concerns raised.

It is relevant that Wivelsfield's Neighbourhood Plan will be over two years old in December 2018, with the result that the more restrictive NPPF Paragraph 14 will not apply. There is no indication as to when a review of the Wivelsfield Neighbourhood Plan might commence or be completed. Given the Council's stated five year land supply position and the fact that the Wivelsfield Neighbourhood Plan's housing policies will shortly be out-of-date, there is a clear case to support the allocation of additional land in Wivelsfield on suitable sustainable sites now, to ensure a genuinely plan-led system to provide greater certainty in the Council's housing supply and to support the NPPF requirement to positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change.

It is notable that the Government's current standardised method identifies a housing requirement for Lewes District of 483 dwellings per annum which is significantly above the Council's adopted figure of 345 dwellings (it is acknowledged that there is currently a consultation on the application of the methodology, albeit, the Government's intention is clear) although this again shows the level of need in the area, such that the Council should be doing all that it can to allocate additional sites, rather than the current strategy of allocating the bare minimum.

We trust that these representations will be considered duly made and taken into account in amending and progressing the Plan.

Yours faithfully



Simon and Huw Lincoln

**Representation ID: REP/267/E1**Representor Details:

<b>Representor ID:</b>	REP/267
<b>Name:</b>	Stuart Little
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>E1 - Land at East Quay, Newhaven Port</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	
<b>Sound:</b>	
<b>Representation:</b> <p>I wish to object to the proposal to include part of Tidemills Beach in Policy E1 of the Lewes District Council Local Plan. The allocation of change of use of this land to industrial, rather than its retention as a special area of vegetated shingle, is unnecessary and has the following effects:-</p> <ul style="list-style-type: none"><li>* Destruction of the special area of biodiversity of vegetated shingle at Tidemills Beach.</li><li>* Destruction of the historic area of the site of the 1905 Marconi Wireless Station, the base of which is still extant.</li><li>* Destruction of the historic area of the World War 1 Seaplane base.</li></ul>	

- \* It would prevent access to this special area by members of the public, who currently use it for recreation, including walking, swimming and bird watching.
  - \* Closure to the public of the only local area of sandy beach, as the public is not permitted to use the beach to the west of the river.
  - \* It fails to fulfil the requirement for a Local Plan to "contribute to sustainable development".
  - \* Industrial development on this site would create an eyesore and pollution, which would also impact on the neighbouring National Park.
  - \* there would be detrimental effects on the physical and mental health of residents of Lewes District Council.
- Please add my vehement objections to your 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?**

**From:** Stuart Little [REDACTED]  
**Sent:** 04 November 2018 22:44  
**To:** ldf  
**Subject:** Local Plan, Policy E1 Objection.

**Categories:** Vanessa to deal with

To Lewes District Council,

I wish to object to the proposal to include part of Tidemills Beach in Policy E1 of the Lewes District Council Local Plan. The allocation of change of use of this land to industrial, rather than its retention as a special area of vegetated shingle, is unnecessary and has the following effects:-

1. Destruction of the special area of biodiversity of vegetated shingle at Tidemills Beach.
2. Destruction of the historic area of the site of the 1905 Marconi Wireless Station, the base of which is still extant.
3. Destruction of the historic area of the World War 1 Seaplane base.
4. It would prevent access to this special area by members of the public, who currently use it for recreation, including walking, swimming and bird watching.
5. Closure to the public of the only local area of sandy beach, as the public is not permitted to use the beach to the west of the river.
6. It fails to fulfil the requirement for a Local Plan to "contribute to sustainable development".
7. Industrial development on this site would create an eyesore and pollution, which would also impact on the neighbouring National Park.
8. there would be detrimental effects on the physical and mental health of residents of Lewes District Council.

Please add my vehement objections to your consultation.

Stuart Little.



**Representation ID: REP/268/E1**Representor Details:

<b>Representor ID:</b>	REP/268
<b>Name:</b>	Wendy Little
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>E1 - Land at East Quay, Newhaven Port</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	
<b>Sound:</b>	
<b>Representation:</b>	<p>I wish to register my objection to the proposal (Policy E1) to allocate part of Tide Mills beach for future development.</p> <p>* This appears to contravene the requirement of a Local Plan to contribute to sustainable development.</p> <p>* The vegetated shingle is acknowledged to be rare, and this biodiverse environment would be lost with development.</p>

\* The Tidemills area, the beach and the Local Wildlife Site are enjoyed by many, including Lewes District council residents, as a space for healthy activities including walking. Easily accessible on foot from both Newhaven and Seaford, the area enables activities good for both physical and mental health.

\* Any development on the site would be clearly visible from, and blight the views from, the South Downs National Park.

\* Development on the site causing pollution, including visual, air and noise pollution, would be detrimental both to residents of local towns, and to the National Park itself.

Please record my objection and include it when considering 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?**

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

## Hodgson, Lilly

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**From:** Wendy Little <[REDACTED]>  
**Sent:** 04 November 2018 22:06  
**To:** ldf  
**Subject:** OBJECTION -LDC Local Plan proposed Policy E1 Tidemills

**Categories:** Vanessa to deal with

Hello,  
i wish to register my objection to the proposal (Policy E1) to allocate part of Tide Mills beach for future development.

- This appears to contravene the requirement of a Local Plan to contribute to sustainable development.
- The vegetated shingle is acknowledged to be rare, and this biodiverse environment would be lost with development.
- The Tidemills area, the beach and the Local Wildlife Site are enjoyed by many, including Lewes District council residents, as a space for healthy activities including walking. Easily accessible on foot from both Newhaven and Seaford, the area enables activities good for both physical and mental health.
- Any development on the site would be clearly visible from, and blight the views from, the South Downs National Park.
- Development on the site causing pollution, including visual, air and noise pollution, would be detrimental both to residents of local towns, and to the National Park itself.

Please record my objection and include it when considering the proposal.

Yours faithfully,

Wendy Little.  
[REDACTED]

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**Representation ID: REP/269/GT01**Representor Details:

<b>Representor ID:</b>	REP/269
<b>Name:</b>	Jeremy Long
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Local Business / employer

Agent Details:

<b>Name:</b>
<b>Organisation:</b>

Contact Details:

Email Address:	
Address:	

Representation:

<b>Policy/Section:</b>	<b>GT01 - Land south of The Plough</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	
<b>Sound:</b>	
<b>Representation:</b> <p>I have been made aware of a proposal for a gypsy site in the field by the Plough Pub in Plumpton. I would like to strongly voice my concerns over the suitability of this as a traveller site. I'm aware that you need to provide official pitches for the travelling community which must be a very challenging task indeed. However, this field backs directly onto the old Brickworks industrial estate where I have been running my business for the past 10 years or more. We moved our business here, away from central hove, as it's rural location serves our business well (being a bespoke furniture business we generate a certain amount of noise).</p> <p>My business partners and I travel from Brighton to the Brickworks, which isn't exactly</p>	

convenient, but we love this peaceful area so make the effort. If this goes ahead I have no doubt that we would have to relocate to another area and, talking to some of the other businesses, I fear we wouldn't be the only business to do so. This I'm sure would have a not insignificant economic impact on the area.

I also don't think the field itself is suited to traffic or caravans. I know for a fact that the field is prone to flooding. A couple of years ago a tractor had sunk and was completely stuck up to its axles and was there for some time). The old Brickworks, in fact, has a large retaining bank which keeps the flooding away from the buildings.

I have no doubt that within a few years, without the necessary infrastructure this beautiful greenfield site will be reduced to a mud-bath and the fantastic wildlife we see there now will, I'm sure, have been scared off to greener pastures.

On a final note, I would also like to bring up the safety of the residents of this proposed gipsy site. This is a very dark and fast road, with no street lighting or pavements. I certainly would not want my own kids walking to school down this road in the winter months.

I sincerely hope that this does not get any approval in this weeks meeting as it would be a detriment to the lovely Village of Plumpton which has served us very well for the past decade.

**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 Long [REDACTED]  
**Sent:** 22 October 2018 13:21  
**To:** ldf  
**Subject:** Proposed traveller site- Plumpton  
  
**Categories:** LPP2 comment to code - stakeholder details have been added

Dear Sir/Madam,

I have been made aware of a proposal for a gypsy site in the field by the Plough Pub in Plumpton. I would like to strongly voice my concerns over the suitability of this as a traveller site. I'm aware that you need to provide official pitches for the travelling community which must be a very challenging task indeed. However, this field backs directly onto the old Brickworks industrial estate where I have been running my business for the past 10 years or more. We moved our business here, away from central hove, as it's rural location serves our business well (being a bespoke furniture business we generate a certain amount of noise).

My business partners and I travel from Brighton to the Brickworks, which isn't exactly convenient, but we love this peaceful area so make the effort. If this goes ahead I have no doubt that we would have to relocate to another area and, talking to some of the other businesses, I fear we wouldn't be the only business to do so. This I'm sure would have a not insignificant economic impact on the area.

I also don't think the field itself is suited to traffic or caravans. I know for a fact that the field is prone to flooding. A couple of years ago a tractor had sunk and was completely stuck up to its axles and was there for some time). The old Brickworks, in fact, has a large retaining bank which keeps the flooding away from the buildings.

I have no doubt that within a few years, without the necessary infrastructure this beautiful greenfield site will be reduced to a mud-bath and the fantastic wildlife we see there now will, I'm sure, have been scared off to greener pastures.

On a final note, I would also like to bring up the safety of the residents of this proposed gipsy site. This is a very dark and fast road, with no street lighting or pavements. I certainly would not want my own kids walking to school down this road in the winter months.

I sincerely hope that this does not get any approval in this weeks meeting as it would be a detriment to the lovely Village of Plumpton which has served us very well for the past decade.

Kind Regards  
Jeremy Long

**Representation ID: REP/270/GT01**Representor Details:

<b>Representor ID:</b>	REP/270
<b>Name:</b>	Steve Long
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>GT01 - Land south of The Plough</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	
<b>Sound:</b>	
<b>Representation:</b>	<p>As a member of the Plumpton Parish Council Neighbourhood Plan Steering Committee that was actively involved in the consultation process for our recently approved neighbourhood plan, I feel the need to object to the proposed development of a permanent Gypsy and Travellers site at the land south of The Plough public house and adjacent to 'The Old Brickworks'. The basis of my objections are as follows:</p> <p>* The site does not meet LDC's own core policies for sustainable development. The</p>

proposed site is located one mile from the nearest shop and local school and access to these amenities is along a busy road without pavements or lighting.

\* As part of the consultation process for the neighbourhood plan, LDC expressed its preference for sites to be within a notional planning boundary extending from the railway in the south to the Old Police House and Trillium in the north, in order to both reflect sustainability issues and preserve the current green space around the village settlement. This current proposed site sits outside of this notional planning boundary.

\* LDC had also stated it's preference for east-west development as opposed to north-south development in order to maintain 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. Development of the proposed site would be in contradiction to this previously stated view.

\* The proposed site will have an adverse effect on local Plumpton businesses, many of which are located in the adjacent Old Brickworks. From a personal conversation with one of the business owners (name and contact details available upon request), if the proposed site is given the go-ahead, he will relocate his business out of Plumpton. This business is currently a key business for the village serving many of the villagers who require auto-servicing facilities. As the only other auto-garage in the village is already closing due to that site being developed as part of the neighbourhood plan, this will leave the village with no accessible auto services. I am also informed that several other business owners have similar views. Even if businesses were to stay, these businesses would incur cost for additional security measures to meet insurance requirements based on the proximity of the proposed development. Also, additional security lighting, that would no doubt be required, would be in contravention of the South Downs National Park 'dark skies' policy.

Should LDC have required the inclusion of a Gypsy and Travellers site in the Plumpton area, this should have been clearly articulated previously so that it could have been considered in the Plumpton Parish Neighbourhood Plan and been part of the consultation process and referendum that occurred earlier this year. The current proposed travellers site does not meet the policies that were detailed in this neighbourhood plan and thus should be rejected as a potential development site, as were other sites that similarly did not meet the 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?**

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



**From:** Steve Long <[REDACTED]>  
**Sent:** 05 November 2018 22:34  
**To:** ldf  
**Cc:** Ruth Long  
**Subject:** Policy GT01 - Proposed permanent Gypsy and Travellers site at the land south of The Plough public house and adjacent to 'The Old Brickworks' in Plumpton

**Categories:** GT01, Vanessa to deal with

Dear Sir/Madam,

As a member of the Plumpton Parish Council Neighbourhood Plan Steering Committee that was actively involved in the consultation process for our recently approved neighbourhood plan, I feel the need to object to the proposed development of a permanent Gypsy and Travellers site at the land south of The Plough public house and adjacent to 'The Old Brickworks'. The basis of my objections are as follows:

- The site does not meet LDC's own core policies for sustainable development. The proposed site is located one mile from the nearest shop and local school and access to these amenities is along a busy road without pavements or lighting.
- As part of the consultation process for the neighbourhood plan, LDC expressed its preference for sites to be within a notional planning boundary extending from the railway in the south to the Old Police House and Trillium in the north, in order to both reflect sustainability issues and preserve the current green space around the village settlement. This current proposed site sits outside of this notional planning boundary.
- LDC had also stated it's preference for east-west development as opposed to north-south development in order to maintain 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. Development of the proposed site would be in contradiction to this previously stated view.
- The proposed site will have an adverse effect on local Plumpton businesses, many of which are located in the adjacent Old Brickworks. From a personal conversation with one of the business owners (name and contact details available upon request), if the proposed site is given the go-ahead, he will relocate his business out of Plumpton. This business is currently a key business for the village serving many of the villagers who require auto-servicing facilities. As the only other auto-garage in the village is already closing due to that site being developed as part of the neighbourhood plan, this will leave the village with no accessible auto services. I am also informed that several other business owners have similar views. Even if businesses were to stay, these businesses would incur cost for additional security measures to meet insurance requirements based on the proximity of the proposed development. Also, additional security lighting, that would no doubt be required, would be in contravention of the South Downs National Park 'dark skies' policy.

Should LDC have required the inclusion of a Gypsy and Travellers site in the Plumpton area, this should have been clearly articulated previously so that it could have been considered in the Plumpton Parish Neighbourhood Plan and been part of the consultation process and referendum that occurred earlier this year. The current proposed travellers site does not meet the policies that were detailed in this neighbourhood plan and thus should be rejected as a potential development site, as were other sites that similarly did not meet the policies.

Kind regards,  
Dr Steve J Long and Mrs Ruth Long  
[REDACTED]

**Representation ID: REP/271/E1**Representor Details:

<b>Representor ID:</b>	REP/271
<b>Name:</b>	Donna Lonsdale-O'Brien
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>
<b>Organisation:</b>

Contact Details:

Email Address:	
Address:	

Representation:

<b>Policy/Section:</b>	<b>E1 - Land at East Quay, Newhaven Port</b>
<i>Do you consider the document to be:</i> <b>Legally Compliant:</b> <b>Sound:</b>	
<b>Representation:</b>  It is my understanding that LDC are running a consultation with the local community about the proposed development at Tidemills in Newhaven, and that local opinion forms a vital part of the decision-making process. I am very concerned about the proposed development of the 'E1' area at Tidemills, Newhaven. I have many worries about this proposal, but in this letter I will highlight only two:  Firstly, Tidemills is an area of significant natural beauty and tranquillity, and is also a designated Local Wildlife Site. I have used this outdoor space with my family and friends, weekly, for many years. It is very well used and loved by families, walkers, runners, painters, thinkers, surfers, and dogs - many of the local community. Tidemills is	

a free leisure space, and therefore offers many of the local community regular and free mental and physical health benefits. This seems to be something to protect and to celebrate to me; especially when disposable income is permanently unavailable for many of the population. We must protect and preserve this wonderful space for future generations of people and wildlife. I invite you to walk along this pathway and take a look for yourselves, before you make your decision.

Secondly, Newhaven has a huge traffic problem, and the accompanying toxic air. I don't believe that yet more planned traffic to the area to be fair, just or safe. It is very clear via the website, East Sussex in Numbers, that living in Newhaven already affects people's health outcomes. I include an extract from Kings College London, to highlight the impacts of air pollution to adults and children: 'A new report

[[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/734799/COMEAP\\_NO2\\_Report.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/734799/COMEAP_NO2_Report.pdf)] led by King's and published by the government's Committee on the Medical Effects of Air Pollutants (COMEAP) estimates that between 28,000 and 36,000 people die as a result of air pollution every year in the UK. This is a significant increase on their 2015 figure of about 29,000.'

(<https://www.kcl.ac.uk/lsm/schools/population-health-and-environmental-sciences/newsrecords/air-pollution-could-cause-36000-deaths-a-year-in-the-uk.aspx>) .

So, air pollution kills ten of thousands of people and is increasing. I am also very concerned about increased risks of cancer, heart disease and alzheimers, all indicated when in close contact with air pollution. The most heavily polluted areas of Newhaven are also where the lower-priced housing is. Therefore, air pollution disproportionately affects those on lower-incomes, who are already disadvantaged. Without positive and protective action, the air quality in Newhaven could be considered discriminatory. I wonder if many of the decision-makers, live or work in Newhaven, or know how urgently the air quality needs to addressed? I urge the decision-makers to visit the site, and to refuse the proposals.

Therefore, I believe these proposals for 'E1' would negatively impact on life and well-being, and to be discriminatory.

**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:** Donna Lonsdale-O'Brien [REDACTED]  
**Sent:** 28 October 2018 13:04  
**To:** ldf  
**Subject:** E1 Policy Tidemills, Newhaven, East Sussex

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

Dear LDF,

It is my understanding that LDC are running a consultation with the local community about the proposed development at Tidemills in Newhaven, and that local opinion forms a vital part of the decision-making process. I am very concerned about the proposed development of the 'E1' area at Tidemills, Newhaven. I have many worries about this proposal, but in this letter I will highlight only two:

Firstly, Tidemills is an area of significant natural beauty and tranquillity, and is also a designated Local Wildlife Site. I have used this outdoor space with my family and friends, weekly, for many years. It is very well used and loved by families, walkers, runners, painters, thinkers, surfers, and dogs - many of the local community. Tidemills is a free leisure space, and therefore offers many of the local community regular and free mental and physical health benefits. This seems to be something to protect and to celebrate to me; especially when disposable income is permanently unavailable for many of the population. We must protect and preserve this wonderful space for future generations of people and wildlife. I invite you to walk along this pathway and take a look for yourselves, before you make your decision.

Secondly, Newhaven has a huge traffic problem, and the accompanying toxic air. I don't believe that yet more planned traffic to the area to be fair, just or safe. It is very clear via the website, East Sussex in Numbers, that living in Newhaven already affects people's health outcomes. I include an extract from Kings College London, to highlight the impacts of air pollution to adults and children: 'A new report led by King's and published by the government's Committee on the Medical Effects of Air Pollutants (COMEAP) estimates that between 28,000 and 36,000 people die as a result of air pollution every year in the UK. This is a significant increase on their 2015 figure of about 29,000.'

(<https://www.kcl.ac.uk/lsm/schools/population-health-and-environmental-sciences/newsrecords/air-pollution-could-cause-36000-deaths-a-year-in-the-uk.aspx>) . So, air pollution kills ten of thousands of people and is increasing. I am also very concerned about increased risks of cancer, heart disease and alzheimers, all indicated when in close contact with air pollution. The most heavily polluted areas of Newhaven are also where the lower-priced housing is. Therefore, air pollution disproportionately affects those on lower-incomes, who are already disadvantaged. Without positive and protective action, the air quality in Newhaven could be considered discriminatory. I wonder if many of the decision-makers, live or work in Newhaven, or know how urgently the air quality needs to be addressed? I urge the decision-makers to visit the site, and to refuse the proposals.

Therefore, I believe these proposals for 'E1' would negatively impact on life and well-being, and to be discriminatory.

Best regards,

Donna Lonsdale-O'Brien

**Representation ID: REP/272/GT01**Representor Details:

<b>Representor ID:</b>	REP/272
<b>Name:</b>	John Lorkin
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>GT01 - Land south of The Plough</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	Yes
<b>Sound:</b>	Yes Not Justified Not Effective
<b>Representation:</b>	<p>The site identified as GT01 in Plumpton Green is not appropriate for the proposed use as a Gypsy and Traveller Site, as it is green field agricultural land at present. There must be many brown field sites within the Plan Area that are already in Local Government or similar ownership that are in need of redevelopment and/or decontamination, which</p>

would lend themselves far better for this sort of use and benefit a broader spectrum of the community than just the targeted site users. Safe and appropriate road access and effective site drainage may well be available already. Furthermore, as a green field site, the site in Plumpton Green will be far more high profile than a site that has been previously used for some other use incorporating redundant buildings and hard areas. As such, scrutiny of the Councils on-going management of this site will be far more intense than on a brown field site, resulting in far higher Revenue costs in the future. The Councils revenue costs overall are and will continue to be under excessive strain, to the extent that there will be difficulty to even meet its Statutory responsibilities in the future. Thus, despite the assurances that the Council officers have given the village residents that the site once developed will be effectively controlled by strict planning conditions, there can be scant hope that this will actually happen in the long term. Accordingly, Council officers should be instructed to revisit the search for a suitable site with increased emphasis on reducing to a minimum the on-going costs of maintenance and particularly effective administration. If this results in increased initial capital costs on a more suitable brown field site, then so be it. Those costs will be funded in large part by Central Government. Once a gypsy and travellers site has been developed and occupied, then the costs (including considerable officer time having to be redirected from other duties) will be borne entirely by the local rate payers. Inevitably, there will be never be sufficient funds to manage the site to meet the present, somewhat rose tinted, aspirations of the Councils members and officers which are currently being "peddled" to the very concerned residents of the village. At the end of the day, there will be no "plan B" site to which to relocate the use in the event that the initial development proves to be "unmanageable" and therefore it is essential that the choice of site is right first time and not decided simply on the basis that the site in Plumpton Green appears to be available and relatively cheap to develop when compared with alternatives.

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

The site identified as GT01 in Plumpton Green should be deleted from the 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?**

N/A

**Representation ID: REP/273/E1**

Representor Details:

<b>Representor ID:</b>	REP/273
<b>Name:</b>	Sheila Lothian
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>E1 - Land at East Quay, Newhaven Port</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	Yes
<b>Sound:</b>	No
<b>Representation:</b>  it is a totally unjustifiable planning idea to use this site which will cause the destruction of a natural habitat and local environment as well as the fact that there are many other sites that could be developed for such purposes which would not cause such drastic devastation as well as producing environmental and visual damage. Also, in this time of climate change, how can it be feasible to consider building industries/housing so close to the sea at sea level. I know there are flood defences mentioned in the planning but this area should be left to be part of the flood defences for Newhaven and Seaford. So this	



document should be disregarded as unsound as it is not thought through, nor does it consider the opinions of the local populace.

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

the document should be scrapped.

**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 need to be consulted on this planning idea as it would have a huge effect on a great many local people who currently use this area for recreation purposes as well as the effect of the noise and pollution resulting from such a development in this area. It is part of the Newhaven Port Nature reserve and a Local Wildlife site which has recently been designated and agreed with Friends of Tide Mills and the Newhaven Port Authorities. The area has Coastal Vegetated Shingle and as such should be protected due to its rarity and the area generally is noted for its wildlife and important biodiversity value. Public opinion should be sought as it is the local populace that will be adversely affected by any large scale development.

In the interests of democracy, this should be available for Public scrutiny and consultation.

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**Representation ID: REP/274/E1**Representor Details:

<b>Representor ID:</b>	REP/274
<b>Name:</b>	Nigel Lothian
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>E1 - Land at East Quay, Newhaven Port</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	
<b>Sound:</b>	
<b>Representation:</b>  As you may (or possibly may not) be aware the Tide Mills area currently offers a recreational environment to residents and visitors to the region. It complements the coast and surrounding South Downs National Park. As such it forms part of a total beneficial environment. Any plans to develop parts of the area with heavy, dirty industry and/or increasing the amount of heavy vehicular transport can only be detrimental to the total area and a snub to residents and visitors alike.	

With Brighton and Eastbourne having been included in the list of healthiest towns in the UK it is not at all appropriate to allow Newhaven to further become a carbuncle on this part of the South coast. What Newhaven needs is sympathetic and clean development so as to attract visitors and boost the local economy in an environmentally friendly way.

If in these times of restricted budgets, LDC can find significant funds for a non-essential development for the port, then why not go the whole hog and build a tunnel to access the port.

I oppose any development that upsets the environment in any way and is detrimental to the long term development of Newhaven and its environs. To that end I would hope that, on this occasion, LDC respects the wishes of the local populace and does not have any other agenda.

**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 08:31  
**To:** ldf  
**Subject:** OFF local plan 2

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

Dear Sirs

As you may (*or possibly may not*) be aware the Tide Mills area currently offers a recreational environment to residents and visitors to the region. It complements the coast and surrounding South Downs National Park. As such it forms part of a **total** beneficial environment. Any plans to develop parts of the area with heavy, dirty industry and/or increasing the amount of heavy vehicular transport can only be detrimental to the total area and a snub to residents and visitors alike.

With Brighton and Eastbourne having been included in the list of healthiest towns in the UK it is not at all appropriate to allow Newhaven to further become a carbuncle on this part of the South coast. What Newhaven needs is sympathetic and clean development so as to attract visitors and boost the local economy in an environmentally friendly way.

If in these times of restricted budgets, LDC can find significant funds for a non-essential development for the port, then why not go the whole hog and build a tunnel to access the port.

I oppose any development that upsets the environment in any way and is detrimental to the long term development of Newhaven and its environs. To that end I would hope that, on this occasion, LDC respects the wishes of the local populace and does not have any other agenda.

Yours faithfully,  
Nigel Lothian  
[REDACTED]

I am writing to object wholeheartedly to any plans to further develop Tide Mills. This is absolutely NOT in the public's interest....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. This 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 this is an area I regularly walk with our dog as well as a good place to see a variety of birds. It is a much loved area!

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 on this sensitive area can only add to the dangers associated with flood waters and the rise in sea levels.

I for one am against the Port Access Road and any further deterioration of this area would be intolerant and completely against public opinion and therefore completely undemocratic.

I hope you will listen to public opinion and not to those that are only interested in making money from such a development.

Sheila Lothian



sent from downview

**Representation ID: REP/275/E1**Representor Details:

<b>Representor ID:</b>	REP/275
<b>Name:</b>	Sheila Lothian
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	E1 - Land at East Quay, Newhaven Port
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	
<b>Sound:</b>	
<b>Representation:</b>	
<b>What changes do you suggest to make the document legally compliant or sound?</b>	
<b>Do you consider it necessary to participate at the Examination in Public?</b>	

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

## Thea Davis

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**From:** Sheila Lothian [REDACTED]  
**Sent:** 03 November 2018 13:22  
**To:** ldf  
**Subject:** OFF local plan 2

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

I am writing to object wholeheartedly to any plans to further develop Tide Mills. This is absolutely NOT in the public's interest....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. This 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 this is an area I regularly walk with our dog as well as a good place to see a variety of birds. It is a much loved area!

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 on this sensitive area can only add to the dangers associated with flood waters and the rise in sea levels.

I for one am against the Port Access Road and any further deterioration of this area would be intolerant and completely against public opinion and therefore completely undemocratic.

I hope you will listen to public opinion and not to those that are only interested in making money from such a development.

Sheila Lothian  
[REDACTED]

sent from downsvievw



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**Representation ID: REP/276/BA01**Representor Details:

<b>Representor ID:</b>	REP/276
<b>Name:</b>	Emma Loughlin
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>BA01 - Land at Hillside Nurseries, High Street</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	
<b>Sound:</b>	
<b>Representation:</b>  As a Barcombe resident, I would like to voice my significant concerns, and objections to the proposal on site BA01 Barcombe cross.  Since 2003 a BAI policy has been allocated against land next to the recreation ground in Barcombe. It is vital to the future of the village playspace that this policy be maintained for an equipped playspace.	

The current equipped playspace in Barcombe fulfils only 12% of the fields in trust guidelines for the current population, and will fall below this with the proposed new developments. The Parish council working group have been working towards a new playspace for several years, and has taken advice from LDC Specialist Advisor for Open Spaces who agrees that BA01 is the ONLY suitable site for an equipped play space.

The children of Barcombe deserve an adequate and modern playspace. The current equipped play space in Barcombe has not been updated for 25 to 30 years, the equipment is old & does not meet current standards in terms of safety, & space buffer zones. This means that as each piece of equipment breaks or is damaged it cannot be removed & replaced in the same location, as it contravenes various BS EN standards, so the children have less and less useable equipment.

All of the villages surrounding Barcombe, including those less populous have larger and newer play spaces. Barcombe parish council have confirmed their commitment & full support in providing the village with a new equipped play provision, and a working group has been set up to aid planning, design & funding.

If site BA01 is built on it will leave Barcombe with no other suitable space, and generations of children will suffer, in an age when we need to encourage activity & outdoor play as much as possible.

I reiterate all of the points raised on the attached document, and ask that you ensure the BA1 policy is maintained, and the BA01 site planning boundary is adjusted.

Declaration of interest:

I am a parish councillor in Barcombe - this email represent my views as a local resident & parent 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?**

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

## Thea Davis

---

**From:** Emma Loughlin [REDACTED]  
**Sent:** 04 November 2018 16:24  
**To:** ldf  
**Cc:** Thom, Tondra  
**Subject:** Lewes District Local Plan Part 2 - BA01 Barcombe Cross  
**Attachments:** 181028\_BPWG\_response\_draft\_local\_plan.pdf

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

**Reference:** [Lewes District Local Plan Part 2: Site Allocations and Development Management Policies DPD - Pre-Submission version](#)

As a Barcombe resident, I would like to voice my **significant concerns, and objections** to the proposal on site BA01 Barcombe cross.

Since 2003 a BAI policy has been allocated against land next to the recreation ground in Barcombe. It is vital to the future of the village playspace that this policy be maintained for an **equipped playspace**. The current equipped playspace in Barcombe fulfils only **12%** of the fields in trust guidelines for the current population, and will fall below this with the proposed new developments. The Parish council working group have been working towards a new playspace for several years, and has taken advice from LDC Specialist Advisor for Open Spaces who agrees that BA01 is the **ONLY** suitable site for an equipped play space.

The children of Barcombe deserve an adequate and modern playspace. The current equipped play space in Barcombe has not been updated for 25 to 30 years, the equipment is old & does not meet current standards in terms of safety, & space buffer zones. This means that as each piece of equipment breaks or is damaged it cannot be removed & replaced in the same location, as it contravenes various BS EN standards, so the children have less and less useable equipment.

All of the villages surrounding Barcombe, including those less populous have larger and newer play spaces. Barcombe parish council have confirmed their commitment & full support in providing the village with a new equipped play provision, and a working group has been set up to aid planning, design & funding.

If site BA01 is built on it will leave Barcombe with no other suitable space, and generations of children will suffer, in an age when we need to encourage activity & outdoor play as much as possible.

I reiterate all of the points raised on the attached document, and ask that you ensure the BA1 policy is maintained, and the BA01 site planning boundary is adjusted.

Kind regards,  
Emma Loughlin

Declaration of interest:

I am a parish councillor in Barcombe - this email represent my views as a local resident & parent only.

# 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

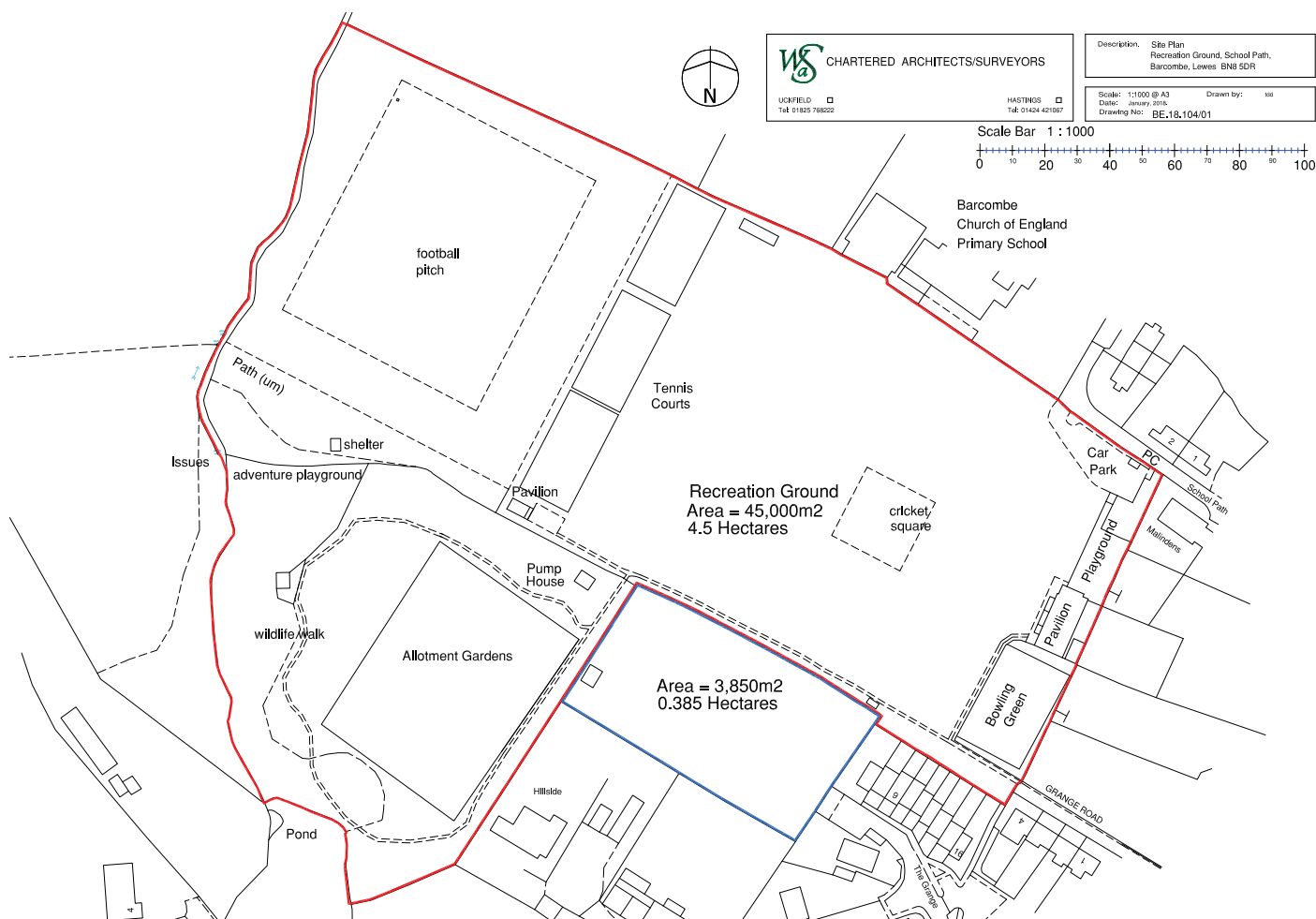
This document outlines our **significant concerns** regarding the Lewes District Local Plan Part 2: Site Allocations and Development Management Policies DPD - Pre-submission version, in particular to Policy BA01 - Land at Hillside Nurseries, High Street. We believe there is an unresolved ongoing shortfall 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 <sup>2</sup> )	4.5ha (45,000m <sup>2</sup> )	3.2ha (32,000m <sup>2</sup> ) Rec, not including WAB?
PLAYGROUND (EQUIPPED PLAY)	0.044ha (440m <sup>2</sup> )	0.043ha (430m <sup>2</sup> )	0.06ha (600m <sup>2</sup> )
WAB TOTAL	1.2ha (12,320m <sup>2</sup> )	1.14ha (11,400m <sup>2</sup> )	Not given
WAB (MINUS ALLOTMENTS)	0.85ha (8500m <sup>2</sup> )	0.79ha (7900m <sup>2</sup> )	Not given
WAB (INFORMAL CHILDREN'S PLAY)	0.62ha (6200m <sup>2</sup> ) Not inc. Orchard or paths	Not given	Not given
BIKE JUMPS	0.048ha (480m <sup>2</sup> ) Before improvements	0.167ha (1670m <sup>2</sup> )	Not given
OUTDOOR SPORTS TOTAL	1.87ha (18,730m <sup>2</sup> )	Not given	1.84ha (18,400m <sup>2</sup> )
CRICKET FIELD/FOOTBALL PITCH	1.59ha (15,900m <sup>2</sup> )	Not given	Not given
CRICKET PITCH (SQUARE)	0.09ha (900m <sup>2</sup> )	Not given	Not given
TENNIS COURTS	0.2ha (2000m <sup>2</sup> )	Not given	Not given
BOWLING GREEN	0.083ha (830m <sup>2</sup> )	Not given	Not given
BOTTOM FIELD	1.2ha (12,000m <sup>2</sup> )	Not given	1.3ha (13,000m <sup>2</sup> ) 'Informal Children's Play'?
BOTTOM FIELD USEABLE PITCH SPACE	0.73ha (7300m <sup>2</sup> ) approx.	Not given	Not given
HILLSIDE NUSERIES (FORMER BAI POLICY)	0.389ha (3890m <sup>2</sup> )	Not given	Not given

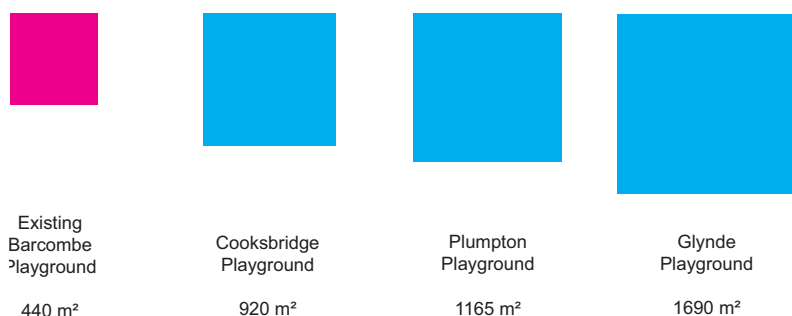
\* 1 Hectare = 10,000m<sup>2</sup>

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).

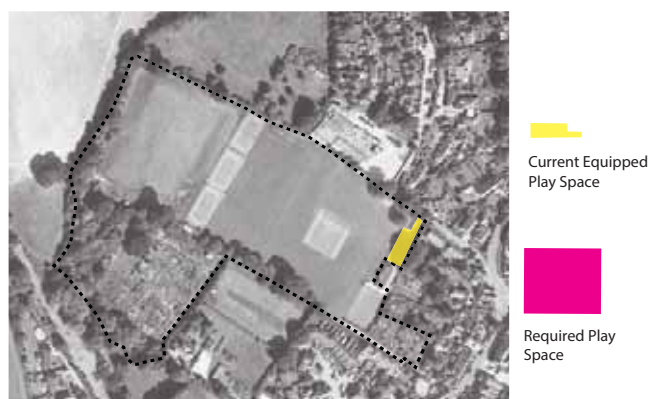
Further, we ask that the language used in policy BA01 ensures that any developer is required to fulfil its obligation to provide the space allocated for play – the use of words such as 'approximately' and 'preferable' (2.63) should be amended to more definitive terms to ensure clarity and accountability.



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 BAI 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.**

<b>Representation ID:</b> REP/277/BA01
--

Representor Details:

<b>Representor ID:</b>	REP/277
<b>Name:</b>	Gary Loughlin
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>BA01 - Land at Hillside Nurseries, High Street</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	Yes
<b>Sound:</b>	Yes
<b>Representation:</b>  The figure of 30 net houses will exceeded by sites utilising BA01- Hillside Nurseries and BA02 Land Adjacent to the High Street which will provide a total of 35 units net.  The proposed Bridgelands site, BA03, stretches into the open countryside well beyond the nucleated development line of Barcombe Cross village.	



BA01 and BA02 will deliver 35 units. Therefore, BA03 site should be removed from the Plan as it is a problematic and unsustainable. 42 units would be too much growth in too short a time for the small settlement of Barcombe Cross. There are currently 342 dwellings in Barcombe Cross and to impose 42 dwellings on three nearby sites would represent an increase of 12 percent. The other two sites will provide the necessary range of houses required with a nine percent increase and become an integral part of 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?** No

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

<b>Representation ID:</b> REP/277/BA03
--

Representor Details:

<b>Representor ID:</b>	REP/277
<b>Name:</b>	Gary Loughlin
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>BA03 - Land at Bridgelands</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	Yes
<b>Sound:</b>	Yes
<b>Representation:</b>  <p>The access to Bridgelands has been referred to as 'sub-standard' as the old bridge on the High Street is humped and blocks visibility, plus there is a blind corner further up the road. The proposed changes to this junction will not provide any safety improvements which will worsen with any increase in traffic. It is a private road which has to be maintained by Bridgelands 'residents'. This access needs to be looked at in the context of the access to BA01 and BA02 which is a short distance away and the increased traffic</p>	

created by proposed 35 new dwellings. If all 3 sites were to proceed at once there would be ensuing traffic chaos.

The net residential density for the 5 current houses at Bridgelands is 5 dph. See Appendix 1. The 'indicative density achieved on site is 13 dph' - significant disparity in densities would give rise to a residential development markedly different and out of character with its surroundings. This has not been correctly assessed, as is required by the Housing Site Options Background Report, Table 1 and Appendix 1, Section H.

The proposed 7 dwellings for BA03 do not take into account the existing houses with regard to density or design. The existing low density 4 house development adjoining and to the south of The Old Station, by providing a similar residential character, complements the Conservation Area. Any development on Site BA03 should similarly complement the Conservation Area. This site should be removed from the Local Plan as it cannot meet the density requirement for inclusion in the plan. The requirement for smaller housing units has been recognised and as outlined elsewhere in the Plan and will be met by Sites BA01 and BA02, which are more suited to this type of development.

Density measures provide a feel for the intensity of the built form. A new development nearly three times the density of the adjoining development will not complement the local character. The objectives of Core Policy 2 are to provide a range of dwelling types to meet local need within the context of conserving and enhancing local character. It is not a requirement for all allocated sites to provide small houses: there are a range of needs and demands. A consideration of Proposal BA02 adjacent to the High St and BA01 Hillside in Barcombe Cross suggests they are better able to provide smaller units to meet local demand.

The southern boundary of site BA03 abuts a conservation area. Development of this site will disrupt a wildlife corridor, which presently connects this conservation area to the 'Wild about Barcombe' reserve and the wildlife area along the old Lewes to Sheffield Park Railway line. It is recognised that isolated conservation areas are of very limited ecological value and that corridors allowing free movement of wildlife are essential to ecological integrity. Site BA03 currently supports a diverse range of wildlife including grass snakes, slow worms, several species of bats and owls, glow worms, frogs, toads and newts. The ??

The pond on the proposed site is at the lowest point in the surrounding area, sitting mainly on clay and all the run-off from the nearby roads, fields and ditches drains into it. The pond is a vital element of the delicate balance of drainage. This should not just be considered in relation to BA03 but also BA01 but particularly BA02 whose proposed 25 houses will have a huge impact on the local drainage system.

Flood risk - we have read all the reports relating to flood risk and can find no reference to the flash flood the residents of Bridgelands suffer from. Flash floods are becoming more common and, with climate change, that will be exacerbated. No local residents have been contacted about this issue. All the properties in Bridgelands have been affected by flooding. This is a low lying area, mostly on clay, with no natural drainage nowhere. Surface water run off from BA0 and, BA02 will exacerbate this. The land on

both east and west sides of Bridgelands slopes downwards, with Bridgelands being the lowest point in the topography. Flooding at the rear of the properties on the west side of Bridgelands, the station garden and the land to the east, including part of site BA03 occurs every winter. We have submitted photographic evidence of these events to the LDC Chief Planning Officer.

In the year 2000, all the gardens of the properties in Bridgelands and most of the area designated BA/A04 were seriously flooded and the flood water was only a few feet away from entering houses. On another occasion, although the RSPCA were contacted, a horse trying to drink from the pond in site BA03, sank so deeply into the mud that it drowned. ESF&R were called to remove the body of the horse and this should appear on their records.

Surface run off from the developments proposed at sites BA/A01, BA/A02 and BA/A03, where a total of 45 housing units are envisaged will drain to site BA/A04. At present, these Greenfield sites allow natural percolation of rainfall to the underground aquifers. Development will concentrate run off towards Bridgelands and inevitably exacerbate flooding. It should also be noted that road drains from Barcombe High Street are culverted to the ditch adjacent to the western aspect of Bridgelands. This ditch also receives run off from the land to the east via a nineteenth century culvert running beneath the gardens of numbers 1 and 2 Bridgelands. The combination of these already challenges the capacity of drainage infrastructure.

Whilst the existing properties on the west side of Bridgelands have escaped serious flooding so far, the risk will be exacerbated by these proposed developments and flooding of the site BA/A04 is very likely.

**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?**

<b>Representation ID:</b> REP/277/DM17
--

Representor Details:

<b>Representor ID:</b>	REP/277
<b>Name:</b>	Gary Loughlin
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>DM17: Former Lewes/Sheffield Park Railway Line</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	Yes
<b>Sound:</b>	Yes
<b>Representation:</b>  As well as Policy BA03 land at Bridgelands, we would draw your attention to Policy DM16 and DM17 which are in conflict with Policy BA03.  The disused railway line approaches Barcombe from the north, as illustrated on Inset Map 6 but its natural and most direct route to the nearest point on the public highway, at the High Street via Bridgelands, is blocked by the housing allocation BA03. This	

blocking 'of the what must be the best route to implement the footpath/bridleway/cycleway in the Barcombe area in terms of user requirements and cost effectiveness to the public purse conflicts with countryside access objectives.

**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?**

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**Representation ID: REP/278/E1**Representor Details:

<b>Representor ID:</b>	REP/278
<b>Name:</b>	Graham Lower
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>E1 - Land at East Quay, Newhaven Port</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	
<b>Sound:</b>	
<b>Representation:</b>	<p>I wish to lodge my objection to your plan to commercialise this land. There are acres of land not used at the rear of B &amp; Q and now you are taking more land to be develop when there is land left empty. I believe your interest in this land is an attempt to justify the millions of pounds ESCC are going to waste on a bridge. If the bridge is ever built it will cost millions over budget and will never produce enough income to cover this. I believe that this bridge, if built, will be the gravestone for ESCC.</p>

On my visit to the site [E1] today it looked to me as if you have included part of the WW1 Seaplane Base. If I am right, why is there not a preservation order on this site? You should draw the public's attention to your proposed destruction of this historic, possibly unique, 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?**



## Hodgson, Lilly

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**From:** Penny Lower <[REDACTED]>  
**Sent:** 04 November 2018 19:17  
**To:** ldf  
**Subject:** Lewes Local Plan Part 2 Land at Newhaven East Quay  
**Categories:** LPP2 comment to code - stakeholder details have been added

I wish to lodge my objection to your plan to commercialise this land. There are acres of land not used at the rear of B & Q and now you are taking more land to be develop when there is land left empty. I believe your interest in this land is an attempt to justify the millions of pounds ESCC are going to waste on a bridge. If the bridge is ever built it will cost millions over budget and will never produce enough income to cover this. I believe that this bridge, if built, will be the gravestone for ESCC.

On my visit to the site [E1] today it looked to me as if you have included part of the WW1 Seaplane Base. If I am right, why is there not a preservation order on this site? You should draw the public's attention to your proposed destruction of this historic, possibly unique, site.

Graham AC Lower  
[REDACTED]

Sent from [Mail](#) for Windows 10

**Representation ID: REP/279/E1**

Representor Details:

<b>Representor ID:</b>	REP/279
<b>Name:</b>	Penelope Lower
<b>Organisation:</b>	<b>Seaford Town Council</b>
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>E1 - Land at East Quay, Newhaven Port</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	Yes
<b>Sound:</b>	No
	Not Positively Prepared
	Not Justified
	Not Effective
	Not Consistent with national policy
<b>Representation:</b>	
Further development of the East Quay [land adjoining] will impact negatively on the whole of Seaford Bay, putting in jeopardy the nature reserve and wildlife environment and impacting negatively on the beach environment, leisure pursuits amenity for the local population. There is more than sufficient land now allocated for port-related	

industry and other economic activity. The land outlined in E1 extends the already potentially polluting industrial development with no sound justification. Existing sites to be served by the Port Access Road have been unused for years despite the road being available for much of its length.

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

The land in E1 beyond [east] of the existing buildings should be designated as protected for nature and amenity use only.

**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?**

<b>Representation ID:</b> REP/280/E1
--------------------------------------

Representor Details:

<b>Representor ID:</b>	REP/280
<b>Name:</b>	Jane Lucas
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>E1 - Land at East Quay, Newhaven Port</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	
<b>Sound:</b>	
<b>Representation:</b>  As a resident of Seaford who regularly walks along the seafront to Newhaven and enjoys the unspoilt nature of the open greenery to the East of Tide Mills, I very much oppose this development. Why take away what is so valued and at the heart of what makes Newhaven/ Seaford a special place. This contradicts the direction of clean, green development stated in the plans for the regeneration of Newhaven. The roads are extremely congested along the A259/ A26 and anything that adds to this traffic should	

be avoided.

I hope Lewes will pay attention to 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?**

## Hodgson, Lilly

---

**From:** Jane Lucas [REDACTED]  
**Sent:** 04 November 2018 17:58  
**To:** ldf  
**Subject:** Ref- E1 Development of Tide Mills beach

**Categories:** Vanessa to deal with

As a resident of Seaford who regularly walks along the seafront to Newhaven and enjoys the unspoilt nature of the open greenery to the East of Tide Mills, I very much oppose this development. Why take away what is so valued and at the heart of what makes Newhaven/ Seaford a special place. This contradicts the direction of clean, green development stated in the plans for the regeneration of Newhaven. The roads are extremely congested along the A259/ A26 and anything that adds to this traffic should be avoided.

I hope Lewes will pay attention to local people.

Jane Lucas

[Sent from Yahoo Mail for iPhone](#)

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**Representation ID: REP/281/GT01**Representor Details:

<b>Representor ID:</b>	REP/281
<b>Name:</b>	Johannes Makonnen
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>
<b>Organisation:</b>

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	GT01 - Land south of The Plough
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	
<b>Sound:</b>	
<b>Representation:</b>	
I object most strongly to the proposal to have a site in Plumpton	
We have a beautiful village that is virtually crime free	
If this happens we will need street lights in the village which the council will have to fund	

<div><div></div><div></div></div> <p>You must reconsider this crazy idea</p>
<p><b>What changes do you suggest to make the document legally compliant or sound?</b></p>
<p><b>Do you consider it necessary to participate at the Examination in Public?</b></p>
<p><b>Why do you feel it is necessary to participate at the Examination in Public?</b></p>



## Hodgson, Lilly

---

**From:** Jmakonnen [REDACTED]  
**Sent:** 25 October 2018 18:16  
**To:** ldf  
**Subject:** Plumpton Gypsy site  
  
**Categories:** LPP2 comment to code - stakeholder details have been added

I object most strongly to the proposal to have a site in Plumpton We have a beautiful village that is virtually crime free If this happens we will need street lights in the village which the council will have to fund [REDACTED]

You must reconsider this crazy idea  
Regards Johannes

Sent from my iPhone


**Representation ID: REP/282/GT01**Representor Details:

<b>Representor ID:</b>	REP/282
<b>Name:</b>	Guy Malyon
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>GT01 - Land south of The Plough</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	Yes
<b>Sound:</b>	No
<b>Representation:</b>  Having read both the Lewes District Council Local Plan Part 2 Site Allocations and Development Management Policies Pre-Submissions Document (REPLP) and the Plumpton Neighbourhood Plan 2017-2030 (PPNP) I am concerned that Policy GT01 Land South of the Plough is not in accordance with the PPNP for the reasons given below.  Policy 1 of PPNP clearly that any new development should e within the existing planning	

boundary and the rural character of the village should be maintained by ensuring new development is contained around the current centre of the village, Policy GT01 contravenes this policy.

Policy 2 of the PPNP states that new development should reflect local finishes and complement the local surroundings, Policy GT01 contravenes this policy.

Policy 6 of the PPNP states that new development proposals that result in the loss of an existing business or employment will be resisted. Policy 7 of the PPNP states that new development proposals that negatively impact existing shops or commercial units will be resisted. At a recent meeting to discuss Policy GT01 the owner of the owner of the Old Brickworks business park stated that the business owners would look to re-locate their business if a residential development were approved due to security concerns. This would have the knock on effect of reducing business to the local shop and public houses. For new business to move in there would need to be security fencing and lighting which would be both intrusive and go against the wish to be a dark skies parish.

At a Plumpton parish council meeting held on 9th October 2018 a representative from Lewes District Council read out a prepared list of questions and answers. The following question with its answer was given regarding purchase of the land.

Q: Who will own the site? Will LDC purchase it, lease it from the current owner or 'broker' its sale to the travellers? it is the arrangement the perpetuity?

A: We understand from the landowner that the site will need to be purchased and LDC is looking into the funding and government grants available to deliver the allocation. It is highly likely the site would remain either in LDC ownership or be transferred to ESCC - it is not anticipated to become a private site; due to the costs of delivery it will remain in public ownership and be rented through licence agreements.

The use of phrases such as 'we understand', 'it is highly likely' and 'it is not anticipated' basically invalidate the answer to this questions. I find it extraordinary that as the period of public consultation comes to an end there is no factual evidence available regarding future ownership of the land.

I also have concern that the 60mph road plus lack of suitable footpaths both to the North and South of the site could be very dangerous for anyone going on foot North to the bus stop or South into the village centre.

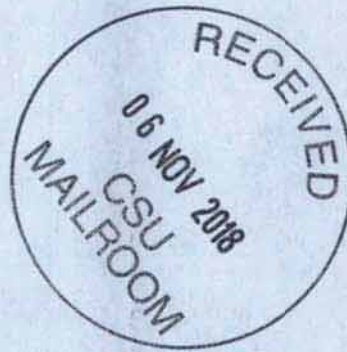
**What changes do you suggest to make the document legally compliant or sound?**

**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?**

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



Guy Malyon,



1<sup>st</sup> November 2018

**Policy GT01 Land South of the Plough**

Dear Sir / Madam,

Having read both the Lewes District Council Local Plan Part 2 Site Allocations and Development Management Policies Pre-Submissions Document (**LDCLP**) and the Plumpton Parish Neighbourhood Plan 2017-2030 (**PPNP**) I am concerned that **Policy GT01 Land South of the Plough** is not in accordance with the **PPNP** for the reasons given below.

Policy 1 of the **PPNP** clearly that any new development should be within the existing planning boundary and the rural character of the village should be maintained by ensuring new development is contained around the current centre of the village. **Policy GT01** contravenes this policy.

Policy 2 of the **PPNP** states that new development should reflect local finishes and complement the local surroundings. **Policy GT01** contravenes this policy.

Policy 6 of the **PPNP** states that new development proposals that result in the loss of an existing business or employment will be resisted. Policy 7 of the **PPNP** states that new development proposals that negatively impact existing shops or commercial units will be resisted. At a recent meeting to discuss **Policy GT01** the owner of the owner of the Old Brickworks business park stated that the business owners would look to re-locate their businesses if a residential development were approved due to security concerns. This would have the knock-on effect of reducing business to the local shop and public houses. For new business to move in there would need to be security fencing and lighting which would be both intrusive and go against the wish to be a dark skies parish.



At the Plumpton Parish Council meeting held on 9<sup>th</sup> October 2018 a representative from Lewes District Council read out a prepared list of questions and answers. The following question with its answer was given regarding purchase of the land.

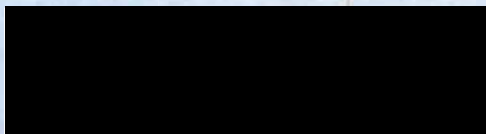
Q: Who will own the site? Will LDC purchase it, lease it from the current owner or 'broker' its sale to the travellers? Is the arrangement for perpetuity?

A: We understand from the landowner that the site will need to be purchased and LDC is looking into the funding and government grants available to deliver the allocation. It is highly likely the site would remain either in LDC ownership or be transferred to ESCC – it is not anticipated to become a private site; due to the costs of delivery it will remain in public ownership and be rented through license agreements.

The use of phrases such as 'we understand,' 'it is highly likely,' and 'it is not anticipated' basically invalidate the answer to this question. I find it extraordinary that as the period of public consultation comes to an end there is no factual evidence available regarding future ownership of the land.

I also have concerns that the 60mph road plus lack of suitable footpaths both to the North and South of the site could be very dangerous for anyone going on foot North to the bus stop or South into the village centre.

Yours sincerely

A black rectangular box redacting the signature of Guy Malyon.

Guy Malyon

**Representation ID: REP/283/GT01**Representor Details:

<b>Representor ID:</b>	REP/283
<b>Name:</b>	Sarah Mann
<b>Organisation:</b>	<b>Friends Families and Travellers</b>
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Other group or organisation

Agent Details:

<b>Name:</b>
<b>Organisation:</b>

Contact Details:

<b>Email Address:</b>	Sarah@gypsy-traveller.org
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>GT01 - Land south of The Plough</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	Yes
<b>Sound:</b>	Yes
<b>Representation:</b>  Lewes Local Plan Part 2 Friends, Families and Travellers (FFT) is a national charity working towards equality of opportunity and an end to discrimination against Gypsies Roma and Travellers. We also work with Gypsy, Roma and Traveller clients across Sussex, so we are familiar with established private and public Gypsy and Traveller sites in Sussex and in Lewes District specifically.  We welcome the opportunity to comment on the Lewes Local Plan Part 2, with specific reference to the proposed allocation GT01 - Land South of the Plough.  There is not only a clearly evidenced local need, but also a national need for pitches for Gypsies and Travellers. By developing this piece of land it will give a welcome	

opportunity for a family to have a safe place to live. Core Policy 3 of the adopted Joint Core Strategy the Local Plan Part 1 sets the requirement for provision to be found in LPP2 and this is based on the 2016 GTAA for East Sussex. There are a number of families in East Sussex looking for availability on sites and at FFT we have regular requests from families asking us to help them find a site. This is not necessarily area specific as Travellers understand the lack of site availability in East Sussex.

Some concerns have been raised in regards to this being a suitable location as there are no footpaths to use leading from the site. This is very similar to a site currently managed by East Sussex County Council, Swan Barn in Hailsham. The road adjacent to the site is National Speed limit and there is not a footpath that leads from the site. Six out of the ten Local Authority sites in West Sussex do not have footpath access and this should not be seen as a barrier to delivery. There is a bus stop that is adjacent to the site on Station Road. Vehicle access to and from the site is sound. One of the recommendations will be and should be to reduce the speed limit along Station Road which we would recommend, but again should not be seen as a barrier to delivery. The Swan Barn Site has a National Speed limit road adjacent to the site and there have been no recorded Road Traffic Collisions that are related to residents or visitors to the site.

The site is not within a flood risk zone for fluvial or tidal flooding; the Environment Agencys mapping shows that the property is not in the vicinity of Flood Zone 2 and flood zone 3. We are aware there is a stream (ordinary watercourse) on the boundary line to the south of the site and this is why the policy requires a surface water drainage strategy and site specific flood risk assessment. This is quite normal for residential allocations and a number of other residential allocations also have this requirement.

The development will use the natural topography in screening the site from wider, sensitive landscape views and is designed to minimise the perception of urbanisations in this location, particularly with regards to hard standing and amenity buildings. we understand that there is a concern from local residents that that 'aesthetics' of the landscape will be affected and that this will destroy the rural appeal of Plumpton Village. By having sufficient bunding and hedge row planting in place this will not affect the visual appeal of the village or damage the aesthetics of the landscape.

Through our casework, our experience of small Gypsy and Traveller sites in Sussex and in other areas is very positive in terms of the benefits for the families and the positive contribution to the local community. This is also evidence in the Equality and Human Rights Commission publication, Simple Solutions for Living Together.

This site meets the requirements for Gypsy and Travellers and is culturally sensitive in the needs of the Travelling community.

Please do not hesitate to contact us if you would like further information or evidence of need.

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

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



05 November 2018



Dear Planners,

## **Lewes Local Plan Part 2**

Friends, Families and Travellers (FFT) is a national charity working towards equality of opportunity and an end to discrimination against Gypsies Roma and Travellers. We also work with Gypsy, Roma and Traveller clients across Sussex, so we are familiar with established private and public Gypsy and Traveller sites in Sussex and in Lewes District specifically.

We welcome the opportunity to comment on the Lewes Local Plan Part 2, with specific reference to the proposed allocation GT01 – Land South of the Plough.

There is not only a clearly evidenced local need, but also a national need for pitches for Gypsies and Travellers. By developing this piece of land it will give a welcome opportunity for a family to have a safe place to live. Core Policy 3 of the adopted Joint Core Strategy the Local Plan Part 1 sets the requirement for provision to be found in LPP2 and this is based on the 2016 GTAA for East Sussex. There are a number of families in East Sussex looking for availability on sites and at FFT we have regular requests from families asking us to help them find a site. This is not necessarily area specific as Travellers understand the lack of site availability in East Sussex.

Some concerns have been raised in regards to this being a suitable location as there are no footpaths to use leading from the site. This is very similar to a site currently managed by East Sussex County Council, Swan Barn in Hailsham. The road adjacent to the site is National Speed limit and there is not a footpath that leads from the site. Six out of the ten Local Authority sites in West Sussex do not have footpath access and this should not be seen as a barrier to delivery. There is a bus stop that is adjacent to the site on Station Road. Vehicle access to and from the site is sound. One of the recommendations will be and should be to reduce the speed limit along Station Road which we would recommend, but again should not be seen as a barrier to delivery. The Swan Barn Site has a National Speed limit road adjacent to the site and there have been no recorded Road Traffic Collisions that are related to residents or visitors to the site.

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**Friends Families & Travellers**  
Community Base, 113 Queens Road, Brighton, BN1 3XG

**T: 01273 234 777**  
**F: 01273 234 778**

**[www.gypsy-traveller.org](http://www.gypsy-traveller.org)**

**[fft@gypsy-traveller.org](mailto:fft@gypsy-traveller.org)**

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The site is not within a flood risk zone for fluvial or tidal flooding: the Environment Agency's mapping shows that the property is not in the vicinity of Flood Zone 2 and Flood Zone 3. We are aware there is a stream (ordinary watercourse) on the boundary line to the south of the site and this is why the policy requires a surface water drainage strategy and site-specific flood risk assessment. This is quite normal for residential allocations and a number of other residential allocations also have this requirement.

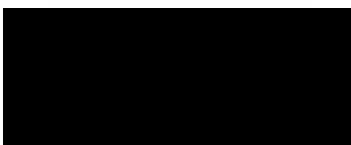
The Development will use the natural topography in screening the site from wider, sensitive landscape views and is designed to minimise the perception of urbanisation in this location, particularly with regards to hardstanding and amenity buildings. We understand that there is a concern from local residents that the "aesthetics" of the landscape will be affected and that this will destroy the rural appeal of Plumpton Village. By having sufficient bunding and hedge row planting in place this will not affect the visual appeal of the village or damage the aesthetics of the landscape.

Through our casework, our experience of small Gypsy and Traveller sites in Sussex and in other areas is very positive in terms of the benefits for the families and the positive contribution to the local community. This is also evidenced in the Equality and Human Rights Commission publication, *Simple Solutions for Living Together* ([https://www.equalityhumanrights.com/en/file/6506/download?token=8L\\_E32Zg](https://www.equalityhumanrights.com/en/file/6506/download?token=8L_E32Zg)).

This site meets the requirements for Gypsy and Travellers and is culturally sensitive to the needs of the Travelling community.

Please do not hesitate to contact us if you would like further information or evidence of need.

Yours sincerely,



Sarah Mann, Director, Friends, Families and Travellers

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**Friends Families & Travellers**  
Community Base, 113 Queens Road, Brighton, BN1 3XG

**T: 01273 234 777**  
**F: 01273 234 778**

**[www.gypsy-traveller.org](http://www.gypsy-traveller.org)**

**[fft@gypsy-traveller.org](mailto:fft@gypsy-traveller.org)**

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<b>Representation ID:</b> REP/284/GT01
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Representor Details:

<b>Representor ID:</b>	REP/284
<b>Name:</b>	Diane Marks
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	GT01 - Land south of The Plough
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	No
<b>Sound:</b>	No Not Positively Prepared Not Justified Not Effective
<b>Representation:</b>	
I object to this proposal on the following grounds:	
This is not part of the Neighbourhood Plan – This proposal is for a permanent site and therefore is relevant to the Neighbourhood Plan. Introducing this makes a mockery of	



the Neighbourhood Plan process and all the hard work / consideration that went into that.

Cannot believe this is the 'only possible site' in East Sussex as quoted by the LDC representatives at the Plumpton Parish Council meeting and wonder if the call for land was loud enough / long enough, noting that it went across the Christmas period. If it is not possible to extend any of the existing sites, then the transit site in Lewes, Bridies Tan, could convert to include these 5 permanent pitches and still some transit space. We knew nothing of this proposal until very recently (despite all the interactions our Parish Council has with LDC) and so there should be a longer period and more thorough process to identify a suitable location.

The information provided was misleading. The quoted 5 pitches then transpired at the meeting to be 10 caravans (1 permanent and 1 static), together with all the vehicles for these, plus each one being allowed visitors for up to a week at a time – so a much larger presence than was originally stated. Given this proposed site would only be using part of the field, it strikes as being the thin end of the wedge and that this in time will only continue to grow.

We would lose the businesses at The Old Brickworks which serve the village both in terms of employment and services such as the garage there.

The position of this proposed site would mean that in order to access the amenities in the village, people, including children going to / from school, would be walking in the road which is of course unlit given the rural nature (an important factor to the village).

It also seems that LDC is being discriminatory. This land was deemed to be unsuitable for general housing due to its proximity to the amenities, and yet, even though it's a permanent site, it is deemed to be ok for the Gypsy / Traveller community – how can that be anything other than discriminatory?

This site would be so out of keeping with the rural nature of the village and take development beyond the existing boundaries. For LDC to even entertain this, shows how out of touch with the area they are.

Lastly, the process to comment on proposals is not made easy – many of the villagers are of an age where they do not use computers. Even if they do, the wording and different sections make it hard to navigate, when people just want to be able to comment. (I use a computer daily, but found it very frustrating trying to submit my comments – and I'm still not sure I have successfully!)

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

I object to this proposal on the following grounds:

This is not part of the Neighbourhood Plan – This proposal is for a permanent site and therefore is relevant to the Neighbourhood Plan. Introducing this makes a mockery of the Neighbourhood Plan process

**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 don't understand this.

## **Response to Lewes District Local Plan Part 2 – Site Allocations & Development Management**

I object to this proposal on the following grounds:

This is not part of the Neighbourhood Plan – This proposal is for a permanent site and therefore is relevant to the Neighbourhood Plan. Introducing this makes a mockery of the Neighbourhood Plan process and all the hard work / consideration that went into that.

Cannot believe this is the 'only possible site' in East Sussex as quoted by the LDC representatives at the Plumpton Parish Council meeting and wonder if the call for land was loud enough / long enough, noting that it went across the Christmas period. If it is not possible to extend any of the existing sites, then the transit site in Lewes, Bridies Tan, could convert to include these 5 permanent pitches and still some transit space. We knew nothing of this proposal until very recently (despite all the interactions our Parish Council has with LDC) and so there should be a longer period and more thorough process to identify a suitable location.

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We would lose the businesses at The Old Brickworks which serve the village both in terms of employment and services such as the garage there.

The position of this proposed site would mean that in order to access the amenities in the village, people, including children going to / from school, would be walking in the road which is of course unlit given the rural nature (an important factor to the village).

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Lastly, the process to comment on proposals is not made easy – many of the villagers are of an age where they do not use computers. Even if they do, the wording and different sections make it hard to navigate, when people just want to be able to comment. (I use a computer daily, but found it very frustrating trying to submit my comments – and I'm still not sure I have successfully!)

**Representation ID: REP/285/E1**Representor Details:

<b>Representor ID:</b>	REP/285
<b>Name:</b>	Jason Martin
<b>Organisation:</b>	<b>Buckle Seaford B&amp;B</b>
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Local Business / employer

Agent Details:

<b>Name:</b>
<b>Organisation:</b>

Contact Details:

<b>Email Address:</b>	jason@thebuckleseaford.co.uk
<b>Address:</b>	The Buckle Marine Parade Seaford East Sussex BN25 2QR

Representation:

<b>Policy/Section:</b>	<b>E1 - Land at East Quay, Newhaven Port</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	No
<b>Sound:</b>	No Not Positively Prepared Not Justified Not Effective Not Consistent with national policy
<b>Representation:</b>	Land noted for Policy E1 should absolutely and unequivocally be left alone and not

allocated for any development whatsoever.

\* There will be impact on tourism to the surrounding area and significant to us at The Buckle Seaford B&B. We enjoy superb views across the East Sussex coast. This will be more of a reason to look left and ignore the suffocation strangling Newhaven.

\* You will not be able to minimise the impact of any kind of further development that will lead to:

\* Air pollution (we already suffer significantly from this)

\* Light pollution (we already suffer significantly from this)

\* Noise pollution (we already suffer significantly from this)

\* Visual pollution (we already suffer significantly from this)

\* Soil contamination.

\* Water pollution.

\* Further development in this area will directly lead to loss in our revenue.

\* This will increase the loss of biodiversity (including internationally rare vegetated shingle).

\* Continue to contribute to significant traffic pollution and and poor air quality.

\* You are talking about using the new port access road but this is a white elephant as still the traffic has to enter the A259 which already has a huge congestion issue, you will not be able to manage this, you will see and increase in traffic on the Denton cut through - so move one problem away from the existing port access road to another.

\* With all the housing already allocated for Newhaven, this would be too much development.

\* There is an absolute need need to preserve this designated Local Wildlife Site for nature and Leisure.

\* I am a very keen runner, train hard for marathons every year, to lose any more space for development will be appalling.

\* This type of development is also not reflecting the 'clean green marine' vision of the enterprise zone or 'renewable energy cluster' of the port master plan.

The port access road has made the previous inaccessible land open for a "free for all". This land is there fore the benefit of everybody and not 100% directly for the profits of private organisations.

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

Policy E1: Land at East Quay, Newhaven Port should be taken out of the "Lewes District Local Plan Part 2: Site Allocations and Development Management Policies DPD" completely. The land should have a covenant applied whereby no development whatsoever can be granted and the land left to locals and tourists alike, to enjoy and



wildlife to thrive.	
<b>Do you consider it necessary to participate at the Examination in Public?</b>	No
<b>Why do you feel it is necessary to participate at the Examination in Public?</b>	

**Representation ID: REP/286/E1**Representor Details:

<b>Representor ID:</b>	REP/286
<b>Name:</b>	Rachel Martin
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>E1 - Land at East Quay, Newhaven Port</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	
<b>Sound:</b>	
<b>Representation:</b>  I have just read the Sussex Express Newspaper and im appalled to read about the last minute plan to develop the Tide Mill section of the beach under E1 Policy.  How dare the New E1 policy and whos in charge, give the public a very unfair vote..with such a small window to write against.. where is Democracy!!!!..  I am 100% AGAINST this development...it will change the view , wildlife, and Seaford/ Newhaven bay forever....every small piece of land is being built on these days, roads are full, Doctors and schools are busting..We are making ugly decisions based on todays greed, and not thinking of our future.	

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Enough is enough..

**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?**

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## Hodgson, Lilly

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**From:** rachel martin [REDACTED]  
**Sent:** 02 November 2018 14:36  
**To:** ldf  
**Subject:** AGAINST E1 PLANS AT TIDE MILLS.

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

To whom it may concern.

I have just read the Sussex Express Newspaper and im appalled to read about the last minute plan to develop the Tide Mill section of the beach under E1 Policy.

How dare the New E1 policy and whos in charge, give the public a very unfair vote..with such a small window to write against.. where is Democracy!!!!..

I am 100% AGAINST this development...it will change the view , wildlife, and Seaford/ Newhaven bay forever....every small piece of land is being built on these days, roads are full, Doctors and schools are busting..We are making ugly decisions based on todays greed, and not thinking of our future.

Enough is enough..

regards

Rachel Martin

---

**Representation ID: REP/287/GT01**Representor Details:

<b>Representor ID:</b>	REP/287
<b>Name:</b>	Kevin Massingale
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	GT01 - Land south of The Plough
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	
<b>Sound:</b>	
<b>Representation:</b>	
<b>What changes do you suggest to make the document legally compliant or sound?</b>	
I wish to register my objection to the proposed Permanent Traveller and Gypsy Site GT01 – Land south of The Plough. I object for the following reasons.	
The site has previously been rejected for housing development and was excluded from	

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the neighbourhood plan due to lack of infrastructure, pedestrian access to the village services and it is located outside the planning boundary. The site lacks electricity, lighting, water supplies and would require a sewage treatment facility to be built at substantial cost and would require regular servicing.

The site is on greenfield land that slopes downhill, a stream in the Old Brickworks currently takes away excess rain water. The proposed site would sit between the field and the stream and this would require significant drainage work.

The proposed site would be visible from several properties, including mine. The sizable screenings to protect the privacy for both existing village residents, including the Old Brickworks business tenants, and residents of the proposed site would not be in keeping with the existing surroundings. There is also a public footpath running through the adjacent field which would also need to be screened off to protect the privacy of the proposed site's residents.

The village services, including shop, post office, school, pre-school, station, village hall, church, play park and sports field are not accessible by foot due to the national speed limit road into the village centre having two bends close together and no footpath. The road is extremely dangerous for pedestrians, especially children. The proposed footpath to the bus stop near The Plough pub would be costly and probably not of any benefit due to the limited bus service that operates in the village, the village bus service is at risk of being reduced further. Motor vehicles would be required to travel anywhere from the proposed site resulting in further vehicle travelling through the village. With the proposed site being located so far from the village services this will impact of the proposed site's residents integrating with the existing village residents.

The site access from the national speed limit road would be dangerous, especially when manoeuvring large vehicles in and out of the proposed site. The slight bend and the incline on the road makes visibility quite difficult, especially when the hedge rows grow in spring. The proposed site entrance sits at the bottom of an incline, surface water flows down the road and pools around this area which can turn to ice in winter. East Sussex Highways previously objected to the site being used for housing development due to road access, nothing has changed with the road layout and due to additional development in the village the amount of traffic on this road has increased. Any vehicles parking on the road around the proposed site entrance would make travelling past the site in either direction quite difficult and very dangerous.

Access to the site would need to be very secure to protect young children and animals such as dogs from wandering on to the national speed limit road and these security measures would not be in keeping with the surrounding area.

All businesses within the Old Brickworks have informed the landlord that they will relocate should the proposed site be built. The tenants of the sole residential property within the Old Brickworks have also stated they will leave. This will have a massive economic effect on the village as a number of these businesses employ local people and support other local businesses. Without these businesses, the Old Brickworks would be forced to shut resulting in job losses of the maintenance staff.

The proposed site is located next to greenfield land that could be used for additional pitches should further government targets for permanent pitches be set in years to come and the possibility of unauthorised vehicles encamping on the land.

**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:** Kevin Massingale [REDACTED]  
**Sent:** 01 November 2018 22:33  
**To:** ldf  
**Cc:** Kevin Massingale  
**Subject:** Objection to the proposed Permanent Traveller and Gypsy Site GT01 – Land south of The Plough

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

Dear Sir / Madam,

I wish to register my objection to the proposed Permanent Traveller and Gypsy Site GT01 – Land south of The Plough. I object for the following reasons.

The site has previously been rejected for housing development and was excluded from the neighbourhood plan due to lack of infrastructure, pedestrian access to the village services and it is located outside the planning boundary. The site lacks electricity, lighting, water supplies and would require a sewage treatment facility to be built at substantial cost and would require regular servicing.

The site is on greenfield land that slopes downhill, a stream in the Old Brickworks currently takes away excess rain water. The proposed site would sit between the field and the stream and this would require significant drainage work.

The proposed site would be visible from several properties, including mine. The sizable screenings to protect the privacy for both existing village residents, including the Old Brickworks business tenants, and residents of the proposed site would not be in keeping with the existing surroundings. There is also a public footpath running through the adjacent field which would also need to be screened off to protect the privacy of the proposed site's residents.

The village services, including shop, post office, school, pre-school, station, village hall, church, play park and sports field are not accessible by foot due to the national speed limit road into the village centre having two bends close together and no footpath. The road is extremely dangerous for pedestrians, especially children. The proposed footpath to the bus stop near The Plough pub would be costly and probably not of any benefit due to the limited bus service that operates in the village, the village bus service is at risk of being reduced further. Motor vehicles would be required to travel anywhere from the proposed site resulting in further vehicle travelling through the village. With the proposed site being located so far from the village services this will impact of the proposed site's residents integrating with the existing village residents.

The site access from the national speed limit road would be dangerous, especially when manoeuvring large vehicles in and out of the proposed site. The slight bend and the incline on the road makes visibility quite difficult, especially when the hedge rows grow in spring. The proposed site entrance sits at the bottom of an incline, surface water flows down the road and pools around this area which can turn to ice in winter. East Sussex Highways previously objected to the site being used for housing development due to road access, nothing has changed with the road layout and due to additional development in the village the amount of traffic on this road has increased. Any vehicles parking on the road around the proposed site entrance would make travelling past the site in either direction quite difficult and very dangerous.

Access to the site would need to be very secure to protect young children and animals such as dogs from wandering on to the national speed limit road and these security measures would not be in keeping with the surrounding area.

All businesses within the Old Brickworks have informed the landlord that they will relocate should the proposed site be built. The tenants of the sole residential property within the Old Brickworks have also stated they will leave. This



will have a massive economic effect on the village as a number of these businesses employ local people and support other local businesses. Without these businesses, the Old Brickworks would be forced to shut resulting in job losses of the maintenance staff.

The proposed site is located next to greenfield land that could be used for additional pitches should further government targets for permanent pitches be set in years to come and the possibility of unauthorised vehicles encamping on the land.

Yours sincerely,

Kevin Massingale



**Representation ID: REP/288/GT01**Representor Details:

<b>Representor ID:</b>	REP/288
<b>Name:</b>	Nichola Massingale
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>GT01 - Land south of The Plough</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	
<b>Sound:</b>	
<b>Representation:</b>  To whom this may concern, I'm am writing with regards to my concerns of a traveller site you have plans for in Plumpton Green.  Plumpton Green is a beautiful warm hearted village with lots of caring lovely people whom work hard and thrive on community spirit either with clubs and associations. Our community support all events that take place and fundraising to give our village a happy	

healthy community. We have lived in Plumpton Green for 20 years and have become an honoured member of the village. Where you are planning to place your travellers site is in full view of every resident, visitor and worker entering and exiting the village. Putting myself in the shoes of a travellers family, I would not like to be seen and felt unwelcome anywhere in the community.

Looking up the required plot for them to take occupancy, they would be asked to avoid the following. 1. Try to find a place that is not, for example, in the Green Belt, in an Area of Special Scientific Interest or in an Area of Outstanding Natural Beauty. The best type of land is a 'brown field' site (that means a piece of land that has already had buildings or development on it) Ideally, the site should be well screened. This means any caravans or mobile homes should not be visible from any direction – either from the road, other houses, roads or locations that might overlook the site from a nearby hill, etc.. 2. It is very important that the site has a safe entrance and exit. There are very strict Highway regulations about visibility at the entrance/exit to sites to ensure there is no danger of accidents and this is very important. The land should be in an area where you have a local connection. For example, you have lived there for a long time, you have close family there, your children attend the local school or you are registered with local doctors. 3. The site should either already have services provided to it or be able to have them installed. This means mainly water and sewage. If the site doesn't already have these, then you will need to look into if it is possible to provide them and how much it will cost. 4. Do you carry out any business that is likely to increase the amount of traffic on an off the site beyond what a family would create and will any work create noise or nuisance? 5. Before you buy a piece of land you should get a solicitor to do a check on it, to make sure there are no restrictions such as previous injunctions on it, which would make it impossible to get planning permission.. So the first thing to bear in mind is that nothing will happen quickly and you must be prepared to commit considerable time, effort and money, with the possibility that you will fail, despite all your efforts. All these points to me are against this proposed site. Travellers like to keep their community and families private and away from onlookers which placing them where you intend would not be fair on them and for our community and families alike. Large screening around them would imprison them and for the surrounding area would be an eyesore and a very costly process to hide from residents and businesses overlooking the site. I am all for living in peace and harmony and placing this site here would cause lots of unnecessary heart ache to all parties involved, as well as an extreme costly matter for the sack of 5 pitches.

**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:** Floral Art by Nichola Massingale [REDACTED]  
**Sent:** 04 November 2018 14:48  
**To:** ldf  
**Subject:** My objection to proposed Permanent Traveller and Gypsy Site GT01 (the land south of the The Plough pub)

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

To whom this may concern,

I'm writing with regards to my concerns of a traveller site you have plans for in Plumpton Green.

Plumpton Green is a beautiful warm hearted village with lots of caring lovely people whom work hard and thrive on community spirit either with clubs and associations. Our community support all events that take place and fundraising to give our village a happy healthy community. We have lived in Plumpton Green for 20 years and have become an honoured member of the village.

Where you are planning to place your travellers site is in full view of every resident, visitor and worker entering and exiting the village.

Putting myself in the shoes of a travellers family, I would not like to be seen and felt unwelcome anywhere in the community.

Looking up the required plot for them to take occupancy, they would be asked to avoid the following.

1. Try to find a place that is not, for example, in the Green Belt, in an Area of Special Scientific Interest or in an Area of Outstanding Natural Beauty. The best type of land is a 'brown field' site (that means a piece of land that has already had buildings or development on it)  
Ideally, the site should be well screened. This means any caravans or mobile homes should not be visible from any direction – either from the road, other houses, roads or locations that might overlook the site from a nearby hill, etc..
2. It is very important that the site has a safe entrance and exit. There are very strict Highway regulations about visibility at the entrance/exit to sites to ensure there is no danger of accidents and this is very important.  
The land should be in an area where you have a local connection. For example, you have lived there for a long time, you have close family there, your children attend the local school or you are registered with local doctors.
3. The site should either already have services provided to it or be able to have them installed. This means mainly water and sewage. If the site doesn't already have these, then you will need to look into if it is possible to provide them and how much it will cost.
4. Do you carry out any business that is likely to increase the amount of traffic on an off the site beyond what a family would create and will any work create noise or nuisance?
5. Before you buy a piece of land you should get a solicitor to do a check on it, to make sure there are no restrictions such as previous injunctions on it, which would make it impossible to get planning permission.. So the first thing to bear in mind is that nothing will happen quickly and you must be prepared to commit considerable time, effort and money, with the possibility that you will fail, despite all your efforts.

All these points to me are against this proposed site.

Travellers like to keep their community and families private and away from onlookers which placing them where you intend would not be fair on them and for our community and families alike.

Large screening around them would imprison them and for the surrounding area would be an eyesore and a very costly process to hide from residents and businesses overlooking the site.

I am all for living in peace and harmony and placing this site here would course lots of unnecessary heart ache to all parties involved, as well as an extreme costly matter for the sack of 5 pitches.

With heart felt concerns,

Nichola Massingale



**Representation ID: REP/289/GT01**Representor Details:

<b>Representor ID:</b>	REP/289
<b>Name:</b>	John Masters
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>GT01 - Land south of The Plough</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	
<b>Sound:</b>	
<b>Representation:</b>	
<p>As a resident of Plumpton, I would like to register an objection to the Council's proposal to build a permanent Gypsy and Travellers site at the land south of the Plough in Plumpton.</p> <p>My objection is based on the loss of a precious greenfield site - this development will increase the likelihood of further development in the surrounding area.</p>	

Additionally, the development is outside of the adopted Village Plan and finally the development will increase the amount of traffic on what is already a very busy road. I note that in the Gypsy and Traveller Site Assessment Addendum in December 2012 the Highway Authority raised an objection to 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?**

## Hodgson, Lilly

---

**From:** JOHN MASTERS <[REDACTED]>  
**Sent:** 25 September 2018 17:15  
**To:** ldf  
**Subject:** LDC Local Plan Part 2: Gypsy and Traveller Accommodation Policy GT01 Land South of the Plough, Plumpton

**Categories:** Vanessa to deal with

As a resident of Plumpton, I would like to register an objection to the Council's proposal to build a permanent Gypsy and Travellers site at the land south of the Plough in Plumpton.

My objection is based on the loss of a precious greenfield site - this development will increase the likelihood of further development in the surrounding area.

Additionally, the development is outside of the adopted Village Plan and finally the development will increase the amount of traffic on what is already a very busy road. I note that in the Gypsy and Traveller Site Assessment Addendum in December 2012 the Highway Authority raised an objection to this site.

Regards,

John Masters

[REDACTED]



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**Representation ID: REP/290/CH01**Representor Details:

<b>Representor ID:</b>	REP/290
<b>Name:</b>	Dennis Matthews
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>CH01 - Glendene, Station Road</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	
<b>Sound:</b>	
<b>Representation:</b>	
<p>With reference to the proposed allocations quoted above, whilst it is a pity to see these sites developed, I do not oppose the principle of residential development, bearing in mind their location. However, I have concerns over the number of dwellings</p> <p>I note the comments that a small number of dwellings is appropriate to the character of the area, but there is no single, established character. Glendene is opposite farmland</p>	

and commercial use, whilst, immediately to the west is a high density group of houses, including backland development. Layden Hall is more isolated and can set it's own character.

The danger is that if such low-density housing is provided, it will inevitably become large 4/5 bedroom houses, not meeting the. National policy framework, Lewes' own policies and housing needs and, I understand, the future Neighbourhood Plan. The national and local necessity is for smaller unit, first-time buyer housing and affordable housing and the current proposas for low density housing do not meet adopted policies. The implication is that there will be no small units built in N.Chailey until after 2030.

**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/290/CH03**Representor Details:

<b>Representor ID:</b>	REP/290
<b>Name:</b>	Dennis Matthews
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>CH03 - Land adjacent to Mill Lane</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	
<b>Sound:</b>	
<b>Representation:</b>  With reference to the proposed allocations quoted above, whilst it is a pity to see these sites developed, I do not oppose the principle of residential development, bearing in mind their location. However, I have concerns over the number of dwellings  I note the comments that a small number of dwellings is appropriate to the character of the area, but there is no single, established character. Glendene is opposite farmland	

and commercial use, whilst, immediately to the west is a high density group of houses, including backland development. Layden Hall is more isolated and can set it's own character.

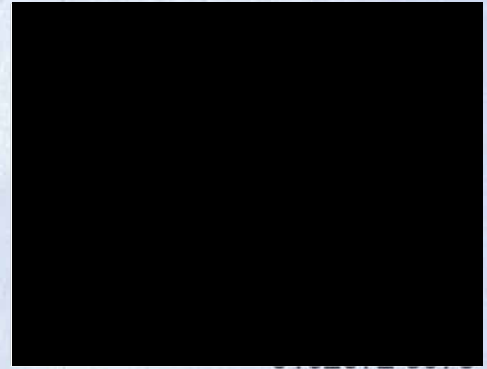
The danger is that if such low-density housing is provided, it will inevitably become large 4/5 bedroom houses, not meeting the. National policy framework, Lewes' own policies and housing needs and, I understand, the future Neighbourhood Plan. The national and local necessity is for smaller unit, first-time buyer housing and affordable housing and the current proposas for low density housing do not meet adopted policies. The implication is that there will be no small units built in N.Chailey until after 2030.

**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?**

22<sup>nd</sup> October 2018



Dear Sir/Madam,

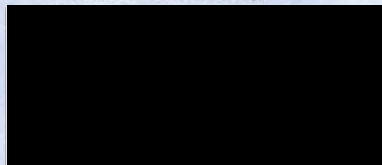
**Local Plan Part 2 – Draft allocations  
CH 01 Glendene Farm, Station Rd, N Chailey  
CH 03 Layden Hall, East Grinstead Road**

With reference to the proposed allocations quoted above, whilst it is a pity to see these sites developed, I do not oppose the principle of residential development, bearing in mind their location. However, I have concerns over the number of dwellings.

I note the comments that a small number of dwellings is appropriate to the character of the area, but there is no single, established character. Glendene is opposite farmland and commercial use, whilst, immediately to the west is a high density group of houses, including backland development. Layden Hall is more isolated and can set it's own character.

The danger is that if such low-density housing is provided, it will inevitably become large 4/5 bedroom houses, not meeting the. National policy framework, Lewes' own policies and housing needs and, I understand, the future Neighbourhood Plan. The national and local necessity is for smaller unit, first-time buyer housing and affordable housing and the current proposas for low density housing do not meet adopted policies. The implication is that there will be no small units built in N.Chailey until after 2030.

Yours faithfully,



Dennis Matthews

District Planning Officer  
Planning policy section,  
Lewes District Council,  
Southover House,  
Southover Road,  
Lewes,  
East Sussex,  
BN7 1AB



**Representation ID: REP/291/HPC**Representor Details:

<b>Representor ID:</b>	REP/291
<b>Name:</b>	
<b>Organisation:</b>	<b>EA Strategic Land LLP</b>
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Planning Consultant

Agent Details:

<b>Name:</b>	Leo Scarfe
<b>Organisation:</b>	Iceni Projects

Contact Details:

<b>Email Address:</b>	lscarfe@iceniprojects.com
<b>Address:</b>	Flitcroft House 114-116 Charing Cross Road London London WC2H 0JR

Representation:

<b>Policy/Section:</b>	<b>Housing Policy Context</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	No
<b>Sound:</b>	No Not Positively Prepared Not Consistent with national policy
<b>Representation:</b>	
(See attached PDF)	
<b>What changes do you suggest to make the document legally compliant or sound?</b>	

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

<b>Representation ID: REP/291/OM</b>
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Representor Details:

<b>Representor ID:</b>	REP/291
<b>Name:</b>	
<b>Organisation:</b>	<b>EA Strategic Land LLP</b>
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Developer/Landowner

Agent Details:

<b>Name:</b>	Leo Scarfe
<b>Organisation:</b>	Iceni Projects

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>Housing Policy Context, Omission Site</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	No
<b>Sound:</b>	No Not Positively Prepared Not Consistent with national policy
<b>Representation:</b>  (See attached PDF)	
<b>What changes do you suggest to make the document legally compliant or sound?</b>	
<b>Do you consider it necessary to participate at the Examination in Public?</b> Yes	
<b>Why do you feel it is necessary to participate at the Examination in Public?</b>	



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Planning Services  
Lewes District Council  
Southover House  
Lewes  
BN7 1AB

5<sup>th</sup> November 2018

Dear Sir/Madam,

**Representations to Lewes District Local Plan Part 2: Site Allocations and Development Management Policies DPD pre-submission (Regulation 19) Consultation | Land East and West of A275, North of Cooksbridge**

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On behalf of our client, EA Strategic Land LLP ('EASL'), we write in response to Lewes District Council's Local Plan Part 2 Site Allocations and Development Management Policies pre-submission (Regulation 19) document (consultation document) to promote the redevelopment of the land at east and west of A275 at Cooksbridge (The Site) as shown in the enclosed site location plan. EASL have a long-standing interest in land in Cooksbridge and is working collaboratively with stakeholders to bring forward a sustainable urban extension to the existing settlement.

These representations focus on the matters of housing need and delivery; the sustainability, suitability and achievability of the Site at Cooksbridge for residential use. These representations provide commentary relating to the overall soundness of the consultation document and the proposed allocation of housing in contrast to the identified need.

**a. Lewes District Council Housing Need and Delivery**

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The Housing Policy Context set out within the 'Consultation Document' explains that Spatial Policies 1 of the adopted Local Plan Part 1 (2016) identifies the housing requirement for Lewes District as being 6,900 net additional dwellings (345 dwellings per annum). This relates both to the plan area and part of the District falling within the National Park.

Strategic Policy 2 demonstrating that 6,926 net dwellings can be provided over the course of the Plan period and treats this in effect as the requirement for the district as a whole. The Council also seeks to suggest that of the 6,926 homes figure, the proportion of housing to be delivered outside the National Park is 5,494 net additional dwellings over the Plan period, amounting to a housing requirement of 275 dwellings per annum, with the remaining 1,432 dwellings (72 dpa) being provided within the South Downs National Park.

The Consultation document identifies that of the Part 1 Plan housing requirement of 5,494 dwellings, the supply as at April 2015 was as follows:

- 2,216 dwellings – Built or committed as at 1 April 2015;
- 1,073 dwellings – Housing supply from strategic allocations;
- 468 dwellings – Supply from windfall allowance; and
- 77 dwellings – Supply from rural exception sites allowance.

The above equates to a total of 3,834 dwellings.

This leaves 1,660 dwellings to be allocated in the emerging Stage 2 Local Plan. The consultation document explains that this will be accounted for by 1,250 dwellings through adopted or emerging Neighbourhood Plans and the remaining 432 dwellings as residual housing growth which is to be identified within the Local Plan Part 2. Of this number, some need to be met within specific settlements as per Policy SP2, whilst the location of 200 dwellings are still yet to be determined.

### **The requirements of the National Planning Policy Framework**

It is acknowledged that, the Regulation 19 Consultation document has been prepared under the National Planning Policy Framework (NPPF) (2012), which sets out the overriding principle to achieve “sustainable development.”

When examining the soundness of a Local Plan the NPPF (2012) explains under paragraph 182 that Plans must be:

- **Positively prepared** – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- **Justified** – the plan should be based on the most 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 priorities; and
- **Consistent with National Policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework.

This is a requirement that has been carried forward under Paragraph 35 of the adopted NPPF (2018).

Although it is appreciated, under Paragraph 214 of the NPPF (2018), that ‘the policies in the previous Framework will apply for the purpose of examining plans, where those plans are submitted on or before 24 January 2019’ should the Independent Inspector, find the submitted Local Plan Part 2 document to be unsound then, given the amount of dwellings which are found to be required under the draft standardised housing methodology, it is likely that Lewes District Council will be required to allocate even more suitable and sustainable land for residential purposes, in order to deliver their increased OAN.

Given that by their own admission, Lewes District Council accept that they are unable to demonstrate a five-year housing land supply against the Council’s Objectively Assessed Housing Need, the consultation document, when viewed against the requirements of the NPPF, should be seen as unsound. It is therefore imperative that in order to fulfil their requirements, Lewes District Council revisit the ‘Residential Site Allocations’ and Housing Policy Context chapters of the draft Local Plan Part 2 document and seek further opportunities to allocate more suitable, sustainable, available and achievable sites for residential purposes.

### **b. Housing Land Supply**

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Iceni accepts that the purpose of the Part 2 plan is to meet the housing requirement set out in the Part 1 plan. It is not to re-examine the housing requirement.

However we would comment that the Part 1 housing requirement is a **minimum figure** and thus where there are sustainable sites that can be allocated, they should be. This is particularly relevant given that the Part 1 did not meet Lewes District’s OAN – the plan requirement of 345 dpa falling substantively short of the OAN of 520 dpa (see Inspector’s Report Para 22). In this context it is clear that every effort should be made to identify and bring forward additional sustainable sites.

In respect of the land supply put forward within the Plan, Iceni notes the following:

1. Windfalls

Windfall sites, by definition, refer to sites which become available for development unexpectedly and therefore not included as allocations within the Council's development plan nor an adopted neighbourhood plan. We accept that the windfall numbers and the rural exception site allowance have been tested and accepted in the Part 1 Plan Examination.

2. Requirement and Supply

The Council has calculated the level of provision to be made in the Part 2 plan by taking the requirement, and totalling the supply expected to come forward from completions/commitments, strategic allocations, the made neighbourhood plans and emerging neighbourhood plans. This results in a figure of 127 dwellings (Table 4). Set against this, the plan proposes the allocation of 132 dwellings.

The position taken provides no flexibility in supply. It is typical for local plans to make provision for sites above the requirement figure, to take account of delays in some sites coming forwards or non-implementation. The approach adopted provides no provision for this flexibility. No contingency is allowed for in the event that the delivery of some sites is delayed, or the emerging neighbourhood plans fail to make provision for 865 dwellings which in itself is a significant assumption. In this respect, the plan is not effective.

Iceni note that the 'Lewes District Five Year Housing Land Supply Position as at 1 April 2018' confirms that "the District as a whole has a supply of deliverable housing land equivalent to 4.99 years outside of the South Downs National Park (calculated via the Liverpool Method), and therefore unable to demonstrate a five year housing land supply; and a supply of deliverable housing land equivalent to 4.92 years inside the South Downs National Park Area. This highlights the need to bring forward additional housing supply to provide sufficient to deliver the level of housing needed, and points to an under-delivery against the constrained requirement.

This requirement is intensified, given that sites such as the proposed development at Marina Fort Road, Newhaven have been allocated since 2003 with still no sign of development coming forward and current marketing material anticipating that development on the site is not likely within the next five years. The five year land supply should be reviewed, and additional sustainable sites brought forwards.

Lewes District is evidently facing challenges to meet their housing requirements and deliver their OAN within the defined settlement boundaries. These challenges are intensified by physical barriers with the District being constrained to both the south and north, by both the sea, and the South Downs National Park, respectively. To help relieve some of this pressure EASL believe that Cooksbridge should be considered as an extension to the Lewes Housing Market as it provides sustainable opportunities to deliver additional housing to go towards the Council's housing shortfall against its OAN and to provide the required flexibility of supply to deliver the Part 1 Plan requirement. The site has the ability to deliver more than the 30 dwellings allocated with the emerging Local Part 2 document.

The site is a sustainable location for new housing. Public transport connections between Lewes and Cooksbridge will enable residents to be able to travel quickly and easily between the two settlements. Cooksbridge can therefore accommodate a proportion of Lewes' housing needs to relieve the pressure on the settlement and make efficient use of Cooksbridge's underutilised transport nodes.

**c. Proposed Development of land at land at east and west of A275 at Cooksbridge**

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The Site extends to cover approximately 10ha in size and consists of land located to the north east of Cooksbridge. The site is approximately 150m from the existing Cooksbridge train station and is split into two parts with the A275 intersecting through the site.

At a proposed density mix of 35 dwellings per hectare, it is suggested that the site is suitable and available to deliver 150 dwellings to go towards the District's required housing need. Development of the site would also go towards, improved surface water drainage, provide a mixed-use hub including new shops for the local community and new drop-off facilities for Hamsey Community Primary School. In addition to this, it is expected that the development of circa 150 units in this location will lead to train service improvements from Cooksbridge Station providing a more regular connection for the local community to London Victoria and Lewes. It is also proposed that through sensitive design and a careful choice of materials, a new entrance to the village from the north, via the site, could be established to help ease traffic congestion between South Chailey and Cooksbridge.

#### **d. Sustainability of the Site**

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The Site, is located adjoining an existing settlement and can be deemed to be highly sustainable location for the provision of dwellings. The following sub-sections provide an overview of the factors which improve the sustainability of the site.

##### **Railway station**

Cooksbridge Railway Station is located at the heart of the settlement and around 170m from the south of the site. The station provides regular services both towards Lewes, Ore, Eastbourne, Hastings and London Victoria. Equally, with sustainable development Cooksbridge is capable of becoming a destination in its own right and has a school that is capable of serving a wider catchment than just the settlement.

The Hamsey National Plan identifies, at section 10.4 that the community are seeking to secure at least one stopping service at Cooksbridge station per hour, 7 days per week, as well as more bus services running on evenings and weekends. An increase in population within the settlement through further development would help the community to secure these fundamental increases in train and bus services.

##### **Bus Stops**

The settlement also benefits from bus stops, which provide services into Lewes, as well as to other nearby villages and towns including Uckfield, Newick, Barcombe Mills, and Barcombe Cross, where a range of services and shops can be accessed.

These good bus links provide future residents with the opportunity to travel to work or education by sustainable transport methods and will help to ensure the services are well-used and maintained.

##### **School**

The settlement has an educational establishment which has been assessed as a 'Good' school in its most recent Ofsted Inspection. The fact that a community primary school is located in the settlement means that future residents with children will not need to travel long distances to take children to school, and again, the increase in population in the settlement will help to ensure the school remains operational.

##### **Hamsey Neighbourhood Plan**

The Hamsey Neighbourhood Plan also identifies the settlement of Cooksbridge as a suitable location to direct future housing growth within the Parish. The Hamsey Parish Neighbourhood Plan, which was adopted in 2016, directs development toward major transport hubs. The text at paragraph 5, Objectives, specifically lists Cooksbridge Railway Station as one of these notable 'transport hubs'. In addition to this, 78% of those who took part in the Neighbourhood Plan Survey (section 7.5 of the Neighbourhood Plan) agreed that development in the Parish should be concentrated in Cooksbridge so as to maintain the rural character of the rest of the Parish. The Neighbourhood Plan is therefore fully supportive of directing development to the settlement and the redevelopment of the land at Cooksbridge should be further considered.

#### **e. d. High quality scheme**

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This sub-section provides commentary on the work which has gone into the preparation of the proposed draft scheme at this site, and the specific matters which have been considered in the design stages in order to demonstrate the sustainability, suitability, availability of the site. The site is also available for development due to EASL's long-standing interest in the land.

Policy DM34 of the Local Plan Part 2 Consultation document highlights Cooksbridge as an area of established character stating that "Development within this location will be permitted where it reflects the existing character of the area in terms of the gaps between buildings, building height, building size, site coverage set back from the street, boundary treatments mature trees, hedges and grass verges.

Proposed development of this Site will ensure that the Cooksbridge Character Area is protected with the high-quality design reflecting the existing character and ensuring the requirement of Policy DM34 are met.

#### **Technical Reports**

In order to show objectively the suitability of the site for the development of housing, EASL have commissioned the preparation of a Flood Risk Assessment, Ecological Assessment and draft Landscape Visual Impact Assessment (prepared by PLACE), the later of which is enclosed for your reference.

Firstly, the Flood Risk Assessment has determined that the site is not at risk from flooding, meaning the site is suitable for residential development.

Secondly, the Ecological Assessment has given an insight into potentially ecologically important aspects of the site which has subsequently been used to influence the design of the scheme. A small amount of hedgerow along the south eastern boundary of the site is thought to be potentially important hedgerow, and thus is proposed for retention in the proposals.

Finally, the draft Landscape and Visual Impact Assessment (LVIA) provides insight into how the redevelopment of the site would sit in relation to the nearby South Downs National Park. It is important that this was carried out so as to distinguish whether the redevelopment of the site is feasible in relation to the nearby South Downs National Park.

The draft LVIA assessed 14 views into the site and assesses the type of view (distance), the receptor type, view quality, susceptibility to change, value of view, and sensitivity. Two of the views were confirmed to have no view of the site. 6 of the views were considered to have low quality views of the site, and 6 were considered to have moderate quality views. The remaining two views deemed to be high quality. However, through further assessment, this is considered to be of low value. This is due to both of these locations having existing uses which are not necessarily there to enjoy views – they are from a large junction, or from a narrow lane with no footpath.

The draft LVIA provided the following conclusions:

#### **Boundaries of the scheme**

The preparation of the technical reports has enabled us to understand the sites' strong natural boundaries including the areas at risk of flooding to the immediate north, as well as the tree belt which bounds the site to the north and east.

The constraints surrounding the site meant that strong, natural boundaries exist. This means further expansion of the village is unlikely to occur, even if the subject site is redeveloped.

#### **Master-planned Improvements**

The sustainability of the site has been covered above; however, planned improvements to the site, and consequently the settlement, will aid in improving the sustainability of this location further.

Within the proposed scheme shops are proposed to be included; the provision of local shops will enable existing and future residents to access everyday services and amenities without the need to travel long distances by car or public transport. This will not only benefit residents who are already living there as well as future residents.

### **South Downs National Park**

The redevelopment of the site will not have any detrimental impact on the South Downs National Park. The settlement of Cooksbridge is bounded to the south by the South Downs National Park. This therefore means that the most desirable location for the expansion of the village is to the north as this would cause the least impact on the National Park.

It is also important to consider that a large amount of the District is located within the South Downs National Park, which restricts the amount and form of development which can be provided by the Council. Lewes District Council should therefore consider sustainably located sites which are not situated within the South Downs National Park as having the potential to meet and exceed their housing requirements.

### **Phasing**

The provision of these sustainably located dwellings can be phased over a number of years within the emerging Local Plan period. This will help to ensure the Council have a consistent and reliable delivery of housing over the Plan period. Given that there is uncertainty over a number of strategic sites allocated within the Council's consultation document, EA Strategic Land consider that this approach is extremely important for Lewes District Council to favour.

## **f. Conclusion**

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Having reviewed Lewes District Council's Local Plan Part 2 Site Allocations and Development Management Policies pre-submission (Regulation 19) document, EA Strategic Land are of the opinion that the Plan is currently unsound as there is insufficient flexibility in the overall housing supply, that the plan has not been positively prepared in seeking to find additional sustainable sites consistent with the treatment of the housing requirement as a minimum, and the evidence does not suggest that the Council currently have a five year housing land supply.

Given the above, it is imperative that, in order to fulfil their requirements, Lewes District Council revisit the 'Residential Site Allocations' and Housing Policy Context chapters of the draft Local Plan Part 2 document and seek further opportunities to allocate more suitable, sustainable, available and achievable sites for residential purposes.

To help relieve some of this pressure EA Strategic Land believe that Cooksbridge should be considered as an ideal location to provide an extension to the Lewes Housing Market as it forms sustainable opportunities to deliver additional dwellings to go towards the Council's housing shortfall.

EASL have had a long standing interest in land located to the east and west of the A275 at Cooksbridge and for sustainable reasons including: the provision of an existing railway station, bus stops, primary school and identification within the adopted Hamsey Neighbourhood Plan that Cooksbridge is suitable for housing, it is proposed that this Site is suitable, achievable and available to deliver up to 150 dwellings to help go towards meeting the Council's OAN and required housing land supply.

Necessary provisions have been taken, through the preparation of initial technical assessments, to demonstrate how a high quality designed scheme, which takes into account and overcomes all potential site constraints, could be delivered in this location. Further detail of how this can be achieved can be found within the enclosed draft LVIA prepared by PLACE.

EASL respectfully request that Lewes District Council revisit the Residential Site Allocations section of the Regulation 19 Local Plan Part 2 document and consider the land east and west of the A275 at Cooksbridge for residential allocation.



We trust that the above comments can be incorporated as part of the Council's Draft Local Plan Part 2 consultation exercise and we would be grateful for confirmation that these representations have been received. EASL also confirm that they would like to be involved in future stages of the plan-making process, including attendance at EIP. We trust that the information provided is sufficient at this stage, however, should any additional information be required then please do not hesitate to contact me on 02034354227/ [lscarfe@iceniprojects.com](mailto:lscarfe@iceniprojects.com).

Yours Faithfully,

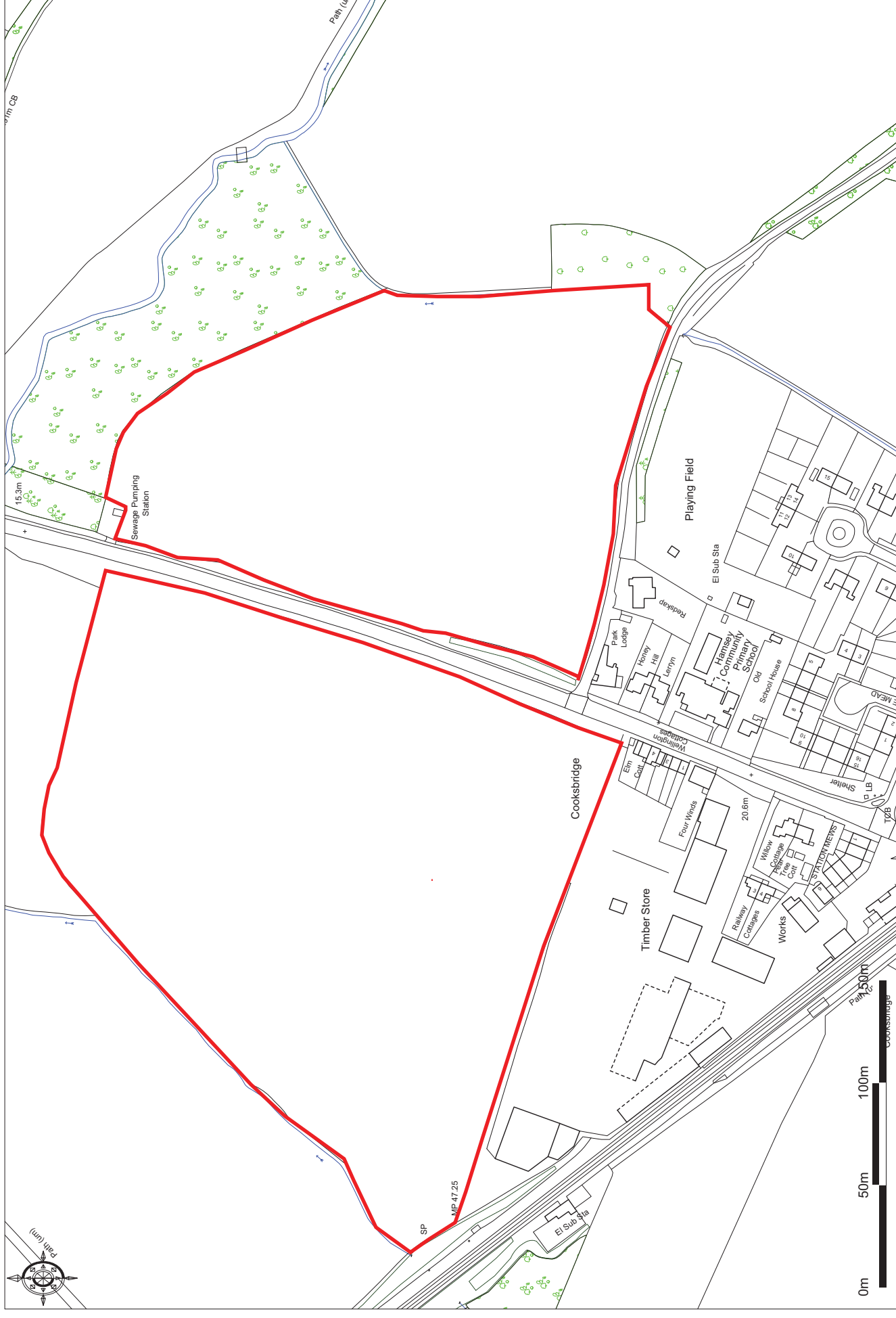
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Leo Scarfe MRTPI

Senior Planner



## Sites off A275 North of 'New Cooksbridge' East Sussex



# PLACE

## Design+Planning

Cooksbridge

Landscape and Visual Impact  
Assessment

June 2017

633\_DO\_001 - Part I

**DRAFT**



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## 1.0 INTRODUCTION

- 1.1 This document has been produced to accompany an outline Planning Application for the construction of a new housing development on the northern periphery of Cooksbridge village. This report has informed the design proposals for the site masterplan and the landscape strategy as set out in the Planning Application Design and Access Statement.
- 1.2 The site sits on either side of the A275 on the northern edge of Cooksbridge defined in planning documents as 'New Cooksbridge'. The site is currently open land and presently forms the open gap between 'New Cooksbridge' and 'Old Cooksbridge' as defined in the Old Cooksbridge Conservation Area. It is composed of two fields, defined by historic field boundaries which can be traced back to the 18<sup>th</sup> Century. These records define the field to the west of the main road as 'Cow Field' and the field to the east as 'The Cromps'. The north boundary is further defined by an area of seasonally flooding marsh grazing land and the North End Stream historically known as Tanner's Lagge. The site essentially rises up from the flood plain (14.00 AOD) to the higher (20.00 AOD) dry land of the village edge on the sites southern boundary.
- 1.3 The size and scope of the proposed development is not expected to require an Environmental Impact Assessment (EIA). The Local Planning Authority (LPA) are yet to issue a screening opinion. We will be submitting this Landscape and Visual Impact Assessment (LVIA) to support an Outline Planning Application.
- 1.4 The receptor locations were selected by a desktop analysis of the local topography and features, with views subsequently assessed on site by two chartered landscape architects. The following report has been prepared following the methodology in Guidelines for Landscape and Visual Impact Assessment 3rd Edition published by the Landscape Institute.
- 1.5 The LVIA has influenced the approach to the site planning of the proposed development scheme. The landscape design proposals, which complement the mainly residential scheme, mitigate the visual impact of development in the landscape. They provide a landscape framework, based on indigenous vegetation, to integrate the scheme into the local context. Careful consideration has been given to the floor levels of development in relation to the site topography, building massing and building heights to ensure the development sits sympathetically within the wider landscape setting. The assessed effects on various receptors is based on the site plan and assumptions with regard to issues such as the colour and texture choice of building materials. The potential to retain existing mature trees and hedgerows within the new layout has also been considered along with the wider visual impact of the development.
- 1.6 For the purposes of this report the 'site' is defined by the planning red line boundary and includes the development of housing, access roads, sustainable urban drainage features and community infrastructure, such as play areas.

## 2.0 PLANNING POLICY CONTEXT

This document has prepared in response to principles set down in national and local planning policy and particularly in response to the following documents and designations relevant to landscape masterplanning at this site.

- The National Planning Policy Framework
- The Lewes District Council Local Plan
- Hamsey Parish Policy
- Hamsey Neighbourhood Plan
- South Downs National Park
- Offham Marshes SSSI
- Clayton to Offham SSSI
- Lewes District Council Flood Plan

### National Planning Policy

- 2.1 The National Planning Policy Framework (NPPF – 2012) sets out the Government’s economic, environmental and social planning policies for England, which include a presumption in favour of sustainable development.
- 2.2 The NPPF strengthens the importance of design in the built environment, stating as one of its overarching core principles (paragraph 17) that planning should  
  
“always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings;  
  
- take account of the different roles and character of different areas, promoting the vitality of our main urban areas, protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it.”
- 2.3 Paragraph 17 - promote mixed use developments, and encourage multiple benefits from the use of land in urban and rural areas, recognising that some open land can perform many functions (such as for wildlife, recreation, flood risk, mitigation, carbon storage, or food production);

## Technical Guidance to the National Planning Policy Framework

The NPPF incorporates a number of elements on flood risk and flood management and this is relevant to this site. The policy affords protection to the fields between Old Cooksbridge and New Cooksbridge. These wet meadow fields such as Tanner's Lagge, and the field to the north east of the site form part of Flood Zone 2 and Flood Zone 3 defined by the Environment Agency and further defined as part of the Lewes District Flood Plan, and under the policy not to be developed. The result of this is a low level area adjoining the site which will always remain open in aspect, contributing a rural riverine character to this edge of the site, and an open aspect contributing to high visibility of the northern site boundary.

## Local Planning Policy

2.4 The Local Planning Authority is Lewes District Council (LDC).

2.5 The LDC Local Plan, the core strategy which was adopted 11<sup>th</sup> May 2016 and sets out the policies for guiding and determining development in the district. This is a joint strategy drawn up in tandem with South Downs National Park for the period 2010-2030. Relevant Policies reviewed as part of this assessment include:

**Spatial Policy 1** – Provision of Housing and Employment

**Spatial Policy 2** – Distribution of housing

**Core Policy 1** - Affordable housing

**Core Policy 8** - Green Infrastructure

**Core Policy 9** – Air Quality

**Core Policy 10** - Natural Environment and Landscape

**Core Policy 12** – Flood Risk, Coastal Erosion and Drainage

2.6 **Local Plan Policy** – Saved Policies from the 2003 Local Plan

The following policies were saved from the 2013 LDC Local Plan and are referenced directly by the New Cooksbridge plan in the current LDC Local Plan Core Strategy. These define the council's commitment to encourage sustainable, sensitive and functional design of appropriate density, to protect statutory landscape designations and manage rural issues such as light pollution, parking provision for transport nodes, traffic management, employment and play provision.

**ST3** - Development requiring planning permission will be expected to comply with the following criteria, and be supported by justification statements where necessary:

(a) development should respect the overall scale, height, massing, alignment, site coverage, density, landscaping, character, rhythm and layout of neighbouring buildings and the local area more generally

(b) materials should be of a quality, type, colour and design which is appropriate to the character of the local area

- (c) development, including conversion, should respect the amenities of adjoining properties in terms of noise, privacy, natural daylight, and visual amenities and smell
- (d) development should not result in detriment to the character or the amenities of the area through increased traffic levels, congestion or hazards, noise levels and other environmental considerations
- (e) access, circulation and parking to the development shall be provided in accordance with the policies in the Transport and Communications chapter. The site should be capable of accommodating the required parking provision without detriment to the visual amenities of the area through over intensive parking in a prominent position
- (f) development should not result in the loss of significant buildings, public views or spaces between and around buildings, or trees or other landscape features which make an important contribution to the character of the area
- (g) the design of hard and soft landscaping in spaces around buildings should enhance and complement new development where appropriate and should maximise wildlife potential by the use of native species and appropriate design in accordance with Policies ST11 and ST12  
***(Policies ST11 and ST12 were not saved in the LDC 2016 Core Strategy)***
- (h) development should consider the enclosure of spaces around buildings and should be designed to take account of overlooking, microclimate and the function of such spaces
- (i) in exposed locations, such as seafronts, materials used in new development will normally be required which have been demonstrated to be durable in comparable conditions and which complement locally used materials
- (j) development should seek to maximise the efficient use of energy, resources and materials through the influence of factors such as design, housing type, orientation, location and construction methods.

**ST7** - Details of any external lighting required as part of any new development should be submitted with the planning application. Planning permission will not be granted unless the District Council is satisfied that the proposed lighting scheme is the minimum necessary for security and working purposes and that it minimises potential pollution from glare and spillage.

**ST9** -The Council will seek to safeguard (and wherever possible enhance) the intrinsic qualities of sites which are of importance for their nature conservation, geological or landscape interest, having regard to:

- (a) the particular quality of the features on the site, including their rarity value and any factors giving rise to special international, national or local designations
- (b) the extent of any adverse effects on the above features stemming from the proposed development, and

(c) the extent and effectiveness of any proposed mitigation or compensation measures aimed at enhancing, retaining or recreating habitat or landscape features on or off the site

In negotiating development proposals the Council will, where appropriate, seek to secure the effective management of sites through the imposition of conditions or the creation of planning obligations

**RES4** - All residential development (both large and small) must make an efficient use of land, and development will not be permitted at a density of less than 30 units per hectare unless there are significant site constraints or character considerations that make this figure unattainable.

**RES19** - In areas where there is a deficiency of outdoor sports and/or children's play space in quantitative or qualitative terms as identified in the Topic Paper "Outdoor Playing Space in the Lewes District", planning applications for all residential development will be expected to include a level of provision for outdoor sports and/or children's outdoor play space in accordance with the standards set out in Policy RE1.

**H5** - Planning permission and/or listed building consent will be granted for developments within or near to Conservation Areas, provided that they:

- (a) conserve or enhance the special architectural or historic character or appearance of the area and re-instate historic elements wherever possible
- (b) do not require the demolition or partial demolition of any unlisted building(s) which make a positive contribution to the character or appearance of the area
- (c) use materials which are traditional to the area or are otherwise sympathetic to the character of the particular building or site
- (d) respect the design of the existing buildings of the area
- (e) respect any important traditional groupings of buildings which contribute to the character of the area
- (f) protect open spaces, trees and significant public views, and
- (g) comply with the criteria in Policy ST3

**T3** - The District Council will resist the loss of parking on sites at or near to stations (as identified on the Proposals Map) and will encourage the improvement of the quality and quantity of car parking and secure cycle parking to serve stations.

**T5**- Development in the rural area will be carefully considered in terms of the traffic generation implications of the development. This will take into account technical capacity, safety and environmental impact and effect on the rural character of the area.

## 2.7 Hamsey Parish Policy



22.5 The Topic Paper “Outdoor Playing Space in the Lewes District”, updated August 2000, identifies a shortfall within Hamsey of Informal Play Space and Equipped Play Areas. Any new housing would exacerbate this shortfall. Due to this, any developers of unidentified housing sites will be expected to contribute towards outdoor playing space as specified under District Wide policy RES19 (Provision of Outdoor Playing Space). “

22.3 In order to protect the rural setting of the village, it is important to resist outward encroachment of development into the surrounding open countryside. A major issue that detracts from the ambience and atmosphere of the conservation area is the busy traffic which passes through along the main roads, often at high speeds. This may in time lead to pressure for additional signs or speed control methods, and it will be important that any such methods are mindful of the potential effects on the character and appearance of the conservation area.

“22.10 An Area of Established Character has been identified in Cooksbridge to the west of the A275 and south of the railway line (See Inset map No 12a). District –Wide Policy H12 will apply to this area.”

22.11 The area is characterised by spacious plots with rich, mature vegetation and trees. The large houses are a mixture of styles and age and are set well back from the road.

## 2.8 Hamsey Neighbourhood Plan

2.9 The Neighbourhood plan can be referred to at:

[http://www.lewes.gov.uk/Files/Plan\\_Hamsey\\_Neighbourhood\\_Plan\(1\).pdf](http://www.lewes.gov.uk/Files/Plan_Hamsey_Neighbourhood_Plan(1).pdf)

2.10 The Hamsey Neighbourhood Plan is very similar to the Local and Parish Plan and has much overlap with the other policies but is developed by the local community itself. The neighbourhood plan is not a statutory document but is prepared by local community members to directly identify their concerns and aspirations. Beyond the issues outlined in the above policies, the neighbourhood plan highlights the community’s aspirations for instance, to have trains stop at Cooksbridge on the weekend, to improve play and well-being provisions, such as having more benches to sit on outdoors in public space, to have a safe cycle path running along the A275 or to have a village shop where local people can buy local produce. The plan also outlines the communities wish to maintain areas of biodiversity or of tranquillity and maintaining the rural character of the villages generally.

2.11 Refer to ICENI Planning Statement for more information (To be completed)

## Landscape Designations

### 2.12 National Parks

2.13 Cooksbridge is located on the Eastern border of the South Downs National Park (SDNP), in East Sussex (Refer to Appendices, Figure. ). The South Downs National Park was designated in 2010 and contains over 1600 km<sup>2</sup> of varied landscape; from the chalky escarpments of Beachy Head to the undulating hills and ancient woodlands of the Low Weald. It stretches from Winchester in the west through medieval towns and hamlets to Eastbourne in the east.

2.14 The national park reaches the edge of the settlement of ‘New Cooksbridge’ but diverts around the settlement boundary of Cooksbridge to the south thus excluding Cooksbridge and the

proposed development from the administrative boundaries of the National Park. Despite this administrative exclusion the site and the villages of Cooksbridge and the immediate environs still enjoy many locally valued views to the South Downs, and is visible particularly from Blackcap to the south west of the site.

#### 2.15 The landscape of the South Downs National Park itself

“has a distinct form and character due to its complex geological history. It is marked by huge variety and contrast, giving rise to a wide range of habitats including rich chalk grassland, beech hanger woodland, floodplain grassland, as well as ancient woodland, heathland, chalk streams and coastal habitats.” *from [www.southdowns.gov.uk](http://www.southdowns.gov.uk)*

#### 2.16 Sites of Special Scientific Interest

##### 2.17 Offham Marshes SSSI – Recovering area – (1.5km from the development site)

The site is in the study area but not visible from the proposed site, however the proposed site falls within the Impact Risk Zone of the SSSI (Refer to Appendices, Figure...) and the qualities of this site bare many similarities to the lower section of the development site, particularly the northern boundary and Tanner’s Lagge. The ecology type and species bare marked similarities.

This alluvial grazing marsh supports large amphibian populations, a feature which is unusual for this type of habitat in Sussex. This is due to the close proximity of the breeding sites to the areas of suitable terrestrial habitat (woodland, scrub and fen) on the flood plain and the chalk escarpment. The site also supports several scarce dragonflies (Odonata), beetles (Coleoptera) and flies (Diptera).

The combination of seasonally flooding land and drainage ditches create a ‘Fen’ like ecology of rich alluvial soils with a mosaic of marginal and flood tolerant plant species supporting amphibian species and other dependant predator species.

##### 2.18 Clayton to Offham SSSI – Unfavourable Recovering area. Broad Leaved, mixed and Yew woodland (1.5km from the development site)

This site is within the South Downs National Park. Part of the site is a Nature Reserve managed by the Sussex Trust for Nature Conservation.

The site looks down on the proposed development site and forms an important part of the visual backdrop when looking back south to the National Park.

This extensive site lies on the chalk escarpment and dip slope of the South Downs. The nationally uncommon chalk grassland habitat dominates much of the site but woodland and scrub is better represented here than on the other chalk sites in East Sussex. The site supports a rich community of breeding birds.

Where areas are ungrazed woodland scrub has begun to regenerate with the common native species, Hawthorn, Blackthorn, Dogwood, Spindle, Hazel and Whitebeam. The site supports a profusion of orchids. Breeding birds include Woodpeckers, Tawny Owls, Thrushes, Finchs and Tits and a number of birds of prey.

#### 2.19 Conservation Areas

- 2.20 Old Cooksbridge Conservation Area (immediately adjoining the development site)
- 2.21 The site falls between the New Cooksbridge plan area and the beginning of the Old Cooksbridge Conservation Area. It's character is further defined and discussed in the Baseline Conditions under the Character of Cooksbridge Village. (4.18 to 4.21)
- 2.22 In the Conservation Area Appraisal under 'Key Views and Vistas' the following is highlighted:
- "From the south of the conservation area, in particular Cooksbridge Farm, there are stunning views across the open landscape to the south, and the Cook's Bridge itself is set within much more open countryside." This view has been picked up in the study and has been described and assessed in this report.

### 3.0 ASSESSMENT METHODOLOGY

- 3.1 The landscape and visual impact assessment identifies and assesses the likely significant effects of the proposed development on the environment with respect to landscape and visual issues. The effects have been evaluated with reference to definitive standards and legislation where available. Where it has not been possible to quantify effects, qualitative assessments have been carried out, based on available knowledge and professional judgement.
- 3.2 Landscape and visual effects are assessed separately but are presented within this report. The impact assessment follows the guidance set out in the Landscape Institute and the Institute of Environmental Assessment's "Guidelines for Landscape and Visual Impact Assessment" (3rd Edition, 2013). Paragraph references refer to this guidance. The assessment process is one of description (i.e. collecting and presenting the information about the landscape and visual resources in a systematic manner) and evaluation (i.e. attaching a value to a given landscape or visual resource by reference to specified criteria).
- 3.3 Although the guideline's publication refers to 'landscape', the European Landscape Convention definition of landscape confirms that it includes the landscapes of towns, cities and villages i.e. townscapes. So 'townscape' is defined as the landscape within a built-up area including the buildings and the relationships between them. This assessment therefore uses the generic term landscape for both landscape and townscape.
- 3.4 In order to predict and evaluate impacts, it is necessary to have detailed baseline information of the existing landscape and visual resource. It is also relevant to understand the cumulative landscape effects resulting from "the nature of other projects to allow their landscape effects to be predicted and described. This will allow the effects of the main proposal being assessed to be set alongside these other additional projects and their cumulative effects identified..." (para 7.25)
- 3.5 Combined effects "may result from changes in the content and character of the views experienced in particular places due to introduction of new elements or removal of damage to existing ones. (7.29)
- 3.6 The baseline study extends beyond the site and covers the whole of the area from which the proposed development would be visible, generally within a 2km wide study area, and additionally from the high point of Black Cap. The assessment includes desk study, field survey and analysis, involving comprehensive and extensive site and surroundings walkover visits. The baseline study also explores patterns and scale of landform, land cover and built development and includes any special historic and cultural values and specific potential receptors of landscape and visual effects, such as important components of the landscape, and pedestrians or motorists (i.e. available views from footpaths, public open spaces and roads).
- 3.7 Baseline conditions have been assessed through an appraisal of the following:
- General character of the area, including the landscape and built form context;
  - Site components including the condition and quality of existing landscape features;
  - Visual context of the site
  - Relevant landscape policies, at the national and local levels.

- 3.8 Landscape and visual assessments are separate, although linked, procedures. The landscape baseline, its analysis and the assessment of landscape effects all contribute to the baseline for visual assessment studies. Visual effects are assessed as one of the interrelated effects on population.
- 3.9 Landscape effects derive from changes in the physical landscape, which may give rise to changes in its character and how this is experienced. This may in turn affect the perceived value ascribed to the landscape.
- 3.10 Visual effects relate to the changes that arise in the composition of available views as a result of changes to the landscape, to people's responses to the changes, and to the overall effects with respect to visual amenity.
- 3.11 The assessment of likely significant effects aims to:
- Identify the likely effects of the development;
  - Indicate the measures proposed to avoid, reduce, remedy or compensate for those effects (mitigation measures);
  - Estimate the magnitude of the effects; and
  - Provide an assessment of the nature and significance of these effects.

#### Approach to Landscape Assessment

- 3.12 Landscape receptors with the potential to be affected by the proposed development have been identified; these include Landscape Character Areas, designated townscape features (such as listed buildings), public open spaces, transport routes and the application area itself. Once identified a subjective, professional analysis can be made of all available information to interpret landscape quality.

3.13 For the purposes of the baseline study, the overall quality of the landscape is summarised and defined below.

**Table 1.0 - Quality of Landscape**

Scale	Quality of Landscape
High	Has valued features that are significant in the context of the surrounding area, with distinctive components and structure. These landscapes are considered to be of particular importance to conserve and may be particularly sensitive to change. The area possess a particularly distinctive sense of place and its value is nationally recognised
Medium	An area with a clearly defined sense of place and/or character in moderate condition; and or an area valued at a local or regional level, and/or a landscape which is partially tolerant of the type of change identified without undue harm
Low	An area with a weak sense of place and or with poorly defined character and or in poor condition, often not valued for its scenic quality, and or an area that is tolerant of substantial change of the type proposed without undue harm

3.14 Effect significance is summarised as follows

**Table 2.0 - Effect Significance Landscape**

Effect	Description
Major Beneficial	The development would be complementary with the scale, landform and pattern of the landscape and would provide a substantial benefit to the landscape.
Moderate Beneficial	The development would fit well with the scale, landform and pattern of the landscape and maintain or enhance the existing character.
Minor Beneficial	The development would complement the scale, landform and pattern of the landscape whilst maintaining the existing character.
Negligible	The development would cause very little change from baseline conditions and the change would be barely distinguishable, approximating to a no change situation.
Minor Adverse	The development would cause minor permanent and/or temporary loss or alteration to one or more key elements of the landscape, including the introduction of elements that are prominent, but may not be uncharacteristic of the surrounding landscape.
Moderate Adverse	The development would cause moderate permanent loss or alteration to one or more key elements of the landscape, including the introduction of elements that are prominent, but may be uncharacteristic with the surrounding landscape.
Major Adverse	The development would cause total loss or major/substantial alteration to key elements features of the landscape (pre-development) such that the post development character/composition/attributes will be fundamentally changed.

## Visual Baseline Methodology

- 3.15 The assessment also includes a visual appraisal of the study area i.e. the whole of the area from which the proposed development would be visible. Using topographical data including OS 1:25,000 mapping and onsite survey work the approximate extent to which the development would be visible is considered to be approximately 2 kilometres wide, and therefore the wider baseline study area has been determined as 2 kilometres from the site with the one exception of an identified view at 2.5km away in the National Park, within the Black Cap National Trust Reserve. The appraisal seeks to demonstrate views as existing from a range of viewpoints, which fall within the visual envelope from close, middle and longer distance views, including public viewpoints such as roads and open space.
- 3.16 To determine baseline visual amenity the extent and nature of existing views of the site was established and potentially sensitive receptors identified. The following procedure was adopted to achieve this:
- Analysis of topographical data including OS 1:25,000 mapping
  - Identification of landmarks and their relative heights Above Ordnance Datum (AOD) and visibility. Landmarks, and their known heights, were used in the field and when studying site photographs to assist with orientation and in an assessment of the visibility of structures of a known height;
  - A number of separate site visits by two landscape architects to identify sensitive visual receptors including users of public rights of way, residents, users of amenity open space and recreation facilities, users of public roads and railways. Baseline photography was undertaken in winter when deciduous vegetation was mostly bare.

## Visual Impact Assessment Methodology

- 3.17 Visual effects, either direct or indirect, consider the changes in the character of the available views, resulting from the proposed development and changes in the visual amenity of the visual receptors (which include residents, workers, users of public open spaces, rights of way, roads and railways). A study has been carried out as part of this assessment which systematically identifies all the visual receptors that are likely to be affected by the development and seeks to assess its effect on these receptors, including their magnitude and significance.
- 3.18 An analysis of the importance and sensitivity of visual receptors was undertaken for the assessment of effects on views. Importance of views is generally considered in the context of values placed on scenes, alternatives available and the relative scenic quality. The sensitivity of the receptor and the magnitude of effect in a view are considered in undertaking the assessment of significance of effects.
- 3.19 The sensitivity of visual receptors in views will be dependent on:
- The location and context of the viewpoint;
  - The distance the viewpoint is from the site;
  - The expectations and occupation or activity of the receptor; and

- The importance of the view (which may be determined with respect to its popularity or numbers of people affected, its appearance in guide books, on tourist maps, and in the facilities provided for its enjoyment and reference to it in literature or art).

3.20 The distance from which the development is viewed, obviously affects the proportion of the view which is taken up by the development. From a distance the development may only form a small part of a wider view and therefore this affects the impact of the change on the view for the receptor. For this assessment we have defined length of view as the following:

**Close Views** – Less than 1km

**Middle Distance Views** – 1km and 2km

**Long Distance Views** – over 2km

3.21 The types of visual receptor and the quality of their view is considered in determining the susceptibility of a visual receptor to a change in their view:

**Table 3.0 - Visual Receptor Type**

Visual Receptor Type	Criteria
A	People, whether residents or visitors, who are engaged in outdoor recreation, including the use of public rights of way, whose attention or interest is likely to be focused on the landscape and on particular views Visitors to heritage assets, or to other attractions, where views of the surroundings are an important contributor to the experience Communities where views contribute to the landscape setting enjoyed by residents in the area.
B	People engaged in outdoor sport or recreation which does not involve or depend on appreciation of views in the landscape People at their place of work whose attention may be focussed on their work or activity, not on their surroundings Users of retail and employment sites, sports and recreational facilities where the views are secondary to the activity at hand
C	Users of Industrial sites, agricultural land or busy commuter links where there is little appreciation of the view.



3.22 The quality of the view towards the site is defined as follows and considers the visual qualities within a view and the extent to which this site can be seen from a particular receptor.

**Table 4.0 - Quality of View**

Quality	Criteria
Exceptional	Where there is an open view or panoramic view of the site and the elements that make up the view are of exceptionally high scenic value, natural or man-made beauty, and uninterrupted by incongruous elements.
High	Where the view is largely un-interrupted and the view is of a good scenic value, natural or man-made beauty with few incongruous elements.
Moderate	Where the view is partially screened by intervening features, only forms part of the view or the site is in the distance. Where the view has some or few features of note but generally of no particular scenic quality or the features are in poor condition.
Poor	Where the site is largely obscured by intervening features or difficult to perceive in the distance. Or where the view would be considered by most as unsightly or in very poor condition in which case the view can be open or partially screened.

3.23 The following table can be used to consider above in determining the visual receptor's susceptibility to change in their view:

**Table 5.0 - Susceptibility to Change**

Type of Visual Receptor	Visual Receptor's Susceptibility To Change In The View		
A	Low	Low	Medium
B	Low	Medium	High
C	Medium	High	High
	Exceptional / High	Moderate	Poor
	Quality of the View		

3.24 The value of the view is determined through consideration of its relationship to heritage assets or planning designations or through recognition from local residents and visitors, published guidebooks or provision of facilities for enjoyment of the view.

**Table 6.0 - Value of View**

Value of View	Criteria
High	A recognised view within, towards or across a designated landscape or towards a heritage or locally important feature. Historic or published viewpoints either identified in published guidebooks or literature or demarcated by a physical element.
Medium	A view within, towards or across a locally important landscape or towards a locally recognised feature or reference point. A published viewpoint within local guidebooks or literature or demarcated by a physical element.
Low	A view which is not rare and does not have any local value attached to it.

3.25 The following table can be used to consider the above in assessing sensitivity of visual receptor:

**Table 7.0 - Sensitivity**

Value of view		Sensitivity	
High	High	High	Moderate
Medium	Moderate	Moderate	Moderate
Low	Moderate	Low	Low
	Low	Medium	High
Susceptibility of Visual Receptor to Change in the view			

The magnitude of change of the visual effect resulting from the proposed development at any particular viewpoint is based on the interpretation of a combination of factors as follows, and which are described in the table below.

- The distance between the receptor and the development;
- The extent of the development that will be seen, e.g. full, partial or glimpse;
- The proportion of the view that is affected by the development;
- The position of the development in relation to the orientation of the visual receptor;
- The context within which the development will be seen; and
- The nature and duration of the effect, whether temporary or permanent, intermittent or continuous.

**Table 8.0 Magnitude of Change to Visual Receptors**

	Description
Major	Dominant - The change experienced as a result of the development would dominate the existing view over a wide area, or an intensive change over a limited area.
Moderate	Conspicuous - The development would cause substantial changes to the existing view over a wide area, or noticeable change over a limited area.
Minor	Apparent - The development would cause minor changes to the existing view.
Negligible	Inconspicuous - No real change to perception of the view; hardly discernible.

## Significance of Visual effects

3.26 The table below is used to guide the assessment of the significance visual effects from a combination of the assessment sensitivity and the magnitude of effects.

**Table 9.0 Significance and Description of Visual effects**

Effect	Description
Major Beneficial	The proposed development could cause a material improvement in a view
Moderate Beneficial	The proposed development would cause a notable improvement in a view
Minor Beneficial	The proposed development would cause a perceptible improvement in a view
Negligible	The proposed development would cause no discernible deterioration or improvement in a view. Effects are considered neither adverse nor beneficial in nature
Minor Adverse	The proposed development would cause a perceptible deterioration in a view
Moderate Adverse	The proposed development would cause a notable deterioration in a view
Major Adverse	The proposed development would cause a material deterioration in a view

## Cumulative Effects

3.27 Consideration has been given to local approved planning applications or applications predicted to come forward.

3.28 Cumulative effects arise where the effects of other developments or other predicted changes are anticipated to add the effects of the proposed development being assessed. Currently there is only one major development, on an adjoining site, in close proximity to the proposal outlined below:

- LW/16/0935: Chatfields Yard Cooksbridge Road – Erection of 27 dwellings with associated landscaping, access and parking. Planning application validated 14.11.16, decision pending.

3.29 There are several other minor applications in the vicinity for extensions or alterations to residential properties. Due to the small scale development changes these will have limited to no effect on the assessed scheme.

3.30 See Cumulative Impacts drawing in the appendices for details of locations of the potential developments.

## Assumptions and Limitations

3.31 It should be noted that during site visits no access to private properties or land was sought and the visual assessment is therefore based on a best assumption from publicly accessible locations outside or close to properties, as well at roads and public rights of way.

- 3.32 The study zone notes features such as boundaries formed by deciduous trees which have a variable screening effect depending upon season. Site inspection has sought to verify the effectiveness of such features in the landscape.
- 3.33 Where it has not been possible to quantify effects, qualitative assessments have been carried out, based on available knowledge and professional judgement.

## 4.0 BASELINE CONDITIONS

- 4.1 The assessment has been carried out in January 2017 when the screening by deciduous planting was at its least effective. The assessment specifies the nature of the proposed changes, describes the existing landscape, views and visual amenity in the area that may be affected and how those effects can be mitigated.

### Site context

- 4.2 The proposed development site and study area is located at the northern edge of the village of New Cooksbridge, East Sussex. The village lies at the junction of the A275 and the Newhaven to London railway line approximately 3 miles North of the county town of Lewes, East Sussex, on series of tributaries to the River Ouse. Brighton lies 10 miles to the south west of the site and Haywards Heath 10 miles to the north west.
- 4.3 The majority of the proposed site sits either side of the A275 in two fields recorded historically as 'Cow Field' to the west of the road and 'The Cromps' to the east.

### Topography

- 4.4 The site slopes down from South to North, from approximately 21.50m (AOD) to approximately 14.00m AOD. The level differences are generally distributed evenly across the site with localised depressions as the site dips down to the stream at the bottom of the site and two streams that bound the fields on both east and west.
- 4.5 The topography reinforces the setting of the surrounding buildings, generally sitting above the level of the proposed development site. The slopes and gradients are one of the defining characteristics of the site.

### Rights of Way

- 4.6 Other than the A-road which crosses the site north / south there are no public rights of way within the application site or grounds. The site does however have a number of public footpaths passing around it as close as 50m and with direct line of site from the North West of the site.

### Vegetation

- 4.7 The majority of the site is composed of improved grassland which shows signs of being used recently as grazing land with sporadic wet pockets particular in the lower reaches predominated by sedges and other wet grassland species. The site is defined by field boundary hedgerows in the main which from the map data available, suggest that they have been in place since at least the mid 18<sup>th</sup> century and are now species rich. To the south of Cow Field there is a large conifer hedge (approx. 10-15m tall) planted to screen / wind break the timber yard site. The North side of the site is bounded by Folly Brook and it's associated flood plain. This encompasses wet meadow and smaller sections of wet woodland (approx. 10-20m tall)

### Soils and Geology

- 4.8 The area is dominated by clay soils with potential pockets lighter loamier soils. At the bottom of the site particularly towards the wet woodland on the north east corner of the site, richer alluvial soil with increased organic content will have a slightly more acid pH.
- 4.9 Site drainage is poor particularly at the bottom of the site as we approach the floodplain. Clay based soils overlying chalk geology also leads to perched water tables and spring lines. The

site is surrounded by spring points which all feed in to the North End Stream and then into the Ouse.

## Landscape Character

### National Landscape Character Areas

- 4.10 Natural England, with support from English Heritage, has undertaken a detailed review and classification of broad areas with similar landscape characteristics across England, called National Character Areas (NCAs). The study area falls between two National Character Area 125: South Downs and 121: Low Weald. Which are summarised as follows:-

#### 4.11 NCA No.125 : South Downs

The South Downs National Character Area (NCA) comprises a 'whale-backed' spine of chalk stretching from the Hampshire Downs in the west to the coastal cliffs of Beachy Head in East Sussex; two per cent of the NCA between Eastbourne and Seaford is recognised as Heritage Coast. The majority of the area falls within the South Downs National Park, a recognition of its natural beauty and importance for access and recreation, and allowing for local decision making processes to manage this nationally important area. Some eight per cent of the NCA is classified as urban, comprising the coastal conurbation of Brighton and Hove in the east. The South Downs NCA is an extremely diverse and complex landscape with considerable local variation representing physical, historical and economic influences; much of it has been formed and maintained by human activity, in particular in agriculture and forestry. International Biosphere status was confirmed for Brighton and Lewes Downs in June 2014, securing it as the first completely new Biosphere site in the UK established for almost forty years and the first ever in south-east England.

This is a landscape of contrasts. Dramatic white chalk cliffs and downland create a sense of openness. Enclosure and remoteness can be found in woodland and even in close proximity to urban areas. This NCA provides a rich variety of wildlife and habitats; rare and internationally important species, such as the Duke of Burgundy butterfly, mature elms and rare ground-nesting birds all benefit from the characteristic mixed farming systems. Recreational activities within the NCA include cycling, walking and horse riding on the South Downs Way National Trail which follows the ridge of the northern scarp and provides extensive panoramic views. National Park status enhances the NCA's recreational opportunities.

The Brighton groundwater management unit is the principal chalk aquifer supplying Brighton and surrounding areas. It has been identified as being under significant stress and is classified as having 'no water available', as is the River Ouse water resource management unit (WRMU). The River Adur WRMU, however, is classified as having 'water available'.

In the west of the NCA, groundwater in the chalk feeds many of the rivers, streams and wetlands in the area and provides most of the water abstracted for public supply. The porosity of chalk is one of its most notable properties. Rain is largely absorbed through tiny, connected pores instead of lying on the surface and forming rivers, lakes and ponds. Rain water moves through the thin chalk soils and slowly replenishes the chalk aquifer below.

#### 4.12 NCA No. 121 : Low Weald

The Low Weald National Character Area (NCA) is a broad, low-lying clay vale which largely wraps around the northern, western and southern edges of the High Weald. It is predominantly agricultural, supporting mainly pastoral farming owing to heavy clay soils, with horticulture and some arable on lighter soils in the east, and has many densely wooded areas with a high proportion of ancient woodland. Around 9 per cent of it falls within the adjacent designated landscapes of the Surrey Hills, Kent Downs and High Weald Areas of Outstanding Natural Beauty and the South Downs National Park. Around 23 per cent of the area is identified as greenbelt land.

The Low Weald is one of the most important of the NCA's in terms of a rich biodiversity including many rare and high quality habitats and is particularly rich protected biodiversity sites (SSSIs, SACs, Nature Reserves, etc). The area has many sites that are critical for the understanding of complex Wealden geology, including 11 geological SSSI. There are also important historical sites, many associated with the Wealden iron industry, and nearly 900 ha of Registered Parks and Gardens, with many more, smaller designed landscapes.

The area is generally wet and woody. It is dissected by flood plains and its impermeable clay soil and low-lying nature make many areas prone to localised flooding. Ponds are common, often a legacy of iron and brick-making industries.

Despite its proximity to London and continuing pressure for development, the Low Weald remains essentially rural in character with small-scale villages nestled in woodland and many traditional farm buildings.

### Local Landscape Character Areas

4.13 East Sussex County Council commissioned a landscape character review in 2015 to provide a consistent landscape character assessment across the county of East Sussex.

#### 4.14 LCA - 14:Western Low Weald:

4.15 Whilst Cooksbridge and particularly New Cooksbridge, at first impression, may not seem distinctive in detail, particularly on its periphery, they show many of the characteristics, the main ones of which are outlined below.

4.16 Key characteristics include:

- A gently undulating and low lying topography with highest points on the green sand ridges and lowest in the river and stream valleys.
- Unspoilt and distinctive rural character with few intrusive features and no large urban areas.
- Fields are generally small and irregular; many formed from woodland clearance and often bounded by remnant woodland strips known as shaws.
- A largely pastoral landscape, especially on the heavy clay soils. More used for grazing than for arable with a few exceptions as the land rises up to the south of the study area.
- Scattered tree features including distinctive mature oaks, tree belts, woods, parkland and hedgerow trees give an impression that the area is well wooded.
- Seasonal impact of carpets of celandine, wood anemone and bluebells in woodland
- Generally across the area there is a strong historic landscape structure with a patchwork of medieval assart fields and hedgerow boundaries.
- Oak and ash as predominant mature tree species in woods and hedges with field maple, wild cherry and hornbeam (coppice) also frequent, there are a few remnant mature elm trees.

Alder and willow are common in the river valleys. Lime trees and horse chestnut are frequent in designed landscapes and along roadsides.

- The flat and sometimes wide expanse of the River Ouse Valley
- Gently winding often tree lined minor river and stream valleys, most as tributaries to the Ouse.
- Scattered settlement of frequently picturesque villages and farmsteads, particularly on the Greensand ridge running parallel with the Downs.
- Distinctive vernacular buildings associated with farmsteads including many farm house barns such as the ones at Cooksbridge Farm.
- The vernacular building material for the area is timber frame and principally oak.
- Typical building materials since the late 18 century include local brick, white weatherboarding, clay tiles and Horsham slabs on the roofs of larger buildings and churches.
- Well managed village and farm ponds as focal points.
- Frequent wide views of the bold scarp of the Downs to the south and 'big skies'.
- Areas of tranquillity away from the main centres of settlement and roads.
- Distinctive pattern of north south orientated route ways and lanes which are considered to be drove roads along which farmers traditionally took their stock to the Downs. Typically these link with the steep bostals which climb the scarp slopes.
- Few main roads cross the area with the exception of the two north south A26 and A275 roads. The B2112 to the west of the area is a busy commuter route which puts pressure on the historic village of Ditchling. The B2116 running along the southern edge of the area under the north scarp of the South Downs is also a busy route. Rat running and fast traffic on minor roads which link these busy routes is intrusive.
- The mainline London to Lewes railway crosses the area.

## Local Conservation Areas

- 4.17 As described previously the 'Old Cooksbridge' Conservation Area reaches out from Cooksbridge Farm along the road to the Cooksbridge itself, an original brick built structure of some age now obscured by overgrowth. The Conservation Area Plan defines under 'Key Views and Vistas' the views south from Cooksbridge Farm particularly characterised as being of an open and rural nature with noteworthy distant views of the South Downs.

'From the south of the conservation area, in particular Cooksbridge Farm, there are stunning views across the open landscape to the south, and the Cook's Bridge itself is set within much more open countryside.'

## The Character of Cooksbridge village

- 4.18 The village as a rural settlement originated as a point cross the North End Stream and over the years has developed upwards and outwards from the wet unuseable land to the surrounding higher drier ground. Once the railway was brought through the village in the middle of the 19<sup>th</sup> Century it moved the focus of the village away the north part new 'Old Cooksbridge' and focused on what is in some places referred to as New Cooksbridge. The gap in middle of the two has always remained with the periodic flooding of the land in between.
- 4.19 The village and its surroundings, even with it's architectural mix of Victorian cottages and 60's 70's infilling, still bares many of the characteristics of the Low Weald, particularly at the periphery. Ancient field boundary are everywhere and as most of the land is low lying grazing land very few of these old hedges have been removed in the quest for bigger arable fields. And the village benefits from a mixture of private isolated aspects and occasional expansive views of great natural beauty.



4.20 It would seem the landscape of Cooksbridge could be defined as of: *Medium Quality*

4.21 That is its character is definable, shows many of the characteristics defined under the Local Character Area and National Character Area, if not necessarily as an exemplar of its type and does, as such, show scope and capacity for change if sensitively carried out.

### Visual Impact Assessment: Baseline Conditions

4.22 The following are considered to be the main receptors to changes to the landscape:

- Employees travelling and working in the surrounding area.
- Pupils, staff and parents at the adjoining primary school.
- Pedestrian, cycle and horse riding users of the public rights of way surrounding the site.
- Tourists and locals using the landscape for recreation and leisure.

4.23 Road cyclists, private vehicle drivers and public transport users are transient receptors, focused on journeys and are therefore less sensitive to visual change.

## Key Representative Views of Receptors of Development Proposals Identified

### 4.24 Viewpoint 1 - View from footpath immediately north west of the site

View looking east from public footpath from railway tunnel up to Cooksbridge Farm. Mostly viewed by occasional ramblers, local people and the farmer. The immediate foreground dominated grazing land falls away to a drainage ditch out of view and an established field boundary. The development site rises up in front and the grass of the field is visible above the level of the hedge where the land rises up in level. In the distance buildings on the junction of the A275 and the Hamsey Lane are visible as are established trees in the distance out towards Copyhold Farm.

Leylandii to the right of the view screens the timber yard (adjoining development site by others). The screen is in excess of approximately 10-15m tall is extremely visible throughout the surrounding landscape. An established native hedge crosses the mid ground mostly full to 1.5m high with occasional hedgerow trees which reach 3 or 4m in places. Other human influences include a telegraph poles and line leading diagonally into the distance across the site.

The view is almost completely open and the site is highly visible but the field boundary already forms some effective screening.

*Distance of View – Close*

*Visual receptor type – A*

*Quality of view – Moderate*

*Susceptibility to change – Low*

*Value of view – Low*

*Sensitivity – Moderate*

### 4.25 Viewpoint 2 - View from the railway line

The London to Lewes rail route runs along the South West boundary of the site. It's not practical to document this view but it is a wide view, very similar to View 1 but from an elevated position. The view will be most evident on the approach from Chilmington until the train reaches the timber yard when the view will begin to be screened or obscured by intervening buildings. After the train passes the level crossing it runs into a cutting and all views will be obscured. Whilst there will be some tourists using the train in daytime, the train only runs 5 days a week and it can be assumed that the majority of users will be commuters and local people.

*Distance of View – Close*

*Visual receptor type – C*

*Quality of view – Moderate*

*Susceptibility to change – High*

*Value of view – Low*

*Sensitivity – Low*

#### **4.26 Viewpoint 3 - View from footpath at south west corner of Cooksbridge Farm**

Occluded view looking south from public footpath by the corner of the Cooksbridge Farm property. The view will mostly be seen by walkers as View 1. The view significantly obscured by foreground hedgerows and intervening stands of trees. Most are self-seeded trees along the banks of North End Stream (the point where a lone pair of trees sit in the mid ground). The tops of the Leylandii hedge at the timber yard are visible through the branches, when the trees come back into leaf the site may be almost completely obscured. The large Sequoia trees at the top of New Cooksbridge are visible, as are a couple of rooftops of buildings along the high street. The scarp slope of the Downs rises up in the distance towards Offham and the National Park / SSSI. The site is surrounded by pockets of tree planting and the nearby views are afforded as brief glimpses. Other human influences in this view include the telegraph poles and lines across the mid ground and in the middle distance by the railway line appears some form of signals box and telecom mast.

*Distance of View – Close*

*Visual receptor type – A*

*Quality of view – Moderate*

*Susceptibility to change – Low*

*Value of view – Medium*

*Sensitivity – Moderate*

#### **4.27 Viewpoint 4 - View from Cooksbridge Farm (A275)**

As previously discussed under legislation and the baseline descriptions this view is identified in the Old Cooksbridge Conservation Plan Appraisal. (*refer to point 4.17*)

View south across Cow Field only with the Crops obscured by woodland east of main road. Whilst a number of cyclists and pedestrians were observed, the majority of receptors would be drivers, locals and commuters. Some clearly are tourists but they would not appear to be in the majority. The foreground grass and scrub is largely unmanaged forming part of the farm yard where there is signs of waste dumping and planting of windbreak trees possibly birch.

The hedgerows in the middle distance are old, discontinuous and frequently engulfed in bramble, ivy and old man's beard, standing back from the road. Mature hedgerow trees frequently obscure the view along the length of the road, some off which are quite established deciduous species, probably ash, alder, and some sessile oak (variably 15-20m tall). The Leylandii hedge at the top of the field can clearly be seen. Only half of the development site is visible as the west field, 'The Crops' is screened by dense woodlands. But where visible much of the grass field can be seen.

The village itself is not currently visible from this point as it is screened by the Leylandii hedge. In the distance behind that ridge the scarp slope of the Downs rises up and dominates the background.

The Hamsey Neighbourhood Plan proposes the implementation of a cycle route along the road but presently the road is mostly used by fairly fast flowing car traffic.

*Distance of View – Close*

*Visual receptor type – C*

*Quality of view – Moderate*

*Susceptibility to change – High*

*Value of view – High*

*Sensitivity – Moderate*

#### **4.28 Viewpoint 5 - Tanner's Lagge (A275)**

View south across North End Stream and Cow Field only with the Crops obscured by woodland east of main road. As with View 4 the photograph is taken from the pedestrian footpath beside A275 below Cooksbridge Farm, but is predominantly seen from the road. In the foreground partially visible but obscured by overgrowth is the original 'Cooks Bridge' from which the settlements name derives. As with View 4 this view is seen occasionally by cyclists and tourists but it is mainly seen by drivers, many locals but the majority likely commuters passing at speed on their way to Lewes and Brighton.

Views of buildings in the village start to show, particularly the white house on the corner of the Hamsey Lane junction. As one drives into the village the views up to the South Downs become less dominant and the foreground elements become more dominant such as the bridge, the fragments of native hedgerow, large mature trees, etc. and behind that foreground sits the marginal vegetation to the North End Stream, and the occasional native trees. Behind that the seasonally flooding Tanners Lagge and the North boundary of the development site which is approx. 1.5m tall and perhaps 75% in tact. When vegetation is back in leaf much screening will be offered. Once the road passes the bridge and particularly the hedgerow the view of the sight does become completely open.

Other human influences include the pump house building at the bottom of the hill and all the signage marking entrance to the village. As explained in View 4 glimpses of the new Timber Yard proposal will become increasingly evident.

*Distance of View – Close*

*Visual receptor type – C*

*Quality of view – Moderate*

*Susceptibility to change – High*

*Value of view – High*

*Sensitivity – Moderate*

#### 4.29 Viewpoint 6 - Footpath from Rainbow Inn

View looking south from public footpath heading east from Rainbow Inn south of Conyboro School. The path is signposted from the road and connects through to Barcombe. Whilst this track is possibly used more by the landowners the receptor in this case is the leisure walker or local passing through. The site is largely obscured by the foreground topography and the field. The land here gently rolls providing occasional glimpses through to the site. The view is partially filtered by the occasional hedgerow tree or thicket which are predominantly deciduous tree and shrub species. The view focus's naturally on the ridge leading up to Black Cap in the National Park and is expansive. The Leylandii hedge is visible through the gap in the trees mid right of the image. The two large Sequoia trees at the top of New Cooksbridge are also visible in the middle distance to the left.

The village presents a thin partially visible sliver between the foreground and the background whose effect will be minimised in spring and summer when the vegetation comes back into leaf.

*View – Close*

*Visual receptor type – A*

*Quality of view – Poor*

*Susceptibility to change – Medium*

*Value of view – Low*

*Sensitivity – Low*

#### 4.30 Viewpoint 7 - The Cromps from North End Stream

View south from Public footpath running north of North End Stream immediately north of site. The footpath is only used by ramblers and locals connecting with the Ouse Valley Way below Barcombe. The route is identified as part of a number local walking guides but it would be reasonable to assume this route is primarily used in summer, in autumn or winter a similar route is achieved by taking a diversion via dry ground through the Hamsey Lane or the footpath in View 6.

The footpath immediately adjacent to the site but the view is almost completely obscured by the vegetation and the hedgerow trees growing alongside the stream. There is one point where an access gate opens up the view across the stream and the site is fully visible but this would be a brief glimpses to the side of the ramblers main focus, along the path following the stream. All the vegetation is deciduous, dominated by Alder, Ash and Willow. In summer when everything is in leaf the field will be very much obscured. During the winter months the filtered view allows a lot of green field to be visible. In the distance the school's boundary trees, a melange of architectural styles and building heights are all visible.

*Distance of View – Close*

*Visual receptor type – A*

*Quality of view – Poor*

*Susceptibility to change – Low*

*Value of view – Low*

*Sensitivity – Moderate*

#### **4.31 Viewpoint 8 - A275 and Hamsey Lane Junction across Cow Field**

View from the parking layby on the A275 frequently used by those commuting from Cooksbridge station when the station car park is filled. From this point the full length of the boundary of Cow Field is visible as is a large proportion of the field as it rises up in the middle distance. Some scrub vegetation running along the top of the bank filters the view a little but barely. The Leylandii hedge just starts to the left of view. Whilst the road is sunken like the other drove roads locally but the effect is magnified by the probable road widening to accommodate the modern width. The road is busy with signage and traffic calming measures and a number of established trees in the opposite hedgerow provide some screening with the approx. 1.5m high species rich hedge of the east field, 'The Cromps'. In the distance the woodland at Old Cooksbridge, the farm and its windbreak of planted trees are all visible. The view is dominated by the road and its associated features.

*Distance of View – Close*

*Visual receptor type – C*

*Quality of view – High*

*Susceptibility to change – Medium*

*Value of view – Low*

*Sensitivity – Low*

#### **4.32 Viewpoint 9 - View from Hamsey Lane across 'The Cromps'**

View from Hamsey Lane from south side of the site looking east and down to North End Stream. A minor lane with poor visibility being surrounded by hedges and high verges whilst it may be used by walkers, cyclists, horse riders it is more likely used by locals driving to and from Barcombe or Hamsey. In the distance beyond the stream the topography rises up towards the woods and fields of the Conyboro estate. The A275 lying immediately to the west is well obscured from the site, physically by its lower elevation and by its well established hedgerow along the field boundary.

The hedge along the A275 is approx. 1.5m high, thick and gap free. As with the other historic field boundaries this hedge would suggest to being rich in native species. The southern boundary is completely open only bounded with post and wire fencing across the foreground. A number of telegraph poles are visible in the foreground. In the near distance the northern and western field boundaries are clearly visible. The boundary along the stream is porous in places but generally the boundaries are formed of well-established colonising native trees and scrub, such as Ash, Alder, and Field Maple.

There are no obstructions to this view.

*Distance of View – Close*

*Visual receptor type – B*

*Quality of view – High*

*Susceptibility to change – Low*

*Value of view – Low*

*Sensitivity – Moderate*

#### **4.33 Viewpoint 10 - View from Horse Brook looking across the Cromps to the A275**

View from Hamsey Lane standing opposite Cooksbridge School playing fields beside Horse Brook looking west across The Cromps to the A275 below. The road is identified in some local walking maps as a route to Hamsey, and is quiet, as no traffic was seen in the Hamsey Lane throughout the time spent at site. The receptors would be the same as view 9.

To the left the view is enclosed by shrub vegetation, and an established native hedge approx. 1.5m in height, full and continuous to the end of the lane. To the right the view is framed by the beginnings of the colonising vegetation to the drainage ditch. Beyond, the extensive grass rolls out to the distant field boundary along the A275. At the bottom of the field the pump house is visible and one of the buildings of Cooksbridge Farm. Beyond the view is mostly enclosed by stands of deciduous trees in the fields below Cooksbridge Farm.

*Distance of View – Close*

*Visual receptor type – B*

*Quality of view – Moderate*

*Susceptibility to change – Medium*

*Value of view – Low*

*Sensitivity – Low*

#### **4.34 Viewpoint 11 - View from Hamsey Lane at Copyhold Farm with roofs of urban development around station visible**

View looking west to the site, typically obscured by topography, hedgerows and high hedge banks to lanes. View looking west from junction of two public footpaths and the Hamsey Lane where by the 'Greenwich Meridian' sign nearby Copyhold Farm. Receptors the same as at View 9. Less than 1km away and with a vantage point of higher elevation the site is still completely obscured. The view seems to be exemplary of Low Weald character, with mixed grazing and arable land very clearly defined by established hedgerow field boundaries, sporadic mature trees and frequently sunken roads suggesting significant age to the route. Views are afforded by significantly higher ground frequently looking out and up but largely obscured in the near distance.

There is no view of the site.

*Distance of View – Close*

*Visual receptor type – B*

*Quality of view – Poor*

*Susceptibility to change – High*

*Value of view – Low*

*Sensitivity – Low*

#### **4.35 Viewpoint 12 - View from gate on Beechwood Lane**

View from the gate into Beechwood Hall recreation ground. This site is clearly well used by local children and adults alike for recreation and is the only truly communal access open space in the village. It is a functional space which whilst having a pleasant rural aspect is not significantly rare. From this viewpoint the development site is completely obscured by the timber yard and the Leylandii hedge.

No view of the site.

*Distance of View – Close*

*Visual receptor type – B*

*Quality of view – Poor*

*Susceptibility to change – High*

*Value of view – Low*

*Sensitivity – Low*

#### **4.36 Viewpoint 13 - View from footpath north of Winterland Farm**

View south from footpath connecting from Wickham Lane through to A275 Resting Oak Hill. This public right of way is relatively trodden but is probably still ploughed with the rest of the field judging from the soft going. Whilst certainly attractive, and very characteristic of Low Weald, it is a common view in the area looking across a patchwork of open grazing and arable fields broken up with aging native hedgerow boundaries, past the village in the dip below, towards the South Downs scarp slope and ridge running through to Offham and Lewes on the far side. Farm buildings sit further down the hill and to the left would be mostly obscured when the vegetation is in leaf. The very tops of the Leylandii hedge are visible in the middle distance but as only the tips of a 10-15m hedge it would seem that the site is mostly obscured by the topography in the middle distance.

*Distance of View – Medium*

*Visual receptor type – A*

*Quality of view – Poor*



*Susceptibility to change – Medium*

*Value of view – Low*

*Sensitivity – Low*

#### **4.37 Viewpoint 14 - Footpath below Blackcap**

View north from footpath to Blackcap. Close by View identified in 'South Downs National Park: View Characterisation and Analysis' Published November 2015 by LUC and SDNPA and in several other documents. The view is regarded by many as to be of high quality. But at this distance of 2-2.5km away the site and at an elevation of 125m AOD it is extremely difficult to discern the development site. As ramblers or horseriders descend the path the view of the site will become increasingly acute. The timber yard and the Leylandii hedge are discernible from this vantage point but the great distance makes the site a minor element of the view. Chimney pots and roof apexes may be visible of the first row of houses on the edge of the village but the site will be barely discernible and mostly obscured by the timber yard. At this distance even the two veteran Giant Sequoia's (25-30m) at the top of the village seem insignificant. The view is dominated at this point by the form of the shaw cut in between to spurs jutting out from the downs either side and the sweep of the road to Ditchling snaking up the hill. The patchwork of the Low Weald unravels out to meet the High Weald clearly visible in the distance. The Lewes Down SSSI and SAC site is also visible to the right of the horizon.

*Distance of View – Long*

*Visual receptor type – A*

*Quality of view – Poor*

*Susceptibility to change – Medium*

*Value of view – High*

*Sensitivity – High*

## **5.0 IDENTIFICATION AND EVALUATION OF POTENTIAL EFFECTS ON LANDSCAPE AND VIEWS**

### **6.0 SUMMARY**

# COOKSBRIDGE

**lceni** Pre-Application Document  
27 June 2017



# CONTENTS

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- 1. INTRODUCTION
- 2. SITE LOCATION
- 3. SITE PHOTOS
- 4. LOCAL ANALYSIS
- 5. SITE ANALYSIS
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- 7. THE MASTERPLAN IN COOKSBRIDGE
- 8. ILLUSTRATIVE MASTERPLAN
- 9. ILLUSTRATIVE VIEWS

## 1 Introduction

This document has been prepared on behalf of the Estate and Agency Group to accompany a request for pre-application advice to develop a site in Cooksbridge, for in the region of 154 residential dwellings, mixed use centre and associated parking and landscaping.

The document outlines the context to the site, presents the site constraints and work towards a masterplan solution.

## 2 Site Location

The site sits to the immediate north of the settlement of Cooksbridge and the South Downs National Park, in the parish of Hamsey, East Sussex. It incorporates land to the east and west of the A275. The site forms part of the northern boundary of Cooksbridge and extends to approximately 9 hectares, consisting of arable land sloping to the north.

The A275 dissects the sites into two parts and acts as the boundary between them. Along the southern boundary of the western area is an area of industrial buildings and open storage areas associated with the timber and builders yard, separated by tree planting. It should be noted that outline planning permission has been granted for an area of the open storage for up to 25 dwellings (Application no. LW/14/0943).

Hamsey Lane forms the southern boundary of the eastern site, with a stream and landscaping marking its eastern boundary. A sewage pumping station is located adjacent to the eastern site's northern boundary, close to the A275.

The site as a whole is currently in agricultural use with no buildings on site.

Key  Site boundary



Application boundary (not to scale)

### 3 Site Photos

1. Looking south west across the western site boundary towards the timber yard.
2. View south opposite entrance to residential property on A275.
3. View south from opposite entrance to Cooksbridge Farm.
4. View north from A275 towards Cooksbridge Farm.
5. View north along the A275 showing existing landscaped edge.
6. View of the southern tip of the site from Cooksbridge village.
7. View south from A275 with the western site in the background.
8. View of the house on the corner of Hamsey lane and the A275.
9. View towards Cooksbridge village showing informal on-street parking along the verge.



Photograph locations



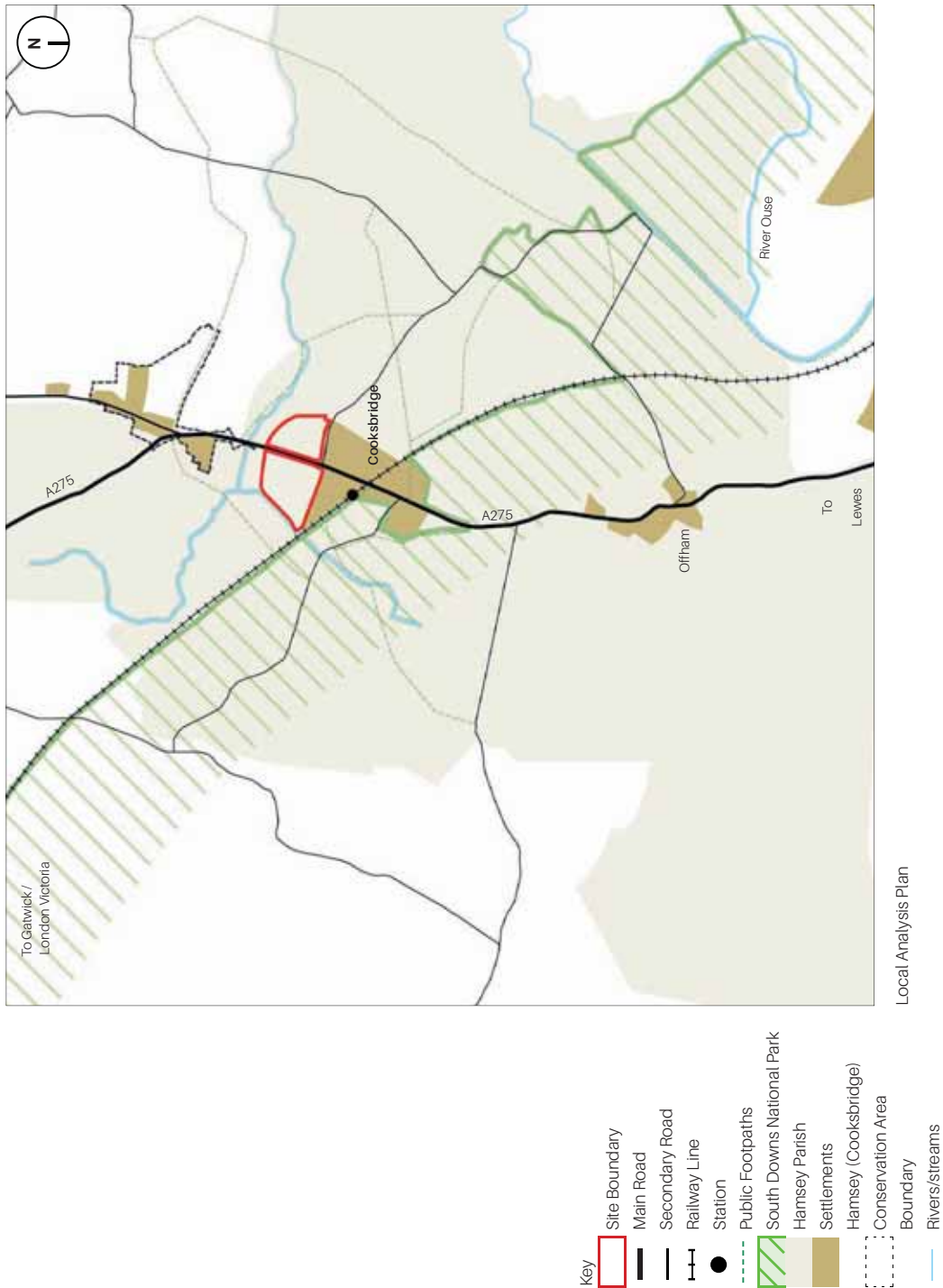
#### 4 Local Analysis

The site is located close to Cooksbridge station, which provides links to Gatwick Airport and London Victoria in an hour. Road links provide connections to the wider South Downs National Park, as well as the local centre of Lewes.

Bus routes serve the settlement and provide services to Lewes, Uckfield and Barcombe.

A comprehensive public footpath network links the settlement and site to the wider countryside.

The amenities in Cooksbridge, as well as the railway station, include the Hamsey Community Primary School, the recreation ground and community centre at Beechwood Lane.





5 Site Analysis

Site constraints

The site's constraints can be summarised in the following categories. These have been identified as part of a comprehensive survey of the site, which feeds into a constraints plan, an extract of which is included.

Contours

The site slopes downwards from north to south, towards the lowest lying land outside of the site. These areas (which have been included in the survey and shown on the Constraints Plan) are densely planted, and include areas known locally as lagoons.

Overhead cables

Overhead cables run over the northern part of the west site, cross the A275 and cut across the northern and eastern parts of the eastern site towards the settlement of Cooksbridge.

Sewer Network & Utilities

An existing sewer runs parallel to the A275 inside the western site and runs along the sites southern boundary. A separate sewer takes a similar route but runs along the southern boundary of the eastern site. A water supply runs along the western site's southern boundary, to cross the A275 and continue to the north of Hamsey Lane.

TPOs

A number of protected trees exist along the site's southern boundary with the timber store.

Boundary Treatment

The western site is bounded on all sides by hedgerows and trees, whilst the eastern site is marshland to the north and Hamsey Lane to the south.

Pumping Station

A pumping station is located adjacent to the A275 and the site's northern boundary, on the eastern side of the road.

The proposed scheme will work with the constraints of the site to produce a responsive layout and design solution.

Key

Site Boundary

Overhead Electric Cables

Water Supply Network

Spot Heights

Landfall

Sewerage network 1

Sewerage network 2

Existing Trees

TPO's

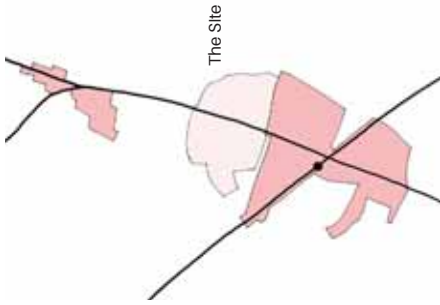
Highway Adoption Area

Surface Water Runoff area



Constraints Plan Extract (not to scale)

## 6 Design Rationale



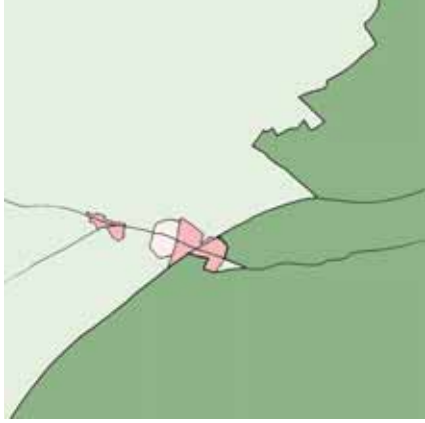
### Respecting the setting of Cooksbridge

Create a sensitively laid out neighbourhood that is respectful to the setting of Cooksbridge



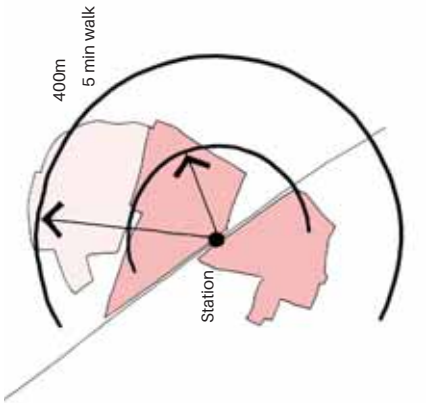
### Fitting in to the existing landscape structure

Provide an area of new housing the fits into the landscape structure of the village including its hedgerows, woodland, street planting and watercourses.



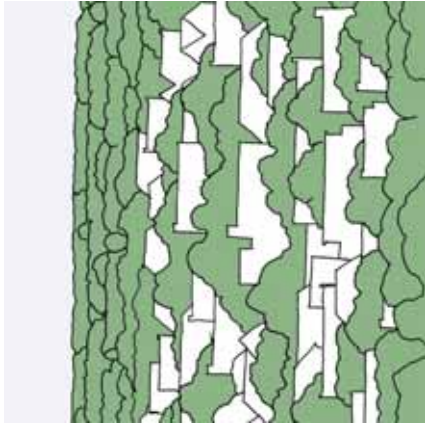
### Respectful of the South Downs National Park (SDNP)

Locate the area of new housing on the opposite side of the village to the South Downs National Park. Located in such way that the existing village acts as a buffer between the site and the National Park as it forms rising land to the south.



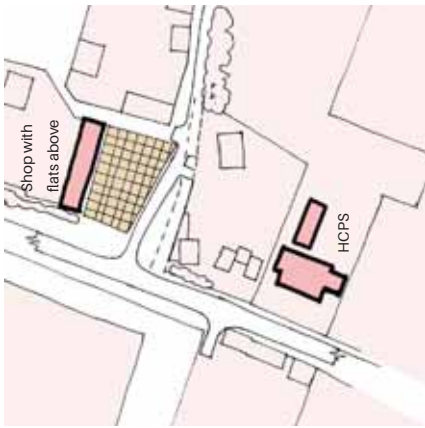
Creating a well connected neighbourhood

Provide a new neighbourhood in close proximity to Cooksbridge railway station, allowing more people with sustainable access to Lewes and London.



Low Visual impact

Layout an arrangement of houses with a low visual impact, ensuring that the setting out of buildings responds to the levels and contours of the site. Low visual impact will also be aided by the vast majority of new homes to be two storey.



Creating a new mixed use centre

Includes a shop (with flats above) around a square; to provide the village with the much needed amenity and to strengthen the identity of the village. It also includes a school drop-off area; that will provide safer drop off facilities for the Hamsey Community Primary school (HCPS) children.

## 7 The Masterplan in Cooksbridge



Cooksbridge over brook

Recently approved housing

Cooksbridge Station



## 8 Illustrative Masterplan

The adjacent plan provides an indicative overview of the proposed masterplan. This plan should not be considered as a reflection of the final masterplan solution, but to allow feedback and a visualisation of how the site layout could look.

Key components of the masterplan include:

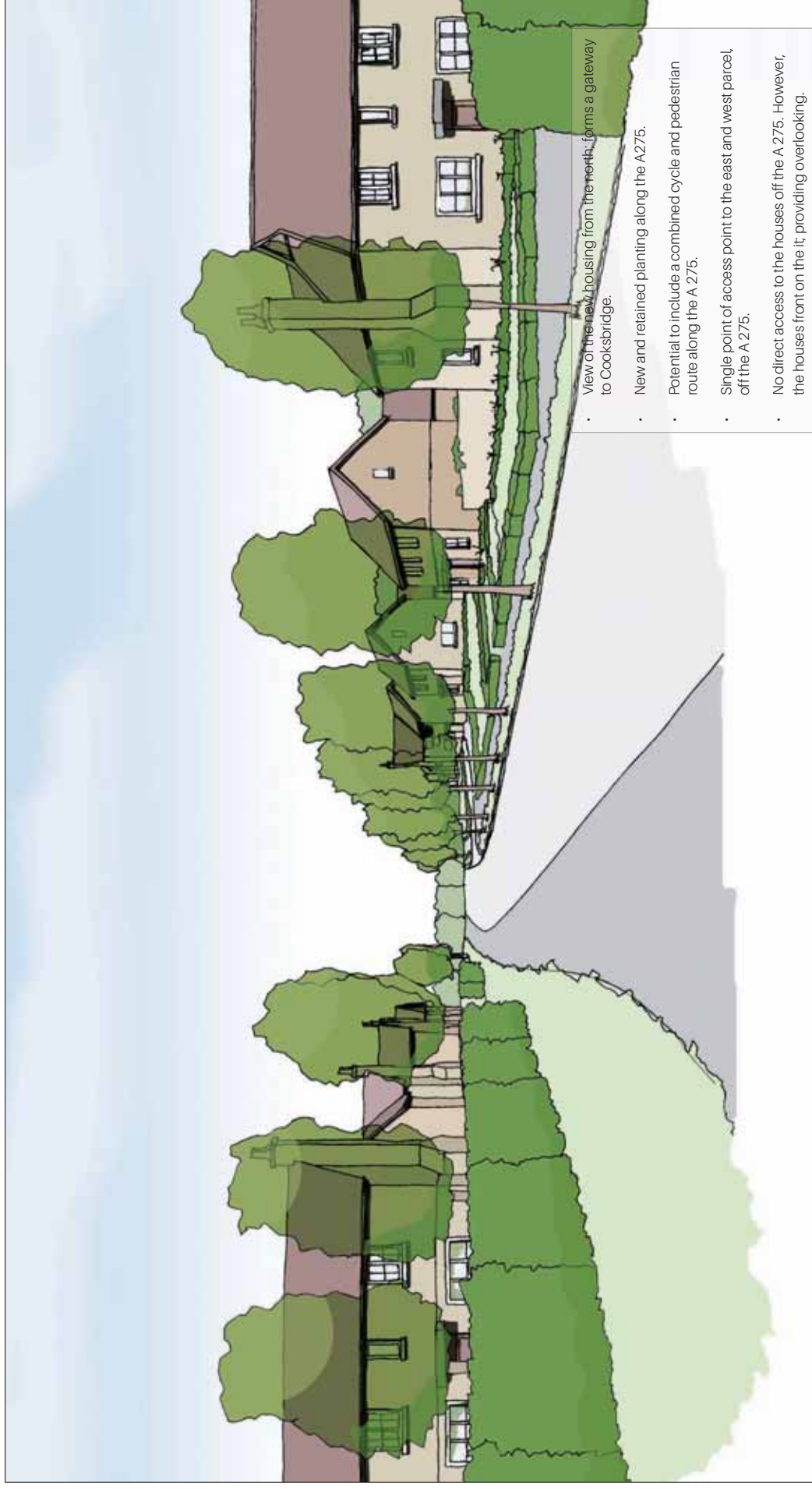
- Changing the character of the A275 from a road to a street, through planting and new frontages.
- Providing a new entrance to the existing settlement of Cooksbridge
- Enhancing the identity of the village to form a new village square; a focus for the new and existing community. The new hub will include a shop and provision for drop-off facilities for Hamsey Community Primary School.
- Realigning Hamsey Lane at the junction of Hamsey lane and the A275, to provide legible and clear movement routes around the new village square.
- A network of open spaces that work with the topography of the site contributing to a comprehensive drainage strategy.
- Set housing in the existing landscape structure of Cooksbridge and include the provision of new planting to enhance the network.

The illustrative masterplan is followed by two key perspective views of the proposals.



## 9 Illustrative Views







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Planning Services  
Lewes District Council  
Southover House  
Lewes  
BN7 1AB

5<sup>th</sup> November 2018

Dear Sir/Madam,

**Representations to Lewes District Local Plan Part 2: Site Allocations and Development Management Policies DPD pre-submission (Regulation 19) Consultation | Land at Old Hamsey Brickworks Lakeside, South Chailey, Lewes, BN8 4QD**

---

On behalf of our client, EA Strategic Land LLP ('EASL'), we write in response to Lewes District Council's Local Plan Part 2 Site Allocations and Development Management Policies pre-submission (Regulation 19) document (consultation document) to promote the land at the above address (The Site) outlined in red on the enclosed site location plan (drawing reference: OHB\_750\_005).

EASL has a long-standing interest in this site and the wider land holding, having gained outline planning permission for the redevelopment of the Former Old Hamsey Brickworks Site, which adjoins the lakeside, with 8 x B1 (business) unit and enabling residential development of 37 open market houses and 12 affordable dwellings (LPA ref: LW/14/0712).

In addition to this, EASL have also obtained outline planning permission for the redevelopment of the neighbouring Knights Court for a further 6 dwellings (LPA ref: LW/17/0030).

Reserved Matters Applications in respect of the above planning consents were submitted to Lewes District Council in October 2018.

These representations focus on the matters of housing need and delivery; the sustainability, suitability and achievability of the lakeside parcel of the Old Hamsey Brickworks site for residential use. These representations provide commentary relating to the overall soundness of the consultation document and the proposed allocation of housing in contrast to the identified need.

**a. Lewes District Council Housing Need and Delivery**

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The Housing Policy Context set out within the 'Consultation Document' explains that Spatial Policies 1 of the adopted Local Plan Part 1 (2016) identifies the housing requirement for Lewes District as being 6,900 net additional dwellings (345 dwellings per annum). This relates both to the plan area and part of the District falling within the National Park.

Strategic Policy 2 demonstrating that 6,926 net dwellings can be provided over the course of the Plan period and treats this in effect as the requirement for the district as a whole. The Council also seeks to suggest that of the 6,926 homes figure, the proportion of housing to be delivered outside the National Park is 5,494 net additional dwellings over the Plan period, amounting to a housing requirement of 275 dwellings per annum, with the remaining 1,432 dwellings (72 dpa) being provided within the South Downs National Park.

The Consultation document identifies that of the Part 1 Plan housing requirement of 5,494 dwellings, the supply as at April 2015 was as follows:

- 2,216 dwellings – Built or committed as at 1 April 2015;

- 1,073 dwellings – Housing supply from strategic allocations;
- 468 dwellings – Supply from windfall allowance; and
- 77 dwellings – Supply from rural exception sites allowance.

The above equates to a total of 3,834 dwellings.

This leaves 1,660 dwellings to be allocated in the emerging Stage 2 Local Plan. The consultation document explains that this will be accounted for by 1,250 dwellings through adopted or emerging Neighbourhood Plans and the remaining 432 dwellings as residual housing growth which is to be identified within the Local Plan Part 2. Of this number, some need to be met within specific settlements as per Policy SP2, whilst the location of 200 dwellings are still yet to be determined.

### **The requirements of the National Planning Policy Framework**

It is acknowledged that, the Regulation 19 Consultation document has been prepared under the National Planning Policy Framework (NPPF) (2012), which sets out the overriding principle to achieve “sustainable development.”

When examining the soundness of a Local Plan the NPPF (2012) explains under paragraph 182 that Plans must be:

- **Positively prepared** – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- **Justified** – the plan should be based on the most 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 priorities; and
- **Consistent with National Policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework.

This is a requirement that has been carried forward under Paragraph 35 of the adopted NPPF (2018).

Although it is appreciated, under Paragraph 214 of the NPPF (2018), that ‘the policies in the previous Framework will apply for the purpose of examining plans, where those plans are submitted on or before 24 January 2019’ should the Independent Inspector, find the submitted Local Plan Part 2 document to be unsound then, given the amount of dwellings which are found to be required under the draft standardised housing methodology, it is likely that Lewes District Council will be required to allocate even more suitable and sustainable land for residential purposes, in order to deliver their increased OAN.

Given that by their own admission, Lewes District Council accept that they are unable to demonstrate a five-year housing land supply against the Council’s Objectively Assessed Housing Need, the consultation document, when viewed against the requirements of the NPPF, should be seen as unsound. It is therefore imperative that in order to fulfil their requirements, Lewes District Council revisit the ‘Residential Site Allocations’ and Housing Policy Context chapters of the draft Local Plan Part 2 document and seek further opportunities to allocate more suitable, sustainable, available and achievable sites for residential purposes.

## b. Housing Land Supply

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Iceni accepts that the purpose of the Part 2 plan is to meet the housing requirement set out in the Part 1 plan. It is not to re-examine the housing requirement.

However we would comment that the Part 1 housing requirement is a **minimum figure** and thus where there are sustainable sites that can be allocated, they should be. This is particularly relevant given that the Part 1 did not meet Lewes District's OAN – the plan requirement of 345 dpa falling substantively short of the OAN of 520 dpa (see Inspector's Report Para 22). In this context it is clear that every effort should be made to identify and bring forward additional sustainable sites.

In respect of the land supply put forward within the Plan, Iceni notes the following:

### 1. Windfalls

Windfall sites, by definition, refer to sites which become available for development unexpectedly and therefore not included as allocations within the Council's development plan nor an adopted neighbourhood plan. We accept that the windfall numbers and the rural exception site allowance have been tested and accepted in the Part 1 Plan Examination.

### 2. Requirement and Supply

The Council has calculated the level of provision to be made in the Part 2 plan by taking the requirement, and totalling the supply expected to come forward from completions/commitments, strategic allocations, the made neighbourhood plans and emerging neighbourhood plans. This results in a figure of 127 dwellings (Table 4). Set against this, the plan proposes the allocation of 132 dwellings.

The position taken provides no flexibility in supply. It is typical for local plans to make provision for sites above the requirement figure, to take account of delays in some sites coming forwards or non-implementation. The approach adopted provides no provision for this flexibility. No contingency is allowed for in the event that the delivery of some sites is delayed, or the emerging neighbourhood plans fail to make provision for 865 dwellings which in itself is a significant assumption. In this respect, the plan is not effective.

Iceni note that the 'Lewes District Five Year Housing Land Supply Position as at 1 April 2018' confirms that "the District as a whole has a supply of deliverable housing land equivalent to 4.99 years outside of the South Downs National Park (calculated via the Liverpool Method), and therefore unable to demonstrate a five year housing land supply; and a supply of deliverable housing land equivalent to 4.92 years inside the South Downs National Park Area. This highlights the need to bring forward additional housing supply to provide sufficient to deliver the level of housing needed, and points to an under-delivery against the constrained requirement.

This requirement is intensified, given that sites such as the proposed development at Marina Fort Road, Newhaven have been allocated since 2003 with still no sign of development coming forward and current marketing material anticipating that development on the site is not likely within the next five years. The five-year land supply should be reviewed, and additional sustainable sites brought forwards.

Lewes District is evidently facing challenges to meet their housing requirements and deliver their OAN within the defined settlement boundaries. These challenges are intensified by physical barriers with the District being constrained to both the south and north, by both the sea, and the South Downs National Park, respectively. To help relieve some of this pressure EASL believe that development on the eastern edge of the lake at Old Hamsey Brickworks would benefit the Lewes Housing Market as it provides sustainable opportunities to deliver additional housing to go towards the Council's housing shortfall against its OAN and to provide the required flexibility of supply to deliver the Part 1 Plan requirement. The site has the ability to deliver up to 12 serviced plot self/custom build dwellings allocated with the emerging Local Part 2 document.

### **c. Proposed Development of land at land at Old Hamsey Brickworks, Lakeside**

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The land at this location extends to cover approximately 7ha and consists of the land to the north of the area granted outline planning permission on 17<sup>th</sup> November 2015 at the former Old Hamsey Brickwork site (LPA application reference: LW/14/0712). The proposed development site consists of the land to the east edge of the lake and sites outside of the Kiln Wood and Ancient Woodland and related buffer zone to the east.

The wider Old Hamsey Brickwork site comprises an irregular shape extending to 9.41 hectares in total, sitting to the east of the A275, South of South Chailey and north of Cooksbridge. The site falls beyond any of the defined built up areas as identified in the 'Saved' Lewes District Local Plan 2003. For Planning Policy purposes, Lewes District Council therefore define the site as being located in the open countryside.

Despite this, the NPPF stipulates that in rural areas, local planning authorities should be responsive to local circumstances and plan housing development to reflect local need. In order to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. The NPPF also supports well designed new buildings to support sustainable growth and expansion of all types of enterprise in rural areas.

It is also key to note that the proposed development site falls within the NPPF definition of previously developed land (PDL). This is evident as no application has been submitted to restore the lake and the surrounding land from its former landfill purpose. For reference, the NPPF defines PDL as follows: "Land that has been developed for minerals extraction of waste disposal by landfill purposes where the provision for restoration has been made through development control procedures."

Given that an application has not been submitted to restore the lake and the surrounding land from its former landfill purpose, EASL are of the opinion that the site surrounding the lake should be seen as previously developed, development and the effective use of which is encouraged within the NPPF. Environmental Surveys have confirmed that the lake is not of high environmental value.

Given that the lake and the land surrounding the lake should be considered as previously developed land and that, by their own admission, Lewes District Council through the consultation document, are unable to provide sufficient land to meet their required OAN. It is proposed that this site, which adjoins and forms the same land holding as the Former Old Hamsey Brickworks and Knights Court site, both of which have been granted planning permission for residential use, should be seen as a suitable and sustainable location to provide additional dwellings to go towards the Council's required housing need.

In line with Core Policy 2 of the Joint Core Strategy 2010-2030, it is proposed that the site is suitable to deliver up to 12 service plot self/custom-build properties which will sit on the eastern back of the lake and would have the woodland as a backdrop. Access to the woodland will be informal and in accordance with the guiding principles set out within the woodland management plan. Improved access to this area will also encourage and create a new natural habitat for wildlife and species.

The proposal will also be of high-quality design which will respect the distinctive character and quality of the surrounding countryside in line with Policy DM1 of the emerging Local Plan Part 2.

This form of residential development represents a unique sector of housing need which Council's must deliver in line with the serviced plot Self-Build and Custom Housebuilding Act 2015, which places a duty on Local Authorities to keep a register of individual and association individuals who are seeking to acquire serviced plots of land in order to build homes for those people to occupy as their main/sole residence.

The Council have a requirement to meet this demand for self/custom build housing. With this in mind, the number of people who have registered an interest on the self-build demand list is 133. To date, Lewes District Council have confirmed that they have received 43 applications for self/custom build units since 1 April 2016. All the applications submitted have been approved, however, due to failure to comply with the CIL regulations (in most cases failure to submit a commencement notice prior to work commencing on site) only 33 permissions are still valid. This therefore leaves a remaining demand of 100 self/custom build units for the Council to deliver across the District.

#### **d. Conclusion**

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Having reviewed Lewes District Council's Local Plan Part 2 Site Allocations and Development Management Policies pre-submission (Regulation 19) document, EA Strategic Land are of the opinion that the Plan is currently unsound as there is insufficient flexibility in the overall housing supply, that the plan has not been positively prepared in seeking to find additional sustainable sites consistent with the treatment of the housing requirement as a minimum, and the evidence does not suggest that the Council currently have a five year housing land supply.

Given the above, it is therefore imperative that, in order to fulfil their requirements, Lewes District Council revisit the 'Residential Site Allocations' and Housing Policy Context chapters of the draft Local Plan Part 2 document and seek further opportunities to allocate more suitable, sustainable, available and achievable sites for residential purposes.

EASL believe that the land to the eastern edge of the lake and sites outside of the Kiln Wood and Ancient Woodland and related buffer zone to the east provides an ideal opportunity to deliver up to 12 new serviced plot self/custom-build dwellings to be delivered towards the Council's required housing need target. This is as:

- The Site should be considered as Previously Developed Land which the development and effective use of is encouraged by the NPPF;
- The site has been considered suitable and sustainable for residential development as outlined by the planning permission for the combined total of 55 dwellings and 8 B1 business units on the surrounding Former Old Hamsey Brickworks and Knight Courts site (LPA ref: LW/14/0712 and LPA ref LW/17/0030 respectively);
- No objections have previously been received by statutory consultees to the principle of residential development in these locations. The proposal will also be of high-quality design which will respect the distinctive character and quality of the surrounding countryside in line with Policy DM1 of the emerging Local Plan Part 2.
- Development of the site will help the Council to deliver their requirement for providing serviced plot self/custom build dwellings; and
- The site will provide informal access to the woodland and be in accordance with the guiding principles set out within the woodland management plan. Improved access to this area will also encourage and create a new natural habitat for wildlife and species.

EASL respectfully request that Lewes District Council revisit the Residential Site Allocations section of the Regulation 19 Local Plan Part 2 document and consider the land at Old Hamsey Brickwork, Lakeside for residential allocation.

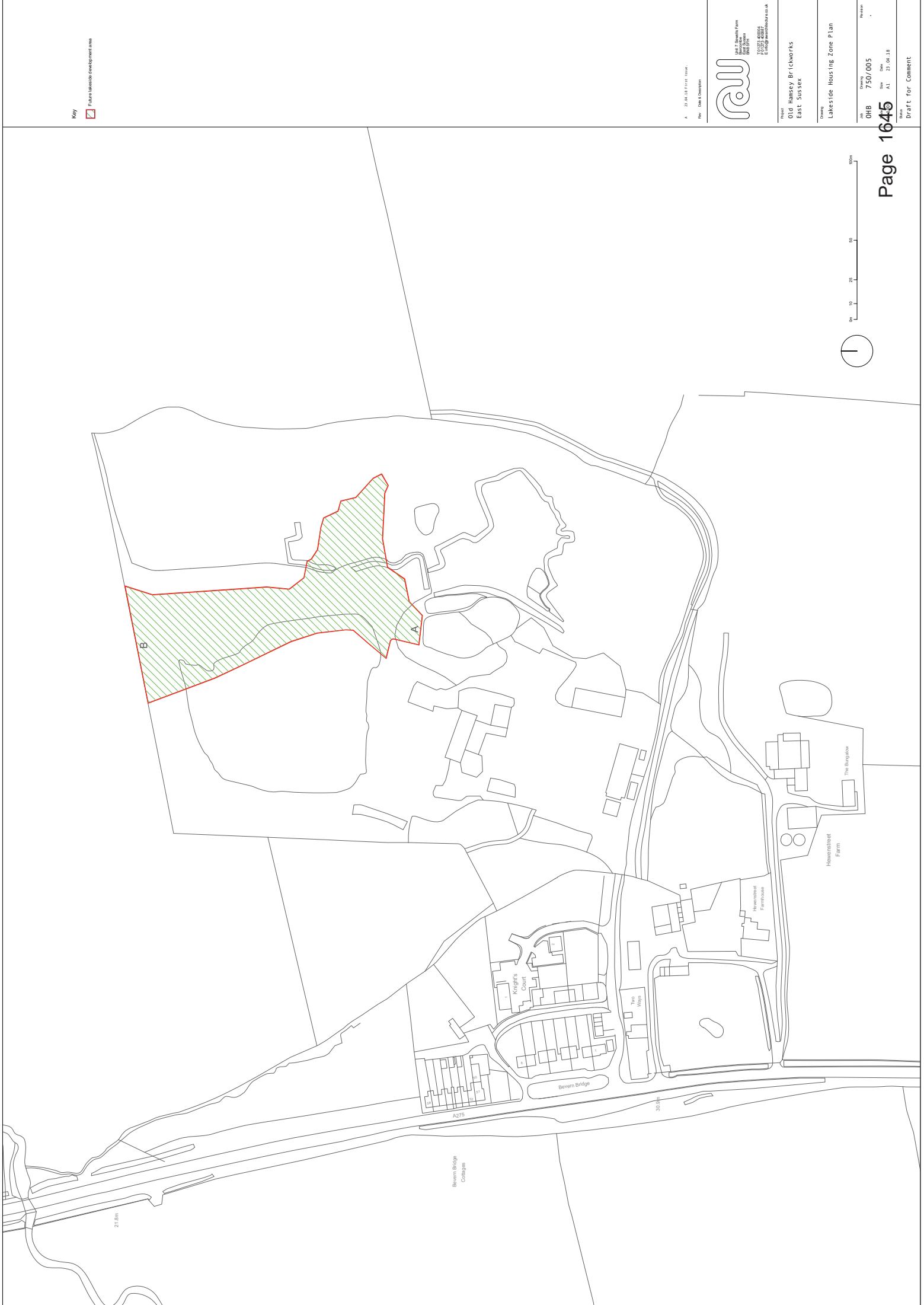
We trust that the above comments can be incorporated as part of the Council's Draft Local Plan Part 2 consultation exercise and we would be grateful for confirmation that these representations have been received. EA Strategic Land also confirm that they would like to be involved in future stages of the plan-making process and request attendance at future EIP sessions. We trust that the information provided is sufficient at this stage, however, should any additional information be required then please do not hesitate to contact me on 02034354227/ [lscarfe@iceniprojects.com](mailto:lscarfe@iceniprojects.com).

Yours Faithfully,



Leo Scarfe MRTPI

Senior Planner



Key  
☒ Future lakeside development area

A 23.04.18 First Issue  
Rev Date & Description

**raw**  
Rural & Agricultural  
Planning  
14/17 Queens Farm  
1000 High Street  
Barnham, East Sussex  
BN8 3JH  
Tel: 01323 400015  
E: info@ruralplanning.co.uk

Project  
Old Hasey Brickworks  
East Sussex

Drawing  
Lakeside Housing Zone Plan

Job	OH8	750/005	Revision	.
Drawn	AL	23.04.18	Check	.
Status				
Draft for Comment				

**Representation ID: REP/292/E1**Representor Details:

<b>Representor ID:</b>	REP/292
<b>Name:</b>	Katharine McKay
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>E1 - Land at East Quay, Newhaven Port</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	Yes
<b>Sound:</b>	No Not Positively Prepared Not Justified Not Effective Not Consistent with national policy
<b>Representation:</b>	
The continued destruction of our coastline and the western end of Seaford Bay by large scale industrial development must now cease	



Tidemills is an historic area of natural beauty. Seaford bay is outstanding and it's symmetry and landscape should not be destroyed for future generations.

The proposed increase in industrialisation is short term and does nothing to attract tourism or provide decent housing. Further industrial development would pollute the area which is well used by families for leisure and learning.

LDC have no care for Newhaven nor Seaford. This wonton destruction of the local area must stop. LDC do not listen to the views of local people. LDC pretend to consult but historically have ignored the opinions of the public and local town councils - reference Brett Aggregates, port expansion and the incinerator!

If you wish to improve employment opportunities and income for Newhaven then sort out the shocking state of the town centre and ring road. Develop the retail area, make them attractive and accessible. Use the coastline to attract decent housing and leisure facilities. Don't destroy our natural area which should be seen as a precious asset.

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

Invoke the public and listen to them

**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?**

This should be for public consultation- but then LDC have already decided what they wish to do any any consultation is a sham - as ever.



**Representation ID: REP/293/GT01**Representor Details:

<b>Representor ID:</b>	REP/293
<b>Name:</b>	Jeremy Midmer
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>GT01 - Land south of The Plough</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	
<b>Sound:</b>	
<b>Representation:</b>	<p>I am writing to express my objection and concerns over Lewes District Council's proposal to provide 5 permanent travellers pitches on the land south of the Plough, Plumpton Green as outlined in their Policy GT01 within the LDC Local Plan, Part 2 - Site Allocations and Development Policies Pre-submission Document September 2018.</p> <p>Whilst I understand the governments requirement to provide housing and</p>

accommodation for all, I object to this proposal as it plans to build on a green field site within an area of lovely East Sussex countryside, and will set a new and dangerous precedence on future housing and other accommodation developments within East Sussex and village neighbourhood plans going forward.

My objections to this proposal are as follows:

1. The proposed 0.69 hectare site (in GT01) is a greenfield location within countryside and therefore will immediately impact the local biodiversity and wildlife.
2. Building on this piece of land that has previously been refused planning for housing creates a dangerous precedence for further development for other housing developments in the county. It also questions what further developments might occur on this field in future. If development starts here, will more development occur in years to come?
3. When Local Plan Part 1 judged that there were no suitable pitches for allocation, the core policy criteria appears to have changed. Under subsequent Core Policy 3 criteria, this site did not have the highest score which meant it was not the most appropriate location for gypsy and travellers pitches, however, now it seems to be the only option within East Sussex and Lewes District Council proposals. How can this be correct?
4. As the location is a greenfield site, it has no amenities and all these would need to be installed. With LDC already tasked with making continuous funding cuts, this choice of location seems inappropriate. The cost to buy, develop and provide all necessary amenities will be considerable.
5. For any development there needs to be a footpath or safe access for pedestrians and disabled people. None of this currently exists to the North of Station Road and to the proposed site.

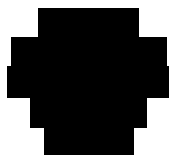
The proposal will need further clarification on how this will be provided. The other conditions outlined under Policy GT01 – Land south of the Plough still have to be proved but I wanted to provide my objection and comments above.

I trust the above is self-explanatory, however, if you require any clarification please contact me

**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

14<sup>th</sup> October 2018

Dear Sir/Madam

**Re: LDC Local Plan 2 Policy GT01 – Land South of the Plough, Plumpton Green**

I am writing to express my objection and concerns over Lewes District Council's proposal to provide 5 permanent travellers pitches on the land south of the Plough, Plumpton Green as outlined in their Policy GT01 within the LDC Local Plan, Part 2 - Site Allocations and Development Policies Pre-submission Document September 2018.

Whilst I understand the governments requirement to provide housing and accommodation for all, I object to this proposal as it plans to build on a green field site within an area of lovely East Sussex countryside, and will set a new and dangerous precedence on future housing and other accommodation developments within East Sussex and village neighbourhood plans going forward.

My objections to this proposal are as follows:

1. The proposed 0.69 hectare site (in GT01) is a greenfield location within countryside and therefore will immediately impact the local biodiversity and wildlife.
2. Building on this piece of land that has previously been refused planning for housing creates a dangerous precedence for further development for other housing developments in the county. It also questions what further developments might occur on this field in future. If development starts here, will more development occur in years to come?
3. When Local Plan Part 1 judged that there were no suitable pitches for allocation, the core policy criteria appears to have changed. Under subsequent Core Policy 3 criteria, this site did not have the highest score which meant it was not the most appropriate location for gypsy and travellers pitches, however, now it seems to be the only option within East Sussex and Lewes District Council proposals. How can this be correct?
4. As the location is a greenfield site, it has no amenities and all these would need to be installed. With LDC already tasked with making continuous funding cuts, this choice of location seems inappropriate. The cost to buy, develop and provide all necessary amenities will be considerable.
5. For any development there needs to be a footpath or safe access for pedestrians and disabled people. None of this currently exists to the North of Station Road and to the proposed site. The proposal will need further clarification on how this will be provided.

The other conditions outlined under Policy GT01 – Land south of the Plough still have to be proved but I wanted to provide my objection and comments above.

I trust the above is self-explanatory, however, if you require any clarification please contact me

Yours sincerely

A large black rectangular box used to redact the signature of Jeremy Midmer.

Jeremy Midmer

**Representation ID: REP/294/GT01**Representor Details:

<b>Representor ID:</b>	REP/294
<b>Name:</b>	Denise Miller
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>GT01 - Land south of The Plough</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	
<b>Sound:</b>	
<b>Representation:</b>	
<p>As a former member of the Plumpton Parish Neighbourhood Plan Steering Group, I am writing to fully support the Plumpton Parish Council's (PPC) response to the proposed site above, and to add the following points arising from the Lewes District Council (LDC) presentation to the parish at the Plumpton Green Village Hall on 9th October 2018 in the form of 20 questions and answers:</p>	
<p>3. What are the planning grounds for the allocation?</p>	
<ul style="list-style-type: none"><li>• Core Policy 3 in the JCS states that sites to meet the need for 13 pitches will be delivered through Local Plan Part 2 and the SDNPA Local Plan, unless allocated through neighbourhood plans. No neighbourhood plans have sought to address this</li></ul>	

need.

No need for Gypsy and Traveller accommodation was ever expressed by any of the representatives of LDC working with the PPC Steering Group (SG) during the four years the Plumpton Parish Neighbourhood Plan (PPNP) took to produce.

#### 4. What is the planning history for the site?

- The site was submitted to the council as a potential development site in 2009 – it was submitted as the whole field (4.4ha) in response to a call for sites for the Strategic Housing Land Availability Assessment. It was filtered out due to proximity to the nearest planning or settlement boundary (more than 500m).

The SG was given no choice but to omit this site from the PPNP on the advice of LDC as it was considered too far from village amenities and main services to be sustainable. LDC made it clear that if the PPNP included sites remote from the planning boundary of Plumpton Green as part of its allocation of 50+ houses, it would grant planning permission for sites not included in the plan but closer to village amenities as windfall, thus increasing the total amount of development in the parish beyond its allocation. To alleviate the additional pressure on infrastructure and excessive traffic this would cause, sites central to the village of Plumpton Green were accepted in the revised plan and less sustainable remote sites removed. All this was done at the recommendation of the LDC representatives working with the SG.

It appears that LDC has not only misled the SG and the PPC but is prepared to dismiss its own criteria for site selection to suit itself, with no respect for the parish residents who put a lot of work and effort into making a neighbourhood plan which gave LDC more than it required (68 potential houses). To develop this site not only contravenes LDC's own policies but insults the intelligence of everyone in the parish and undermines confidence in the integrity of LDC.

**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:** Denise Miller [REDACTED]  
**Sent:** 28 October 2018 17:18  
**To:** ldf  
**Subject:** Lewes District Council Local Plan Part 2: Site Allocations and Development Management Policies DPD – Pre-submission version

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

**Lewes District Council Local Plan Part 2: Site Allocations and Development Management Policies DPD – Pre-submission version**

**Policy GT01 – Land south of the Plough: Proposed Gypsy and Traveller site in Plumpton Green**

Dear Sir or Madam

As a former member of the Plumpton Parish Neighbourhood Plan Steering Group, I am writing to fully support the Plumpton Parish Council's (PPC) response to the proposed site above, and to add the following points arising from the Lewes District Council (LDC) presentation to the parish at the Plumpton Green Village Hall on 9<sup>th</sup> October 2018 in the form of 20 questions and answers:

**3. What are the planning grounds for the allocation?**

- Core Policy 3 in the JCS states that sites to meet the need for 13 pitches will be delivered through Local Plan Part 2 and the SDNPA Local Plan, unless allocated through neighbourhood plans. No neighbourhood plans have sought to address this need.

No need for Gypsy and Traveller accommodation was ever expressed by any of the representatives of LDC working with the PPC Steering Group (SG) during the four years the Plumpton Parish Neighbourhood Plan (PPNP) took to produce.

**4. What is the planning history for the site?**

- The site was submitted to the council as a potential development site in 2009 – it was submitted as the whole field (4.4ha) in response to a call for sites for the Strategic Housing Land Availability Assessment. It was filtered out due to proximity to the nearest planning or settlement boundary (more than 500m).

The SG was given no choice but to omit this site from the PPNP on the advice of LDC as it was considered too far from village amenities and main services to be sustainable. LDC made it clear that if the PPNP included sites remote from the planning boundary of Plumpton Green as part of its allocation of 50+ houses, it would grant planning permission for sites not included in the plan but closer to village amenities as windfall, thus increasing the total amount of development in the parish beyond its allocation. To alleviate the additional pressure on infrastructure and excessive traffic this would cause, sites central to the village of Plumpton Green were accepted in the revised plan and less sustainable remote sites removed. All this was done at the recommendation of the LDC representatives working with the SG.

It appears that LDC has not only misled the SG and the PPC but is prepared to dismiss its own criteria for site selection to suit itself, with no respect for the parish residents who put a lot of work and effort into making a neighbourhood plan which gave LDC more than it required (68 potential houses). To develop this site not only contravenes LDC's own policies but insults the intelligence of everyone in the parish and undermines confidence in the integrity of LDC.

Yours faithfully

Denise Miller



<b>Representation ID:</b> REP/295/BA01
--

Representor Details:

<b>Representor ID:</b>	REP/295
<b>Name:</b>	Alison Mills
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>BA01 - Land at Hillside Nurseries, High Street</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	Yes
<b>Sound:</b>	Yes
<b>Representation:</b>  Policy BA01 - Land at Hillside Nurseries, High Street - states that 1600sqm of public amenity space is to be put aside for equipped and informal play space. The Barcombe playground is far smaller than required for a village of this size. 1600sqm will not address the current deficit of equipped play space which is 3200sqm. There needs to be provision of more space for equipped play space by LDC. The field highlighted on the plan, adjacent to the current recreation ground, is the only field suitable for these purposes - due to it's location next to the recreation ground. The existing policy BA1	

which allocates the whole field for recreational use needs to be maintained.

**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/296/GT01**Representor Details:

<b>Representor ID:</b>	REP/296
<b>Name:</b>	Josh Mitchell
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Local Business / employer

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	Unit 54 The Old Brickworks Plumpton Green BN7 3DF

Representation:

<b>Policy/Section:</b>	<b>GT01 - Land south of The Plough</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	
<b>Sound:</b>	
<b>Representation:</b>	<p>I am writing to make representations in respect of the above document. I am a tenant at Unit 54, The Old Brickworks. I have been a tenant at this industrial estate for the past 10 years. I am seeking to comment on the soundness of the following policy:</p> <p>Policy GT01 – Land south of The Plough</p> <p>Policy GT01 is not justified, effective or sound as it does not represent the most appropriate strategy for addressing the assessed need for permanent gypsy and</p>

traveller pitches within the District.

I do not consider that the proposed site at Land south of The Plough has been properly assessed against Core Policy 3 within the adopted Joint Core Strategy (JCS), particularly the requirement for conformity with other district wide policies, in addition to criteria 1 – 6 which it sets out.

Further, I consider that the site assessment work is fundamentally flawed as it pre dates, by a number of years, the adopted JCS and Core Policy 3. Therefore the assessment failed to (and was unable to) take into consideration and measure as part of its methodology, conformity with other relevant district wide policies set out in the JCS.

Specifically, Policy GT01 fails to conform with the following adopted policies:

Core Policy 4, Encouraging Economic Development and Regeneration which requires (among other criteria) support for economic growth in rural areas.

Many tenants at The Old Brickworks are not prepared to stay if Policy GT01 is adopted. There are a number of uncertainties generated by the proposed development, and many businesses are not prepared to wait and see if they may be affected.

The Old Brickworks has a community feel and if people start to leave, that in itself would be a reason relocate my business, most likely out of the District and into Brighton and Hove where there are a greater range of available units.

The level of uncertainty for small businesses which will inevitably be introduced if Policy GT01 is adopted, is in direct conflict with the requirement in Core Policy 4 to support economic growth in rural areas. The economy, as we know, does not flourish in uncertain times.

Core Policy 6, Retail and Sustainable Town and Local Centres which requires (among other criteria) support for and retention of local shops and a requirement that local shopping centres remain a vibrant focus for the local community.

The shop in Plumpton Green is a really important part of the village. It employs people who don't have the means to easily travel out of the village, the owners are involved in local events and it is treated as a hub by the local community.

Notwithstanding the above, the reality is that the local shop is not where people go to do their weekly shopping. However, tenants of the Old Brickworks go there daily, people they employ all buy a sandwich there and their clients pop in. The shop is also a post office, and local businesses all do their post there. If the businesses at The Old Brickworks move away, this may well halve the income of the local shop, and it is highly unlikely that any new households generated by the proposed development will replace this level of business.

Core Policy 10, Natural Environment and Landscape Character which requires (among other criteria) maintaining and where possible enhancing the natural, locally distinctive and heritage landscape qualities and characteristics of the district, and maintaining and where possible enhancing local biodiversity resources.

The proposed site has previously been considered inappropriate for development by

Lewes District Council. There is nothing within Policy GT01 which provides justification or suitable mitigation for this position to have changed.

The proposed development will impact negatively on the local rural landscape and will likely set a precedent for further development in this area. The proposed development as set out in Policy GT01, will bring with it no environmental benefits which should weigh strongly against it.

Core Policy 11, Built and Historic Environment and High Quality Design which requires (among other criteria) that the design of the development provides a satisfactory environment for existing and future occupants including, in relation to housing development, adequate provision for daylight, sunlight, privacy, private outdoor space and/or communal amenity areas.

It is entirely inappropriate for vulnerable caravans and mobile homes to be sited directly next to a busy and noisy industrial estate.

The estate operates 5.5 days a week, our operating hours being 8am – 5.30pm. Many of the units use industrial machinery. During working hours there are frequently lorries coming and going and fork lifts driving around the estate. It is a potentially hazardous site, particularly for unsupervised children.

The identification of the proposed site for a new settlement is an inappropriate and in direct conflict with Core Policy 11.

As the 2012 site assessment pre dated the JCS, it was incapable of assessing the proposed site against the above adopted policies. If the site assessment was updated - which it should be in order to provide a proper assessment of the proposed site and for Policy GT01 to be sound – the proposed site would be ranked considerably lower and is unlikely to be found to be suitable. The assessment of the site identified by Policy GT01 needs to be reviewed.

**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  
East Sussex  
BN7 1AB

4 November 2018

Dear Sir/ Madam

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

I am writing to make representations in respect of the above document. I am a tenant at Unit 54, The Old Brickworks. I have been a tenant at this industrial estate for the past 10 years. I am seeking to comment on the soundness of the following policy:

**Policy GT01 – Land south of The Plough**

Policy GT01 is not justified, effective or sound as it does not represent the most appropriate strategy for addressing the assessed need for permanent gypsy and traveller pitches within the District.

I do not consider that the proposed site at Land south of The Plough has been properly assessed against Core Policy 3 within the adopted Joint Core Strategy (JCS), particularly the requirement for conformity with other district wide policies, *in addition* to criteria 1 – 6 which it sets out.

Further, I consider that the site assessment work is fundamentally flawed as it pre dates, by a number of years, the adopted JCS and Core Policy 3. Therefore the assessment failed to (and was unable to) take into consideration and measure as part of its methodology, conformity with other relevant district wide policies set out in the JCS.

Specifically, Policy GT01 fails to conform with the following adopted policies:

**Core Policy 4, Encouraging Economic Development and Regeneration** which requires (among other criteria) support for economic growth in rural areas.

Many tenants at The Old Brickworks are not prepared to stay if Policy GT01 is adopted. There are a number of uncertainties generated by the proposed development, and many businesses are not prepared to wait and see if they may be affected.

The Old Brickworks has a community feel and if people start to leave, that in itself would be a reason relocate my business, most likely out of the District and into Brighton and Hove where there are a greater range of available units.

The level of uncertainty for small businesses which will inevitably be introduced if Policy GT01 is adopted, is in direct conflict with the requirement in Core Policy 4 to support economic growth in rural areas. The economy, as we know, does not flourish in uncertain times.

**Core Policy 6, Retail and Sustainable Town and Local Centres** which requires (among other criteria) support for and retention of local shops and a requirement that local shopping centres remain a vibrant focus for the local community.

The shop in Plumpton Green is a really important part of the village. It employs people who don't have the means to easily travel out of the village, the owners are involved in local events and it is treated as a hub by the local community.

Notwithstanding the above, the reality is that the local shop is not where people go to do their weekly shopping. However, tenants of the Old Brickworks go there daily, people they employ all buy a sandwich there and their clients pop in. The shop is also a post office, and local businesses all do their post there. If the businesses at The Old Brickworks move away, this may well halve the income of the local shop, and it is highly unlikely that any new households generated by the proposed development will replace this level of business.

**Core Policy 10, Natural Environment and Landscape Character** which requires (among other criteria) maintaining and where possible enhancing the natural, locally distinctive and heritage landscape qualities and characteristics of the district, and maintaining and where possible enhancing local biodiversity resources.

The proposed site has previously been considered inappropriate for development by Lewes District Council. There is nothing within Policy GT01 which provides justification or suitable mitigation for this position to have changed.

The proposed development will impact negatively on the local rural landscape and will likely set a precedent for further development in this area. The proposed development as set out in Policy GT01, will bring with it no environmental benefits which should weigh strongly against it.

**Core Policy 11, Built and Historic Environment and High Quality Design** which requires (among other criteria) that the design of the development provides a satisfactory environment

for existing and future occupants including, in relation to housing development, adequate provision for daylight, sunlight, privacy, private outdoor space and/or communal amenity areas.

It is entirely inappropriate for vulnerable caravans and mobile homes to be sited directly next to a busy and noisy industrial estate.

The estate operates 5.5 days a week, our operating hours being 8am – 5.30pm. Many of the units use industrial machinery. During working hours there are frequently lorries coming and going and fork lifts driving around the estate. It is a potentially hazardous site, particularly for unsupervised children.

The identification of the proposed site for a new settlement is an inappropriate and in direct conflict with Core Policy 11.

As the 2012 site assessment pre dated the JCS, it was incapable of assessing the proposed site against the above adopted policies. If the site assessment was updated - which it should be in order to provide a proper assessment of the proposed site and for Policy GT01 to be sound – the proposed site would be ranked considerably lower and is unlikely to be found to be suitable. The assessment of the site identified by Policy GT01 needs to be reviewed.

Yours sincerely

Josh Mitchell

Unit 54,

The Old Brickworks

Plumpton Green

BN7 3DF



**Representation ID: REP/297/GT01**Representor Details:

<b>Representor ID:</b>	REP/297
<b>Name:</b>	Lissa Mitchell
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>GT01 - Land south of The Plough</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	
<b>Sound:</b>	
<b>Representation:</b>	
<p>I am writing to object the the proposal of a permanent traveller and gypsy site adjacent the Old Brickworks, South of the Plough site GT01.</p> <p>My name is Lissa Mitchell and I am on the committee for the Old Brickworks, Plumpton Green BN7 3DF, which is a family owned and run business. Which has in fact been in our family for several generations and a huge amount of money and time has been invested into the site, to change it from the former chicken farm my grandfather used to run into the industrial site it now is.</p> <p>I am hugely concerned about the proposed traveller site, for a number of reasons as are the tenants at the Old Brickworks who are already voicing concerns and am very worried</p>	

we will loose our tenants.

My reasons for objecting to the new site, amongst personal reasons are as follows:-

\* The Old Brickworks, is a nice quiet location to work and currently has soft boundaries and minimal security, [REDACTED]

[REDACTED]. As well as the potential effect on the business at the Old Brickworks.

\* The site is over a kilometre from the A275 and half a kilometre from he village services which will prevent the potential residents from coexisting with the village of Plumpton. Which is added by the fact there are no pathways from the site to the village.

\* The proposed site has a lack of infrastructure, no water, gas, power. Which would be a costly expense to instal when surely there must be better suited sites.

\* This is a greenfield site, with no suitable access point.

Thank you for taking the time to read my objections and I really do hope this does not go forward.

**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:** Melissa Mitchell <[REDACTED]>  
**Sent:** 01 October 2018 21:04  
**To:** ldf  
**Subject:** Site GT01 - proposed traveller site

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

Dear Sir/Madam

I am writing to object the the proposal of a permanent traveller and gypsy site adjacent the Old Brickworks, South of the Plough site GT01.

My name is Lissa Mitchell and I am on the committee for the Old Brickworks, Plumpton Green BN7 3DF, which is a family owned and run business. Which has in fact been in our family for several generations and a huge amount of money and time has been invested into the site, to change it from the former chicken farm my grandfather used to run into the industrial site it now is.

I am hugely concerned about the proposed traveller site, for a number of reasons as are the tenants at the Old Brickworks who are already voicing concerns and am very worried we will loose our tenants.

My reasons for objecting to the new site, amongst personal reasons are as follows:-

- The Old Brickworks, is a nice quiet location to work and currently has soft boundaries and minimal security, [REDACTED] view. As well as the potential effect on the business at the Old Brickworks.
- The site is over a kilometre from the A275 and half a kilometre from he village services which will prevent the potential residents from coexisting with the village of Plumpton. Which is added by the fact there are no pathways from the site to the village.
- The proposed site has a lack of infrastructure, no water, gas, power. Which would be a costly expense to instal when surely there must be better suited sites.
- This is a greenfield site, with no suitable access point.

Thank you for taking the time to read my objections and I really do hope this does not go forward.

Yours faithfully

Lissa Mitchell

**Representation ID: REP/298/E1**Representor Details:

<b>Representor ID:</b>	REP/298
<b>Name:</b>	Sally Mockford
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>E1 - Land at East Quay, Newhaven Port</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	
<b>Sound:</b>	
<b>Representation:</b>  I wish to raise my concerns over the future of the Western end of Tidemills adjacent to the Eastern boundary of Newhaven Harbour.  Unfortunately it has been decided to make this area accessible to heavy goods traffic courtesy of a new bridge over Mill Creek linking with the Port Access Road despite this being the only beach accessible to Newhaven residents since West Beach was closed.	

The area stretching eastwards from Newhaven Harbour boundary fence to the South Downs National Park boundary - which is very close to the old Tidemills village ruins - is now also threatened with development.

This would represent another blow to local residents, especially families with children who use this public amenity.

I trust that such concerns will be listened to.

**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:** shmockford <[REDACTED]>  
**Sent:** 09 October 2018 18:46  
**To:** ldf  
**Subject:** Consultation : Lewes District Local Plan Pt 2. Site Allocations and Development Management Policies DPD

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

I wish to raise my concerns over the future of the Western end of Tidemills adjacent to the Eastern boundary of Newhaven Harbour.

Unfortunately it has been decided to make this area accessible to heavy goods traffic courtesy of a new bridge over Mill Creek linking with the Port Access Road despite this being the only beach accessible to Newhaven residents since West Beach was closed.

The area stretching eastwards from Newhaven Harbour boundary fence to the South Downs National Park boundary - which is very close to the old Tidemills village ruins - is now also threatened with development. This would represent another blow to local residents, especially families with children who use this public amenity.

I trust that such concerns will be listened to.

Yours

Sally Mockford  
[REDACTED]

Sent from Samsung tablet

**Representation ID: REP/299/E1**Representor Details:

<b>Representor ID:</b>	REP/299
<b>Name:</b>	Doris Moorhead
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>E1 - Land at East Quay, Newhaven Port</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	
<b>Sound:</b>	
<b>Representation:</b> <p>I am writing to let you know that I strongly object to the development E1 at Tide Mills. As a former Newhaven resident and regular swimmer at Tide Mills I feel that the loss of natural environment for local residents and users, like myself, from Sussex and further afield, would be enormous. The impact of such a development on the marine environment and the South Downs would be considerable. Additional pollution would be created by the transport to (boats) and from (lorries) the site. The economic benefits to the local community with only 30 or so jobs will not make up for this loss, also indicated by the Newhaven Town Council's objection to the development.</p> <p>Newhaven finally deserves better!</p>	

<b>What changes do you suggest to make the document legally compliant or sound?</b>
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<b>Do you consider it necessary to participate at the Examination in Public?</b>
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<b>Why do you feel it is necessary to participate at the Examination in Public?</b>
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## Hodgson, Lilly

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**From:** Doris Moorhead <[REDACTED]>  
**Sent:** 05 November 2018 14:52  
**To:** ldf  
**Subject:** Planning Reference E1  
  
**Categories:** Vanessa to deal with

Dear Planning Policy Team,

I am writing to let you know that I strongly object to the development E1 at Tide Mills. As a former Newhaven resident and regular swimmer at Tide Mills I feel that the loss of natural environment for local residents and users, like myself, from Sussex and further afield, would be enormous. The impact of such a development on the marine environment and the South Downs would be considerable. Additional pollution would be created by the transport to (boats) and from (lorries) the site. The economic benefits to the local community with only 30 or so jobs will not make up for this loss, also indicated by the Newhaven Town Council's objection to the development.

Newhaven finally deserves better!

Best regards,

[REDACTED]

<b>Representation ID:</b> REP/300/E1
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Representor Details:

<b>Representor ID:</b>	REP/300
<b>Name:</b>	Dinah Morgan
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>E1 - Land at East Quay, Newhaven Port</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	
<b>Sound:</b>	
<b>Representation:</b>	<p>I am grieved to hear that developing the western area of Tide Mills beach is being considered by the council and object to this proposal. I and many others believed and want this to be a protected area as it is a very rare environment of foliated shingle and provides an important recreational space for myself and the people of Newhaven. This is even more important considering that the amenity of the sandy beach used happily for generations on the eastern side of the port has been brokered away in the deal to the ferry company. This was without any consultation of the populace and it behoves the council not to make Newhaven into one big dirty industrial sprawl. The idea of a Cleaner Greener Port is of course only an "aspiration" at present, but the only power to push this agenda forward and make it a reality is the council. It seems incredible in this time of</p>

global climate catastrophe that public servants should entertain for a moment policies that do not protect and support the environment from whence we spring-one and all.

Please leave this piece of land free of development and respect the need of local people to get away from the grime, noise and air pollution of the one way system and ugliness of (planner's) development of Newhaven in the name of health (lower than the National average) and the success of the port as gateway to the National Park and those arriving from Europe into what will appear (unnecessarily) to be a dustbin.

**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:** Dinah Morgan <[REDACTED]>  
**Sent:** 04 November 2018 14:05  
**To:** ldf  
**Subject:** Tide mills consultation and development.

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

Dear Sir / Madam,

I am grieved to hear that developing the western area of Tide Mills beach is being considered by the council and object to this proposal. I and many others believed and want this to be a protected area as it is a very rare environment of foliated shingle and provides an important recreational space for myself and the people of Newhaven. This is even more important considering that the amenity of the sandy beach used happily for generations on the eastern side of the port has been brokered away in the deal to the ferry company. This was without any consultation of the populace and it behoves the council not to make Newhaven into one big dirty industrial sprawl. The idea of a Cleaner Greener Port is of course only an "aspiration" at present, but the only power to push this agenda forward and make it a reality is the council. It seems incredible in this time of global climate catastrophe that public servants should entertain for a moment policies that do not protect and support the environment from whence we spring-one and all.

Please leave this piece of land free of development and respect the need of local people to get away from the grime, noise and air pollution of the one way system and ugliness of (planner's) development of Newhaven in the name of health (lower than the National average) and the success of the port as gateway to the National Park and those arriving from Europe into what will appear (unnecessarily) to be a dustbin.

Yours Sincerely

**Representation ID: REP/301/GT01**Representor Details:

<b>Representor ID:</b>	REP/301
<b>Name:</b>	Peter Morgan
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>GT01 - Land south of The Plough</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	
<b>Sound:</b>	
<b>Representation:</b>	
<p>This response relates to the proposed Permanent Gypsy and Traveller site element of the LDC Part 2 planning consultation.</p> <p>This proposal is NOT sound, on the basis of several points:</p> <p>Firstly, LDC have received just this one site for assessment. Consequently they appear to be pushing hard for its approval, when in reality it is not remotely suitable.</p> <p>It is far too close to existing residential and business premises and is not remotely in</p>	

keeping with the overall rural position of the Plumpton Green village.

At an 'open' Plumpton parish council meeting, on 9th October, LDC representatives presented responses to resident's prior questions.

At this meeting it soon became apparent that LDC are struggling 'too hard' to justify this single site's suitability.

For example they cited 'other' village sites that work happily; eg Maresfield. That site is NOT in the village at all, but close to the recycling centre and far away from village properties.

LDC also said that they would not put forward land from their own holdings - potentially a much more controllable suggestion. No reasons were given for their blanket rejection of that idea.

I may not be totally closed to the proposed (0.6ha) site if there could be any assurance that its initiation would not ultimately make way for further expansion out into full 4ha field. LDC said that expansion was "not in current plans". That is NOT an assurance - quite the opposite in fact, and very worrying.

LDC (perhaps inadvertently) gave away their potential future approval for expansion via some of their other replies.....

When asked if the existing Offham site could be approved for expansion, the reply was 'no' - "because it is in the South Downs National Park". Plumpton Green is not in the SDNP so potentially expandable.

As a positive suggestion; if LDC successfully 'buy' the site, could they (and/or the land owner) covenant the land to preclude all future/further development on the 0.6ha AND the whole 4ha site?

That said, I am still entirely opposed to the proposal and approval of this land for a permanent Gypsy and Traveller site.

LDC will hopefully listen to the weight of contra opinion - and not try to bulldoze through their plans for this highly unsuitable site.

Find an LDC-owned 'brown-field' site and/or expand the current Lewes 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:** treadgrapes [REDACTED]  
**Sent:** 30 October 2018 14:40  
**To:** ldf  
**Subject:** Response to LDC Part 2 Planning Consultation  
  
**Categories:** LPP2 comment to code - stakeholder details have been added

This response relates to the proposed Permanent Gypsy and Traveller site element of the LDC Part 2 planning consultation.

This proposal is NOT sound, on the basis of several points:

Firstly, LDC have received just this one site for assessment. Consequently they appear to be pushing hard for its approval, when in reality it is not remotely suitable.

It is far too close to existing residential and business premises and is not remotely in keeping with the overall rural position of the Plumpton Green village.

At an 'open' Plumpton parish council meeting, on 9th October, LDC representatives presented responses to resident's prior questions.

At this meeting it soon became apparent that LDC are struggling 'too hard' to justify this single site's suitability.

For example they cited 'other' village sites that work happily; eg Maresfield. That site is NOT in the village at all, but close to the recycling centre and far away from village prooerties.

LDC also said that they would not put forward land from their own holdings - potentially a much more controllable suggestion. No reasons were given for their blanket rejection of that idea.

I may not be totally closed to the proposed (0.6ha) site if there could be any assurance that its initiation would not ultimately make way for further expansion out into full 4ha field. LDC said that expansion was "not in current plans". That is NOT an assurance - quite the opposite in fact, and very worrying.

LDC (perhaps inadvertantly) gave away their potential future approval for expansion via some of their other replies.....

When asked if the existing Offham site could be approved for expansion, the reply was 'no' - "because it is in the South Downs National Park". Plumpton Green is not in the SDNP so potentially expandable.

As a positive suggestion; if LDC successfully 'buy' the site, could they (and/or the land owner) covenant the land to preclude all future/further development on the 0 6ha AND the whole 4ha site?

That said, I am still entirely opposed to the proposal and approval of this land for a permanent Gypsy and Traveller site.

LDC will hopefully listen to the weight of contra opinion - and not try to bulldoze through their plans for this highly unsuitable site.

Find an LDC-owned 'brown-field' site and/or expand the current Lewes site.

Peter Morgan



Sent from my Samsung Galaxy smartphone.



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**Representation ID: REP/302/E1**Representor Details:

<b>Representor ID:</b>	REP/302
<b>Name:</b>	Alexandre Morin
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>E1 - Land at East Quay, Newhaven Port</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	
<b>Sound:</b>	
<b>Representation:</b>  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.	
<b>What changes do you suggest to make the document legally compliant or sound?</b>	

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

**Kemp, Emma**

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**From:** Alexandre F Morin [REDACTED]  
**Sent:** 05 November 2018 14:57  
**To:** ldf  
**Subject:** Please change policy E1 - Do not develop Tide Mills Beach in Newhaven  
**Categories:** Vanessa to deal with

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,  
Alexandre F Morin,  
[REDACTED]

**Representation ID: REP/303/E1**Representor Details:

<b>Representor ID:</b>	REP/303
<b>Name:</b>	Alison Morris
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>E1 - Land at East Quay, Newhaven Port</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	No
<b>Sound:</b>	No Not Justified Not Consistent with national policy
<b>Representation:</b>  I do not believe this policy to be justified or consistent with national planning policy as it does not take proper account of the destruction of environmentally significant habitat that will ensue, nor does it demonstrate a need for additional business premises in the area when there are empty premises already available.	

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

Spend less money on the folly that is the port access road and put something more appropriate and less intrusive in its place. What's wrong with the existing ferry terminal buildings and land??

**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/304/E1**Representor Details:

<b>Representor ID:</b>	REP/304
<b>Name:</b>	Keith Morris
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>E1 - Land at East Quay, Newhaven Port</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	
<b>Sound:</b>	
<b>Representation:</b>  Reference E1 I am writing to object most strenuously about potential industrialisation development plans for the Tide Mills area. A large area of a wildlife / beach would be destroyed and the surrounding areas would suffer. The Introduction of policy E1 does not reflect the vision for NewHaven within the local plan This Proposal fails to deliver on sustainable development and on the specific policies which relate to conservation and fails to safeguard a designated local wildlife site - a very poor reflection on this proposal By Permitting the potential industrialisation of a wildlife site, it fails to maximise the opportunities for this area Importantly - this Proposal will impact the existing issues with congestion and air quality, and will have an unacceptable cumulative impact in combination with the very high housing allocation It makes absolutely no sense to	

industrialise this unique and much loved section of SeaFord Bay The fact that the privately owned port authority are the landowners have no interest in Retaining a Wildlife Area - They appear solely interested in the potential MONEY that can be generated from their ownership And in Allowing this Proposal to remain in the Plan - the Council will appear to be complicit in this action I fully support the CAN Review and Comments of E1 Wildlife, local people and potential visitors enjoy the area,. Pollution is more than enough - -- and is far more than should be tolerated in NewHaven Port Area Tide Mills MUST surely be protected - -- - and remain as it currently stands

**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 15:09  
**To:** ldf  
**Cc:** [REDACTED]  
**Subject:** Tide Mills - Ref E1 Comments

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

### Reference E1

I am writing to object most strenuously about potential industrialisation development plans for the Tide Mills area.

A large area of a wildlife / beach would be destroyed and the surrounding areas would suffer.

The Introduction of policy E1 does not reflect the vision for NewHaven within the local plan

This Proposal fails to deliver on sustainable development and on the specific policies which relate to conservation  
and fails to safeguard a designated local wildlife site - a very poor reflection on this proposal

By Permitting the potential industrialisation of a wildlife site, it fails to maximise the opportunities for this area

Importantly - this Proposal will impact the existing issues with congestion and air quality, and will have an unacceptable cumulative impact in combination with the very high housing allocation

It makes absolutely no sense to industrialise this unique and much loved section of SeaFord Bay

The fact that the privately owned port authority are the landowners have no interest in Retaining a Wildlife Area -

They appear solely interested in the potential MONEY that can be generated from their ownership

And in Allowing this Proposal to remain in the Plan - the Council will appear to be complicit in this action

I fully support the CAN Review and Comments of E1

Wildlife, local people and potential visitors enjoy the area,.

Pollution is more than enough - -- and is far more than should be tolerated in NewHaven Port Area

Tide Mills MUST surely be protected - -- - and remain as it currently stands

Keith Morris



**Representation ID: REP/305/E1**Representor Details:

<b>Representor ID:</b>	REP/305
<b>Name:</b>	Maryvonne Morris
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>E1 - Land at East Quay, Newhaven Port</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	
<b>Sound:</b>	
<b>Representation:</b>	
Reference E1	
I am objecting strongly about possible industrial development plans on Tide Mills area.	
A large area of the beach would be destroyed, and surrounding areas would , therefore, suffer.	
Wildlife, local people, visitors enjoy the area,.	
Enough pollution already!	
Tide Mills MUST be protected	

<b>What changes do you suggest to make the document legally compliant or sound?</b>
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<b>Do you consider it necessary to participate at the Examination in Public?</b>
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<b>Why do you feel it is necessary to participate at the Examination in Public?</b>
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## Hodgson, Lilly

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**From:** Maryvonne Morris <[REDACTED]>  
**Sent:** 03 November 2018 09:46  
**To:** ldf  
**Subject:** Tide Mills Newhaven reference E1  
  
**Categories:** LPP2 comment to code - stakeholder details have been added

Reference E1

I am objecting strongly about possible industrial development plans on Tide Mills area.  
A large area of the beach would be destroyed, and surrounding areas would, therefore, suffer.  
Wildlife, local people, visitors enjoy the area,.  
Enough pollution already!  
Tide Mills MUST be protected  
M.Morris [REDACTED]

**Representation ID: REP/306/GT01**Representor Details:

<b>Representor ID:</b>	REP/306
<b>Name:</b>	Stephen Morris
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>GT01 - Land south of The Plough</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	
<b>Sound:</b>	
<b>Representation:</b>	<p>I would like to object on the these grounds:</p> <p>The site is greenfield, and will have an adverse effect on the character of the landscape</p> <p>The site is too far from the village services</p> <p>The site had already been declared unsuitable in 2012, and therefore the only reason it is now being reconsidered is because LDC have failed to find a better site.</p> <p>The village have not had the ample communication and consultation time deemed for such a site.</p>

<b>What changes do you suggest to make the document legally compliant or sound?</b>
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<b>Do you consider it necessary to participate at the Examination in Public?</b>
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<b>Why do you feel it is necessary to participate at the Examination in Public?</b>
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## Thea Davis

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**From:** Stephen william Morris <[REDACTED]>  
**Sent:** 02 November 2018 19:13  
**To:** ldf  
**Subject:** Objecting to Policy GT01 - Land South of The Plough q  
**Categories:** LPP2 comment to code - stakeholder details have been added

Dear Sir/ Madam,

I would like to object on the these grounds:

The site is greenfield, and will have an adverse effect on the character of the landscape

The site is too far from the village services

The site had already been declared unsuitable in 2012, and therefore the only reason it is now being reconsidered is because LDC have failed to find a better site.

The village have not had the ample communication and consultation time deemed for such a site.

Thanks  
Stephen

**Representation ID: REP/307/CH01**Representor Details:

<b>Representor ID:</b>	REP/307
<b>Name:</b>	Andrew Munton
<b>Organisation:</b>	<b>Reside Developments Ltd</b>
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Planning Consultant

Agent Details:

<b>Name:</b>
<b>Organisation:</b>

Contact Details:

<b>Email Address:</b>	amunton@residedevelopments.co.uk
<b>Address:</b>	The Dutch House 132-134 High Street Dorking Surrey RH4 1BG

Representation:

<b>Policy/Section:</b>	<b>CH01 - Glendene, Station Road</b>
<i>Do you consider the document to be:</i> <b>Legally Compliant:</b> <b>Sound:</b>	
<b>Representation:</b>  Land at the former Glendene Farm, Station Road, North Chailey, Lewes, BN8 4HG Further to our previous representations at the Reg 18 stage, where we supported the proposed allocation of this site, we write again in response to this latest consultation on Lewes District's Local Plan Part 2 (Site Allocations and Development Management Policies DPD - Pre-Submission version).	

Policy CH01 of the Pre-Submission Local Plan Part 2 proposes Land at Glendene Farm, Station Road for residential development to provide approximately ten dwellings. We continue to fully support this allocation.

The draft Policy sets out criteria, which the proposed allocation will need to comply with. We can confirm that, as required, the following criteria can all be met:

- a) Access, including provision for pedestrians and cyclists, can and will be provided from Station Road;
- b) Buildings can and will reflect the local character in terms of mass, height, form and position in the street scene. In particular the scheme layout has been designed to ensure the privacy of the neighbours to the site;
- c) The site has previously been subject to an assessment and evaluation of archaeological potential, which demonstrated that there are no known constraints. This position is unaltered;
- d) A surface water drainage scheme was submitted as part of the previous planning application, which was approved by the county council as the appropriate authority;
- e) A full ecological assessment was undertaken, and appropriate measures identified and agreed with the county ecologist as part of the previous planning application on this site. This position remains unchanged;
- f) A fully landscaped buffer of 15m between the site and adjacent Ancient Woodland has previously, and still is, a full aspect of the scheme on this site. As with the previous application on the site, in addition to the 15m buffer, the houses will be positioned with their gardens backing onto the Ancient Woodland, separating the buildings further; and
- g) The development will provide a connection to the sewerage system at the nearest point of adequate capacity, as advised by Southern Water.

As can be seen from the above, the scheme is fully compliant with the emerging policy requirements. We therefore conclude, that we fully support the proposed wording of Policy. Furthermore, we support the overall allocation of Glendene Farm for residential development and can confirm that it remains Suitable, Available and Achievable, where in particular it should be noted that there is a developer on board (Reside Developments) who has already submitted a planning application for the development of houses.

A pre-application request has been submitted to Lewes District Council on 2nd July 2018 under reference PREAPP/18/0197 to discuss the site layout in further detail with Planning Officers; the request is still being considered.

Please do not hesitate to contact me if you have any queries or want to discuss this request.

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



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

## **By Email**

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

02 November 2018

Dear Tondra

**Re: Lewes District Local Plan Part 2: Site Allocations and Development  
Management Policies DPD - Pre-Submission version - November 2018  
Land at the former Glendene Farm, Station Road, North Chailey, Lewes, BN8 4HG**

Further to our previous representations at the Reg 18 stage, where we supported the proposed allocation of this site, we write again in response to this latest consultation on Lewes District's Local Plan Part 2 (Site Allocations and Development Management Policies DPD - Pre-Submission version).

Policy CH01 of the Pre-Submission Local Plan Part 2 proposes Land at Glendene Farm, Station Road for residential development to provide approximately ten dwellings. We continue to fully support this allocation.

The draft Policy sets out criteria, which the proposed allocation will need to comply with. We can confirm that, as required, the following criteria can all be met:

- a) Access, including provision for pedestrians and cyclists, can and will be provided from Station Road;
- b) Buildings can and will reflect the local character in terms of mass, height, form and position in the street scene. In particular the scheme layout has been designed to ensure the privacy of the neighbours to the site;
- c) The site has previously been subject to an assessment and evaluation of archaeological potential, which demonstrated that there are no known constraints. This position is unaltered;

d) A surface water drainage scheme was submitted as part of the previous planning application, which was approved by the county council as the appropriate authority;

e) A full ecological assessment was undertaken, and appropriate measures identified and agreed with the county ecologist as part of the previous planning application on this site. This position remains unchanged;

f) A fully landscaped buffer of 15m between the site and adjacent Ancient Woodland has previously, and still is, a full aspect of the scheme on this site. As with the previous application on the site, in addition to the 15m buffer, the houses will be positioned with their gardens backing onto the Ancient Woodland, separating the buildings further; and

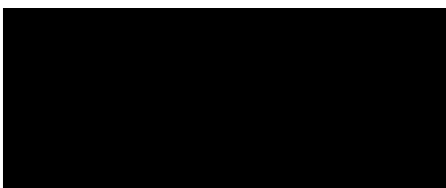
g) The development will provide a connection to the sewerage system at the nearest point of adequate capacity, as advised by Southern Water.

As can be seen from the above, the scheme is fully compliant with the emerging policy requirements. We therefore conclude, that we fully support the proposed wording of Policy. Furthermore, we support the overall allocation of Glendene Farm for residential development and can confirm that it remains Suitable, Available and Achievable, where in particular it should be noted that there is a developer on board (Reside Developments) who has already submitted a planning application for the development of houses.

A pre-application request has been submitted to Lewes District Council on 2nd July 2018 under reference PREAPP/18/0197 to discuss the site layout in further detail with Planning Officers; the request is still being considered.

Please do not hesitate to contact me if you have any queries or want to discuss this request.

Yours sincerely



**Andrew Munton BSc (Hons) MA MRTPI**  
**Director**

encs.

<b>Representation ID:</b> REP/308/BA01
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Representor Details:

<b>Representor ID:</b>	REP/308
<b>Name:</b>	Angela and Sean Murphy
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>BA01 - Land at Hillside Nurseries, High Street</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	
<b>Sound:</b>	
<b>Representation:</b>	
<p>Thank you for inviting us to respond to the above document and we are writing to object to certain elements of the Local Plan Part 2, specifically as it relates to BARCOMBE.</p> <p>'Para 2.53 Spatial Policy 2 of the Local Plan Part 1 sets the requirement for a minimum of 30 net additional dwellings to be provided within the settlement of Barcombe Cross. Housing site allocations to deliver the minimum are identified below and will deliver</p>	

approximately 42 net additional dwellings'.

\* Comment 2.53: The figure of 30 net houses will be exceeded by sites utilising

\* BA01- Hillside Nurseries and BA02 Land Adjacent to the High Street which will provide a total of 35 units net.

'Para 2.55. Barcombe Cross is a nucleated settlement largely concentrated at the junction of the High Street, School Hill and Barcombe Mills Road. The village is approximately three and a half miles north of Lewes town and four and a half miles south west of Uckfield, which lies within Wealden District'.

\* Comment 2.55: The proposed Bridgelands site stretches into the open countryside well beyond the nucleated development line of Barcombe Cross village.

'Para 2.58. The 2018 SHELAA as well as previous SHELAA documents identified a limited number of suitable sites to meet the planned level of housing for Barcombe Cross. This is due to the visually sensitive nature of the landscape surrounding areas adjacent to the village, limiting opportunities for expansion. Nonetheless three sites are proposed for allocation that will deliver approximately 42 net additional dwellings, 12 above the minimum requirement for the settlement'.

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challenges the capacity of drainage infrastructure.

\* Whilst the existing properties on the west side of Bridgelands have escaped serious flooding so far, the risk will be exacerbated by these proposed developments and flooding of the site BA03 is very likely.

Policy DM16 Former Lewes Sheffield Park Railway Line.

Para. 4.57. 'It is unrealistic to protect the route of the former Lewes/Sheffield Park Railway Line for future potential use as a public transport corridor because parts of the track have been developed. However, part of the route is currently used as a bridleway and much of the undeveloped part of the route provides a valuable wildlife habitat. The Council will therefore encourage opportunities to increase access to the countryside by enabling the provision of a footpath, cycleway or bridleway along the undeveloped part of the former line'.

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## CONCLUSIONS

\* The Housing Site Allocation BA03 is based on the incorrect premise that there is an incremental increase in density between the existing Bridgelands development and Site BA03. That is not the case as there will be a threefold increase in density. It will be contrary to Policy BA03 (b) and (c) in that it will not complement the character of the local built form, nor respect the character and appearance of the Conservation Area.

\* The housing allocation figure for Barcombe Cross of 30 net houses will be exceeded by sites utilising BA01- Hillside Nurseries and BA02 Land Adjacent to the High Street which will provide a total of 35 units net.

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<b>Do you consider it necessary to participate at the Examination in Public?</b>
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<b>Why do you feel it is necessary to participate at the Examination in Public?</b>
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**Representation ID: REP/308/BA02**Representor Details:

<b>Representor ID:</b>	REP/308
<b>Name:</b>	Angela and Sean Murphy
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>BA02 - Land adjacent to the High Street</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	
<b>Sound:</b>	
<b>Representation:</b>	<p>'Para 2.53 Spatial Policy 2 of the Local Plan Part 1 sets the requirement for a minimum of 30 net additional dwellings to be provided within the settlement of Barcombe Cross. Housing site allocations to deliver the minimum are identified below and will deliver approximately 42 net additional dwellings'.</p> <p>* Comment 2.53: The figure of 30 net houses will be exceeded by sites utilising</p>

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<b>Representation ID:</b> REP/308/BA03
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Representor Details:

<b>Representor ID:</b>	REP/308
<b>Name:</b>	Angela and Sean Murphy
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>BA03 - Land at Bridgelands</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	
<b>Sound:</b>	
<b>Representation:</b>	<p>Para 2.53 Spatial Policy 2 of the Local Plan Part 1 sets the requirement for a minimum of 30 net additional dwellings to be provided within the settlement of Barcombe Cross. Housing site allocations to deliver the minimum are identified below and will deliver approximately 42 net additional dwellings'.</p> <p>* Comment 2.53: The figure of 30 net houses will be exceeded by sites utilising</p>



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## CONCLUSIONS

\* The Housing Site Allocation BA03 is based on the incorrect premise that there is an incremental increase in density between the existing Bridgelands development and Site BA03. That is not the case as there will be a threefold increase in density. It will be contrary to Policy BA03 (b) and (c) in that it will not complement the character of the local built form, nor respect the character and appearance of the Conservation Area.

\* The housing allocation figure for Barcombe Cross of 30 net houses will be exceeded by sites utilising BA01- Hillside Nurseries and BA02 Land Adjacent to the High Street which will provide a total of 35 units net.

\* For all the above reasons it is requested that Policy BA03 Land at Bridgelands be removed from the Lewes District Local Plan Part 2 pre-submission.

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

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

<b>Representation ID:</b> REP/308/DM16
--

Representor Details:

<b>Representor ID:</b>	REP/308
<b>Name:</b>	Angela and Sean Murphy
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>DM16: Children's Play Space in New Housing Development</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	
<b>Sound:</b>	
<b>Representation:</b>	<p>Further to our conversation this morning, I would refer you to Policy Nos DM16 and DM17 in the Lewes Local Plan Part 2 - pre-submission - regarding the policies for the Old Lewes to Sheffield Park railway line as a wildlife area and bridle way etc.</p> <p>We would draw your attention to Policy DM16 and DM17 which are in conflict with Policy</p>

BA03. The designated wildlife area on the old railway line abuts the proposed development site.

Policy DM16 Former Lewes Sheffield Park Railway Line.

Para. 4.57. 'It is unrealistic to protect the route of the former Lewes/Sheffield Park Railway Line for future potential use as a public transport corridor because parts of the track have been developed. However, part of the route is currently used as a bridleway and much of the undeveloped part of the route provides a valuable wildlife habitat. The Council will therefore encourage opportunities to increase access to the countryside by enabling the provision of a footpath, cycleway or bridleway along the undeveloped part of the former line'.

Policy DM17: Former Lewes/Sheffield Park Railway Line Informal recreational uses, such as walking, cycling and horse-riding, will be 86 permitted along the route of the undeveloped part of the Lewes/Sheffield Park railway line where it can be demonstrated that such uses would maintain or enhance the biodiversity value of the route.

Development which would prejudice such uses will not be

be permitted unless proposals are accompanied by alternative route provision.

Comments on Policy DM 16 and DM 17:

\* As well as Policy BA03 land at Bridgelands, we would draw your attention to Policy DM16 and DM17 which are in conflict with Policy BA03.

\* The disused railway line approaches Barcombe from the north, as illustrated on Inset Map 6 but its natural and most direct route to the nearest point on the public highway, at the High Street via Bridgelands, would be blocked by housing allocation BA03.

\* This 'blocking' of what must be the best route to implement the footpath/bridleway/cycleway in the Barcombe area in terms of user requirements and cost effectiveness to the public purse conflicts with countryside access objectives.

**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?**

<b>Representation ID:</b> REP/308/DM17
--

Representor Details:

<b>Representor ID:</b>	REP/308
<b>Name:</b>	Angela and Sean Murphy
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>DM17: Former Lewes/Sheffield Park Railway Line</b>
<p><i>Do you consider the document to be:</i></p> <p><b>Legally Compliant:</b></p> <p><b>Sound:</b></p>	
<p><b>Representation:</b></p> <p>Further to our conversation this morning, I would refer you to Policy Nos DM16 and DM17 in the Lewes Local Plan Part 2 - pre-submission - regarding the policies for the Old Lewes to Sheffield Park railway line as a wildlife area and bridle way etc.</p> <p>We would draw your attention to Policy DM16 and DM17 which are in conflict with Policy BA03. The designated wildlife area on the old railway line abuts the proposed</p>	



development site.

Policy DM16 Former Lewes Sheffield Park Railway Line.

Para. 4.57. 'It is unrealistic to protect the route of the former Lewes/Sheffield Park Railway Line for future potential use as a public transport corridor because parts of the track have been developed. However, part of the route is currently used as a bridleway and much of the undeveloped part of the route provides a valuable wildlife habitat. The Council will therefore encourage opportunities to increase access to the countryside by enabling the provision of a footpath, cycleway or bridleway along the undeveloped part of the former line'.

Policy DM17: Former Lewes/Sheffield Park Railway Line Informal recreational uses, such as walking, cycling and horse-riding, will be 86 permitted along the route of the undeveloped part of the Lewes/Sheffield Park railway line where it can be demonstrated that such uses would maintain or enhance the biodiversity value of the route.

Development which would prejudice such uses will not be

be permitted unless proposals are accompanied by alternative route provision.

Comments on Policy DM 16 and DM 17:

\* As well as Policy BA03 land at Bridgelands, we would draw your attention to Policy DM16 and DM17 which are in conflict with Policy BA03.

\* The disused railway line approaches Barcombe from the north, as illustrated on Inset Map 6 but its natural and most direct route to the nearest point on the public highway, at the High Street via Bridgelands, would be blocked by housing allocation BA03.

\* This 'blocking' of what must be the best route to implement the footpath/bridleway/cycleway in the Barcombe area in terms of user requirements and cost effectiveness to the public purse conflicts with countryside access objectives.

**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 and Eastbourne Planning Policy Consultations  
Lewes District Local Plan Part 2: Site Allocations and Development Management Policies  
DPD - Pre-Submission version 28-10-18

Thank you for inviting us to respond to the above document and we are writing to object to certain elements of the Local Plan Part 2, specifically as it relates to BARCOMBE.

*'Para 2.53 Spatial Policy 2 of the Local Plan Part 1 sets the requirement for a minimum of 30 net additional dwellings to be provided within the settlement of Barcombe Cross. Housing site allocations to deliver the minimum are identified below and will deliver approximately 42 net additional dwellings'.*

- **Comment 2.53:** The figure of 30 net houses will be exceeded by sites utilising **BA01- Hillside Nurseries** and **BA02 Land Adjacent to the High Street** which will provide a total of **35 units net**.

*'Para 2.55. Barcombe Cross is a nucleated settlement largely concentrated at the junction of the High Street, School Hill and Barcombe Mills Road. The village is approximately three and a half miles north of Lewes town and four and a half miles south west of Uckfield, which lies within Wealden District'.*

- **Comment 2.55:** The proposed Bridgelands site stretches into the open countryside well beyond the nucleated development line of Barcombe Cross village.

*'Para 2.58. The 2018 SHELAA as well as previous SHELAA documents identified a limited number of suitable sites to meet the planned level of housing for Barcombe Cross. This is due to the visually sensitive nature of the landscape surrounding areas adjacent to the village, limiting opportunities for expansion. Nonetheless three sites are proposed for allocation that will deliver approximately 42 net additional dwellings, 12 above the minimum requirement for the settlement'.*

- **Comment 2.58:** BA01 and BA02 will deliver 35 units. Therefore, BA03 site should be removed from the Plan as it is a problematic and unsustainable. 42 units would be too much growth in too short a time for the small settlement of Barcombe Cross. There are currently 342 dwellings in Barcombe Cross and to impose 42 dwellings on three sites in close proximity would represent an increase of 12 percent. The other two sites will provide the necessary range of houses required with a nine percent increase and will integrate better into the village.

*'Para 2.75 Access to BA03 – Access to the site is from Bridgelands which serves a small number of properties. Initial technical highways work has been undertaken by the proponent and demonstrates that the necessary junction improvements to achieve the required visibility to accommodate the additional dwellings, and proposed shared pedestrian access, are acceptable in principle with East Sussex County Council, the highway authority'.*

- **Comment 2.75:** The access to Bridgelands' has been referred to as "sub-standard" as the old bridge on the High Street is humped and blocks visibility, plus there is a blind corner further up the road. The proposed changes to this junction will not provide any

safety improvements which will worsen with any increase in traffic. It is a private road which has to be maintained by Bridgelands' residents. This access needs to be looked at in the context of the access to BA01 and BA02 which is a short distance away and the increased traffic created by proposed 35 new dwellings. If all 3 sites (BA01, BA02 and BA03) were to proceed at once there would be ensuing traffic chaos.

*Para 2.76. The site is a small, linear and vacant parcel of land tapering at the both the north and south end. The site is well contained from wider surrounding views by existing development and disused railway embankment to the west, and by mature trees to the north and east. Bridgelands is characterised by larger, detached two storey properties set back from the road. The development of this site should be sensitively designed to complement the local character, as well as the site's village edge location, bearing in mind the general need for smaller housing units, as reflected in Core Policy 2 of Local Plan Part 1.*

#### **COMMENTS 2.76:**

1. The net residential density for the 5 current houses at Bridgelands is 5 dph. See Appendix 1. The 'indicative density achieved on site is 15 dph' - significant disparity in densities would give rise to a residential development markedly different and out of character with its surroundings. This has not been correctly assessed, as is required by the Housing Site Options Background Report, Table 1 and Appendix 1, Section H.
2. The proposed 7 dwellings for BA03 do not take into account the existing houses with regard to density or design. The existing low density 4 house development adjoining and to the south of The Old Station, by providing a similar residential character, complements the Conservation Area. Any development on Site BA03 should similarly complement the Conservation Area. This site should be removed from the Local Plan as it cannot meet the density requirement for inclusion in the plan. The requirement for smaller housing units has been recognised and as outlined elsewhere in the Plan and will be met by Sites BA01 and BA02, which are more suited to this type of development.
3. Density measures provide a feel for the intensity of the built form. A new development nearly three times the density of the adjoining development will not complement the local character. The objectives of Core Policy 2 are to provide a range of dwelling types to meet local need within the context of conserving and enhancing local character. It is not a requirement for all allocated sites to provide small houses: there are a range of needs and demands. A consideration of Proposal BA02 adjacent to the High St and BA01 Hillside in Barcombe Cross suggests they are better able to provide smaller units to meet local demand.

*'Para 2.77. A small section of the site's southern boundary is adjacent to the Barcombe Cross Conservation Area. The Barcombe Cross Conservation Area Appraisal (CAA) highlights that the historic core is focused around the crossroads to the east of the site. The CAA notes that the residential property 'The Old Station House' located to the south west of the site is identified as one which makes a contribution to the Conservation Area'.*

- **Comment 2.77:** The southern boundary of site BA03 abuts a conservation area. Development of this site will disrupt a wildlife corridor, which presently connects this conservation area to the “Wild about Barcombe” reserve and the wildlife area along the old Lewes to Sheffield Park Railway line Policy DM17 in the Plan. It is recognised that isolated conservation areas are of very limited ecological value and that corridors allowing free movement of wildlife are essential to ecological integrity. Site BA03 currently supports a diverse range of wildlife including grass snakes, slow worms, several species of bats and owls, glow worms, frogs, toads and newts.

*Para 2.79. ‘The site is within Flood Risk Zone 1 (the least at risk of flooding). Despite this, the site and surrounding area currently experiences issues of surface water flooding. The site presently accommodates a pond and number of ditches. Therefore, to ensure that no dwellings are placed in an area of flood risk and the flooding situation is not exacerbated by the development of this site, a site specific flood risk assessment will be required and any necessary mitigation measures, including appropriate Sustainable Urban Drainage System (SuDs), implemented accordingly. The ponds and ditches offer potential ecological value, therefore in considering mitigation options regard should be given to opportunities for positive contributions to be made towards valuable habitats for wildlife and future residents’ amenity’.*

#### **Comments 2.79:**

1. The pond on the proposed site is at the lowest point in the surrounding area, sitting mainly on clay and all the run-off from the nearby roads, fields and ditches drains into it. The pond is a vital element of the delicate balance of drainage. This should not just be considered in relation to BA03 but as a whole with BA01 and particularly BA02 with its proposed 25 houses which will have a huge impact on the local drainage system.
2. Flood risk - we have read all the reports relating to flood risk and can find no reference to the flash floods the residents of Bridgelands suffer from. Flash floods are becoming more common and, with climate change, that will be exacerbated. No local residents have been contacted about this issue. All the properties in Bridgelands have been affected by flooding. The land on both east and west sides of Bridgelands slopes downwards, with Bridgelands being the lowest point in the topography. Flooding at the rear of the properties on the west side of Bridgelands, the station garden and the land to the east, including part of site BA03 occurs every winter. We have submitted photographic evidence of these events to the LDC Chief Planning Officer.
3. In the year 2000, all the gardens of the properties in Bridgelands and most of the area designated BA03 were seriously flooded and the flood water was only a few feet away from entering houses. On another occasion, although the RSPCA were contacted, a horse trying to drink from the pond in site BA03, sank so deeply into the mud that it drowned. ESF&R were called to remove the body of the horse and this should appear on their records.

4. Surface run off from the developments proposed at sites BA01, BA02 and BA03, where a total of 42 housing units are envisaged will drain to site BA03. At present, these Greenfield sites allow natural percolation of rainfall to the underground aquifers. Development will concentrate run off towards Bridgelands and inevitably exacerbate flooding. It should also be noted that road drains from Barcombe High Street are culverted to the ditch adjacent to the western aspect of Bridgelands. This ditch also receives run off from the land to the east via a nineteenth century culvert running beneath the gardens of numbers 1 and 2 Bridgelands. The combination of these already challenges the capacity of drainage infrastructure.
5. Whilst the existing properties on the west side of Bridgelands have escaped serious flooding so far, the risk will be exacerbated by these proposed developments and flooding of the site BA03 is very likely.

**Policy DM16 Former Lewes Sheffield Park Railway Line.**

*Para. 4.57. 'It is unrealistic to protect the route of the former Lewes/Sheffield Park Railway Line for future potential use as a public transport corridor because parts of the track have been developed. However, part of the route is currently used as a bridleway and much of the undeveloped part of the route provides a valuable wildlife habitat. The Council will therefore encourage opportunities to increase access to the countryside by enabling the provision of a footpath, cycleway or bridleway along the undeveloped part of the former line'.*

***Policy DM17:*** *Former Lewes/Sheffield Park Railway Line Informal recreational uses, such as walking, cycling and horse-riding, will be 86 permitted along the route of the undeveloped part of the Lewes/Sheffield Park railway line where it can be demonstrated that such uses would maintain or enhance the biodiversity value of the route. Development which would prejudice such uses will not be permitted unless proposals are accompanied by alternative route provision.*

**Comments on Policy DM 16, para 4.57 and DM 17:**

1. As well as Policy BA03 land at Bridgelands, we would draw your attention to Policy DM16 and DM17 which are in conflict with Policy BA03.
2. The disused railway line approaches Barcombe from the north, as illustrated on Inset Map 6 but its natural and most direct route to the nearest point on the public highway, at the High Street via Bridgelands, would be blocked by housing allocation BA03.
3. This 'blocking' of what must be the best route to implement the footpath/bridleway/cycleway in the Barcombe area in terms of user requirements and cost effectiveness to the public purse conflicts with countryside access objectives.

## CONCLUSIONS

1. The Housing Site Allocation BA03 is based on the incorrect premise that there is an incremental increase in density between the existing Bridgelands development and Site BA03. That is not the case as there will be a threefold increase in density. It will be contrary to Policy BA03 (b) and (c) in that it will not complement the character of the local built form, nor respect the character and appearance of the Conservation Area.
2. The housing allocation figure for Barcombe Cross of 30 net houses will be exceeded by sites utilising **BA01- Hillside Nurseries** and **BA02 Land Adjacent to the High Street** which will provide a total of **35 units net**.
3. For all the above reasons it is requested that Policy BA03 Land at Bridgelands be removed from the Lewes District Local Plan Part 2 pre-submission.

Signed:

Pauline & Richard Cranfield, [REDACTED]  
[REDACTED]

Anja & Robin St.Clair-Jones, [REDACTED]  
[REDACTED]

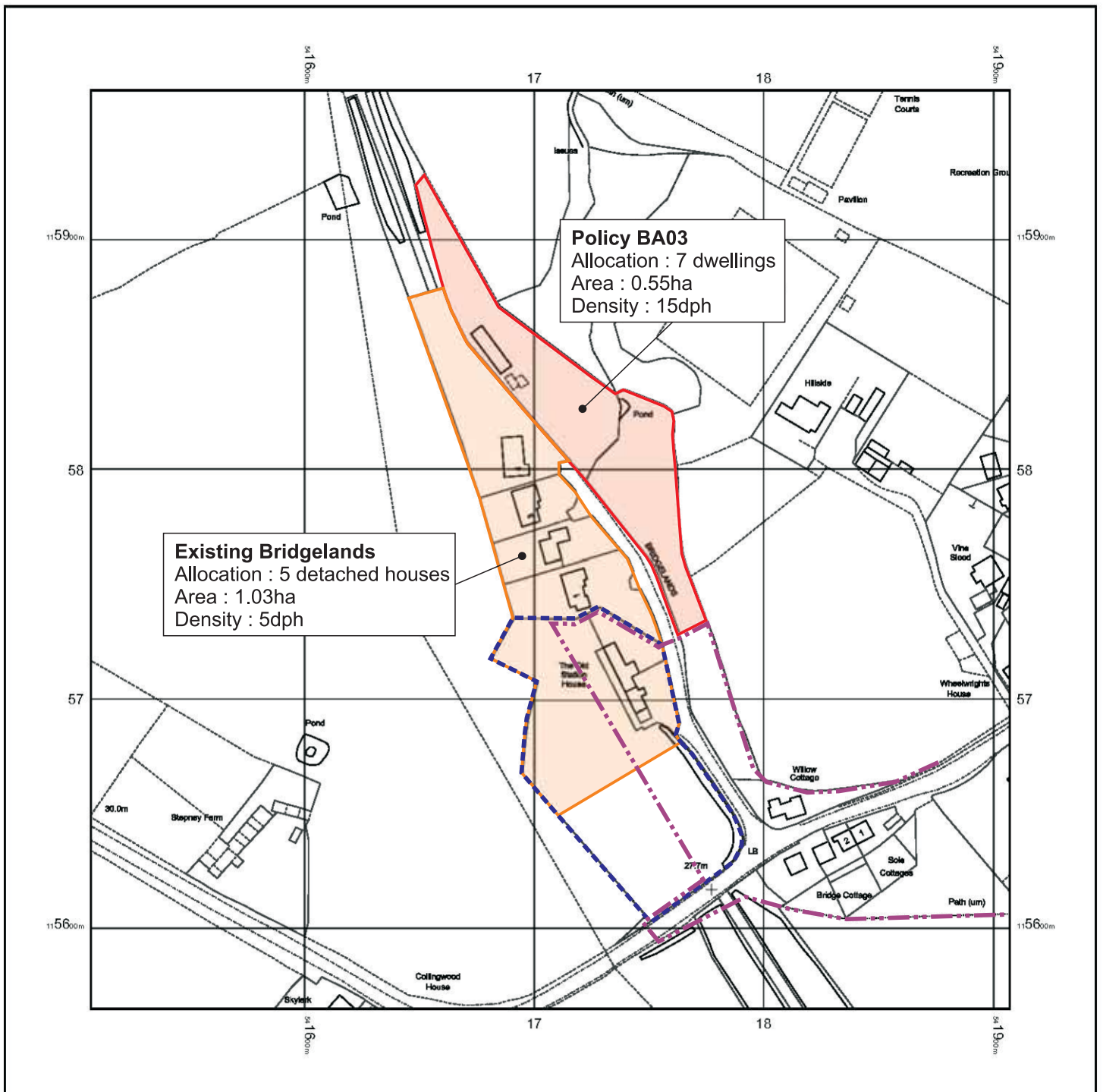
Dr J E St.Pierre, [REDACTED]  
[REDACTED]

Angela & Sean Murphy [REDACTED]  
[REDACTED]  
[REDACTED]

Alasdair & Juliet Smith, [REDACTED]  
[REDACTED]

5.11.18  
DJB/amm





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## APPENDIX 1

Lewes District Local Plan Part 2 Consultation  
Objection to Policy BA03 Bridgelands, Barcombe

- |  |                                   |   |                                     |
|--|-----------------------------------|---|-------------------------------------|
|  | Objection Site                    |  | Old Station House Property Boundary |
|  | Adjoining Residential Development |  | Conservation Area Boundary          |

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**Kemp, Emma**

**From:** Thom, Tondra  
**Sent:** 05 November 2018 14:27  
**To:** Carpenter, Natalie; King, Robert  
**Cc:** ldf  
**Subject:** FW: Application No: LW/18/0627 - Residential Development - Bridgelands  
  
**Categories:** LPP2 comment to code - stakeholder details have been added

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**From:** Hill, Andrew  
**Sent:** 05 November 2018 14:19  
**To:** Thom, Tondra  
**Subject:** FW: Application No: LW/18/0627 - Residential Development - Bridgelands

FYI

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**From:** Angela Murphy [REDACTED]  
**Sent:** 05 November 2018 14:08  
**To:** Hill, Andrew  
**Subject:** Application No: LW/18/0627 - Residential Development - Bridgelands

Dear Mr Hill

Further to our conversation this morning, I would refer you to Policy Nos DM16 and DM17 in the Lewes Local Plan Part 2 - pre-submission - regarding the policies for the Old Lewes to Sheffield Park railway line as a wildlife area and bridle way etc.

We would draw your attention to Policy DM16 and DM17 which are in conflict with Policy BA03. The designated wildlife area on the old railway line abuts the proposed development site.

**Policy DM16 Former Lewes Sheffield Park Railway Line.**



Para. 4.57. *'It is unrealistic to protect the route of the former Lewes/Sheffield Park Railway Line for future potential use as a public transport corridor because parts of the track have been developed. However, part of the route is currently used as a bridleway and much of the undeveloped part of the route provides a valuable wildlife habitat. The Council will therefore encourage opportunities to increase access to the countryside by enabling the provision of a footpath, cycleway or bridleway along the undeveloped part of the former line'.*

**Policy DM17:** *Former Lewes/Sheffield Park Railway Line Informal recreational uses, such as walking, cycling and horse-riding, will be 86 permitted along the route of the undeveloped part of the Lewes/Sheffield Park railway line where it can be demonstrated that such uses would maintain or enhance the biodiversity value of the route. Development which would prejudice such uses will not be permitted unless proposals are accompanied by alternative route provision.*

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1. As well as Policy BA03 land at Bridgelands, we would draw your attention to Policy DM16 and DM17 which are in conflict with Policy BA03.
2. The disused railway line approaches Barcombe from the north, as illustrated on Inset Map 6 but its natural and most direct route to the nearest point on the public highway, at the High Street via Bridgelands, would be blocked by housing allocation BA03.
3. This 'blocking' of what must be the best route to implement the footpath/bridleway/cycleway in the Barcombe area in terms of user requirements and cost effectiveness to the public pursue conflicts with countryside access objectives.

Kind Regards

Angela & Sean Murphy

---

**Representation ID: REP/309/E1**Representor Details:

<b>Representor ID:</b>	REP/309
<b>Name:</b>	Irene Mynott
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>E1 - Land at East Quay, Newhaven Port</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	
<b>Sound:</b>	
<b>Representation:</b> <p>I am emailing to object to the New Policy E1 for the beach area of Tidemills. This is a much used area for recreation which can be reached without using transport., which given the congestion and fumes on our local roads, should be a consideration. The area is used all year round, not just seasonal like many seaside places. It looks as if part of the proposed new plan goes into the sea. Does this mean that walkers and fishermen would not be able to access the shoreline and pier on the east side of the estuary?</p> <p>There seems no point to local consultation where Newhaven is concerned. No one seems to take the residents of the town into consideration when agreeing to industrial plans.</p>	

I hope that this time our views are 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:** Irene Mynott <[REDACTED]>  
**Sent:** 05 November 2018 10:59  
**To:** ldf  
**Subject:** New Policy E1  
**Categories:** Vanessa to deal with

To Whom It May Concern

I am emailing to object to the New Policy E1 for the beach area of Tidemills. This is a much used area for recreation which can be reached without using transport., which given the congestion and fumes on our local roads, should be a consideration. The area is used all year round, not just seasonal like many seaside places. It looks as if part of the proposed new plan goes into the sea. Does this mean that walkers and fishermen would not be able to access the shoreline and pier on the east side of the estuary?

There seems no point to local consultation where Newhaven is concerned. No one seems to take the residents of the town into consideration when agreeing to industrial plans.

I hope that this time our views are taken into consideration.

Regards, Irene Mynott.

Sent from [Mail](#) for Windows 10

**Representation ID: REP/310/E2**Representor Details:

<b>Representor ID:</b>	REP/310
<b>Name:</b>	Simon Neale
<b>Organisation:</b>	<b>University of Sussex</b>
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Local group or organisation

Agent Details:

<b>Name:</b>
<b>Organisation:</b>

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	4th Floor, Bramber House, University of Sussex Refectory Road Falmer BN1 9QU

Representation:

<b>Policy/Section:</b>	<b>E2 - Land adjacent to American Express Community Stadium, Village Way, Falmer</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	Yes
<b>Sound:</b>	Yes
<b>Representation:</b>  The University supports this allocation. It provides the opportunity for development of the site to assist with the further development and enhancement of the role of the Lewes Road area as Brighton and Hove's academic corridor, in accordance with Policy DA3 of the Brighton and Hove City Plan Part One. With respect to the potential of the land to deliver health or education uses, the proposed allocation accords with Strategic Objective 5 and Core Policy 7 of the District Council's Local Plan Part 1 Joint Core	

**Strategy.**

The University welcomes and supports the recognition within supporting paragraph 3.21 of the draft Plan that the design and massing of any proposed development will need to consider the visual impact of the development on the Grade II registered historic Stanmer Park and Listed Buildings within the University of Sussex campus.

It is noted that there is no acknowledgement of the need for improvements to be made to access off and onto the A27 from the B2123 Falmer to Woodingdean Road in view of existing traffic congestion at peak times. The University believes this problem should be acknowledged in the supporting text to the policy with the need for consideration to be given to the scope for improvements to be made to this junction as part of the development proposals 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?** No

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

**Representation ID: REP/311/GT01**Representor Details:

<b>Representor ID:</b>	REP/311
<b>Name:</b>	Kirstie Negus
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>GT01 - Land south of The Plough</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	
<b>Sound:</b>	
<b>Representation:</b> <p>I write to express my objection to the Local Plan Part 2 in which you propose a permanent gypsy/travellers' site to the north of The Old Brickworks, Plumpton Green.</p> <p>I am a local resident and feel strongly that this use of the land would be detrimental in several ways.</p> <p>The proposed site is a green field site at the northern approach to the village and is an attractive and appealing gateway to the village: a travellers' site would ruin the rural character of the area, dissuade the many passing motorists and cyclists from visiting our village (and supporting its businesses) and would fail to preserve the open space.</p> <p>Moreover I am concerned that if the site were allowed, then this would lead to further</p>	

applications in the future which could result in the expansion of the travellers' site, further impacting negatively on the natural beauty of the area. I am also concerned that any site would be difficult to contain and manage.

Finally, as a regular customer of companies operating at The Old Brickworks and as a supporter of local business and our rural economy, I am very worried about the real fear that should the site go ahead, they will all leave (as has been indicated to me). This would be a disaster for the local economy, as I know that the businesses there spend a lot of money at the village shop and pubs. I also fear that should the businesses go elsewhere, then some of the workers there will lose their jobs. I would also have to look outside the area for the services which I currently use.

I urge the council not to go ahead with this 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:** KIRSTIE NEGUS <[REDACTED]>  
**Sent:** 17 October 2018 10:23  
**To:** ldf  
**Subject:** Lewes District Local Plan Part 2  
  
**Categories:** LPP2 comment to code - stakeholder details have been added

Dear Sir/Madam

I write to express my objection to the Local Plan Part 2 in which you propose a permanent gypsy/travellers' site to the north of The Old Brickworks, Plumpton Green.

I am a local resident and feel strongly that this use of the land would be detrimental in several ways.

The proposed site is a green field site at the northern approach to the village and is an attractive and appealing gateway to the village: a travellers' site would ruin the rural character of the area, dissuade the many passing motorists and cyclists from visiting our village (and supporting its businesses) and would fail to preserve the open space.

Moreover I am concerned that if the site were allowed, then this would lead to further applications in the future which could result in the expansion of the travellers' site, further impacting negatively on the natural beauty of the area. I am also concerned that any site would be difficult to contain and manage.

Finally, as a regular customer of companies operating at The Old Brickworks and as a supporter of local business and our rural economy, I am very worried about the real fear that should the site go ahead, they will all leave (as has been indicated to me). This would be a disaster for the local economy, as I know that the businesses there spend a lot of money at the village shop and pubs. I also fear that should the businesses go elsewhere, then some of the workers there will lose their jobs. I would also have to look outside the area for the services which I currently use.

I urge the council not to go ahead with this proposal.

Your faithfully

Mrs Kirstie Negus  
[REDACTED]

**Representation ID: REP/312/GT01**Representor Details:

<b>Representor ID:</b>	REP/312
<b>Name:</b>	Trevor Negus
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>GT01 - Land south of The Plough</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	
<b>Sound:</b>	
<b>Representation:</b>	
<p>I write to register my objection to the proposed Travellers site adjacent to the Old Brickworks Plumpton Green.</p> <p>The site was not referenced under the Neighbourhood Plan, which already has allocated large scale development within Plumpton. This appears to be a last minute 'tag on' of 5 more 'permanent' dwellings and toilet block. One can only assume this was done deliberately to avoid proper scrutiny and therefore runs counter to the government's Planning Policy for Travellers which attempts to harmonise the local and travelling community.</p> <p>The site does not meet criteria for public transport, since there is an irregular bus</p>	

service, which in all likelihood will dwindle further. There is no pavement access to the bus stop in any case, and equally there is no pavement to the village. This means that children attending the local school from the site would need to walk in the road, where there is a 60 mph speed limit. This issue would be compounded further, particularly in the winter, as there is no street lighting from the site to the village.

The LDC should be promoting local business, and it appears that many of those businesses based in the Old Brickworks intend to consider their position if the site goes ahead. This would not only impact rural employment, it would also reduce spending in the village shop and local pubs. This risks the closure of another village pub and perhaps even the local shop.

The land is a Greenfield site at the entrance to a downland village. Having a development, with an accompanying toilet block, in this position cannot be argued as 'in keeping' with the local surroundings.

Finally there is concern over the reality of delivery. It appears no agreement over price or actual site size has been agreed with the vendor which implies the LDC are simply speculating rather than putting forward a meaningful proposal.

Please confirm receipt of this letter

**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:** Trevor Negus [REDACTED]  
**Sent:** 22 October 2018 12:52  
**To:** ldf  
**Subject:** Plumpton Traveller Site Objection  
**Attachments:** Plumpton Traveller Site Objection.docx  
  
**Categories:** LPP2 comment to code - stakeholder details have been added

Dear Sir / Madam

I write to register my objection to the proposed Travellers site adjacent to the Old Brickworks Plumpton Green.

The site was not referenced under the Neighbourhood Plan, which already has allocated large scale development within Plumpton. This appears to be a last minute 'tag on' of 5 more 'permanent' dwellings and toilet block. One can only assume this was done deliberately to avoid proper scrutiny and therefore runs counter to the government's Planning Policy for Travellers which attempts to harmonise the local and travelling community.

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The land is a Greenfield site at the entrance to a downland village. Having a development, with an accompanying toilet block, in this position cannot be argued as 'in keeping' with the local surroundings.

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Please confirm receipt of this letter

Regards

Trevor Negus

Dear Sir / Madam

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The site was not referenced under the Neighbourhood Plan, which already has allocated large scale development within Plumpton. This appears to be a last minute 'tag on' of 5 more 'permanent' dwellings and toilet block. One can only assume this was done deliberately to avoid proper scrutiny and therefore runs counter to the government's Planning Policy for Travellers which attempts to harmonise the local and travelling community.

The site does not meet criteria for public transport, since there is an irregular bus service, which in all likelihood will dwindle further. There is no pavement access to the bus stop in any case, and equally there is no pavement to the village. This means that children attending the local school from the site would need to walk in the road, where there is a 60 mph speed limit. This issue would be compounded further, particularly in the winter, as there is no street lighting from the site to the village.

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Finally there is concern over the reality of delivery. It appears no agreement over price or actual site size has been agreed with the vendor which implies the LDC are simply speculating rather than putting forward a meaningful proposal.

Please confirm receipt of this letter

Regards

Trevor Negus

<b>Representation ID: REP/313/E1</b>
--------------------------------------

Representor Details:

<b>Representor ID:</b>	REP/313
<b>Name:</b>	Kate Newman
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the Public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	E1 - Land at East Quay, Newhaven Port
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	
<b>Sound:</b>	
<b>Representation:</b>	
This will cause a loss of biodiversity and does not reflect sustainable development as per original plans.	
<b>What changes do you suggest to make the document legally compliant or sound?</b>	
<b>Do you consider it necessary to participate at the Examination in Public?</b>	
<b>Why do you feel it is necessary to participate at the Examination in Public?</b>	

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**Hodgson, Lilly**

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**From:** Kate Newman [REDACTED]  
**Sent:** 05 November 2018 19:36  
**To:** ldf  
**Subject:** Newhaven Beach Industrial Expansion  
  
**Categories:** Vanessa to deal with

This will cause a loss of biodiversity and does not reflect sustainable development as per original plans.

<http://www.travelfordifference.com>



<b>Representation ID:</b> REP/314/HSA
---------------------------------------

Representor Details:

<b>Representor ID:</b>	REP/314
<b>Name:</b>	Declan Newman
<b>Organisation:</b>	<b>Source Stream Ltd.</b>
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>
<b>Organisation:</b>

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>Housing Site Allocations</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	Yes
<b>Sound:</b>	Yes
<b>Representation:</b>	
<b>What changes do you suggest to make the document legally compliant or sound?</b>	

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

**Representation ID: REP/315/E1**Representor Details:

<b>Representor ID:</b>	REP/315
<b>Name:</b>	Lucy Newman
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>E1 - Land at East Quay, Newhaven Port</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	
<b>Sound:</b>	
<b>Representation:</b>	
<p>I would like to express my views on the plans for the proposals for Newhaven</p> <p>The context of these comments is in light of the following reports by the United Nations and World Wildlife fund.</p> <p>United Nations: Stop biodiversity loss or we could face our own extinction, warns UN (<a href="https://www.theguardian.com/environment/2018/nov/03/stop-biodiversity-loss-or-we-could-face-our-own-extinction-warns-un?CMP=Share_AndroidApp_Email">https://www.theguardian.com/environment/2018/nov/03/stop-biodiversity-loss-or-we-could-face-our-own-extinction-warns-un?CMP=Share_AndroidApp_Email</a>)</p>	

United Nations- 12 years to limit climate change

(<https://www.theguardian.com/environment/2018/oct/08/global-warming-must-not-exceed-15c-warns-landmark-un-report>)

WWF - Wildlife has declined 60% in 40 Years

(<https://www.independent.co.uk/environment/wildlife-nature-decline-extinct-paris-climate-agreement-wwf-elephants-rhinos-polar-bears-a8607341.html>)

United Nations Sustainable Development Goals. 13, 14 and 15

(<http://www.undp.org/content/undp/en/home/sustainable-development-goals.html>)

The plans for Newhaven (the area of Tide Mills beach) contribute and stimulate climate change and depletion of wildlife.

The plans Newhaven contribute in following ways.

\* Concrete (The Battle to curb our appetite for concrete - (BBC - <https://www.bbc.co.uk/news/business-45893549>)

\* Reducing habitat for wildlife

\* Increasing emissions / pollution (traffic including lorries in their tens of thousands / diesel fumes)

\* Are not in line with protection the biodiversity the sea and seashore

For the residents (children, tourists and visitors), the effects reduce the quality of life by

\* reducing air quality

\* increasing noise and the unpleasant experience of the proximity of lorries and traffic (which already dominate the town planning)

\* reduce leisure opportunities and places for health and fitness (walking, swimming, boating, picnicking)

\* destroying a beautiful coastline near a unique national park, and Tide Mills beach

\* Detrimental visual impact on the site

\* Reducing the opportunities for tourism and leisure businesses.

\* Reducing the attraction of Newhaven as a destination town

Therefore, I wish to see East beach / Tide Mills protected as a nature reserve and to see a genuine overall commitment to visionary, gold standard sustainability in all plans for 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:** Lucy Newman [REDACTED]  
**Sent:** 05 November 2018 12:22  
**To:** ldf  
**Subject:** Plans for Newhaven Tide Mills beach - Policy E1 of Lewes District Local Plan Part 2  
**Categories:** Vanessa to deal with

**RE: Policy E1 of Lewes District Local Plan Part 2**

Dear Sir / Madam

I would like to express my views on the plans for the proposals for Newhaven

The context of these comments is in light of the following reports by the United Nations and World Wildlife fund.

**United Nations:** Stop biodiversity loss or we could face our own extinction, warns UN  
([https://www.theguardian.com/environment/2018/nov/03/stop-biodiversity-loss-or-we-could-face-our-own-extinction-warns-un?CMP=Share\\_AndroidApp\\_Email](https://www.theguardian.com/environment/2018/nov/03/stop-biodiversity-loss-or-we-could-face-our-own-extinction-warns-un?CMP=Share_AndroidApp_Email))

**United Nations-** 12 years to limit climate change (<https://www.theguardian.com/environment/2018/oct/08/global-warming-must-not-exceed-15c-warns-landmark-un-report>)

**WWF - Wildlife has declined 60% in 40 Years** (<https://www.independent.co.uk/environment/wildlife-nature-decline-extinct-paris-climate-agreement-wwf-elephants-rhinos-polar-bears-a8607341.html>)

**United Nations Sustainable Development Goals. 13, 14 and 15** (<http://www.undp.org/content/undp/en/home/sustainable-development-goals.html>)

The plans for Newhaven (the area of Tide Mills beach) *contribute* and stimulate climate change and depletion of wildlife.

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- Concrete (The Battle to curb our appetite for concrete - (BBC - <https://www.bbc.co.uk/news/business-45893549>)
- Reducing habitat for wildlife
- Increasing emissions / pollution (traffic including lorries in their tens of thousands / diesel fumes)
- Are not in line with protection the biodiversity the sea and seashore

For the residents (children, tourists and visitors), the effects reduce the quality of life by

- reducing air quality
- increasing noise and the unpleasant experience of the proximity of lorries and traffic (which already dominate the town planning)
- reduce leisure opportunities and places for health and fitness (walking, swimming, boating, picnicking)
- destroying a beautiful coastline near a unique national park, and Tide Mills beach
- Detrimental visual impact on the site
- Reducing the opportunities for tourism and leisure businesses.
- Reducing the attraction of Newhaven as a destination town

Therefore, I wish to see East beach / Tide Mills protected as a nature reserve and to see a genuine overall commitment to visionary, gold standard sustainability in all plans for Newhaven.

Yours sincerely,  
Lucy

[Redacted signature]

Lucy Newman

[Redacted contact information]

**Representation ID: REP/317/E1**Representor Details:

<b>Representor ID:</b>	REP/317
<b>Name:</b>	Catherine Noyce
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>E1 - Land at East Quay, Newhaven Port</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	Yes
<b>Sound:</b>	No Not Positively Prepared Not Justified
<b>Representation:</b>  Future generations will thank you if you save what will be left of Tide Mills after the Port Access Road and Bridge onto Tide Mills are built.	
<b>What changes do you suggest to make the document legally compliant or sound?</b>  	



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

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**Representation ID: REP/318/GT01**Representor Details:

<b>Representor ID:</b>	REP/318
<b>Name:</b>	Roger Nurse
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	GT01 - Land south of The Plough
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	
<b>Sound:</b>	
<b>Representation:</b>  I am writing to express my concern at the proposed installation of a travellers site at this location. I do not feel that this is an appropriate location for such a site in rural Sussex and on the edge of a beautiful village.  I strongly object.	
<b>What changes do you suggest to make the document legally compliant or sound?</b>	

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

Dear Sir/Madam

I am writing to express my concern at the proposed installation of a travellers site at this location. I do not feel that this is an appropriate location for such a site in rural Sussex and on the edge of a beautiful village. [REDACTED]  
[REDACTED]

I strongly object.

Kind regards

Roger Nurse  
[REDACTED]

**Thea Davis**

---

**From:** Roger Nurse <[REDACTED]>  
**Sent:** 25 September 2018 06:22  
**To:** ldf  
**Subject:** The Old Brickworks - Permanent travellers site : Objection  
**Categories:** Complete, LPP2 comment to code - stakeholder details have been added

Dear Sir/Madam

I am writing to express my concern at the proposed installation of a travellers site at this location. I do not feel that this is an appropriate location for such a site in rural Sussex and on the edge of a beautiful village. [REDACTED]  
I strongly object.

Kind regards

Roger Nurse  
[REDACTED]

**Representation ID: REP/319/GT01**Representor Details:

<b>Representor ID:</b>	REP/319
<b>Name:</b>	Michael O'Brien
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>GT01 - Land south of The Plough</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	
<b>Sound:</b>	
<b>Representation:</b>	
<p>* I have lived in Plumpton Green since 1976 and have serious comments on Policy GT01 – Land south of The Plough.</p> <p>1.1 Whilst I recognise that LDC has obligations under the Government's national Planning Policy for Traveller Sites (PPTS). I note that paragraph 2.132 introduces this policy, but without reference to which version. Paragraph 2.142 explicitly refers to a</p>	

2012 version of this document. I understand that the current version is 2015, and my response refers to that version of the PPTS.

1.2 Firstly, 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).'

I understand that Policy GT01 was first communicated to the Plumpton 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 (i) 'to reduce tensions between settled and traveller communities in plan-making and planning decisions' and suggests to me that either there was deliberate concealment of these plans or that the decision to allocate this site was made hastily, without due consideration, which I 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.

\* Plumpton Neighbourhood Plan

Whilst GT01 specifically addresses the needs of gypsies and travellers, this policy effectively represents an additional new development of five permanent dwellings.

With regard to the Plumpton Neighbour Plan (PPNP), Policy GT01 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

2.1 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 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.

Whilst 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.

This proposal does not comply with PPNP Policy 1, and it is therefore unsuitable area to site permanent dwellings, including 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, I do not believe the proposed site is 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 its development is likely to adversely change 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 (I am 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, I 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.

Therefore, I ask 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, brickbuilt 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.

## 2.2 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.

## 2.3 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.

#### 2.4 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.'

I 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 2.1).

#### 2.5 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 on 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 need for greater security and 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 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 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.

## 2.6 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.'

Whilst 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?**

**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**

**By**

**Michael O'Brien,**

## **1. I have lived in Plumpton Green since 1976 and have serious comments on Policy GT01 – Land south of The Plough.**

1.1 Whilst I recognise that LDC has obligations under the Government's national Planning Policy for Traveller Sites (PPTS). I 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. I understand that the current version is 2015, and my response refers to that version of the PPTS.

1.2 Firstly, 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).'

I understand that Policy GT01 was first communicated to the Plumpton 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 (i) 'to reduce tensions between settled and traveller communities in plan-making and planning decisions' and suggests to me that either there was deliberate concealment of these plans or that the decision to allocate this site was made hastily, without due consideration, which I 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.

## **2. Plumpton Neighbourhood Plan**

Whilst GT01 specifically addresses the needs of gypsies and travellers, this policy effectively represents an additional new development of five permanent dwellings.

With regard to the Plumpton Neighbour Plan (PPNP), Policy GT01 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

## **2.1 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 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.

Whilst 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.

This proposal does not comply with PPNP Policy 1, and it is therefore unsuitable area to site permanent dwellings, including 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, I do not believe the proposed site is 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 its development is likely to adversely change 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 (I am 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, I 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.

Therefore, I ask 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, brickbuilt 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.

## **2.2 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.

## **2.3 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.

## **2.4 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.’

I 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 2.1).

## **2.5 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 on 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 need for greater security and 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 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 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.

## **2.6 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.'

Whilst 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'.

<b>Representation ID:</b> REP/320/GT01
--

Representor Details:

<b>Representor ID:</b>	REP/320
<b>Name:</b>	Robin O'Brien
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>GT01 - Land south of The Plough</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	
<b>Sound:</b>	No Not Justified
<b>Representation:</b>  I have lived in Plumpton Green since 1976 and have serious concerns about Policy GT01 – Land south of The Plough. My comments are: 1.0 Assessment of the Site 1.1 The site is isolated, and is over 0.5km from a local settlement (Plumpton Green). 2.0 Transport 2.1 The nearest bus stop is almost 1km away, along a busy road without pavements or lighting. 2.2 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. 2.3 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. 2.4 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. 2.5 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. 2.6 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. 2.7 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. 2.8 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. 2.9 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. 2.10 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.

2

2.11 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).

2.12 There is already excessive traffic going through Plumpton Green. With cars parked on both sides of the road, there are times when larger vehicles are unable to get through the village.

### 3.0 Summary of Comments on GT01

3.1 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.

3.2 The policy does not promote access to appropriate health services, in contravention of paragraph 13(b) of the PPTS.

3.3 The policy does not ensure that children can attend school on a regular basis, in contravention of paragraph 13(c) of the PPTS.

3.4 The Site is in an area at a risk of flooding, in contravention of paragraph 13(g) of the PPTS.

3.5 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.

3.6 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.

3.7 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.

3.8 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.

3.9 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?**

## **Response to Lewes District Local Plan Part 2: Site Allocations and Development Management Policies DPD**

**by**

**Mrs Robin O'Brien,** [REDACTED]  
[REDACTED]

**I have lived in Plumpton Green since 1976 and have serious concerns about Policy GT01 – Land south of The Plough. My comments are:**

### **1.0 Assessment of the Site**

1.1 The site is isolated, and is over 0.5km from a local settlement (Plumpton Green).

### **2.0 Transport**

2.1 The nearest bus stop is almost 1km away, along a busy road without pavements or lighting.

2.2 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.

2.3 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.

2.4 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.

2.5 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.

2.6 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.

2.7 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.

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2.9 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.

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2.11 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).

2.12 There is already excessive traffic going through Plumpton Green. With cars parked on both sides of the road, there are times when larger vehicles are unable to get through the village.

### **3.0 Summary of Comments on GT01**

3.1 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.

3.2 The policy does not promote access to appropriate health services, in contravention of paragraph 13(b) of the PPTS.

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3.4 The Site is in an area at a risk of flooding, in contravention of paragraph 13(g) of the PPTS.

3.5 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.

3.6 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.

3.7 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.

3.8 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.

3.9 The policy is not justified in that no or no adequate weight has been given to using previously developed (brownfield) land.

**Representation ID: REP/321/E1**Representor Details:

<b>Representor ID:</b>	REP/321
<b>Name:</b>	Teresa O'Brien
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>E1 - Land at East Quay, Newhaven Port</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	
<b>Sound:</b>	
<b>Representation:</b>	<p>I write to support the objections made by Community Action Newhaven to the proposed industrial use of the site labelled E1 which abuts the conservation area of vegetative shingle and the historic area of Tide Mills.</p> <p>I would underline the point made forcibly that there is no need for any further industrial development land given the 8 areas which have already been allocated in the Newhaven enterprise zone.</p>

The site should form part of the sustainable tourism plans for Newhaven . This is an area which is used for leisure pursuits and is already under threat from Brett Aggregates. It needs to be protected for the inhabitants of Newhaven who suffer the worst air quality in the area caused by the congested road network.

Newhaven deserves far better. Please consider the objections you have received 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?**



## Hodgson, Lilly

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**From:** Teresa O'Brien <[REDACTED]>  
**Sent:** 05 November 2018 22:56  
**To:** ldf; ldc@lewes.gov.uk  
**Subject:** Objections to policy E1 of LDC Plan Part 2  
  
**Categories:** Vanessa to deal with

I write to support the objections made by Community Action Newhaven to the proposed industrial use of the site labelled E1 which abuts the conservation area of vegetative shingle and the historic area of Tide Mills.

I would underline the point made forcibly that there is no need for any further industrial development land given the 8 areas which have already been allocated in the Newhaven enterprise zone.

The site should form part of the sustainable tourism plans for Newhaven. This is an area which is used for leisure pursuits and is already under threat from Brett Aggregates. It needs to be protected for the inhabitants of Newhaven who suffer the worst air quality in the area caused by the congested road network.

Newhaven deserves far better. Please consider the objections you have received carefully.

Teresa O'Brien  
[REDACTED]

---

**Representation ID: REP/322/E1/A**Representor Details:

<b>Representor ID:</b>	REP/322
<b>Name:</b>	Emily O'Brien
<b>Organisation:</b>	<b>Community Action Newhaven</b>
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Local group or organisation

Agent Details:

<b>Name:</b>
<b>Organisation:</b>

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>E1 - Land at East Quay, Newhaven Port</b>
<i>Do you consider the document to be:</i> <b>Legally Compliant:</b> <b>Sound:</b>	
<b>Representation:</b>  (See attached PDF)	
<b>What changes do you suggest to make the document legally compliant or sound?</b>	

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

<b>Representation ID:</b> REP/322/E1/B
--

Representor Details:

<b>Representor ID:</b>	REP/322
<b>Name:</b>	Emily O'Brien
<b>Organisation:</b>	<b>Community Action Newhaven</b>
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Local group or organisation

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>E1 - Land at East Quay, Newhaven Port</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	No
<b>Sound:</b>	No Not Positively Prepared Not Justified Not Effective Not Consistent with national policy
<b>Representation:</b>	see email response
<b>What changes do you suggest to make the document legally compliant or sound?</b>	

See email response	
<b>Do you consider it necessary to participate at the Examination in Public?</b>	Yes
<b>Why do you feel it is necessary to participate at the Examination in Public?</b> We have sent a detailed response however we have further information to add	

## **Consultation response from Community Action Newhaven In relation to Policy E1 of Lewes District Local Plan Part 2**

### **Community Action Newhaven**

Community Action Newhaven is a local group which seeks to empower local people to take part in the planning processes for Newhaven. We also campaign for the 'clean green' Newhaven enshrined in the planning documents and strategies for the area.

See <https://www.facebook.com/community-action-newhaven> for more information.

As well as this submission, we request the right to be heard at the Public Examination.

### **Part 1 - A Summary of our response**

Community Action Newhaven is calling for the removal of the newly introduced *Policy E1*. Instead 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 previous saved policy which is no longer appropriate for the area; and which goes against both the agreed vision for the area and community wishes. The assessment against sustainability objectives is Inadequate. *Policy E1* is not justified by employment need. The policy has not been fully and explicitly included in previous consultation drafts which would have allowed the community to voice those concerns.

Should *policy E1* be kept, the area it relates to must be substantially reduced in area, and certainly should not include any areas to the East of the new port access road. It must also be amended so that new wording reflects the original intent of saved *policy NH20* (i.e. be directly related to port expansion only in relation to increased ferry activity) 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.

### **Part 2 - Failure to meet the tests of soundness in relation to sustainable development**

#### **2a Sustainability Assessment - important errors and omissions in appraising against sustainability objectives**

Table 36 (p.79) and the final summary table 113 (page 210) appraising this site (option C) against the sustainability objectives contains the following errors and omissions:

#### **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 it 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 9. To protect, enhance and make accessible the Plan Area's countryside and historic environment. (Environment)**

This is an important site in historic Seaford Bay, well used by walkers and for local recreation. It is crossed by official public footpaths, on the border of the National park, with significant wartime history both on the site (e.g. the WW1 air station - see <https://tidemills.webs.com/theww1airstation.htm>) and around it. It borders Tide Mills, an important historical site (see <https://tidemills.webs.com/tidemillvillage.htm> which is widely visited by tourists and locals. Therefore this objective cannot sensibly be rated amber ( -? ). It must be rated red ( - - ).

**Objective 13. To improve the Plan Area's air quality. (Air quality)**

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.'

**Objective 14. To reduce the risk of flooding and the resulting detriment to public wellbeing, the economy and the environment. (Flooding)**

Although the summary table on page 113 states that E1 is in Flood Zone 2, with surrounding areas in Flood Zone 3, this is apparently an error as the strategic flood risk assessment appears to show that much of this site lies in flood zone risk three, the highest level of risk (see map 4 on p.106 of Sustainability Appraisal).

Whether zone 2 or 3, inclusion of this site would clearly "increase the amount of land in flood risk zones 2 and 3 as a percentage of the Plan Area's coverage". Therefore this objective cannot sensibly be rated as 'of no likely effect' and must be rated red ( - - ).

**Objective 15. To ensure that the Plan Area is prepared for the impacts of coastal erosion and tidal flooding. (Coastal Erosion)**

Shingle plays a well established and important role in protection against coastal flooding as well as erosion of cliffs. It should be noted that the chalk cliffs either side of Seaford Bay where this shingle site lies have been subject to a number of high-profile recent cliff falls. There has apparently been no analysis of the impact on flooding or erosion as a result of policy E1, let alone assessment of the future impact, taking into consideration the likely rise in sea levels. However it is very unlikely that there is 'no likely affect' as assessed here, and in the absence of evidence to the contrary it seems this objective should be rated at least Amber.

**Objective 18. To encourage the growth of a buoyant and sustainable tourism sector. (Tourism)**

Tide Mills is a tourist destination, so removal of part of the present beach site will clearly have a negative impact on tourism. Additionally, the proximity of the National Park and the importance of sustainable tourism for Newhaven, including as a gateway to the National Park as set out in the draft South Downs Local Plan (see below for more info) means that this objective is not 'of no likely effect' and should have been rated red.

**In Summary: There are significant errors and omissions in the sustainability appraisal. If these objectives are correctly assessed, it is clear that the retention of E1 fails on a test of soundness, as E1 cannot be considered compatible with sustainable development.**

**2b - Failure to deliver on policies which relate to conservation and biodiversity within part 1 of the core strategy, and failure to safeguard a designated local wildlife site.**

This tranquil and unspoiled natural area forms part of historic Seaford Bay, with iconic views from both Seaford Head on one side and Newhaven Fort SSSI on the other, and the Ouse Valley Nature Reserve to the North. It is a gateway to the Downs, adjacent to the South Downs National Park at one of the few locations where the South Downs meet the shore. The draft *South Downs Local Plan* identifies Newhaven as a sustainable tourism gateway. The site is widely used for leisure, recreation and tourism, and forms part of the UN-designated Living Coast Biosphere.

This area is a designated local wildlife site (formerly an SNCI). This plan contains the sustainability objective (7.3) of protecting and enhancing the most important landscapes, areas of biodiversity and other protected areas.. Additionally the *July 2018 National Planning Policy Framework* requires local authorities to “identify, map and **safeguard** components of the local ecological networks, including [...] locally designated sites of importance for biodiversity.”

This designated site has been identified as containing internationally important habitat including vegetated shingle and several red book species including reptiles and birds, which should be protected under the local plan, for management as a wildlife area, for example, see:

*The East Sussex Vegetated Shingle Management Plan* (Tim Smith 2009), which states that Tide Mills (west) ‘exhibits an extremely good example of a vegetated shingle habitat’ and suggests possibilities for habitat expansion.  
([https://eastsussexgovuk.blob.core.windows.net/media/1946/shingle\\_mgmt\\_plan.pdf](https://eastsussexgovuk.blob.core.windows.net/media/1946/shingle_mgmt_plan.pdf))

*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. *The Port*



*Master Plan* which identifies the ecological importance and sensitivity of the site<sup>1</sup> and notes that this area “has the potential to host a number of protected species such as great crested newts, invertebrates and reptiles. Protected species surveys were undertaken during 2011 to determine the presence of such species.”

The core plan *part 2 sustainability appraisal* (p.210) states that “the site is within an SNCI. Therefore development on the site could have impact biodiversity. [sic]”

**In conclusion: Policy E1 fails to deliver on sustainable development and on the specific policies which relate to conservation and biodiversity within part 1 of the core strategy, and fails to protect and enhance a designated local wildlife site.**

## **2c Failure to justify development on this site as sufficient alternative employment sites are available.**

The summary of consultation responses for this plan states that

“carrying forward the remaining ‘saved’ policies within the operational port area (Policies NH22 and NH23 of the Lewes District Local Plan 2003) is not considered necessary ... In quantitative terms, the Council’s latest monitoring data demonstrates that **Newhaven has sufficient employment space** to meet the business needs arising from future growth scenarios to 2030 (Source: Newhaven Employment Land Review July 2017).”

Therefore it is inconsistent to argue that *NH20* (which this new policy is based on) should be carried forward, especially given the greater sensitivity and importance of this site for recreation and biodiversity,

There is no evidence provided that the land is needed for this use. The [Employment Land Review](#) identifies a substantial number of sites, the majority in the Newhaven Enterprise Zone (EZ) which covers 8 sites over 79 hectares. The land in policy E1 is **not** in the EZ so does not benefit from any of the development incentives associated with the EZ.

The Employment land review estimates that in a scenario of accelerated growth due to the Enterprise zone regeneration this would lead to the future need for **35,580 sqm of employment floor space**, expressed as a land need of 7.5 hectares. However the report acknowledges that this is an assumption and points out that an estimate of future need based on historical growth patterns is just **17,820 sqm of employment floor space**, expressed as land need of 5 hectares.

The Employment Land Review also points out that the implementation of the EZ will enable an increase of around **55,000 sq.m** of new commercial floorspace, as well as refurbishing a further **15,000 sq.m**. There is clearly more than adequate provision to meet the need identified up to 2030 under any scenario without E1, and its inclusion cannot be justified.

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

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<sup>1</sup> ... In 2010/2011, a series of surveys were undertaken to inform the PMP including: a Phase 1 Habitat Survey, protected species scoping survey, breeding birds survey and wintering birds survey. 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), hedgerows and maritime cliff (located to the west of the River Ouse). In addition, the bird surveys identified some 86 species of birds of which 8 are of high conservation value. 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. To the east of the port, there is 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. Protected species surveys were undertaken during 2011 to determine the presence of such species. [from Port Master Plan]

It should also be noted that in Newhaven, an *Article 4 Direction* 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)* and safeguard existing employment sites from competing uses. This introduction further reduces the need for policy E1 as all the sites within the EZ will be safeguarded under this policy.

### **Flood Risk and unstable ground**

It should be noted that since policy NH20 was drafted in 2003 flood risks have increased and will continue to do so due to rising sea levels. This site is adjacent to the sea. Flood risks are identified in the Employment Land Report as an important barrier to commercial development, and the unstable ground, also identified as a barrier, is a particular issue in this location which is mainly shingle. The recently completed nearby Rampion building, also on shingle, required foundations 60m deep. The new port access road will require foundations 35-40m deep.

Additionally, shingle acts as a flood barrier so development in this area could create flood risk for other areas.

**In conclusion: the assessment of development requirements does not provide evidence that the site is needed for employment sufficient to justify the development of a designated local wildlife site. Other sites are far more suitable for employment uses.**

### **2d Failure to reflect the agreed priorities for regeneration in Newhaven**

The Introduction of policy E1 does not capture the vision for Newhaven in part 1 of the local plan or in other key strategies:

**Lewes District Core Strategy sets out a vision of** “regeneration at Newhaven associated with the existing port and opportunities offered by the **renewable energy sector**, creating a **sustainable tourism economy** that takes advantage of the district’s key attractions” (p.37) and has a vision of “the town developing as a **centre for green industries and innovation**.” (p. 96).

**The aims of Core Policy 4 - regeneration are:**

6. (county wide aim) Promote the development of **sustainable tourism**, including recreation, leisure, cultural and creative sectors, and having particular regard to the opportunities provided by the South Downs National Park, both within and outside the National Park boundary.

7. (Newhaven-specific aim) Support the continued use of Newhaven port for **freight and passengers** including plans for expansion and modernisation of the port as identified in the port authority’s *Port Masterplan*.

*The Port Master Plan* in turn 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:

*‘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.’*

**Newhaven Enterprise Zone (EZ)** plans are 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,'<sup>2</sup>***

*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 as it is by official public footpaths, and enabling access to the only remaining sandy beach in Newhaven after the closure of the West Beach, it represents 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 area, as the port authority has opted out of the plan, however as background it too sets out a vision of Newhaven as:

*'A hub for the 'clean and green' sector.'*

**In conclusion: Policy E1, by allowing for industrialisation of a local wildlife site, fails to maximise the opportunities for this area, and does not reflect the widely agreed development vision for Newhaven specifically around maximising clean/green/marine renewable sectors and sustainable tourism.**

## **2e Air Quality and Cumulative Impact**

Newhaven and the surrounding A26, A27 and A259 are already highly congested with traffic bottlenecks including the town centre gyratory (which is an Air Quality Management Area) and an opening swing bridge. The Sustainability Assessment (page 54) highlights this as a 'key sustainability issue' stating that:

"Car ownership is comparatively high and a number of key highway routes often suffer from congestion during peak hours including the A259, A27 and the A26."

Part 1 of the *Core plan* focuses on relieving congestion and air quality issues faced in Newhaven, in particular:

*"Core Policy 9 – Air Quality* The local planning authority will seek to improve air quality, having particular regard to any Air Quality Management Area (AQMA) designations."

The same section (on p. 113 of part 1) stresses the need to consider cumulative impact, and cumulative impact is identified as of key importance by the *Newhaven Air Quality Action Plan* (p.26):

"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.**"

Additionally the December 2017 East Sussex County Council Public Health JSNA Intelligence briefing: Air Quality in East Sussex (<http://www.eastsussexjsna.org.uk/briefings>)

<sup>2</sup> <http://www.coast2capital.org.uk/projects/newhaven-enterprise-zone.html>

points out the crucial importance of planning policy in relation to the Newhaven AQMA and states that:

“Pollution levels in future in Newhaven will be greatly influenced by further regeneration and development, and the success of mitigation measures.” (P23)

Part 2 of the Core Plan already includes a very high housing allocation for Newhaven - the highest in the district - which will, negatively impact on the air quality, congestion and infrastructure issues identified in the area. There are also substantial housing allocations for Seaford and Peacehaven which will impact on congestion, especially on the A259 and the gyratory. Despite the importance on cumulative impact, there is no evidence that this has been looked at when adding new policy E1.

**In conclusion: This policy will negatively impact the existing issues with congestion and air quality, and will have an unacceptable cumulative impact in combination with the very high housing allocation.**

**Part 3 - problems with the process used for development and consultation of policy E1, which affect soundness.**

### **3a) Inadequate consultation process/ inaccuracies**

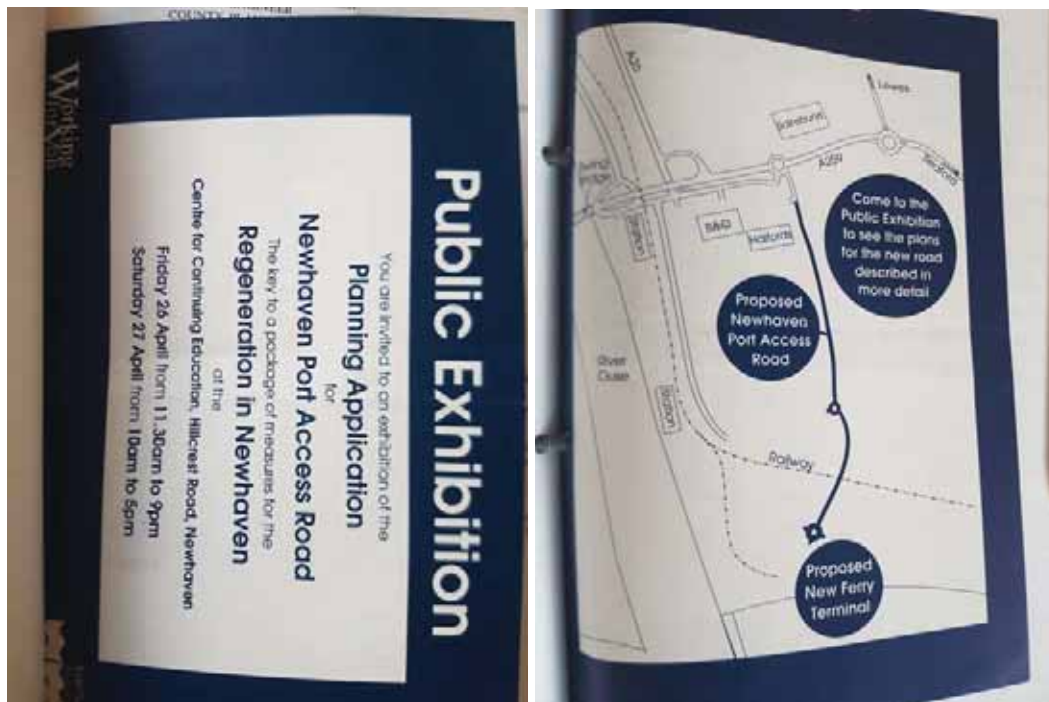
This introduction of policy E1, with its proposal to industrialise a popular and high-value local wildlife site, represents a substantial amendment to the previous drafts that went out to public consultation. If the intention was to retain policy NH20 then this should have been made explicit much earlier in the consultation process e.g. the wording included within the text to allow for proper understanding and comment. In any case, since policy E1 represents a substantial change from the saved policy NH20, as outlined above, this new direction should have been included in draft form in earlier consultation.

Had E1 been explicitly included in the earlier draft, we have no doubt that there would have been a high level of objections. Recent proposals for development in this area have seen substantial opposition from both organisations and from the community. For example, the 2017 [Brett Aggregates application](#) for a concrete batching plant on adjacent land attracted over 1,000 local objections from individuals as well as many objections from organisations including South Downs National Park Authority, Town Council and District Council. A public protest attracted over 400 protestors and was covered in local press and regional TV.

The summary of consultations states that the policy E1 has been added in response to requests from Newhaven Port and Properties Ltd, East Sussex County Council and Newhaven Town Council. This is inaccurate. Newhaven Town Council have clarified that their response pointed that there was a ‘vacuum’ in relation to this land (as Newhaven Port and Properties Ltd has chosen to opt out of the neighbourhood planning process) and far from requesting the industrialising the local wildlife site, we understand that they in fact also intend to object to this policy.

Whilst we are not allowed to see the earlier consultation responses, we assume that East Sussex County Council and Newhaven Port and Properties Plc (the landowners) will have requested policy E1 in order to maximise the development potential of the new port access road that is to be built in this area. This should not be used to justify E1 however, as when planning permission for this road was granted in 1996 the area opened up by this road in policy E1 was clearly intended to allow for a new passenger ferry terminal, not for general ‘employment use’ as outlined in the extract from the strategic plan from which policy NH20 is

carried forward (see above), and as clearly set out in the original public consultation materials for the port access road from 1996:



It should be noted that there has been widespread criticism that the road development does not reflect the current planning context for the area, including the subsequent designation of the South Downs National Park on adjacent land, and the congestion and infrastructure constraints in Newhaven outlined above and in part 1 of the core plan. Also that ESCC did not re-engage with the community or stakeholders over the project, given the time elapsed since earlier consultation (1996 and 2002). Local opposition to this road has included a petition with over 4,000 signatures. Whilst clearly the county council and the private land-owner will be disappointed if the maximum development land is not generated by this new road, this view should not outweigh the other considerations.

There has also been an error in the current consultation materials which may have confused local people and organisations who may have wished to respond. Within the wording of policy E1 itself, there is a map clearly showing the area the policy relates to (see below):

Figure 12 Land at East Quay employment site allocation





However, 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, regardless of which screen it is viewed on. (see below)



We drew this error to Lewes District Council's attention early in the consultation. They stated that issue had arisen because the pink overlay for the local wildlife site is obscuring the dark green for E1 but stated that they were not prepared to address this issue.

One of our members, having heard of policy E1, clicked on the Newhaven map and was reassured by the incorrect map i.e. the small dark green area on the top left identified by the key. In fact this area was incorrectly represented. It is impossible to gauge how many other people this will have happened to.

**In conclusion: This policy has been added far too late in the process for the consultation to be meaningful, and the consultation materials contained an error which has caused confusion.**

### **3b Unacceptable changes made to policy E1 compared to the 'saved' policy NH20**

Policy E1 is adapted from a 'saved policy' NH20 from the 2003 Lewes District plan<sup>3</sup>, which was designed to allow for the **'upgrading and expansion of the port'**. At that time the ferry company (a major local employer) wished to expand operations. This context is very important - NH20 was not designed to allow for general industrial development but to allow an expansion to ferry operations. Note in particular the following extracts from that plan:

"12.79 The District Council recognises that the expansion and enhancement of the Port is a vital component to help revitalise the economy of the local area. Therefore, land is allocated to **provide a sufficient area to accommodate fully satisfactory operating conditions for an operator of cross-channel ferries**. Although Newhaven is a relatively small port, it still provides important maritime links to mainland Europe and beyond.

12.80 Newhaven's corresponding ferry port of Dieppe has benefited from a new outer harbour ferry terminal building. It is considered necessary to encourage investment in modern port infrastructure, to take advantage of the important strategic location of

<sup>3</sup> at [http://www.lewes-eastbourne.gov.uk/ldcllocalplan/lewes\\_local\\_plan/written/cpt12.htm](http://www.lewes-eastbourne.gov.uk/ldcllocalplan/lewes_local_plan/written/cpt12.htm)

Newhaven and **to respond to opportunities to introduce new, faster services such as the larger high-speed catamaran.**"

The current context for the proposed development of this sensitive site is very different. There is no planned passenger ferry expansion. Newhaven in 2003 did not have the current serious issues with air quality and congestion (as identified in 2D above/ Core Strategy part 1). Additionally Newhaven was not allocated as the primary site for housing in the district as outlined above.

Further, the rare habitat which comprises this local wildlife site has increased in value since 2003. Its value has improved as other areas of similar habitat have been lost, especially areas of vegetated shingle, further enhancing its importance and value.

Therefore, any adaptation of policy E1 should be in favour of additional protection for this site. Instead the new wording of E1 has given it less protection. It has moved away from the specific term **upgrading and expansion of the port** (which at the time was understood to mean passenger ferry related - see above) and instead is much more general, allowing for uses which are simply 'associated' with Newhaven port; and even for non-port-related activity i.e:

"Land [...] 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."

**In conclusion this is completely unacceptable. We believe that policy E1 does not contribute to sustainable development and therefore should be taken out. However If the policy is retained it must:**

- **Be reduced to the minimum area, for example restricted to the area which lies outside the Local Wildlife Site (this area is shown in dark green on the 'incorrect' map used by Lewes district Council - see above). At the very least the policy should be restricted to include the area which will lie to the West of the new Port Access Road which will form a natural boundary.**
- **Be strictly limited to port related activity i.e. the additional clause allowing for non-port related activity should be deleted.**
- **The type of employment use permitted should be changed to reflect the agreed vision for the area ( i.e. 'clean green and marine'/'renewables' and 'port related')**
- **If 'port related' is used as a term, there should be a clear definition of what is actually meant by this term, ideally restricting its development strictly to passenger ferry expansion to reflect the original intention of NH20. At the very least it should give a clear definition e.g. the definition used in relation to permitted development at ports in the Town and Country Planning Act.<sup>4</sup>**

<sup>4</sup> "Permitted development "in respect of dock, pier, harbour, water transport, or canal or inland navigation undertakings" is defined as:

(a) *for the purposes of shipping, or*

(b) *in connection with the embarking, disembarking, loading, discharging or transport of passengers, livestock or goods at a dock, pier or harbour, or with the movement of traffic by canal or inland navigation or by any railway forming part of the undertaking*

**Appendix A - Our image of the site including the port access road, which is missing from the official consultation illustrations.**

Whilst we believe that this policy should be entirely rejected, if it is not rejected then the new Port Access Road should form a natural boundary for E1 with development only to the West of the port access road, and only to the North of the roundabout which will terminate that road.

The illustration also shows the location of the historic WW1 Seaplane base, Tide Mills abandoned village and some of the footpaths crossing the site.



(from Town & Country Planning Act <https://www.legislation.gov.uk/uksi/2015/596/made>)



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**Representation ID: REP/323/E1**Representor Details:

<b>Representor ID:</b>	REP/323
<b>Name:</b>	Sheila Ogden
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>
<b>Organisation:</b>

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>E1 - Land at East Quay, Newhaven Port</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	
<b>Sound:</b>	
<b>Representation:</b>	
Subject: reference E1	
I think it is a scandal that already the other side of the estuary we are not allowed access because of the French owners but now because of industrialisation we are to be stopped from using the the only bit of sandy beach in the area in the small cove next to the jetty.Are the council stupid giving up OUR beauty spot.	
<b>What changes do you suggest to make the document legally compliant or sound?</b>	

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

## Thea Davis

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**From:** sheila ogden <[REDACTED]>  
**Sent:** 03 November 2018 10:50  
**To:** ldf  
**Subject:** reference E1

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

I think it is a scandal that already the other side of the estuary we are not allowed access because of the French owners but now because of industrialisation we are to be stopped from using the the only bit of sandy beach in the area in the small cove next to the jetty. Are the council stupid giving up OUR beauty spot.

Sent from [Mail](#) for Windows 10

**Representation ID: REP/324/E1**Representor Details:

<b>Representor ID:</b>	REP/324
<b>Name:</b>	Sheila Ogden
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>E1 - Land at East Quay, Newhaven Port</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	
<b>Sound:</b>	
<b>Representation:</b>	
So many reasons to object:	
Loss to wildlife	
Industrialisation of historical beauty spot	
Contravention of council's Green policy	
East Sussex intention to spend £23 million (and the rest!) on building a flyover when local services are being cut.	
Traffic, noise, dust associated with running such a development.	

I strongly object 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?**

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

## Thea Davis

---

**From:** sheila ogden [REDACTED] >  
**Sent:** 03 November 2018 13:40  
**To:** ldf  
**Subject:** Reference E1  
  
**Categories:** LPP2 comment to code - stakeholder details have been added

So many reasons to object:

Loss to wildlife  
Industrialisation of historical beauty spot  
Contravention of council's Green policy  
East Sussex intention to spend £23 million (and the rest!) on building a flyover when local services are being cut.  
Traffic, noise, dust associated with running such a development.

I strongly object to the proposal.

Sheila Ogden

Sent from [Mail](#) for Windows 10

**Representation ID: REP/325/GT01**Representor Details:

<b>Representor ID:</b>	REP/325
<b>Name:</b>	Anna Owczarski
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>GT01 - Land south of The Plough</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	
<b>Sound:</b>	
<b>Representation:</b>  As a new resident to Plumpton Green the main reason I was attracted to this lovely village was to enjoy a quiet lifestyle with beautiful surroundings. The residents of the village are very pleasant and we have so far enjoyed our time here for a mere two months. After the considerations taken into place for the Gypsy Traveller site for Plumpton Green there are some points which I hope will be considered as representation of not the community wishing to move in but the surrounding area. Since	

moving from Haywards Heath, our council tax has been considerably raised. With this in mind we have noticed certain parts of Plumpton Village which should be considered for extensive improvements. This is question is Station Road; a very busy road and the main access road throughout the village for all residents. The amount of pot holes and unevenness in the road can be seen through the whole road. With the additional 20-30 residents moving into the traveller site (understandably some will be children who do not drive cars), what improvements does the council wish to take to ensure the following:

- \* a) a safe road which can be accessed not only by normal size vehicles but anything from caravans, trucks or any other means of transportation.
- \* b) there is no path currently at certain points of Station road, predominantly the area which is being assessed for building. How will the council sustain the natural surroundings and habitants of nature as well as ensuring a safe area for walking.
- \* c) from my short experience here I can be honest that most vehicles that drive through the village are not 30mph but much faster, thus causing another problem especially in the heart of the village where there is a school and local shop.

On a separate note from the meeting which took place on the 9th October in Plumpton Village hall I had some other concerns:

- \* As the sites will be regularly assessed (every 2 weeks), what are the processes in place to ensure the traveller residents are not breaking any agreements made in their contract with the council. Obviously the council is placing a lot of resources to ensure they are not in event of default with their contract. Surely if they break their contract I suppose we are back to square one as they will continue to travel as in their traditions and beliefs. Thus meaning the site in Plumpton Green would never be a PERMANENT home but merely a stop over for 6 months at a time. This would be unsettling as there would be an influx of new families always in the sites,

- \* There was mention in businesses which the residents of this community are able to do. Is there a better definition of what these business are and what would be considered a breach of contract. I can only assume they have some form of livelihood however are they legitimate businesses that could benefit the village?

- \* When I moved to Plumpton Green, early August 2018, I moved here to be in a picturesque village and although slightly a selfish request but are there any pictures or demonstration of what this site would look like when entering the village from The Plough pub direction. Although I am not local to the area, I am concerned that the home and area I wish to settle in and live will be damaged by the view of static caravans, which is something I really would not want to see and never invisioned for my future forever home. I appreciate that there is a government obligation to provide x amount of static homes to the traveller community but this should be done in already allocated sites.

- \* Although the choice is our own how will the new residents integrate to a new



community, especially if they move around a lot and are not in their PERMANENT base. [REDACTED]

i have no further questions or points to raise but I hope my email has raised some points which you may have already be aware of and if not I hope they can be put forward for serious 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?**

**Representation ID: REP/325/SA**Representor Details:

<b>Representor ID:</b>	REP/325
<b>Name:</b>	Anna Owczarski
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
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<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>Sustainability Appraisal</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	Yes
<b>Sound:</b>	Yes
<b>Representation:</b>  As a new resident to Plumpton Green the main reason I was attracted to this lovely village was to enjoy a quiet lifestyle with beautiful surroundings. The residents of the village are very pleasant and we have so far enjoyed our time here for a mere two months. After the considerations taken into place for the Gypsy Traveller site for Plumpton Green there are some points which I hope will be considered as representation of not the community wishing to move in but the surrounding area. Since	

moving from Haywards Heath, our council tax has been considerably raised. With this in mind we have noticed certain parts of Plumpton Village which should be considered for extensive improvements. This is question is Station Road; a very busy road and the main access road throughout the village for all residents. The amount of pot holes and unevenness in the road can be seen through the whole road. With the additional 20-30 residents moving into the traveller site (understandably some will be children who do not drive cars), what improvements does the council wish to take to ensure the following:

a) a safe road which can be accessed not only by normal size vehicles but anything from caravans, trucks or any other means of transportation.

b) there is no path currently at certain points of Station road, predominantly the area which is being assessed for building. How will the council sustain the natural surroundings and habitants of nature as well as ensuring a safe area for walking.

c) from my short experience here I can be honest that most vehicles that drive through the village are not 30mph but much faster, thus causing another problem especially in the heart of the village where there is a school and local shop.

On a separate note from the meeting which took place on the 9th October in Plumpton Village hall I had some other concerns:

1. As the sites will be regularly assessed (every 2 weeks), what are the processes in place to ensure the traveller residents are not breaking any agreements made in their contract with the council. Obviously the council is placing a lot of resources to ensure they are not in event of default with their contract. Surely if they break their contract I suppose we are back to square one as they will continue to travel as in their traditions and beliefs. Thus meaning the site in Plumpton Green would never be a PERMANENT home but merely a stop over for 6 months at a time. This would be unsettling as there would be an influx of new families always in the sites,

2. There was mention in businesses which the residents of this community are able to do. Is there a better definition of what these business are and what would be considered a breach of contract. I can only assume they have some form of livelihood however are they legitimate businesses that could benefit the village?

3. When I moved to Plumpton Green, early August 2018, I moved here to be in a picturesque village and although slightly a selfish request but are there any pictures or demonstration of what this site would look like when entering the village from The Plough pub direction. Although I am not local to the area, I am concerned that the home and area I wish to settle in and live will be damaged by the view of static caravans, which is something I really would not want to see and never invisioned for my future forever home. I appreciate that there is a government obligation to provide x amount of static homes to the traveller community but this should be done in already allocated sites.

4. Although the choice is our own how will the new residents integrate to a new

community, especially if they move around a lot and are not in their PERMANENT base.

i have no further questions or points to raise but I hope my email has raised some points which you may have already be aware of and if not I hope they can be put forward for serious 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?** No

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

## Kemp, Emma

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**From:** Anna Owczarski <[REDACTED]>  
**Sent:** 10 October 2018 21:58  
**To:** ldf  
**Subject:** Plumpton Green Traveller site pitch near the old brickworks  
**Categories:** LPP2 comment to code - stakeholder details have been added

To whom this may concern,

As a new resident to Plumpton Green the main reason I was attracted to this lovely village was to enjoy a quiet lifestyle with beautiful surroundings. The residents of the village are very pleasant and we have so far enjoyed our time here for a mere two months. After the considerations taken into place for the Gypsy Traveller site for Plumpton Green there are some points which I hope will be considered as representation of not the community wishing to move in but the surrounding area. Since moving from Haywards Heath, our council tax has been considerably raised. With this in mind we have noticed certain parts of Plumpton Village which should be considered for extensive improvements. This is question is Station Road; a very busy road and the main access road throughout the village for all residents. The amount of pot holes and unevenness in the road can be seen through the whole road. With the additional 20-30 residents moving into the traveller site (understandably some will be children who do not drive cars), what improvements does the council wish to take to ensure the following:

- a) a safe road which can be accessed not only by normal size vehicles but anything from caravans, trucks or any other means of transportation.
- b) there is no path currently at certain points of Station road, predominantly the area which is being assessed for building. How will the council sustain the natural surroundings and habitants of nature as well as ensuring a safe area for walking.
- c) from my short experience here I can be honest that most vehicles that drive through the village are not 30mph but much faster, thus causing another problem especially in the heart of the village where there is a school and local shop.

On a separate note from the meeting which took place on the 9th October in Plumpton Village hall I had some other concerns:

1. As the sites will be regularly assessed (every 2 weeks), what are the processes in place to ensure the traveller residents are not breaking any agreements made in their contract with the council. Obviously the council is placing a lot of resources to ensure they are not in event of default with their contract. Surely if they break their contract I suppose we are back to square one as they will continue to travel as in their traditions and beliefs. Thus meaning the site in Plumpton Green would never be a PERMANENT home but merely a stop over for 6 months at a time. [REDACTED]

2. There was mention in businesses which the residents of this community are able to do. Is there a better definition of what these businesses are and what would be considered a breach of contract. I can only assume they have some form of livelihood however are they legitimate businesses that could benefit the village?

3. When I moved to Plumpton Green, early August 2018, I moved here to be in a picturesque village and although slightly a selfish request but are there any pictures or demonstration of what this site would look like when entering the village from The Plough pub direction. Although I am not local to the area, I am concerned that the home and area I wish to settle in and live will be damaged by the view of static caravans, which is something I really would not want to see and never envisioned for my future forever home. I appreciate that there is a government obligation to provide x amount of static homes to the traveller community but this should be done in already allocated sites.

4. Although the choice is our own how will the new residents integrate to a new community, especially if they move around a lot and are not in their PERMANENT base.

i have no further questions or points to raise but I hope my email has raised some points which you may have already be aware of and if not I hope they can be put forward for serious consideration.

Best regards,

Anna

Sent from my iPhone

---

**Representation ID: REP/326/E1**Representor Details:

<b>Representor ID:</b>	REP/326
<b>Name:</b>	Tracey Page
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>E1 - Land at East Quay, Newhaven Port</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	
<b>Sound:</b>	
<b>Representation:</b>  I am giving my option on the proposed development. I am completely against the development for many reasons. I walk along here regularly and have seen lots of wild life including a rear spoon bill, once there is a development here we will not get the amazing nature back.  We do not want to loose any part of the beach, we can't go on the beach the other side of the harbour and this beach is wonderful especially it being sandy when the tide is out. If we can't go down the path just after the bridge crossing the only way we will be able to get to the beach will be via Tide Mills and this will get very busy.  Another reason I am against this is because of the traffic, many a time during the day	

there is a build up of traffic around Newhaven and this will only make it worse.  
Pleas consider our views and DO NOT let this development the 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?**



**Hodgson, Lilly**

---

**From:** Tracey Page <[REDACTED]>  
**Sent:** 31 October 2018 21:11  
**To:** ldf  
**Subject:** E1 Tide Mills Beach  
  
**Categories:** LPP2 comment to code - stakeholder details have been added

Dear Sir/madam

I am giving my option on the proposed development. I am completely against the development for many reasons. I walk along here regularly and have seen lots of wild life including a rear spoon bill, once there is a development here we will not get the amazing nature back.

We do not want to loose any part of the beach, we can't go on the beach the other side of the harbour and this beach is wonderful especially it being sandy when the tide is out. If we can't go down the path just after the bridge crossing the only way we will be able to get to the beach will be via Tide Mills and this will get very busy.

Another reason I am against this is because of the traffic, many a time during the day there is a build up of traffic around Newhaven and this will only make it worse.

Pleas consider our views and DO NOT let this development the go ahead.

Thank you

Tracey Page

**Representation ID: REP/327/GT01**Representor Details:

<b>Representor ID:</b>	REP/327
<b>Name:</b>	Nicole Palmer
<b>Organisation:</b>	<b>The Plough Inn</b>
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Local Business / employer

Agent Details:

<b>Name:</b>
<b>Organisation:</b>

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	The Plough Inn Station Road Plumpton Green East Sussex BN7 3DF

Representation:

<b>Policy/Section:</b>	<b>GT01 - Land south of The Plough</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	No
<b>Sound:</b>	No
<b>Representation:</b>  I am the Landlady and Licensee of The Plough Inn ("The Plough"). I hold a business tenancy at the Plough which has been granted by Harvey & Son (Lewes) Limited ("Harveys"). The freehold of the Plough, it's gardens and the adjacent field to the north is owned by Harveys. I attach a plan which marks the location of the Plough and the proximity to the proposed Gypsy and Traveller Site ("the Site").	

My tenancy commenced in August 2012 and I have also been a resident in the village since 1979.

The Plough is part of the village fabric and is the location of the RAF Chailey War Memorial. The Plough car park is used throughout the summer for various automotive and cultural exhibitions and also the site for the annual Remembrance Parade.

The Plough provides employment to between 6 to 10 staff (at various times of the year) and I look to employ people who are resident in the village.

I attended the Parish Council meeting on 9 October 2018 and have considered the representations made by Lewes District Council at that meeting.

I wish for this letter to place on record my strong objections to the proposed Site. These are from my perspective as operating one of 3 local Public Houses in the village but also as someone who has grown up and lived in the village for the majority of my life.

### Objections

\* Limited time to consider, understand and object

Policy GT01 was first communicated to the Parish Council on 5 September 2018. I was notified of the proposal by letter from Plumpton Parish Council dated 14 September 2018. There has therefore been very little time for a proper consideration of the proposal, not only by the village community, but by Lewes District Council itself. As I understand there has been no discussions on a potential purchase price or any indication of what that might be, no proper pitch layout produced, no environmental impact reports and no highways and transport reports. This creates a very difficult position for proper and full objections to be put in. It seems to indicate some sort of 'knee jerk' reaction in putting this proposal forward and without full details being addressed. Presently, on the documentation so far produced, it is not clear as to whether the proposal is achievable and deliverable in any event.

Further, nobody in the village had any awareness that the Site was highlighted as a potential site 3 years ago. That displays a lack of transparency from Lewes District Council of the planning process. It is inconceivable that the Parish Council and those residents who sit on the neighbourhood plan committee were not notified prior to 4 September 2018. This in my view must call into question the legitimacy of this planning proposal. I do not have enough information to comment further on this but reserve the right to do so.

I wish to draw attention to the Government's national Planning Policy for Traveller Sites (PPTS) which 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).'

The lack of a proper time period which I set out above is not consistent with 'early and effective engagement' . The 'evidence base' does not appear to be properly assembled.

I have therefore taken the decision that the best means for my objection is to follow the points which Plumpton Parish Council has set out in the draft objection dated 29 October 2018 and made available on its website. I have added particular emphasis where particular points affect the Plough.

\* Not in accordance with Plumpton Neighbourhood Plan A)PPNP Policy 1 : Spatial Plan for the parish

The Plumpton Parish Neighbourhood Plan ("PPNP Policy 1") states the primary objective:

'New development proposals within the planning boundary for Plumpton Green will be supported, provided they accord with the other provisions of the PPNP and the development plan for the area.'

Lewes District Council 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.

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, I do not regard the proposed Site as sufficiently sustainable by virtue of its likely impact on local employment. I set out below my concerns of how this will affect the Plough

On the second objective, the proposed Site is greenfield and I believe its development will adversely change the character of the area by replacing arable land with residential development.

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.'

The Site does not meet 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.

Lewes District Council 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.

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. It 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 Plumpton Parish Council 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.

Plumpton Parish Council questions (and I support) 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.

#### B 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.

#### C 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.

There is also a Right of Way across the field on which the Site is proposed. This Right of Way is used by residents and ramblers alike and I fear that there is a real risk that this right will be encroached upon in the future, or that those exercising the right will no longer use this path. It is in my submission not fair to impinge upon or threaten people's use of the pathway.

#### D 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).

E PPNP Policy 6: Local employment I place extremely strong emphasis on this section of the PPNP as I have real concern that the proposed Site will affect my trade. It is national knowledge that the village pub trade is facing its most difficult time. Statistics show that on average 18 public houses close every week. The village has already seen the closure of The Winning Post within the last 5 years and I believe that LDC must look to support public houses as they are at the heart of the village community.

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.

I have daily trade from the Old Brickworks businesses and my ability to trade will be placed in real jeopardy should the Site be granted planning permission.

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 need for greater security.

and 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 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.

F 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'.

\* Road and Access Safety I have a real concern for my customers on their journeys to and from the Plough should the development proceed. I am also concerned of the safety risk caused by in affect a double entrance (that is the Old Brickworks and the Site entrance being next to each other).

\* Site Infrastructure Finally I refer to all previous planning application submitted on this land which have been refused and the reasons for these refusals. I also wish to refer generically to the reasons that other residential planning applications have been refused in the village/parish

\* It is not possible for appropriate on-site physical and social infrastructure such as water, power, drainage, parking and amenity space to be provided for 5 pitches in 0.69 hectares. In addition, the Site is so large it creates space for a number of antisocial uses



such as tipping and scrap car repair and sale. I am also concerned about odours, waste/ bonfires (banned on the adjacent Works site) drainage (foul and surface water), noise, the negative impact on village as a whole

\* A look at the present road surface shows the wear caused by heavy breaking and skidding at this section of Station Road.

\* The entrance to the Site is not safe. The derestricted speed of the road means heavy vehicles from either direction breaking directly opposite / at the access point to turn into the works causes fast moving cars / other commercial vehicles to use the full width of the road so any pedestrian particularly children would be in unnecessary danger – I have always found it difficult to walk out and along this part of the road due to traffic and it is extremely dangerous at night dangerous.

**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?**

THE PLOUGH INN  
STATION ROAD, PLUMPTON GREEN, LEWES BN7 3DF

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

Submitted to : <http://planningpolicyconsult.lewes-eastbourne.gov.uk/consult>

Dear Sirs

**Policy GT1**

**Proposed Gypsy and Traveller Site at land south of The Plough Inn**

**Lewes District Council Plan Part 2 Site Allocations and Development Management Policies Consultation- Pre-submission Version**

I am the Landlady and Licensee of The Plough Inn ("The Plough"). I hold a business tenancy at the Plough which has been granted by Harvey & Son (Lewes) Limited ("Harveys"). The freehold of the Plough, its gardens and the adjacent field to the north is owned by Harveys. I attach a plan which marks the location of the Plough and the proximity to the proposed Gypsy and Traveller Site ("the Site").

My tenancy commenced in August 2012 and I have also been a resident in the village since 1979.

The Plough is part of the village fabric and is the location of the RAF Chailey War Memorial. The Plough car park is used throughout the summer for various automotive and cultural exhibitions and also the site for the annual Remembrance Parade.

The Plough provides employment to between 6 to 10 staff (at various times of the year) and I look to employ people who are resident in the village.

I attended the Parish Council meeting on 9 October 2018 and have considered the representations made by Lewes District Council at that meeting.

I wish for this letter to place on record my strong objections to the proposed Site. These are from my perspective as operating one of 3 local Public Houses in the village but also as someone who has grown up and lived in the village for the majority of my life.

**Objections**

**1. Limited time to consider, understand and object**

Policy GT01 was first communicated to the Parish Council on 5 September 2018. I was notified of the proposal by letter from Plumpton Parish Council dated 14 September 2018. There has therefore been very little time for a proper consideration of the proposal, not only by the village community, but by Lewes District Council itself. As I understand there has

been no discussions on a potential purchase price or any indication of what that might be, no proper pitch layout produced, no environmental impact reports and no highways and transport reports. This creates a very difficult position for proper and full objections to be put in. It seems to indicate some sort of 'knee jerk' reaction in putting this proposal forward and without full details being addressed. Presently, on the documentation so far produced, it is not clear as to whether the proposal is achievable and deliverable in any event.

Further, nobody in the village had any awareness that the Site was highlighted as a potential site 3 years ago. That displays a lack of transparency from Lewes District Council of the planning process. It is inconceivable that the Parish Council and those residents who sit on the neighbourhood plan committee were not notified prior to 4 September 2018. This in my view must call into question the legitimacy of this planning proposal. I do not have enough information to comment further on this but reserve the right to do so.

I wish to draw attention to the Government's national Planning Policy for Traveller Sites (PPTS) which 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).'

The lack of a proper time period which I set out above is not consistent with 'early and effective engagement'. The 'evidence base' does not appear to be properly assembled.

I have therefore taken the decision that the best means for my objection is to follow the points which Plumpton Parish Council has set out in the draft objection dated 29 October 2018 and made available on its website. I have added particular emphasis where particular points affect the Plough.

## **2. Not in accordance with Plumpton Neighbourhood Plan**

### **A) PPNP Policy 1 : Spatial Plan for the parish**

The Plumpton Parish Neighbourhood Plan ("PPNP Policy 1") states the primary objective:

'New development proposals within the planning boundary for Plumpton Green will be supported, provided they accord with the other provisions of the PPNP and the development plan for the area.'

Lewes District Council 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:

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

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, I do not regard the proposed Site as sufficiently sustainable by virtue of its likely impact on local employment. I set out below my concerns of how this will affect the Plough

On the second objective, the proposed Site is greenfield and I believe its development will adversely change the character of the area by replacing arable land with residential development.

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.’

The Site does not meet 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.

Lewes District Council 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.

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. It 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 Plumpton Parish Council 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.

Plumpton Parish Council questions (and I support) 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.

## **B 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.

## **C 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.

There is also a Right of Way across the field on which the Site is proposed. This Right of Way is used by residents and ramblers alike and I fear that there is a real risk that this right will be encroached upon

in the future, or that those exercising the right will no longer use this path. It is in my submission not fair to impinge upon or threaten peoples use of the pathway.

## **D 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).

## **E PPNP Policy 6: Local employment**

I place extremely strong emphasis on this section of the PPNP as I have real concern that the proposed Site will affect my trade. It is national knowledge that the village pub trade is facing it’s most difficult time. Statistics show that on average 18 public houses close every week. The village has already seen the closure of The Winning Post within the last 5 years and I believe that LDC must look to support public houses as they are at the heart of the village community.

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:

- iii. Plumpton College – an outstanding rural education centre covering 2500 acres, predominantly within the SDNP, specialising in land-based courses
- iv. Plumpton Racecourse – a National Hunt racecourse to the south of Plumpton Green that saw its first race in 1884
- v. 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.

I have daily trade from the Old Brickworks businesses and my ability to trade will be placed in real jeopardy should the Site be granted planning permission.

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 need for greater security.

and 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 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.

## **F 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'.

## **3. Road and Access Safety**

The entrance to the Site is not safe. The derestricted speed of the road means heavy vehicles from either direction breaking directly opposite / at the access point to turn into the works causes fast moving cars /

other commercial vehicles to use the full width of the road so any pedestrian particularly children would be in unnecessary danger – I have always found it difficult to walk out and along this part of the road due to traffic and it is extremely dangerous at night dangerous.

I have a real concern for my customers on their journeys to and from the Plough should the development proceed.

A look at the present road surface shows the wear caused by heavy breaking and skidding at this section of Station Road.

I am also concerned of the safety risk caused by in affect a double entrance (that is the Old Brickworks and the Site entrance being next to each other).

#### **4. Site Infrastructure**

It is not possible for appropriate on-site physical and social infrastructure such as water, power, drainage, parking and amenity space to be provided for 5 pitches in 0.69 hectares

In addition, the Site is so large it creates space for a number of antisocial uses such as tipping and scrap car repair and sale.

I am also concerned about odours, waste/ bonfires (banned on the adjacent Works site) drainage (foul and surface water), noise, the negative impact on village as a whole

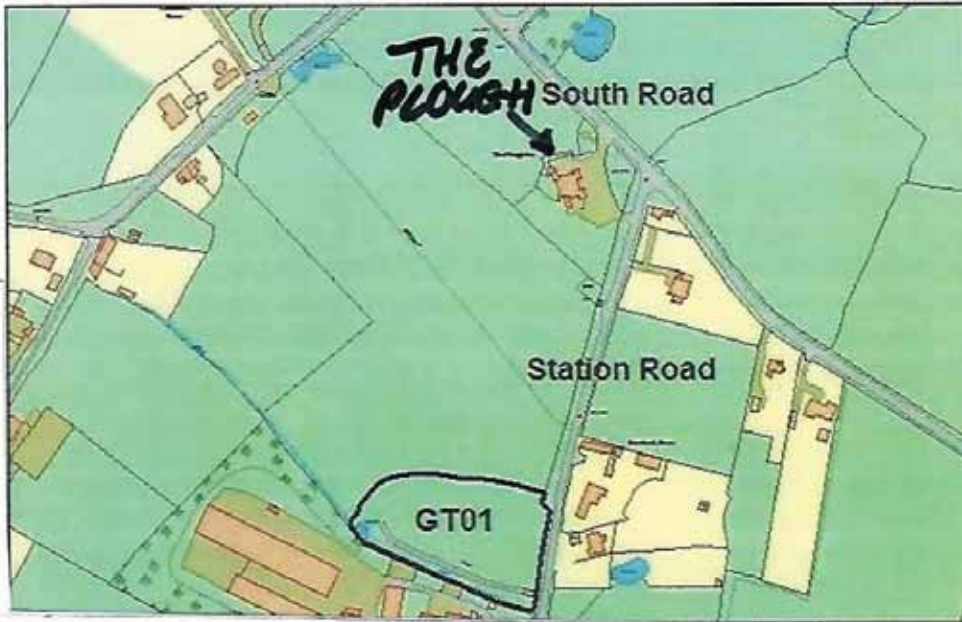
Finally I refer to all previous planning application submitted on this land which have been refused and the reasons for these refusals. I also wish to refer generically to the reasons that other residential planning applications have been refused in the village/parish

For all of the above reasons the proposed development is not suitable and an alternative site considered.

Yours sincerely

Nicole Palmer





<b>Representation ID:</b> REP/328/E1
--------------------------------------

Representor Details:

<b>Representor ID:</b>	REP/328
<b>Name:</b>	Helen Palmer
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>E1 - Land at East Quay, Newhaven Port</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	Yes
<b>Sound:</b>	No Not Justified Not Consistent with national policy
<b>Representation:</b>	<p>The Tidemills area is not only of interest historically but also an important and valuable wildlife reserve. There has already been industrial encroachment into this area with loss of valuable habitat and a decrease in the birdlife to be seen. At a time when we are all being made aware of the danger of species extinctions due to human activity it is</p>

imperative that all reserves such as this should be held sacrosanct and destructive industrialisation avoided. Newhaven and Seaford need to keep this important area, the Tidemills and the whole of Seaford bay, as a place of recreation, peace and quiet, and free from noise, pollution and traffic. More industrial activity is not an appropriate neighbour for the South Downs National park, and this proposal should not be allowed to proceed.

**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?**

<b>Representation ID:</b> REP/329/E1
--------------------------------------

Representor Details:

<b>Representor ID:</b>	REP/329
<b>Name:</b>	Anthony Palmer
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>E1 - Land at East Quay, Newhaven Port</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	Yes
<b>Sound:</b>	No Not Justified Not Consistent with national policy
<b>Representation:</b>	<p>This E1 proposal not only saturates but overwhelms the area with continuing industrial development to the permanent detriment of the adjacent nature and wildlife reserve. The bird life is decreasing and leading to the national extinction of numerous species. There used to be large flocks of Lapwing here which are no longer to be seen. This</p>

continuing industrial expansion by Lewes District Council drives out both the natural world and recreational area and completes the ruin of Newhaven and surrounding areas by overdevelopment. The infrastructure will be inadequate; already the Port is too small in both depth and width as is seen in the Ferry size limitation. Containerisation failed, the crane dismantled. What a sick sad dirty place it is and continues 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?** No

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

<b>Representation ID:</b> REP/330/E1
--------------------------------------

Representor Details:

<b>Representor ID:</b>	REP/330
<b>Name:</b>	Victoria Palmer
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>E1 - Land at East Quay, Newhaven Port</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	
<b>Sound:</b>	
<b>Representation:</b>	<p>I am a resident of Seaford and am writing in response to Policy E1 of Lewes District Council Local Plan Part 2 I consider that development of this area fails to protect the beautiful area of Tidemills, an area of biodiversity and an area enjoyed by tourists and locals. This area is a designated local wildlife site and includes rare vegetated shingle.</p> <p>I can see no evidence that the site is needed for employment as other more suitable sites are available in Newhaven.</p> <p>I understand that the vision for Newhaven should maximise the clean, green, marine sectors and sustainable tourism and Policy E1 fails on this.</p> <p>Increased traffic congestion will be a result of this policy and will result in even poorer air</p>

quality in and around Newhaven.

I, like many others, was initially misled by the inaccuracies of the map shared by Lewes District Council showing the designated area for development and feel most strongly that this led to many people erroneously accepting the 'plan'.

Policy E1 is completely unacceptable and does not contribute to 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?**

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

## Hodgson, Lilly

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**From:** Victoria Palmer <[REDACTED]>  
**Sent:** 05 November 2018 11:31  
**To:** ldf  
**Subject:** Policy E1 of Lewes District Plan Part 2  
  
**Categories:** Vanessa to deal with

I am a resident of Seaford and am writing in response to Policy E1 of Lewes District Council Local Plan Part 2 I consider that development of this area fails to protect the beautiful area of Tidemills, an area of biodiversity and an area enjoyed by tourists and locals. This area is a designated local wildlife site and includes rare vegetated shingle.

I can see no evidence that the site is needed for employment as other more suitable sites are available in Newhaven.

I understand that the vision for Newhaven should maximise the clean, green, marine sectors and sustainable tourism and Policy E1 fails on this.

Increased traffic congestion will be a result of this policy and will result in even poorer air quality in and around Newhaven.

I, like many others, was initially misled by the inaccuracies of the map shared by Lewes District Council showing the designated area for development and feel most strongly that this led to many people erroneously accepting the 'plan'.

Policy E1 is completely unacceptable and does not contribute to sustainable development.

Victoria Palmer  
[REDACTED]



<b>Representation ID: REP/331/GT01</b>
--

Representor Details:

<b>Representor ID:</b>	REP/331
<b>Name:</b>	Walter Panis
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>
<b>Organisation:</b>

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	GT01 - Land south of The Plough
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	
<b>Sound:</b>	
<b>Representation:</b>  I object to the proposal of a permanent Gypsy and Travellers site in Plumpton Green. I believe it would not be good for the village, particularly the local people and atmosphere., and agree with Mr. S.Morris.	
<b>What changes do you suggest to make the document legally compliant or sound?</b>	
<b>Do you consider it necessary to participate at the Examination in Public?</b>	
<b>Why do you feel it is necessary to participate at the Examination in Public?</b>	

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## Hodgson, Lilly

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**From:** Walter Panis <[REDACTED]>  
**Sent:** 28 September 2018 10:19  
**To:** ldf  
**Subject:** Objection to Gypsy site in Plumpton Green  
  
**Categories:** LPP2 comment to code - stakeholder details have been added

Dear sir,

I object to the proposal of a permanent Gypsy and Travellers site in Plumpton Green.

I believe it would not be good for the village, particularly the local people and atmosphere., and agree with Mr. S.Morris.

Thank you for your attention.

Walter Panis (iMAC Apple computer)

[W](#) [REDACTED]

**Representation ID: REP/332/GT01**Representor Details:

<b>Representor ID:</b>	REP/332
<b>Name:</b>	S Parmenter
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>GT01 - Land south of The Plough</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	
<b>Sound:</b>	
<b>Representation:</b>	
<p>We understand that Lewes District Council is proposing to develop a permanent travellers' site of 5 pitches in Plumpton Green adjacent to the Old Brickworks, close to the Plough Inn.</p> <p>We object to the proposed development on the following grounds:</p> <p>* No such proposal was included in the Neighbourhood Plan, which was the subject of extensive and prolonged consultation and has only recently been finalised. It amounts to (a) development and (b) a residential site and should have been included in the</p>	

Neighbourhood Plan for these reasons.

\* The proposed site is currently outside the developed part of the village and is part of the surrounding countryside. Developing this field would be detrimental to the rural nature of this location and could result in further development being justified at a later date, thereby damaging the open space around the village, leading to ribbon development along Station Road/Plumpton Lane and generally undermining this quiet and rural location.

\* The rural location would make unofficial "spread" into adjoining fields difficult to contain and manage.

\* There is likely to be a negative impact on the small business park at The Old Brickworks due to concerns [REDACTED] Loss of businesses from this site (which accommodates 21 small businesses) would have a disproportionately large and detrimental effect on the fragile local economy and local jobs. Proximity to the other small business park at the northern end of St Helena Lane means that businesses there could also be adversely affected.

\* There is no pedestrian access to and from the village from this site and access would be along a very busy road, which is unlit at night. Provision of a footpath and/or lighting to redress this objection would damage the rural character of the village and not be a good use of public money.

\* A traveller site already exists at Offham, next to the petrol station, so there is local provision already. Whether it is currently an official site or not, further development here would, because of its isolated position and location on a main road, not impinge as much on rural character and it has pedestrian access already available.

We trust you will take our objections into account and bring them to the notice of your elected members when they consider this matter after 5th November 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?**

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

Our Ref: SP

Your Ref:

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

07 December 2018

Dear Sir/Madam

### **Proposed Gypsy Site in Plumpton Green**

We understand that Lewes District Council is proposing to develop a permanent travellers' site of 5 pitches in Plumpton Green adjacent to the Old Brickworks, close to the Plough Inn.

We object to the proposed development on the following grounds:

- No such proposal was included in the Neighbourhood Plan, which was the subject of extensive and prolonged consultation and has only recently been finalised. It amounts to (a) development and (b) a residential site and should have been included in the Neighbourhood Plan for these reasons.
- The proposed site is currently outside the developed part of the village and is part of the surrounding countryside. Developing this field would be detrimental to the rural nature of this location and could result in further development being justified at a later date, thereby damaging the open space around the village, leading to ribbon development along Station Road/Plumpton Lane and generally undermining this quiet and rural location.
- The rural location would make unofficial "spread" into adjoining fields difficult to contain and manage.
- There is likely to be a negative impact on the small business park at The Old Brickworks due to concerns [REDACTED]. Loss of businesses from this site (which accommodates 21 small businesses) would have a disproportionately large and detrimental effect on the fragile local economy and local jobs. Proximity to the other small business park at the northern end of St Helena Lane means that businesses there could also be adversely affected.
- There is no pedestrian access to and from the village from this site and access would be along a very busy road, which is unlit at night. Provision of a footpath and/or lighting to redress this objection would damage the rural character of the village and not be a good use of public money.
- A traveller site already exists at Offham, next to the petrol station, so there is local provision already. Whether it is currently an official site or not, further development here would, because of its isolated position and location on a main road, not impinge as much on rural character and it has pedestrian access already available.

We trust you will take our objections into account and bring them to the notice of your elected members when they consider this matter after 5<sup>th</sup> November 2018.

Yours sincerely

Mr and Mrs Parmenter, [REDACTED]

**Copy to:** Plumpton Parish Council

<b>Representation ID:</b> REP/333/GT01/A
--

Representor Details:

<b>Representor ID:</b>	REP/333
<b>Name:</b>	Martin Parry
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>GT01 - Land south of The Plough</b>
<p><i>Do you consider the document to be:</i></p> <p><b>Legally Compliant:</b></p> <p><b>Sound:</b></p>	
<p><b>Representation:</b></p> <p>I wish to register my strong opposition to Policy GT01 – Land south of The Plough which forms part of Lewes District Council's Local Plan Part 2 Site Allocations and Development Management Policies consultation on the Pre-submission version of the Plan.</p> <p>Two of the strategic aims of the Core Policy 3 (Criteria to be considered in any future</p>	

assessment of subsequent potential Gypsy and Traveller pitch allocations made through Local Plan 2) are as follows:

- \* 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
- \* 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

\*

The proposal fails to achieve these key criteria for several reasons:

- \* The government's national Planning Policy for Traveller (PTTS) 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).' The Policy GT01 was first communicated to the Plumpton Parish Council (PPC) on the 05/09/18. I agree with the PPC that this suggests there was either a deliberate attempt to conceal/limit discussion of these plans or a hasty last-minute decision to include this site. Plumpton & Plumpton Green has already agreed within the Plumpton Parish Neighbourhood Plan (PPNP) to a large-scale development within the settlement and is still trying to adjust to this development. The site is located in a greenfield site isolated from Plumpton village and the limited amenities available there. The upper edge of the village is approximately 700 metres south of the proposed site. Plumpton Green has no facilities apart from a rural pub (see point 14). Plumpton Green is a very loosely knit rural collection of properties with no grouping together of five or more residences in a small geographical location. The proposal is completely out of keeping with the prevailing pattern of development and would clearly adversely affect the character of the area. This major objection breaches the Criterion 3 within Policy CP3.

\*

\*

- \* This proposal GT01 has ignored the PPNP which the Plumpton Parish Council in conjunction with LDC spent several months developing, communicating and agreeing with the community. This has already agreed a substantial development within the agreed plan within the existing village of Plumpton. The parish of Plumpton is rural, and comprises two distinct characteristics: • Plumpton – a Service Village where new development should be sited. GT01 policy primarily represents an additional new development of five permanent dwellings plus five semi-permanent dwellings within Plumpton Green – a hamlet where no development should be sited.

\*

- \* • Plumpton Green – a Hamlet where no development should be sited



With regard to the Plumpton Parish Neighbour Plan (PPNP), Policy GT01 is regarded by the PCC 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 land within GT01 is not within the Plumpton Green planning boundary and is 650 metres distant.

\* The proposed site is a greenfield site and the development will directly adversely change the character of the area by replacing arable land with a residential development, both of which fail to meet LDC Core Policy 3.

\* The location lacks any readily accessible amenities, apart from a rural pub. There is no direct or easy access route to shops, transport, healthcare, education or leisure activities. The gypsy and traveller community will be placed in an isolated and isolating location dependent almost exclusively on motor transport for all the daily activities of life. Research has shown that gypsy and traveller women are a disadvantaged group for several reasons including poor access to motor vehicles. As a population they also have greater need to access health and social care services. The council may believe further increasing the difficulties of access for this community is acceptable but most would consider this proposal misguided and harmful. The only amenity LDC have factored in on this site a public house in relatively close proximity. Increased social issues and deprivation follow hand in hand with alcohol and its potential misuse. The LDC needs to empower the gypsy and traveller community to manage their own lives by placing them in locations where ready access to services and amenities is not dependent on motor vehicles and male members of the household. This major objection breaches the Criterion 2 within Policy CP3.

\* Child poverty in gypsies and traveller groups has been highlighted as a significant concern. Members of these communities' experience greater difficulty in accessing mainstream social, educational and health services. This isolated, car dependent location will only exacerbate these acknowledged concerns.

\* The nearest local shop is a 1500 metre walk into the village. The station is even further. One local bus stop, approximately 200 meters away, with an infrequent service during daytimes, limited at weekends and non-existent after early evening. The bus stop is on one side of the road, not the direction which leads into the village. To flag the bus down, one has to run across the road and stand in the road! This will also place a financial burden on the gypsy and traveller families. This major objection breaches the Criterion 2 within Policy CP3.

\* There are no pavements for 700 meters to the village and 200 metres to the bus stop.

No street lighting. The current hedges and road layout leading to the village would not allow a footpath to be constructed at the first bend approximately 200 metres south on the road. This is a dangerous road to walk along, I have had personal experience of this on many occasions. The total lack of safe pedestrian access to the village, along a busy national speed limit minor road is a major breach of the Criterion 2 & 4 within Policy CP3.

\* Core Policy 3 states that the site must be deliverable. However, it was clear following a local presentation by the planning team that this was clearly not the case at present. The land has not been secured or purchased and the objectives of the landowner are unclear to say the least. The site cannot be considered deliverable currently.

\* This site was previously rejected by the highway's agency based on access concerns. The location of the access has not changed but their view has! All the junctions surrounding South Road, Beresford Lane, St Helena Road and Station Road are problematic at best and often frankly dangerous. A significant volume of traffic uses Station road including heavy goods vehicles with cars speeding down the hill approaching maximum speed close to the site entrance. The potential for serious injury or death to children at the site would be a significant risk. This major objection breaches the Criterion 4 within Policy CP3

\* Policy GT01 refers to the provision of access to be provided from Station Road whilst paragraph 2.137 refers also to existing agricultural access. This also noted that access delivery is dependent on land outside the current proposed plot and that of the council. This breaches the Criterion 4 within Policy CP3.

\* Criterion 6 cannot be met as current properties directly overlook the site. Other gypsy and traveller sites are often placed in environments where this is not the case.

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#### Tackling inequalities for Gypsy and Traveller communities

Gypsies and Travellers experience, some of the worst outcomes of any ethnic or social group including: below average educational attainment; above average rates of miscarriage, still births and neo-natal deaths; and widespread discrimination and hostility. Ministers are determined to tackle these inequalities and improve the lives of the country's Gypsy and Traveller communities.

Published 4 April 2012, Ministry of Housing, Communities & Local Government

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Please can I be kept informed of the progress of this proposal and of any inquiry if there should be one.

**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?**

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<b>Representation ID:</b> REP/333/GT01/B
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Representor Details:

<b>Representor ID:</b>	REP/333
<b>Name:</b>	Martin Parry
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>GT01 - Land south of The Plough</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	No
<b>Sound:</b>	No Not Positively Prepared Not Justified Not Effective Not Consistent with national policy
<b>Representation:</b>	
I wish to register my strong opposition to Policy GT01 – Land south of The Plough which forms part of Lewes District Council's Local Plan Part 2 Site Allocations and Development Management Policies consultation on the Pre-submission version of the	

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The land within GT01 is not within the Plumpton Green planning boundary and is 650 metres distant.

\* The proposed site is a greenfield site and the development will directly adversely change the character of the area by replacing arable land with a residential development, both of which fail to meet LDC Core Policy 3.

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Please can I be kept informed of the progress of this proposal and of any inquiry if there should be one.

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

Based on the above response I believe that the proposal GTO1- Land South of The Plough to be used as a Gypsy and Traveller site should be rejected in favour of a more suitable, sustainable and safer location within the district. The expansion of the already existing site in Lewes with its ideal location for access to services and amenities would

be a suitable potential site.	
<b>Do you consider it necessary to participate at the Examination in Public?</b>	Yes
<b>Why do you feel it is necessary to participate at the Examination in Public?</b>	
For the reasons above it is essential that the Inspector should here a broad view of concerns regarding the absolutely unsuitable and unsustainable nature of this proposal.	

Dr Martin G Parry



4<sup>th</sup> November 2018

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

Dear Sir/Madam,

**Re: Response to Lewes District Local Plan Part 2 Site Allocations and Development Management Policies Consultation - Pre-submission version Policy GT01 - Land south of The Plough**

I wish to register my strong opposition to Policy GT01 – Land south of The Plough which forms part of Lewes District Council’s Local Plan Part 2 Site Allocations and Development Management Policies consultation on the Pre-submission version of the Plan.

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The proposal fails to achieve these key criteria for several reasons:

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Yours sincerely,

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4<sup>th</sup> November 2018

Planning Policy Team  
Lewes District Council  
Southover House  
Southover Road  
Lewes  
East Sussex  
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- 11) Criterion 6 cannot be met as current properties directly overlook the site. Other gypsy and traveller sites are often placed in environments where this is not the case.
- 12) The site 0.69 hectares seems very large for 5 pitches even including infrastructure which will be totally out of place within a greenfield. One assumes the plan is to increase the number of pitches?
- 13) The location of the site will clearly directly impact on several local businesses based at the Old Brickworks. It is apparent that a number of these current tenants will not remain at this site if the proposal proceeds due to security and environmental concerns. This will have a significant consequence for employment within the local community with potential job losses, relocation of rural based businesses and detrimentally affect the economic viability of

our fragile rural community. This major objection breaches Criterion 2 within Policy CP3 and of the PPNP Policy 6 & 7.

- 14) The only community amenity within Plumpton Green is The Plough public house. This is a centre for the community and like several surrounding rural pubs has had to face some challenging economic times over the last 10 yrs. We are in the fortunate position that we have an excellent landlady Nicol and the support of Harveys which have enabled the pub to flourish over the last 5 yrs. However, the proposed site could well critically jeopardise our one community asset leaving Plumpton Green with no community assets. Within a 2.5-mile radius of Plumpton Green four pubs have closed within the last 10yrs. The village has already lost one of its local pubs.
- 15) LDC Core Policy 10 relates to the natural Environment and Character. This proposal will adversely impact on all aspects of the natural environment and the varied wildlife flora and fauna present within this greenfield site. A toilet block, sewage works, hard surfacing and erection of high barriers around the site clearly breaches this policy as well. Five permanent and five semi-permanent caravans plus cars in the field do not reflect the character or the landscape of area. All these are at odds with the PPNP Policy 2 & 3 & 5

#### ***Tackling inequalities for Gypsy and Traveller communities***

***Gypsies and Travellers experience, some of the worst outcomes of any ethnic or social group including: below average educational attainment; above average rates of miscarriage, still births and neo-natal deaths; and widespread discrimination and hostility. Ministers are determined to tackle these inequalities and improve the lives of the country's Gypsy and Traveller communities.***

#### ***Published 4 April 2012, Ministry of Housing, Communities & Local Government***

Government commitments aim to tackle ingrained inequalities and promote fairness for Gypsy and Traveller communities. The LDC plan to isolate this vulnerable community in an unsustainable and unsuitable remote site with no access to services or amenities and poor access to education, social and health services does not address these issues and only serves to increase problems already faced within these communities. This proposal is a matter of convenience for the LDC.

This site was rejected by LDC originally and is now being reconsidered because they have nowhere else. This site was inappropriate originally and it still is. All the original concerns are still present. This site isolates the gypsy and traveller communities, making those who are dependent within the community more so. It adds financial burden on them, places their children at greater risk of serious injury and socially isolates them. The potential impact on the fragile hamlet community which is Plumpton Green, its only amenity The Plough and local business is a disgraceful gamble to be taken by LDC. LDC needs to either find an appropriate location for a site within the district or expand existing sites such as Lewes which has all the necessary excellent access to services and leisure

facilities enabling the gypsy and travellers to integrate into the community. Policy GT1 needs to be rejected and the Council needs to reassess its need and approach to the issue of gypsy and traveller sites within the district.

Please can I be kept informed of the progress of this proposal and of any inquiry if there should be one.

Yours sincerely,

Dr Martin G Parry

<b>Representation ID:</b> REP/334/E1
--------------------------------------

Representor Details:

<b>Representor ID:</b>	REP/334
<b>Name:</b>	Linda Payne
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	E1 - Land at East Quay, Newhaven Port
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	Yes
<b>Sound:</b>	No Not Justified
<b>Representation:</b>  This is an outstanding area for wildlife, particularly rare bird life. Used by many migratory birds too. It is a widely used leisure area too where families can enjoy unspoilt land and beach easily accessible by public transport.. Please don't take this from our future generations.	
<b>What changes do you suggest to make the document legally compliant or sound?</b>	

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

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**Representation ID: REP/335/GT01/A**Representor Details:

<b>Representor ID:</b>	REP/335
<b>Name:</b>	Muriele & Tom Pearce
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>GT01 - Land south of The Plough</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	
<b>Sound:</b>	
<b>Representation:</b> <p>I am re-sending my previous e-mail to make sure that it falls within the required framework.</p> <p>We have heard that a permanent Gypsy and Travellers' site is being proposed at the land south of The Plough in Plumpton Green and we would like to state our objection to the proposal.</p> <p>We are concerned at the financial impact this will have on our Council. The additional expenditure, at a time when our Council is already struggling and cutting services year</p>	

on year, is a worry. Should the residents of Plumpton Green suffer financially from this development I trust that the Council will compensate them appropriately.

We are also concerned about the health hazards and the environmental impact of such a site.

We do not believe that this settlement would bring any benefits to the village of Plumpton Green.

We find it difficult to understand why a permanent Gypsy and Travellers' site is needed as the very word 'permanent' is contradictory to their very way of life which is nomadic and can be viewed as an attempt from the establishment to force them to settle.

If these 'Travellers' wish to settle then we cannot see why they cannot be absorbed within the existing community rather than be segregated, which amounts to discrimination.

**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?**



<b>Representation ID:</b> REP/335/GT01/B
--

Representor Details:

<b>Representor ID:</b>	REP/335
<b>Name:</b>	Muriele Pearce
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>GT01 - Land south of The Plough</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	
<b>Sound:</b>	
<b>Representation:</b>	<p>We attended the Plumpton Parish Council meeting regarding the proposed Travellers' site at the land south of The Plough in Plumpton Green and found it very informative. We now understand the needs of the Travellers much better and would like to replace our previous objection with this one.</p> <p>We have great concerns over the location of the site as there is no safe pedestrian access to any of the village amenities, namely the shop and the school.</p> <p>The road leading from the proposed site to the village is busy (especially so during race meetings), narrow and unlit. There is a left-bearing bend, just before the 'Plumpton Green' sign as you leave the village which is highly dangerous not only to pedestrians</p>

but to car drivers when they are faced by pedestrians walking on the wrong side of the road, and have nowhere to go when there is oncoming traffic.

The road will become busier as further approved developments take place in the village.

We understand that a previous proposal for a housing development on the land the Travellers' site is now put forward, was turned down due to safety concerns and we are at a loss to understand why these concerns do not extend to Travellers.

**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:** Muriele Pearce <[REDACTED]>  
**Sent:** 24 September 2018 16:27  
**To:** ldf  
**Subject:** Proposed permanent Gypsy and Travellers' site outside Plumpton Green  
**Categories:** LPP2 comment to code - stakeholder details have been added

TO WHOMEVER IT MAY CONCERN

I am re-sending my previous e-mail to make sure that it falls within the required framework.

We have heard that a permanent Gypsy and Travellers' site is being proposed at the land south of The Plough in Plumpton Green and we would like to state our objection to the proposal.

We are concerned at the financial impact this will have on our Council. The additional expenditure, at a time when our Council is already struggling and cutting services year on year, is a worry. Should the residents of Plumpton Green suffer financially from this development I trust that the Council will compensate them appropriately.

We are also concerned about the health hazards and the environmental impact of such a site.

We do not believe that this settlement would bring any benefits to the village of Plumpton Green.

We find it difficult to understand why a permanent Gypsy and Travellers' site is needed as the very word 'permanent' is contradictory to their very way of life which is nomadic and can be viewed as an attempt from the establishment to force them to settle.

If these 'Travellers' wish to settle then we cannot see why they cannot be absorbed within the existing community rather than be segregated, which amounts to discrimination.

Kind regards,

Tom and Muriele Pearce  
[REDACTED]  
[REDACTED]  
[REDACTED]

<b>Representation ID:</b> REP/336/E1
--------------------------------------

Representor Details:

<b>Representor ID:</b>	REP/336
<b>Name:</b>	Timothy & Stephanie Pearce & Miles
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	E1 - Land at East Quay, Newhaven Port
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	
<b>Sound:</b>	
<b>Representation:</b>	<p>We are life-long local residents of the Newhaven area, originally born and brought up in Seaford and now currently residing in Lewes. We visit (at least twice a week) the existing Tide Mills area for relaxation, enjoyment of the natural area and access to the sea.</p> <p>Whilst this document represents our personal objections to the above policy proposal, we are professional conservation practitioners (currently employed at the Royal Botanic</p>

Gardens Kew), and active members of the Sussex Botanical Recording Society.

Whilst fully supportive of the need to continue to improve the lifestyle quality of Newhaven's permanent residents and visitors alike, we are concerned that the health and wellbeing benefits are ill-considered in the Local Plan and make an appeal that the few remaining areas of natural and historical interest are carefully incorporated into development planning.

We therefore wish to register our concern regarding the proposed extension of designation area E1 which has found its way into the district plan. It appears that the latest proposal has been published at a very late stage giving little time for local consultation and response.

We have studied and fully endorse the content of the Consultation Response from Community Action Newhaven in relation to Policy E1 of Lewes District Local Plan Part 2. In particular, we would like to register the following key objections:

1) The proposal will directly impact an EU Priority 1 habitat (shoreline shingle vegetation); which the UK government has a global responsibility to protect.

The Habitat Action Plan for Sussex June 1999 developed in consultation with East Sussex County Council states:

"Vegetated shingle is a nationally rare habitat type and is listed on Annex 1 of the EC Habitats Directive as a habitat of international conservation importance. Japan and New Zealand are the other most important global locations for vegetated shingle habitats. Sussex has approximately 1000 hectares of vegetated shingle altogether with the large areas of shingle at Rye Harbour and at Dungeness providing the bulk of the cusplate foreland shingle resource. The shingle in West Sussex consists of fringing beaches along much of the coast (Shoreham Beach, Climping Beach, Bognor Regis and Pagham) along with a smaller area of ridges at Pagham. Much of the vegetated shingle resource in Sussex is covered by either SSSI or SNCI designation, however a large area at Rye Harbour has no protection (197 hectares) along with other areas along the Sussex coast - see Table 1 for a list of known designated sites. Small areas of vegetated shingle also occur at a number of other sites including Littlehampton, Kingston, Worthing, Lancing Beach, Newhaven (West) and Galley Hill."

East Sussex Vegetated Shingle Management Plan (2009) states that the area at Tide Mills (west) "exhibits an extremely good example of vegetated shingle habitat".

2) The Coastal Vegetated Shingle Habitat Action Plan, as laid out in the UK Biodiversity Action Plan 1992-2012 (1994), clearly targets:

- \* No further net loss of existing vegetated shingle;
- \* Prevention of exploitation or damage to existing shingle sites through human activities; and
- \* And, where possible, restore damaged or degraded shingle habitats.

3) The DEFRA 25Yr Environment Plan (2018) states clearly that any planning should

inter alia address:

- \* Conservation and enhancement of the natural environment;
  - \* Making sure there are high quality natural spaces particularly in urban areas; and
  - \* Encouraging more people to spend time in them to benefit their health and well-being.
- 4) The area is regularly used by the local community for walking, access to the beach for fishing, swimming, picnicking, birdwatching and plant recording and is studied for its biodiversity value with a plant checklist (attached) and regular bird censuses carried out.
- 5) There are a number of priority plant species to be found on the Tide Mills site such as:
- \* Seven species including *Bromus hordeaceus* ssp. *ferronii*, and *Trifolium squamosum* both listed as Nationally Scarce on the Vascular Plant Red Data List for Great Britain, 2006;
  - \* *Fragaria vesca* (wild Strawberry) listed as Near Threatened on the Vascular Plant Red List for England, 2014);
  - \* At least 12 "Axioophytes" (indicators of habitat that is considered important for conservation).
- 6) The existing Tide Mills area (including the area designated as E1) has been granted a status of Designated Local Wildlife Site (formally an SNCI). This designation has implications for planning designation, no further development should be permitted on this remaining "green" space.
- 7) We consider the remains of the village of Tide Mills itself along with the WW2 Seaplane base have significant historical and cultural value. There is an enormous opportunity for Newhaven to incorporate such local history into the town's development process. This current E1 plan severely jeopardises this potential.
- Please consider the above as part of your decision making process, and please do not hesitate to contact us should you require further information on the above.

**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:** Tim Pearce [REDACTED]  
**Sent:** 03 November 2018 14:47  
**To:** ldf  
**Cc:** communityactionnewhaven@gmail.com; maria.caulfield.mp@parliament.uk  
**Subject:** Consultation: Policy E1 of Lewes District Local Plan Part 2  
**Attachments:** Tide Mills Check List June 2011\_MilesPearce.xlsx

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

Lewes District Council  
Planning Office

Mr. T. Pearce & Ms. S. Miles  
[REDACTED]

cc. Maria Caulfield MP, Lewes County Constituency  
cc. Community Action Newhaven  
3<sup>rd</sup> November 2018

**Re: Policy E1 of Lewes District Local Plan Part 2**

Dear Sir

We are life-long local residents of the Newhaven area, originally born and brought up in Seaford and now currently residing in Lewes. We visit (at least twice a week) the existing Tide Mills area for relaxation, enjoyment of the natural area and access to the sea.

Whilst this document represents our personal objections to the above policy proposal, we are professional conservation practitioners (currently employed at the Royal Botanic Gardens Kew), and active members of the Sussex Botanical Recording Society.

Whilst fully supportive of the need to continue to improve the lifestyle quality of Newhaven's permanent residents and visitors alike, we are concerned that the health and wellbeing benefits are ill-considered in the Local Plan and make an appeal that the few remaining areas of natural and historical interest are carefully incorporated into development planning.

We therefore wish to register our concern regarding the proposed extension of designation area E1 which has found its way into the district plan. It appears that the latest proposal has been published at a very late stage giving little time for local consultation and response.

We have studied and fully endorse the content of the **Consultation Response from Community Action Newhaven in relation to Policy E1 of Lewes District Local Plan Part 2**. In particular, we would like to register the following key objections:

- 1) The proposal will directly impact an **EU Priority 1 habitat** (shoreline shingle vegetation); which the UK government has **a global responsibility** to protect.

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*"Vegetated shingle is a nationally rare habitat type and is listed on **Annex 1 of the EC Habitats Directive as a habitat of international conservation importance**. Japan and New Zealand are the other most important global locations for vegetated shingle habitats. Sussex has approximately 1000 hectares of vegetated shingle altogether with the large areas of shingle at Rye Harbour and at Dungeness providing the bulk of the cusped foreland shingle resource. The shingle in West Sussex consists of fringing beaches along much of the coast (Shoreham Beach, Climping Beach, Bognor Regis and Pagham) along with a smaller area of ridges at Pagham. Much of the*

vegetated shingle resource in Sussex is covered by either SSSI or SNCI designation, however a large area at Rye Harbour has no protection (197 hectares) along with other areas along the Sussex coast - see Table 1 for a list of known designated sites. Small areas of vegetated shingle also occur at a number of other sites including Littlehampton, Kingston, Worthing, Lancing Beach, Newhaven (West) and Galley Hill."

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- Prevention of exploitation or damage to existing shingle sites through human activities; and
- And, where possible, restore damaged or degraded shingle habitats.

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- Conservation and enhancement of the natural environment;
- Making sure there are high quality natural spaces particularly in urban areas; and
- Encouraging more people to spend time in them to benefit their health and well-being.

4) The area is regularly used by the local community for walking, access to the beach for fishing, swimming, picnicking, birdwatching and plant recording and is studied for its biodiversity value with a plant checklist (attached) and regular bird censuses carried out.

5) There are a number of priority plant species to be found on the Tide Mills site such as:

- Seven species including *Bromus hordeaceus* ssp. *feronii*, and *Trifolium squamosum* both listed as Nationally Scarce on the Vascular Plant Red Data List for Great Britain, 2006;
- *Fragaria vesca* (wild Strawberry) listed as Near Threatened on the Vascular Plant Red List for England, 2014);
- At least 12 "Axiophytes" (indicators of habitat that is considered important for conservation).

6) The existing Tide Mills area (including the area designated as E1) has been granted a status of **Designated Local Wildlife Site** (formally an SNCI). This designation has implications for planning designation, no further development should be permitted on this remaining "green" space.

7) We consider the remains of the village of Tide Mills itself along with the WW2 Seaplane base have significant historical and cultural value. There is an enormous opportunity for Newhaven to incorporate such local history into the town's development process. This current E1 plan severely jeopardises this potential.

Please consider the above as part of your decision making process, and please do not hesitate to contact us should you require further information on the above.

Yours sincerely

Timothy R Pearce

Stephanie MH Miles



Species	Common name/notes
Achillea millefolium	
Agrimonia eupatorium	
Aira praecox	
Aira caryophyllea	axiophyte
Allium triquetrum	
Anacamptis pyramidalis	Pyramidal orchid
Anagallis arvensis	
Anthoxanthum odoratum	
Anthriscus sylvestris	
Aphanes arvensis s.s.	
Arabidopsis thaliana	
Arctium sp.	
Arenaria serpyllifolia	
Armeria maritima	
Asplenium ruta-muraria	
Atriplex hastata	
Atriplex portulacoides	
Barbarea verna	
Bellis perennis	
Beta vulgaris	Sea beet
Blackstonia perfoliata	Yellow-wort
Brachypodium sylvaticum	
Bromus sterilis	
Bromus mollis	
Bromus hordeaceus subsp. ferronii	nationally scarce
Bromus hordeaceus subsp. thominei	nationally scarce
Buddleja davidii	Intr
Cardamine hirsuta	
Cardaria draba	Hoary cress (Intr)
Carduus tenuiflorus	
Carex divulsa subsp. divulsa	
Carlina vulgaris	Carline Thistle
Catapodium rigidum	
Catapodium maritimum	axiophyte
Centaurea erythraea	
Centranthus rubra	
Cerastium diffusum	Sea chickweed
Cerastium fontanum	
Cerastium glomerata	
Chamaenerion angustifolium	Rosebay Willowherb
Cirsium arvense	
Cirsium vulgare	
Clematis vitalba	
Clinopodium vulgare	
Cochlearia danica	Danish Scurvy grass
Convolvulus arvensis	
Coronopus sp.	
Cortaderia selloana	
Cotoneaster ?horizontalis	

Crambe maritima	
Crataegus monogyna	
Crepis capillaris	
Cymbalaria muralis	
Daucus carota	
Dipsacus fullonum	
Echium vulgare	
Eleocharis palustris	axiophyte
Eleocharis palustris subsp. vulgaris	axiophyte
Elymus sp.	
Epilobium hirsutum	
Epilobium tetragonum	
Erigeron acer	Blue Fleabane
Erophila verna	
Euphrasia officinalis agg.	
Falcaria vulgaris	
Ficaria verna subsp. fertilis	
Fragaria vesca	near threatened
Fumaria muralis	axiophyte
Galium aparine	
Galium mollugo	
Geranium rotundifolium	
Geranium dissectum	
Geranium pusillum	axiophyte
Glaucium flavum	
Glechoma hederacea	
Halimione portulacoides	Sea-purslane
Hedera helix	
Heracleum sphondylium	
Hirschfeldia incana	
Holcus lanatus	
Hordeum murinum	
Hypericum perforatum	
Lamium album	
Lamium purpureum	
Lathyrus latifolius	Intr
Leontodon saxatilis	
Ligustrum vulgare	Wild Privet
Limonium sp. X 2	waiting list to be assessed
Limonium hyblaicum	waiting list to be assessed
Limonium procerum subsp. procerum	waiting list to be assessed
Linaria vulgaris	
Lotus corniculatus	Birds Foot Trefoil
Lycium barbarum	
Malva sp.	Mallow on path to TM
Malva moschata	Musk Mallow
Medicago lupulina	Black Medick
Myosotis arvensis	
Myosotis ramosissima	Early Forget-me-not
Myosotis discolor	

<i>Oenothera erythrosepala</i>	Large-flowered Evening Primrose
<i>Ononis</i> sp.	
<i>Ophrys apifera</i>	
<i>Orobanch</i> sp.	
<i>Oxalis articulata</i>	
<i>Parapholis incurva</i>	nationally scarce; axiophyte
<i>Pastinaca sativa</i>	
<i>Phlox paniculata</i>	Intr
<i>Picris echioides</i>	
<i>Picris hieracioides</i>	
<i>Plantago coronopus</i>	
<i>Plantago lanceolata</i>	
<i>Plantago major</i>	
<i>Poa annua</i>	
<i>Potentilla reptans</i>	
<i>Poterium sanguisorba</i>	
<i>Primula veris</i>	axiophyte
<i>Prunella vulgaris</i>	Selfheal
<i>Pulicaria dysenterica</i>	
<i>Quercus robur</i>	
<i>Ranunculus bulbosus</i>	
<i>Ranunculus repens</i>	
<i>Raphanus raphanistrum</i> subsp. <i>mariti</i>	axiophyte
<i>Reseda luteola</i>	Wild Mignonette
<i>Ribes</i> sp	Intr
<i>Rosa canina</i>	
<i>Rubus fruticosus</i> agg.	
<i>Rumex acetosella</i>	
<i>Rumex crispus</i>	
<i>Rumex obtusifolius</i>	
<i>Sagina apetala</i>	?
<i>Salicornia</i> agg.	
<i>Salicornia fragilis</i>	nationally scarce
<i>Salicornia pusilla</i>	nationally scarce
<i>Salicornia pusilla</i> x <i>ramosissima</i>	
<i>Salicornia ramosissima</i>	
<i>Salix cinerea</i>	
<i>Sambucus nigra</i>	
<i>Scrophularia nodosa</i>	check
<i>Sedum acre</i>	
<i>Sedum anglicum</i>	
<i>Sedum album</i>	
<i>Senecio jacobea</i>	Ragwort
<i>Senecio viscosus</i>	
<i>Senecio erucifolius</i> ?	
<i>Sherardia arvensis</i>	
<i>Silene latifolia</i> subsp. <i>alba</i>	
<i>Silene vulgaris</i>	
<i>Sisymbrium officinale</i>	Hedge Mustard
<i>Solanum dulcamara</i>	

Sonchus asper	
Sonchus oleraceus	
Stachys sylvatica	
Suaeda maritima	Annual Sea-blite
Symphytum orientale	Intr
Teucrium scorodonia	
Thalictrum flavum	axiophyte
Thesium humifusum	nationally scarce
Tragopogon pratensis subsp. minor	
Trifolium campestre	
Trifolium repens	
Trifolium scabrum	axiophyte
Trifolium ornithopodioides	axiophyte
Trifolium squamosum	nationally scarce
Trifolium subterraneum	axiophyte
Tussilago farfara	
Ulex europaeus	
Urtica dioica	
Valerianella sp.	
Verbascum densiflorum	
Verbascum phlomoides	
Verbena officinalis	
Veronica serpyllifolia	
Veronica chamaedrys	
Veronica arvensis	
Vicia sativa	
Vicia cracca	
Viola odorata	
Vulpia ciliata subsp. ambigua	nationally scarce

## Source

[illegible]

Source Pearce/Miles unpubl.  
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**Representation ID: REP/337/GEN**Representor Details:

<b>Representor ID:</b>	REP/337
<b>Name:</b>	Anthony and Linda Pedley
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Developer/Landowner

Agent Details:

<b>Name:</b>	Elliott Bance
<b>Organisation:</b>	Asprey Homes

Contact Details:

<b>Email Address:</b>	ElliottBance@aspreyhomes.co.uk
<b>Address:</b>	The Granary Squerryes Estate Westerham Kent TN16 1SL

Representation:

<b>Policy/Section:</b>	<b>General</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	Yes
<b>Sound:</b>	Yes
<b>Representation:</b>	
<b>What changes do you suggest to make the document legally compliant or sound?</b>	

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

**Representations relating to: Land at Layden Hall, East Grinstead Road, North Chailey**

**DRAFT POLICY CH/A08**

We write in response to the Public Consultation process regarding the Pre-Submission version (Regulation 19) of Lewes District Council's Local Plan Part 2. Asprey Homes represent the owners of the proposed site allocation known as CH/A08 – Land at Layden Hall, North Chailey.

We would like to reaffirm that this site is available and deliverable within the next 5 years of the Local Plan and will therefore positively contribute towards the identified housing delivery for North Chailey.

As stated within the recently updated site assessment, the land has very few constraints to development and offers the opportunity to provide a slightly enhanced yield than has indicatively been suggested, of perhaps 8 or 9 dwellings. This would enable a broader mix of dwelling types to be delivered. Vehicular access from East Grinstead Road is achievable, whilst retaining a mature tree screen along the western boundary.

A sensitively designed layout, together with the retention of mature trees will minimise any impact on the distant views to the east and south, whilst additional landscaping opportunities can also be considered at the design stage.

Supporting reports regarding archaeological potential, will be provided as part of any future planning application, however the site owners are not currently aware of any such constraints.

In conclusion and on behalf of the site owners, we would like to confirm support for the recommended allocation for housing.

**For and on behalf of Asprey Homes Southern Limited**

<b>Representation ID:</b> REP/338/E1
--------------------------------------

Representor Details:

<b>Representor ID:</b>	REP/338
<b>Name:</b>	June Pegna
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>E1 - Land at East Quay, Newhaven Port</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	Yes
<b>Sound:</b>	No Not Positively Prepared Not Justified
<b>Representation:</b>  I have only just been made aware of the proposed development at Tide Mills and am horrified. This is a part of the coast that is totally unspoiled. I have always wondered how Seaford has managed to keep its seafront as natural as possible - no tacky shops or car parks . I go there regularly, parking at the Tide Mills end and walking the length of the coast up to the Seven Sisters. Why would anyone want to put a cement factory or	

indeed any kind of manufacturing business in such a lovely place and spoil the landscape? I am proud to live in the South Downs National Park and bring all my visitors to this particular area with its iconic views of the Seven Sisters. Should we not be thinking of the future and retaining as much of our beautiful coastline as possible? If this area is designated for development, then at least use it for something that is 'clean and green' and nice to look at. Hundreds of people walk along this part of the coast - I have been there in all seasons and all weathers and there are always people around who probably go there to switch off and enjoy the natural environment and the peacefulness.

'Apologies if my comment is in the wrong place but the consultation document is not particularly user-friendly - I wasn't expecting to be asked if the comment is Legally Compliant/Sound!!! It is somewhat off-putting.

**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/339/GT01**Representor Details:

<b>Representor ID:</b>	REP/339
<b>Name:</b>	Cindy Penny
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>GT01 - Land south of The Plough</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	
<b>Sound:</b>	
<b>Representation:</b>	
<p>I would like to lodge my objections to the proposed Gypsy Site in Plumpton Green.</p> <p>This proposal was not shown as part of the Neighbourhood Plan for Plumpton.</p> <p>I am all for the housing development within the village as part of the Plan which is needed and has been agreed with local residents.</p> <p>Plumpton is a quiet rural village comprising of many green fields and I feel this proposal would ruin the character of the village.</p> <p>The village has limited pavements and no pavements by the proposed site which is on a busy road. Access to the site on foot would be via this road and I'm very worried about</p>	

the safety of pedestrians and road users alike.

I am extremely concerned that if this proposal is allowed to go ahead that it would expand without permission. What is to stop more caravans being parked in the field? If permission was granted, what's to stop more permission being sought by the council until the whole field is taken up with caravans?

I think this site would be very difficult to manage. I don't know how this proposal can even go ahead at present without any agreement from the owner of the field?

I am also concerned about the impact of the Gypsy Site on the many businesses at The Old Brickworks. It is so important to a small village like Plumpton to have businesses that support the local community, employing local residents.

The businesses have made it known that should the proposed site go ahead that they would relocate, leading to loss of employment for many people and this would be detrimental to our village. I am also aware of the heightened security measures that would need to be installed and of the cost attached to 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?**

## Hodgson, Lilly

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**From:** Cindy Penny <[REDACTED]>  
**Sent:** 05 November 2018 19:51  
**To:** ldf  
**Subject:** Lewes District Plan Part 2: Site Allocation and Development of Proposed Gypsy Site in Plumpton Green  
  
**Categories:** GT01, Vanessa to deal with

Dear Sirs,

I would like to lodge my objections to the proposed Gypsy Site in Plumpton Green. This proposal was not shown as part of the Neighbourhood Plan for Plumpton. I am all for the housing development within the village as part of the Plan which is needed and has been agreed with local residents. Plumpton is a quiet rural village comprising of many green fields and I feel this proposal would ruin the character of the village. The village has limited pavements and no pavements by the proposed site which is on a busy road. Access to the site on foot would be via this road and I'm very worried about the safety of pedestrians and road users alike. I am extremely concerned that if this proposal is allowed to go ahead that it would expand without permission. What is to stop more caravans being parked in the field? If permission was granted, what's to stop more permission being sought by the council until the whole field is taken up with caravans? I think this site would be very difficult to manage. I don't know how this proposal can even go ahead at present without any agreement from the owner of the field? I am also concerned about the impact of the Gypsy Site on the many businesses at The Old Brickworks. It is so important to a small village like Plumpton to have businesses that support the local community, employing local residents. The businesses have made it known that should the proposed site go ahead that they would relocate, leading to loss of employment for many people and this would be detrimental to our village. I am also aware of the heightened security measures that would need to be installed and of the cost attached to that.

Yours sincerely,

Cindy Penny  
[REDACTED]

Sent from my iPhone



<b>Representation ID:</b> REP/340/HSA
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Representor Details:

<b>Representor ID:</b>	REP/340
<b>Name:</b>	Tony Perris
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Developer/Landowner

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	Peacehaven & Telscombe
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	Yes
<b>Sound:</b>	Yes
<b>Representation:</b>  Peacehaven & Telscombe councils have a long history of trying to avoid housing development, despite the urgent need and the obvious local opportunities, including brown-field sites. The Neighbourhood Plan activity is simply their latest strategy for further delays (look how long ago they registered to prepare such a plan and how recently they started any meaningful work). It has also proved difficult to establish contact and participate in any of their activities. They have had plenty long enough to	

develop this plan, at least to the consultation/pre-submission stage - LDC should "firmly encourage" those involved to accelerate their activities, so that the whole district plan can be viewed as an integrated whole! Looking at bits of it in isolation is very likely to lead to bad overall decisions?

**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?**

<b>Representation ID: REP/341/E2</b>
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Representor Details:

<b>Representor ID:</b>	REP/341
<b>Name:</b>	Martin Perry
<b>Organisation:</b>	<b>The Community Stadium Limited</b>
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Planning Consultant

Agent Details:

<b>Name:</b>	Daniel Frisby
<b>Organisation:</b>	DMH Stallard LLP

Contact Details:

<b>Email Address:</b>	daniel.frisby@dmhstallard.com
<b>Address:</b>	Gainsborough House Pegler Way Pegler Way West Sussex RH11 7FZ

Representation:

<b>Policy/Section:</b>	<b>E2 - Land adjacent to American Express Community Stadium, Village Way, Falmer</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	Yes
<b>Sound:</b>	Yes Not Positively Prepared Not Justified
<b>Representation:</b>  We are generally supportive of the wording of the proposed policy however we consider that the range of acceptable uses should include a retail store associated directly with the American Express Community Stadium. This would allow sufficient flexibility for the	

range of uses that may be required to support use of the Stadium, furthermore it would allow the retail store within the Stadium itself to be reconfigured as part of these proposals and ensure the effective use of the Stadium and proposed East Stand building.

The above is considered necessary to make the proposed allocation positively prepared and in accordance with the NPPF (2018) which states that planning policies should 'be flexible enough to accommodate needs not anticipated in the plan...and to enable a rapid response to changes in circumstance'.

With regards to bullet point 3, it should be noted that the Community Stadium already lies in a highly sustainable location which has received significant investment due to construction and expansion of the Universities and Community Stadium. Both the Universities and Community Stadium operate under detailed Travel Plans to promote sustainable transport in compliance with Planning Conditions and Legal Agreements. The Proposed Development will be for a complementary use to these existing facilities and it is considered unnecessary and too prescriptive to require any significant additional sustainable transport infrastructure. It is considered that any significant additional sustainable transport infrastructure would not be justified, due to the highly sustainable location and the proposed uses.

With regards to bullet point 4, it is considered that reference to green walls and roofs is too prescriptive and should be removed, as such features will not always be either the best or achievable solutions to any specific project. The use of such features would not be in keeping with the architecture of the Stadium, and it is unlikely that they would be the best landscape approach to the Proposed Development. It is considered that the specific detailed landscape design of the Proposed Development would be more appropriately addressed at the Planning Application stage. Therefore it is considered that reference to specific features should be removed as they would be too prescriptive and the approach to be taken has not been justified in design terms.

With regards to bullet point 6, it is considered unnecessary and unjustified to require a training place agreement given the level of training being provided already to local people throughout various aspects of The Community Stadium Limited's business and having regard to the proposal which will comprise part educational use. The requirement for additional financial contributions to training may make any scheme unviable.

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

would request that:

1. the Policy is amended to include Retail (A1) directly associated with use of The American Express Community Stadium to be included as part of the mixture of acceptable uses;
2. removal of reference to provision of new sustainable transport infrastructure; and
3. removal of reference to green roofs and walls.
4. removal of reference to the requirement for a training place agreement

<b>Do you consider it necessary to participate at the Examination in Public?</b>	Yes
<b>Why do you feel it is necessary to participate at the Examination in Public?</b>	
We consider that the policy as drafted is unsound and therefore would seek to provide evidence at the oral examination to set out our reasons for this to the Inspector.	

**Representation ID: REP/342/GT01**Representor Details:

<b>Representor ID:</b>	REP/342
<b>Name:</b>	Michael Petty
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>GT01 - Land south of The Plough</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	
<b>Sound:</b>	
<b>Representation:</b>	
<p>I write to OBJECT to the proposed Gypsy and traveller sit in Plumpton Green, on the following grounds</p> <p>The proposed site is not within the Plumpton Green planning boundary and would seem to be in contradiction of Lewes District Councils advice against any inclusion in the Plumpton Parish Neighbourhood Plan for any development sites to the northern or southern extremes to the village.</p>	

The site is not allocated in the Neighbourhood Plan.

The proposed site is a greenfield area and any development would be out of keeping and damage the local environment.

Concerns have been expressed that any development would have a negative impact on businesses located in the Old Brickworks site and the possibility of businesses relocating this will result in a loss of local employment and damage to the local economy.

There is no footpath along the busy road and poses a significant danger to pedestrians from any development on this site.

Vehicles, possibly towing large caravans, entering and exiting this site would create a dangerous hazard to other road users travelling along the busy main route to and from Plumpton Green.

I therefore urge Lewes District Council to reject this 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:** michael petty <[REDACTED]>  
**Sent:** 04 November 2018 20:14  
**To:** ldf  
**Subject:** Proposed Gypsy and traveller site in Plumpton Green.

**Categories:** GT01, Vanessa to deal with

Dear Sirs,

I write to OBJECT to the proposed Gypsy and traveller sit in Plumpton Green, on the following grounds .

The proposed site is not within the Plumpton Greeen planning boundary and would seem to be in contradiction of Lewes District Councils advice against any inclusion in the Plumpton Parish Neighbourhood Plan for any development sites to the northern or southern extremes to the village.

The site is not allocated in the Neighbourhood Plan.

The proposed site is a greenfield area and any development would be out of keeping and damage the local environment.

Concerns have been expressed that any development would have a negative impact on businesses located in the Old Brickworks site and the possibility of businesses relocating this will result in a loss of local employment and damage to the local economy.

There is no footpath along the busy road and poses a significant danger to pedestrians from any development on this site.

Vehicles, possibly towing large caravans, entering and exiting this site would create a dangerous hazard to other road uses travelling along the busy main route to and from Plumpton Green.

I therefore urge Lewes District Council to reject this proposal.

Yours sincerely

Michael Petty.

[REDACTED]

- 
-



**Representation ID: REP/343/GT01**Representor Details:

<b>Representor ID:</b>	REP/343
<b>Name:</b>	Susan Petty
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>GT01 - Land south of The Plough</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	
<b>Sound:</b>	
<b>Representation:</b>	<p>I write to OBJECT to the proposed Gypsy and traveller sit in Plumpton Green, on the following grounds.</p> <p>The proposed site is not within the Plumpton Green planning boundary and would seem to be in contradiction of Lewes District Councils advice against any inclusion in the Plumpton Parish Neighbourhood Plan for any development sites to the northern or southern extremes to the village.</p>

The site is not allocated in the Neighbourhood Plan.

The proposed site is a greenfield area and any development would be out of keeping and damage the local environment.

Concerns have been expressed that any development would have a negative impact on businesses located in the Old Brickworks site and the possibility of businesses relocating this will result in a loss of local employment and damage to the local economy.

There is no footpath along the busy road and poses a significant danger to pedestrians from any development on this site. Should the travellers children want to use the local school, this could be very dangerous getting them to and from school.

Vehicles, possibly towing large caravans, entering and exiting this site would create a dangerous hazard to other road users travelling along the busy main route to and from Plumpton Green.

I therefore urge Lewes District Council to reject this 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:** sue petty <[REDACTED]>  
**Sent:** 04 November 2018 20:36  
**To:** ldf  
**Subject:** FW: Proposed Gypsy and traveller site in Plumpton Green.  
**Categories:** GT01, Vanessa to deal with

Subject: Proposed Gypsy and traveller site in Plumpton Green.

Dear Sirs,

I write to OBJECT to the proposed Gypsy and traveller sit in Plumpton Green, on the following grounds.

The proposed site is not within the Plumpton Green planning boundary and would seem to be in contradiction of Lewes District Councils advice against any inclusion in the Plumpton Parish Neighbourhood Plan for any development sites to the northern or southern extremes to the village.

The site is not allocated in the Neighbourhood Plan.

The proposed site is a greenfield area and any development would be out of keeping and damage the local environment.

Concerns have been expressed that any development would have a negative impact on businesses located in the Old Brickworks site and the possibility of businesses relocating this will result in a loss of local employment and damage to the local economy.

There is no footpath along the busy road and poses a significant danger to pedestrians from any development on this site. Should the travellers children want to use the local school, this could be very dangerous getting them to and from school.

Vehicles, possibly towing large caravans, entering and exiting this site would create a dangerous hazard to other road uses travelling along the busy main route to and from Plumpton Green.

I therefore urge Lewes District Council to reject this proposal.

Yours sincerely  
Susan Petty.

[REDACTED]

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<b>Representation ID:</b> REP/344/E1
--------------------------------------

Representor Details:

<b>Representor ID:</b>	REP/344
<b>Name:</b>	Corinne Philibert-Lockyer
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>E1 - Land at East Quay, Newhaven Port</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	No
<b>Sound:</b>	No Not Justified
<b>Representation:</b>  This would only benefit privately owned companies, the benefits to Newhaven residents would be minimal whilst the loss of local leisure amenities would be big. The impact on the environment would be very negative (wildlife, air pollution, visual impact...) loss of direct footpath access to the beach for local residents (footpath constantly used by locals with children and tourists). This is not a green project, in line with the clean green	

marine vision of the enterprise zone.

**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/345/GT01**Representor Details:

<b>Representor ID:</b>	REP/345
<b>Name:</b>	Anna and David Phillips
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>GT01 - Land south of The Plough</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	
<b>Sound:</b>	
<b>Representation:</b> <p>We are writing to object in the strongest possible terms to the proposed plan of Lewes District Council (LDC) for a permanent gypsy and traveller site adjacent to The Plough public house in Plumpton Green (Policy / Site GT01). We have lived at Crossways since 1997. This is immediately opposite said pub, and therefore only a very short distance from the proposed encampment.</p> <p>From a purely forensic analysis of why the LDC plan should be scrapped forthwith, we believe that the response from Plumpton Parish Council (PPC) perfectly itemises and</p>	

nails the flaws in the proposal. We endorse the PPC response wholeheartedly.

<http://www.plumptonpc.co.uk/new/wp-content/uploads/2016/11/REP-Part-2-consultation-final.pdf>

Anything else that is said would be personal and emotive and we have been advised that this would not be productive.....

However, let us just make these remarks. Over the last few years, we have had considerable contact with your Planning Department regarding the conversion of an existing water tower on our property into a new dwelling. However onerous the demands made on us, we were understanding. After all, The Water Tower acts as something of a gateway to the precious little village of Plumpton (Green): it should look attractive and in-keeping. Please draw your own conclusions about a permanent gypsy and traveller plot on a greenfield site a few yards down the road. Access to planning permission and interpretation of planning laws are seemingly a strange and wondrous things, but eminently flexible if you are lucky enough to have the relevant power.

We suspect that you know that going ahead with your proposal would cost this community (and therefore The Council) jobs and money and would potentially negatively impact the community socially, and certainly aesthetically.

We suspect that you know that the site proposed would be far from satisfactory for the gypsies and travellers themselves, as the only community facility accessible without resorting to a car or a considerable walk along a dangerous road is the Plough Pub (and the future of this facility might be seriously in doubt should your proposal ever see the light of day).

We feel that your proposal is a desperate one, borne of lack of alternatives. We understand that you would be very happy if Plumpton could come up with a more suitable location. Isn't that your job?

**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?**

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**Kemp, Emma**

**From:** [REDACTED]  
**Sent:** 01 November 2018 18:07  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** Objection to permanent gypsy and traveller site in Plumpton Green  
**Categories:** LPP2 comment to code - stakeholder details have been added

Dear Sir / Madam

We are writing to object in the strongest possible terms to the proposed plan of Lewes District Council (LDC) for a permanent gypsy and traveller site adjacent to The Plough public house in Plumpton Green (Policy / Site GT01). We have lived at Crossways since 1997. This is immediately opposite said pub, and therefore only a very short distance from the proposed encampment.

From a purely forensic analysis of why the LDC plan should be scrapped forthwith, we believe that the response from Plumpton Parish Council (PPC) perfectly itemises and nails the flaws in the proposal. We endorse the PPC response wholeheartedly.

<http://www.plumptonpc.co.uk/new/wp-content/uploads/2016/11/LDC-Part-2-consultation-final.pdf>

Anything else that is said would be personal and emotive and we have been advised that this would not be productive.....

However, let us just make these remarks. Over the last few years, we have had considerable contact with your Planning Department regarding the conversion of an existing water tower on our property into a new dwelling. However onerous the demands made on us, we were understanding. After all, The Water Tower acts as something of a gateway to the precious little village of Plumpton (Green): it should look attractive and in-keeping. Please draw your own conclusions about a permanent gypsy and traveller plot on a greenfield site a few yards down the road. Access to planning permission and interpretation of planning laws are seemingly a strange and wondrous things, but eminently flexible if you are lucky enough to have the relevant power.

We suspect that you know that going ahead with your proposal would cost this community (and therefore The Council) jobs and money and would potentially negatively impact the community socially, and certainly aesthetically.

We suspect that you know that the site proposed would be far from satisfactory for the gypsies and travellers themselves, as the only community facility accessible without resorting to a car or a considerable walk along a dangerous road is the Plough Pub (and the future of this facility might be seriously in doubt should your proposal ever see the light of day).



We feel that your proposal is a desperate one, borne of lack of alternatives. We understand that you would be very happy if Plumptre could come up with a more suitable location. Isn't that your job?

Yours faithfully

Anna and David Phillips

[Redacted]  
[Redacted]  
[Redacted]

**Representation ID: REP/346/GT01**Representor Details:

<b>Representor ID:</b>	REP/346
<b>Name:</b>	Deborah Phillips
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>GT01 - Land south of The Plough</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	
<b>Sound:</b>	
<b>Representation:</b>	
<p>I write with reference to the proposed development of a permanent Gypsy and Traveller site in Plumpton, East Sussex, Policy GT01, and wish to register my objection to this proposal, the following being my main reasons.</p> <p>* As I understand the LDC Head of Planning has already stated that this site would not be considered for residential housing development so I cannot understand why it can</p>	

therefore be allowed for a Gypsy and Traveller site for all the reasons previously given by the Council.

\* Pedestrian access to the village is on an unlit road with no pavement, thereby creating an unsafe environment for users to gain access to the shop, school or public transport.

\* Any access to this site by large caravans would also be unsafe due to difficult junctions at both ends of the village and narrow lanes that are certainly not built for large caravans.

\* Local businesses, which are essential for any small village, will be in danger of closing thereby losing income and employment for the village.

\* This is a green field site in a quiet rural location and any development there will increase noise pollution and fail to preserve the character and open spaces of the village and damage the wildlife environment.

\* I understand there will be no warden on the site so am not sure how numbers etc will be monitored which is a major concern.

I hope you will give this your 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?**

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3<sup>rd</sup> November 2018

Dear Sir/Madam,

I write with reference to the proposed development of a permanent Gypsy and Traveller site in Plumpton, East Sussex, Policy GT01, and wish to register my objection to this proposal, the following being my main reasons.

1. As I understand the LDC Head of Planning has already stated that this site would not be considered for residential housing development so I cannot understand why it can therefore be allowed for a Gypsy and Traveller site for all the reasons previously given by the Council.
2. Pedestrian access to the village is on an unlit road with no pavement, thereby creating an unsafe environment for users to gain access to the shop, school or public transport.
3. Any access to this site by large caravans would also be unsafe due to difficult junctions at both ends of the village and narrow lanes that are certainly not built for large caravans.
4. Local businesses, which are essential for any small village, will be in danger of closing thereby losing income and employment for the village.
5. This is a green field site in a quiet rural location and any development there will increase noise pollution and fail to preserve the character and open spaces of the village and damage the wildlife environment.
6. I understand there will be no warden on the site so am not sure how numbers etc will be monitored which is a major concern.

I hope you will give this your consideration.

Yours faithfully

Deborah Phillips

**Representation ID: REP/347/GT01**Representor Details:

<b>Representor ID:</b>	REP/347
<b>Name:</b>	Ron Phillips
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>GT01 - Land south of The Plough</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	
<b>Sound:</b>	
<b>Representation:</b>	
<p>I am a resident of Plumpton, and I request that you register and consider my objections to the proposed development of a permanent Gypsy and Traveller site in Plumpton, East Sussex (Policy GT01).</p> <p>The following are the key points under which I object to the proposed development:</p> <p>* The proposed development conflicts with established policies agreed in Lewes District</p>	

Council's Local Plan, in the National Planning Policy Framework, in the Government's National Planning Policy for Traveller Sites (dated August 2015), and not least with Plumpton Parish Council's Neighbourhood Plan.

\* The proposed development would not comply with the overarching aim of the Planning Policy for Travellers, which requires "the provision of suitable accommodation from which travellers can access education, health, welfare and employment infrastructure", and requires that local planning authorities should "very strictly limit new traveller site development.....outside areas allocated in the development plan", nor would it comply with LDC's own core policy for sustainable development to meet the needs of the gypsy and traveller community.

\* Specifically, the proposed site is isolated. From the proposed site, access to the village (and village school) would be via an un-lit road with no pavement. This would be unsafe for residents of the proposed site (specifically young residents of 5 to 11 years of age accessing the school from the proposed site), and visitors to the site. Further, there are no health facilities in the village. Hence, contrary to Policy, there would not be reasonable or safe access to education, no local access to health and welfare, nor the existing village services and facilities, thereby denying residents of the proposed development scope for social integration with the existing local community. There is no evidence of local family support within the local existing settled community.

\* Further, the proposed site does not link with other broader strategies in place for improving community cohesion. It is not in accordance with existing planning policies and designations.

\* Development at the proposed site is subject to a current Highways Authority objection, as they consider that there is no suitable access to the site from Station Road as required visibility splays are not achievable.

\* The proposed development is on a greenfield site, bordering Station Road, and in close proximity to existing residential and small commercial properties. It would not have aesthetic compatibility with the existing local environment. Other such local sites, for example at Maresfield and Robertsbridge, are significantly separated from the villages by a main road, well screened and not close to existing residential dwellings.

\* One of the only two means of accessing the proposed site is from the South, turning at the difficult, and poorly sighted, junction of Plumpton Lane and the B2166 at the Half Moon, then passing over the narrow white bridge on Plumpton Lane, then over the railway crossing and through the village of Plumpton Green, where car parking around the village school and village shop makes the road narrow and visibility poor. It would be very unsuitable and unsafe for large caravans to be passing. There is an increased duty of care due to the 5 to 11 year old children attending the village school, and a responsibility not to create an increased danger to those children attending the school.

\* The proposed development would change the character of the village. There would be noise and disturbance not in keeping with the surrounding community.

\* There is evidence that the proposed development would potentially damage the local

economy, as the 21 businesses currently situated at The Old Brickworks (who currently employ 50 people) have informed their landlord of their intent to relocate should the proposal be accepted, with the consequent loss of local employment.

\* There is no detail of how the proposed development would be 'policed' and monitored. For example, how would the proposed maximum of 5 travelling caravans be controlled? How would activities on the site be controlled (any 'unofficial' activity that does not comply with agreed legislation, regulation or guidelines risks land contamination, water pollution, noise nuisance etc)? Such detail is a prerequisite of planning approval.

In summary, the policy GT01 is not properly considered, is not sound, has not been positively prepared or justified, and is not consistent with 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?**

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

**From:** Ron Phillips <[REDACTED]>  
**Sent:** 04 November 2018 16:32  
**To:** ldf  
**Subject:** Policy GT01 - Proposed Gypsy and Traveller Site in Plumpton  
**Categories:** LPP2 comment to code - stakeholder details have been added

Dear Sir / Madam,

I am a resident of Plumpton, and I request that you register and consider my objections to the proposed development of a permanent Gypsy and Traveller site in Plumpton, East Sussex (Policy GT01).

The following are the key points under which I object to the proposed development:

1. The proposed development conflicts with established policies agreed in Lewes District Council's Local Plan, in the National Planning Policy Framework, in the Government's National Planning Policy for Traveller Sites (dated August 2015), and not least with Plumpton Parish Council's Neighbourhood Plan.
2. The proposed development would not comply with the overarching aim of the Planning Policy for Travellers, which requires "the provision of suitable accommodation from which travellers can access education, health, welfare and employment infrastructure", and requires that local planning authorities should "very strictly limit new traveller site development.....outside areas allocated in the development plan", nor would it comply with LDC's own core policy for sustainable development to meet the needs of the gypsy and traveller community.
3. Specifically, the proposed site is isolated. From the proposed site, access to the village (and village school) would be via an un-lit road with no pavement. This would be unsafe for residents of the proposed site (specifically young residents of 5 to 11 years of age accessing the school from the proposed site), and visitors to the site. Further, there are no health facilities in the village. Hence, contrary to Policy, there would not be reasonable or safe access to education, no local access to health and welfare, nor the existing village services and facilities, thereby denying residents of the proposed development scope for social integration with the existing local community. There is no evidence of local family support within the local existing settled community.
4. Further, the proposed site does not link with other broader strategies in place for improving community cohesion. It is not in accordance with existing planning policies and designations.
5. Development at the proposed site is subject to a current Highways Authority objection, as they consider that there is no suitable access to the site from Station Road as required visibility splays are not achievable.
6. The proposed development is on a greenfield site, bordering Station Road, and in close proximity to existing residential and small commercial properties. It would not have aesthetic compatibility with the existing local environment. Other such local sites, for example at Maresfield and Robertsbridge, are significantly separated from the villages by a main road, well screened and not close to existing residential dwellings.
7. One of the only two means of accessing the proposed site is from the South, turning at the difficult, and poorly sighted, junction of Plumpton Lane and the B2166 at the Half Moon, then passing over the narrow white bridge on Plumpton Lane, then over the railway crossing and through the village of Plumpton Green, where car parking around the village school and village shop makes the road narrow and visibility poor. It would be very unsuitable and unsafe for large caravans to be passing.



There is an increased duty of care due to the 5 to 11 year old children attending the village school, and a responsibility not to create an increased danger to those children attending the school.

8. The proposed development would change the character of the village. There would be noise and disturbance not in keeping with the surrounding community.
9. There is evidence that the proposed development would potentially damage the local economy, as the 21 businesses currently situated at The Old Brickworks (who currently employ 50 people) have informed their landlord of their intent to relocate should the proposal be accepted, with the consequent loss of local employment.
10. There is no detail of how the proposed development would be 'policed' and monitored. For example, how would the proposed maximum of 5 travelling caravans be controlled? How would activities on the site be controlled (any 'unofficial' activity that does not comply with agreed legislation, regulation or guidelines risks land contamination, water pollution, noise nuisance etc)? Such detail is a prerequisite of planning approval.

In summary, the policy GT01 is not properly considered, is not sound, has not been positively prepared or justified, and is not consistent with national policy.

Best regards

***Ron Phillips***



**Representation ID: REP/348/E1**Representor Details:

<b>Representor ID:</b>	REP/348
<b>Name:</b>	Nick Phillips
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>E1 - Land at East Quay, Newhaven Port</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	Yes
<b>Sound:</b>	No Not Justified
<b>Representation:</b>  It is very wrong to be converting such a large area of wild open space, in such a strategic location, to an industrial or commercial facility.  The land provides a haven for wildlife and is much enjoyed by many people for quiet amenity purposes such as enjoying wildlife, healthy exercise and dog-walking.  Granted much of the land has previously been affected by human activity, but Mill Creek, and the area between it and the sea, provide homes and feeding grounds to a lot	

of wildlife.

The plan to make all of the "E1" area industrial / commercial would fragment the area of land behind the beach which currently stretches from the harbour entrance to Tide Mills. This, and the extra disturbance it would cause will have an extremely detrimental effect on wildlife. Most likely this would impact the ringed plover colony that hangs on by tide Mills, and also the egrets and redshank which regularly feed in Mill Creek. It will also compress the walkers, runners and dog walkers into a smaller area, putting more pressure on the wildlife in those areas.

I can see how it would benefit the port to have a road direct to the A259 via the proposed bridge over Mill Creek and the railway. Grudgingly I accept that this may be necessary, and will take up some of the "E1" land. I prefer this not to happen, but if it does, please let the development stop there. Let the industrial / commercial changes be restricted to the existing area.

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

To make the plan sound, preferably:

a) The "E1" land is no longer zoned for commercial or industrial use and is retained as a public amenity and wildlife resource

Failing that:

b) Development of the "E1" land is confined to providing the access road to the existing commercial and industrial area.

Regarding the legalities. Being a layman I am not in a position to judge if the document is legally compliant or not.

**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 am a layman, so do not fully understand what is behind this question. However I would be prepared to state my case in public at a public enquiry should there be one.

<b>Representation ID:</b> REP/349/E1
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Representor Details:

<b>Representor ID:</b>	REP/349
<b>Name:</b>	peter pick
<b>Organisation:</b>	<b>aural witness</b>
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>E1 - Land at East Quay, Newhaven Port</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	Yes
<b>Sound:</b>	No Not Justified
<b>Representation:</b>  the area designated is a very interesting habitat and landscape which would be missed if redeveloped. areas of emptiness near large settlements need to be preserved. seaford bay is both beautiful and under utilised as a recreational area.	
<b>What changes do you suggest to make the document legally compliant or sound?</b>	

a proper environmental and wildlife survey needs to be made of the area. more weight should be placed on the aesthetic value and recreational uses of the land.

**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/350/GT01**Representor Details:

<b>Representor ID:</b>	REP/350
<b>Name:</b>	S Pinnock
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>GT01 - Land south of The Plough</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	Yes
<b>Sound:</b>	No
<b>Representation:</b>	
I object to this proposed site:	
1. Not in neighbourhood plan	
2. On a greenfield site	
3. Access to it by foot not safe - busy 60mph road - hill brow on a slight bend. Bus stop on Plough Side of road, space on opposite side not available	
<b>What changes do you suggest to make the document legally compliant or sound?</b>	

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

28.10.2018.

Planning Policy Team.

Proposed Gypsy Site Plumpton Green

I object to this proposed site.

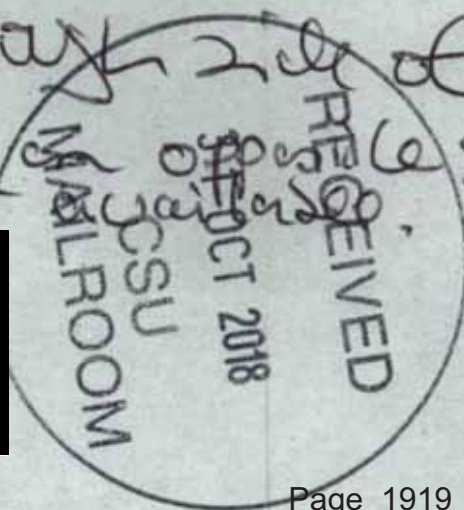
1/ Not in Neighbourhood Plan.

2/ On a Green field site.

3/ Access to it by foot

not safe - down 60 mph  
road - hill brow on a slight  
bend

Bus stop on Play side of  
road - ~~space~~ <sup>not</sup> on opposite side.





**Representation ID: REP/351/E1**Representor Details:

<b>Representor ID:</b>	REP/351
<b>Name:</b>	Christine and Chris Platford
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>E1 - Land at East Quay, Newhaven Port</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	
<b>Sound:</b>	
<b>Representation:</b>  Alongside the elected councillors of both Seaford Town Council and Newhaven Town Council I wish to add my objections to the proposed designation of plot E1 as an area available for "employment purposes." Regardless of whether this area has somehow been added to land owned by the Port Authority, it is simply not suitable for development, especially as there is still plenty of unused space within the original port area. Indeed, it is madness to sabotage the potential of tourism - and of course a much-loved local amenity - in a location that nudges right up against the South Downs National	

Park, at the only place (Tidemills) where it actually meets the sea. Moreover, the site is - in itself - an important nature reserve which includes a substantial amount of vegetated shingle (a habitat that is rare in the world as a whole). It should continue to serve both local inhabitants and visitors as a green space while also acting as an undeveloped buffer zone between Tidemills and the industry of the port area.

Nobody disputes the fact that Newhaven needs new businesses and better employment opportunities, even though many of us strongly feel that there should be more businesses like Rampion Offshore Wind Generation (which actually fit into the declared aim of providing clean, green marine development for the port area), and fewer like Brett Aggregates (currently developing the area directly west of E1), Ripley's scrapyard, and that which runs the waste incinerator. We have already had Brett imposed upon us by distant planning officers of ESCC, as well as the project locally known as the flyover Bridge to Nowhere or Bridge to Brett: a white elephant which will not solve serious problems of congestion and dire air quality. There is much local suspicion that the belated addition of E1 to the area plan is an attempt to justify the flyover.

And even if the business development envisaged for E1 is actually clean, green & marine (unlikely in the light of recent decisions) there is, as I have said above, plenty of unused or derelict space within the original port area. This should be used first, efficiently and thoughtfully, before the idea of expanding beyond the original port area is given any consideration at all. And if the flyover bridge is therefore not justified in its present designated location, maybe this £23 million pound project should be shifted to a more useful and rational location where it would cost a lot less and might even be useful.

**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:** CHRISTINE PLATFORD <[REDACTED]>  
**Sent:** 04 November 2018 14:50  
**To:** ldf  
**Subject:** planning reference E1 Newhaven

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

Alongside the elected councillors of both Seaford Town Council and Newhaven Town Council I wish to add my objections to the proposed designation of plot E1 as an area available for "employment purposes." Regardless of whether this area has somehow been added to land owned by the Port Authority, it is simply not suitable for development, especially as there is still plenty of unused space within the original port area. Indeed, it is madness to sabotage the potential of tourism - and of course a much-loved local amenity - in a location that nudges right up against the South Downs National Park, at the only place (Tidemills) where it actually meets the sea. Moreover, the site is - in itself - an important nature reserve which includes a substantial amount of vegetated shingle (a habitat that is rare in the world as a whole). It should continue to serve both local inhabitants and visitors as a green space while also acting as an undeveloped buffer zone between Tidemills and the industry of the port area.

Nobody disputes the fact that Newhaven needs new businesses and better employment opportunities, even though many of us strongly feel that there should be more businesses like Rampion Offshore Wind Generation (which actually fit into the declared aim of providing clean, green marine development for the port area), and fewer like Brett Aggregates (currently developing the area directly west of E1), Ripley's scrapyards, and that which runs the waste incinerator. We have already had Brett imposed upon us by distant planning officers of ESCC, as well as the project locally known as the flyover Bridge to Nowhere or Bridge to Brett: a white elephant which will not solve serious problems of congestion and dire air quality. There is much local suspicion that the belated addition of E1 to the area plan is an attempt to justify the flyover.

And even if the business development envisaged for E1 is actually clean, green & marine (unlikely in the light of recent decisions) there is, as I have said above, plenty of unused or derelict space within the original port area. This should be used first, efficiently and thoughtfully, before the idea of expanding beyond the original port area is given any consideration at all. And if the flyover bridge is therefore not justified in its present designated location, maybe this £23 million pound project should be shifted to a more useful and rational location where it would cost a lot less and might even be useful.

Yours faithfully,  
Christine & Chris Platford

[REDACTED]

**Representation ID: REP/352/GT01**Representor Details:

<b>Representor ID:</b>	REP/352
<b>Name:</b>	David Pleasence
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>GT01 - Land south of The Plough</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	Yes
<b>Sound:</b>	No Not Effective
<b>Representation:</b>  My comment refer to the proposed Gypsy site in Plumpton Green which is not in line with planning policy for the following reasons.  1, This is a greenfield site and the proposed development would cause damage to the open space. It would also be very visible.  2. The site does not have good access to services as there is no footpath to the village	

and access by bus as mentioned in the plan is not actually practical as the bus service is poor.

3. The site is next to the old brickworks which provides units for many local businesses giving local employment. Having this site next door might not be attractive to these businesses which could move away and we would lose local employment.

4. The proposed site is not allocated in the Neighbourhood Plan which has been accepted by the council.

5. Given the nature of the site it would be difficult to maintain within the proposed area.

6. The site would extend the ribbon development of the village which is not a good idea.

7. There are sites close to Ringmer which give better access for services and a larger community for integration. These would be more in keeping with National Policy.

It appears the plan has not given sufficient consideration to the requirements of the Gypsy population in proposing this site.

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

Look at options in the Ringmer area which give better access to services and opportunities for the travellers to find work. Also provide a safer way to obtain these, rather than walk on a busy road which does not have any street lights.

**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?**

<b>Representation ID:</b> REP/353/GT01
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Representor Details:

<b>Representor ID:</b>	REP/353
<b>Name:</b>	Amanda Plummer
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>GT01 - Land south of The Plough</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	Yes
<b>Sound:</b>	No Not Positively Prepared Not Justified Not Consistent with national policy
<b>Representation:</b>	
<p>As a resident of Plumpton, I object to this proposal. On the basis it is unfair and discriminatory against developers that have to comply with LDC planning policies and yet this proposal seems to fly in the face of a number of these, such as not meeting the criteria for a sustainable development, ignores the process of the local Neighbourhood Plan, is not within land allocated for planning, the structures and site would be completely out of keeping with the surrounding area, it will impact on the local deer</p>	

population known to use this land, the location has previously been dismissed by LDC as unsuitable for residential housing, and the negative impact the development could have on local employment by having a negative impact on the Old Brickworks industrial area. Also, I object to my council tax being spent on a local facility that will, in no way, bring benefit or make a positive contribution socially, economically or environmentally to the district and has instead, significant potential to be detrimental to the local community in a number of ways.

**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?**

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**Representation ID: REP/354/E1**Representor Details:

<b>Representor ID:</b>	REP/354
<b>Name:</b>	Georgina Poacher
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>
<b>Organisation:</b>

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>E1 - Land at East Quay, Newhaven Port</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	
<b>Sound:</b>	
<b>Representation:</b>	
<p>I am writing to you to oppose to the prospective building works that will affect tide mills beach and surrounding area.</p> <p>I've lived in seafood for almost 4 years, moving from a built up and concrete jungle of flats and houses in London. When we moved here all anyone told us was to make sure we head down to tide mills which we did. Now it's our favourite place to go on a sunny evening when the tides out with the kids and the dog. It's the place we go to remind us of what's important when days are stressful and life gets difficult. This is the story for most people in seafood and surrounding areas.</p> <p>You will be taking away a beach that is loved by so many and holds so many memories</p>	



for each person that has visited. As well as this, you will be damaging the environment; stopping the growth of wildflowers and encouraging wildlife.

There must be another option to do what your planning but in a way that doesn't affect the natural surroundings of tide mills. Please consider all these option, all the responses to this plan and please don't spoil a place that holds so much beauty and holds many memories for the sake of a road.

Do the right thing.

**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

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**From:** Georgina Poacher <[REDACTED]>  
**Sent:** 04 November 2018 21:46  
**To:** ldf  
**Subject:** E1

**Categories:** Vanessa to deal with

To whom it may concern,

I am writing to you to oppose to the prospective building works that will affect tide mills beach and surrounding area.

I've lived in seaford for almost 4 years, moving from a built up and concrete jungle of flats and houses in London. When we moved here all anyone told us was to make sure we head down to tide mills which we did. Now it's our favourite place to go on a sunny evening when the tides out with the kids and the dog. It's the place we go to remind us of what's important when days are stressful and life gets difficult. This is the story for most people in seaford and surrounding areas.

You will be taking away a beach that is loved by so many and holds so many memories for each person that has visited. As well as this, you will be damaging the environment; stopping the growth of wildflowers and encouraging wildlife.

There must be another option to do what your planning but in a way that doesn't affect the natural surroundings of tide mills. Please consider all these option, all the responses to this plan and please don't spoil a place that holds so much beauty and holds many memories for the sake of a road.

Do the right thing.

Many thanks

Georgina poacher  
[REDACTED]

**Representation ID: REP/355/E1**Representor Details:

<b>Representor ID:</b>	REP/355
<b>Name:</b>	Melanie Potter
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>E1 - Land at East Quay, Newhaven Port</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	
<b>Sound:</b>	
<b>Representation:</b>	<p>Comment on consultation process for the Local Plan: So far all images provided in association with planning with regard to area E1 are highly deceptive. The map provided does not show the port access road which is key to industrial development in this area. The area E1 represents a highly valued resource for the local community: I would therefore like to point out that in not providing the local community with images that give a clearer impression as to the true visual impact on that area the council is being dishonest and the process shows a lack of transparency as to true impact of the plan. I</p>

feel that LDC has a moral duty to provide this as part of the consultation process.

"Pride of Place" is a significant document for East Sussex Strategic Partnership in setting out "a long term vision for improving people's quality of life and the main things we must do to achieve that vision"

Although this features "Developing our economy, creating jobs and increasing prosperity" it also includes

- o "Protecting our natural and built environments and adapting and responding to climate change.

- o Improving health and well-being:

- o Creating strong communities and community leadership ( One would assume this means listening to and not disregarding the views of local people and of our town councils and making your information more accessible)

- o Enabling people to enjoy culture, sports and leisure"

In light of this, I would like to raise the following objections and comments with regard to part 3 in relation to Newhaven Port and policy E1:

1) The area is close to a nature reserve and to the national park and will cause not only visual impact but also significant light pollution which will have a detrimental effect on the wildlife in the nature reserve and biodiversity of the area. Light pollution has a significant impact on moths and other insects and nocturnal animals as well as on migratory birds. This is a significant landing place for migratory birds. The area sits within a UNESCO biosphere reserve. The accompanying Habitats Regulations Assessment October 2017 appears to ignore this. As a site that includes vegetated shingle and several red book species, this is of international significance. The East Sussex Vegetated Shingle Management Plan (2009, Tim Smith) 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 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."

2) The area marked out in E1 is of major importance for the community in terms of leisure amenity, and for daily physical exercise, as well as drawing a significant amount of visitors to the area. It is also essential for the wellbeing of the community that footpath access to the East Pier and access to the East Beach of Newhaven is maintained.

I realise that the Port area sits outside the Neighbourhood Planning Area – however the Local Plan should not contravene the aspirations of the neighbourhood planning for "sustainable development" via: 'clean, green and marine technology sectors, including manufacturing and engineering industries linked to the maritime sector. There are also aspirations to develop Newhaven's tourism industry with the town "acting as the

continental gateway to the adjacent South Downs National Park".

This policy does not in any way support the aspirations of the Neighbourhood Plan and represents a major threat to quality of life for people living Newhaven, Seaford and surrounding areas as well as representing a threat to the sustainability of nearby small businesses who benefit from the use of this area as a leisure space by local people and visitors to the area.

3) The plan for E1 contravenes the concept of "A great place for living" which underpins the local "Pride of Place" strategic vision as well as the national priorities for government bodies such as DEFRA.

The plan goes against the following aims of the East Sussex Joint Strategic Partnership

- ☐ " A valued environment;
- ☐ Safer and stronger communities
- ☐ Access to good local facilities
- ☐ Healthier communities

Also many of the "key" tasks and "priorities" in terms of Health and Wellbeing and The Environment.

- ☐ " Increase green spaces, leisure opportunities and visitor facilities, and make best use of our natural assets"
- ☐ "Develop high quality environments in our towns and villages
- ☐ "Reduce traffic, increase alternative sustainable travel choices and improve air quality"
- ☐ "Ensure climate change is a strategic consideration of Local Development Frameworks and other planning policies"

Surely the point of "Joint Strategic Planning" is that it is meant to be "Joint" in terms of reflecting the needs of the diverse communities across East Sussex and also to ensure that the complexity of issues involved – (local economies, environmental sustainability, climate change, the physical and mental wellbeing of communities) are addressed simultaneously?

Given the urgency of concerns about climate change, biodiversity and health impacts of air pollution, the County and District councils should be proactive in tackling issues about cumulative and long term effects of these , not merely burying their heads in the sand and leaving it to individual planning applications and their often highly dubious environmental impact assessments that overly rely on modelling from out of date information.

There is no evidence of specific mitigation measures or even acknowledgement of the impact that the loss of this area will represent to the biodiversity of the adjacent natural environments or the loss of this highly valued community amenity.

As a community leisure amenity for this is currently beneficial in addressing key public health concerns such as combating heart disease, poor mental health, childhood asthma

and obesity.

DEFRA: "A healthy and resilient natural world underpins economic prosperity. Investing in species and habitats is an investment in a sustainable economy. Environmental services and technologies drive economic growth and are part of a modern economy.

We know better than ever before that economic growth should not come at the cost of environmental degradation. We have a responsibility to tackle, rather than tolerate, challenges like climate change, poor air quality...."

4) Land use: No-one can disagree that it is good to bring jobs or business to the area. However the Newhaven Employment Land Review, 2017 highlights that there are numerous sites across Newhaven that are under used and require improvement and or development. This includes the Enterprise Zone areas. Surely priority should be given to existing brownfield sites before making plans that will ultimately destroy areas that will have a detrimental impact on the quality of life, health and wellbeing of the community as well as wildlife? Surely the overall quality of the environment in which people live is paramount.

5) Lack of road infrastructure: The A259 simply cannot support the level of traffic in addition to the 1000 houses to be built. The Port Access Road will not reduce and improve traffic (as falsely claimed in the PAR business plan) . Traffic going to this site via The Port Access Road will be coming off an already congested roundabout on the A259 .

6) Environmental impact and Air Quality Action Plan: Lack of environmental impact assessment in relation to the area: There has been a noticeable lack of reference to the need for traffic assessment and adequate air quality assessments. Any additional developments will increase traffic on the A259. There is a noticeable lack of comprehensive air pollution monitoring in the area. The Air Quality Action Plan states that "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 has been ill thought out in terms of ensuring that the AQMA for Newhaven is supported. Currently information on air Quality on Sussex Air does not include any testing sites in Newhaven and the town is not covered by Sussex Air "alerts" despite the implementation of AQMA .

7) POLICY CHANGE - 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.

8) FLOOD RISK: Shingle is an important factor for reducing flood risk. It is well acknowledged that there is a need to preserve trees, vegetation and shingle areas to reduce risk of flooding.

9) MITIGATION: 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, despite the fact that since 2003 the importance of reducing environmental impact and improving air quality has escalated now that we have more knowledge around the significant health implications and costs to public health in terms of poor air quality and poor environments.

The area is designated as a local wildlife site, and is also in close proximity to habitat of international importance in terms of vegetated shingle and the range of species. This level of development is not in keeping with the Habitat Action Plan or for Sussex or the East Sussex Vegetated Shingle Management plan as overdevelopment of the area will have a significant and detrimental effect.

10) Equality impact assessment: This appears to have been neglected. Please note that the elderly, children and pregnant women are disproportionately affected by poor air quality [Royal College of Physicians 2016] and therefore any equality impact assessments on policies leading to increases in traffic should take consideration of this. The industrial development of this area will also represent the loss of a leisure which currently provides benefit for elderly people and children. The East Pier is used on a daily basis for fishing for many members of our community, including BME groups (largely Eastern European and Asian). I have seen no efforts to make planning policy consultation information easily accessible to these groups.

**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 LOCAL PLAN PART 2, COMMENTS / OBJECTIONS:

**Comment on consultation process for the Local Plan:** So far all images provided in association with planning with regard to area E1 are highly deceptive. The map provided does not show the port access road which is key to industrial development in this area. The area E1 represents a highly valued resource for the local community: I would therefore like to point out that in not providing the local community with images that give a clearer impression as to the true visual impact on that area the council is being dishonest and the process shows a lack of transparency as to true impact of the plan. I feel that LDC has a moral duty to provide this as part of the consultation process.

**“Pride of Place”** is a significant document for East Sussex Strategic Partnership in setting out “a long term vision for improving people’s quality of life and the main things we must do to achieve that vision”

Although this features “Developing our economy, creating jobs and increasing prosperity” it also includes

- “Protecting our natural and built environments and adapting and responding to climate change.
- Improving health and well-being:
- Creating strong communities and community leadership (*One would assume this means listening to and not disregarding the views of local people and of our town councils and making your information more accessible*)
- Enabling people to enjoy culture, sports and leisure”

**In light of this, I would like to raise the following objections and comments with regard to part 3 in relation to Newhaven Port and policy E1:**

- 1) **The area is close to a nature reserve and to the national park and will cause not only visual impact but also significant light pollution which will have a detrimental effect on the wildlife in the nature reserve and biodiversity of the area.** Light pollution has a significant impact on moths and other insects and nocturnal animals as well as on migratory birds. This is a significant landing place for migratory birds. The area sits within a UNESCO biosphere reserve. The accompanying Habitats Regulations Assessment October 2017 appears to ignore this. As a site that includes vegetated shingle and several red book species, this is of international significance. The East Sussex Vegetated Shingle Management Plan (2009, Tim Smith) 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 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.”

- 2) **The area marked out in E1 is a of major importance for the community in terms of leisure amenity**, and for daily physical exercise, as well as drawing a significant amount of visitors to the area. It is also essential for the wellbeing of the community that footpath access to the East Pier and access to the East Beach of Newhaven is maintained.

I realise that the Port area sits outside the Neighbourhood Planning Area – however **the Local Plan should not contravene the aspirations of the neighbourhood planning** for “sustainable development” via: ‘clean, green and marine technology sectors, including manufacturing and engineering industries linked to the maritime sector. There are also aspirations to develop Newhaven’s tourism industry with the town “acting as the continental gateway to the adjacent South Downs National Park”.

This policy does not in any way support the aspirations of the Neighbourhood Plan and represents a major threat to quality of life for people living Newhaven, Seaford and surrounding areas as well as representing a threat to the sustainability of nearby small businesses who benefit from the use of this area as a leisure space by local people and visitors to the area.

- 3) **The plan for E1 contravenes the concept of “A great place for living” which underpins the local “Pride of Place” strategic vision as well as the national priorities for government bodies such as DEFRA.**

The plan goes against the following aims of the East Sussex Joint Strategic Partnership

- “ A valued environment;
- Safer and stronger communities
- Access to good local facilities
- Healthier communities

Also many of the “key” tasks and “priorities” in terms of Health and Wellbeing and The Environment.

- “ Increase green spaces, leisure opportunities and visitor facilities, and make best use of our natural assets”
- “Develop high quality environments in our towns and villages
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- “Ensure climate change is a strategic consideration of Local Development Frameworks and other planning policies”

**Surely the point of “Joint Strategic Planning” is that it is meant to be “Joint” in terms of reflecting the needs of the diverse communities across East Sussex and also to ensure that the complexity of issues involved – (local economies, environmental sustainability, climate change, the physical and mental wellbeing of communities) are addressed simultaneously?**

Given the urgency of concerns about climate change, biodiversity and health impacts of air pollution, the County and District councils should be proactive in tackling issues about cumulative and long term effects of these , not merely burying their heads in the sand and leaving it to individual planning applications and their often highly dubious environmental impact assessments that overly rely on modelling from out of date information.

There is no evidence of specific mitigation measures or even acknowledgement of the impact that the loss of this area will represent to the biodiversity of the adjacent natural environments or the loss of this highly valued community amenity.

As a community leisure amenity for this is currently beneficial in addressing key public health concerns such as combating heart disease, poor mental health, childhood asthma and obesity.

**DEFRA: “A healthy and resilient natural world underpins economic prosperity. Investing in species and habitats is an investment in a sustainable economy. Environmental services and technologies drive economic growth and are part of a modern economy.**

**We know better than ever before that economic growth should not come at the cost of environmental degradation. We have a responsibility to tackle, rather than tolerate, challenges like climate change, poor air quality....”**

**4)Land use:** No-one can disagree that it is good to bring jobs or business to the area. However the Newhaven Employment Land Review, 2017 highlights that there are numerous sites across Newhaven that are under used and require improvement and or development. This includes the Enterprise Zone areas. Surely priority should be given to existing brownfield sites before making plans that will ultimately destroy areas that will have a detrimental impact on the quality of life, health and wellbeing of the community as well as wildlife? **Surely the overall quality of the environment in which people live is paramount.**

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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”.

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**7) POLICY CHANGE** - 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.

**8) FLOOD RISK:** Shingle is an important factor for reducing flood risk. It is well acknowledged that that there is a need to preserve trees , vegetation and shingle areas to reduce risk of flooding.

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**10) Equality impact assessment:** This appears to have been neglected. Please note that the elderly, children and pregnant women are disproportionately affected by poor air quality[*Royal College of Physicians 2016*] and therefore any equality impact assessments on policies leading to increases in traffic should take consideration of this. The industrial development of this area will also represent the loss of a leisure which currently provides benefit for elderly people and children. The East Pier is used on a daily basis for fishing for many members of our community, including BME groups (largely Eastern European and Asian) . I have seen no efforts to make planning policy consultation information easily accessible to these groups.

Yours Sincerely

Melanie Potter

**Representation ID: REP/356/GT01**Representor Details:

<b>Representor ID:</b>	REP/356
<b>Name:</b>	Pat and Steven Poynter
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>GT01 - Land south of The Plough</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	
<b>Sound:</b>	
<b>Representation:</b> <p>We object to a gypsy traveller site being sited on green belt land to the North of the village at Plumpton Green. This site was put forward for planning consent of houses and turned down as it was not deemed suitable due to lack of access to local facilities. We feel that the site would also comprise The Old Brickwork which comprises 21 units employing a considerable number of employees who contribute considerably to the local economy, people who reside in the village and further afield. Perhaps housing these gypsy travellers on a brown site close to facilities would better suit their purpose.</p>	

<b>What changes do you suggest to make the document legally compliant or sound?</b>
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<b>Do you consider it necessary to participate at the Examination in Public?</b>
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<b>Why do you feel it is necessary to participate at the Examination in Public?</b>
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## Hodgson, Lilly

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**From:** PAT TYLER <[REDACTED]>  
**Sent:** 04 November 2018 18:51  
**To:** ldf  
**Subject:** Gypsy Traveller Site Plumpton Green Objection by 5 November 2018

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

We object to a gypsy traveller site being sited on green belt land to the North of the village at Plumpton Green. This site was put forward for planning consent of houses and turned down as it was not deemed suitable due to lack of access to local facilities. We feel that the site would also comprise The Old Brickwork which comprises 21 units employing a considerable number of employees who contribute considerably to the local economy, people who reside in the village and further afield. Perhaps housing these gypsy travellers on a brown site close to facilities would better suit their purpose.

Regards

Pat and Steven Poynter  
[REDACTED]



Virus-free. [www.avg.com](http://www.avg.com)

**Representation ID: REP/357/GT01**Representor Details:

<b>Representor ID:</b>	REP/357
<b>Name:</b>	Peter and Gill Pratt
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	GT01 - Land south of The Plough
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	
<b>Sound:</b>	
<b>Representation:</b>	
<p>We object to the proposed Gypsy site for the following reasons.</p> <p>If when planning permission was refused a few years back due to it being considered dangerous for access and unsafe for pedestrian access to the village, what has changed! If it wasn't regarded suitable for houses</p> <p></p> <p></p> <p></p> <p>The owner of the industrial Brickworks Site which is tenanted to a number of small</p>	

business premises has apparently said that all her tenants have said 'to a man' that, they will leave the site, hardly conducive to local employment!

Will we still keep our wonderful village store and Post Office!!

The Parish Council were asked to produce a development plan to provide potential housing , and the site chosen for the travellers settlement was not included in the plan because it was not considered appropriate.

We are concerned that the development proposed will set a precedent for any further development for the field in the future. Will there be any safeguards to stop this.

We were told at the meeting in Plumpton that there are two managed sites in Sussex, one in Maresfield and the other on the outskirts of Lewes, Bridies Tan. This site is not close to shops or schools! So why have we been told that Plumpton is the only possible area that is suitable for the development of a permanent Gypsy/Traveller site.

We hope that our feelings and the feelings of the majority of the residents of Plumpton and Plumpton Green NOT to allow this site to be developed, will seriously be taken into consideration before the decision is made.

**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

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**From:** Gill Pratt <[REDACTED]>  
**Sent:** 31 October 2018 21:52  
**To:** ldf  
**Subject:** Proposed Gypsy Traveller Site  
**Categories:** LPP2 comment to code - stakeholder details have been added

We object to the proposed Gypsy site for the following reasons.

If when planning permission was refused a few years back due to it being considered dangerous for access and unsafe for pedestrian access to the village, what has changed! If it wasn't regarded suitable for houses [REDACTED]  
[REDACTED]

[REDACTED]  
[REDACTED]  
The owner of the industrial Brickworks Site which is tenanted to a number of small business premises has apparently said that all her tenants have said 'to a man' that, they will leave the site, hardly conducive to local employment!

Will we still keep our wonderful village store and Post Office!!

The Parish Council were asked to produce a development plan to provide potential housing , and the site chosen for the travellers settlement was not included in the plan because it was not considered appropriate.

We are concerned that the development proposed will set a precedent for any further development for the field in the future. Will there be any safeguards to stop this.

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We hope that our feelings and the feelings of the majority of the residents of Plumpton and Plumpton Green NOT to allow this site to be developed, will seriously be taken into consideration before the decision is made.

Peter and Gill Pratt.

Sent from my iPad

**Representation ID: REP/358/E1**Representor Details:

<b>Representor ID:</b>	REP/358
<b>Name:</b>	Judy Preece
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>E1 - Land at East Quay, Newhaven Port</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	
<b>Sound:</b>	
<b>Representation:</b>	<p>I am strongly opposing the plans for future development at the western end of Tide Mills Beach in Newhaven. Any proposals will lead to increased traffic and significant air, noise and water pollution. Newhaven is already a highly polluted area and has a serious traffic and air quality issue. At busy times of the day all roads in and out of Newhaven in every direction are grid locked, this development with its increase in traffic will only make an unacceptable situation worse. Please be reminded that Newhaven One Way System is</p>

already an Air Quality Management Area and emissions already breach legal limits!

It is heart breaking to think that we could lose our designated Local Wildlife Site for nature including internationally rare vegetated shingle. This site is popular with both locals and tourists for many leisure activities and is busy at all times of the year.

This policy does not reflect the "clean green marine" vision of the enterprise zone or "renewable energy cluster" of the port master plan. I wonder why this is the case and what the reason could be for ignoring these important goals?

**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:** Judy Preece [REDACTED] >  
**Sent:** 31 October 2018 10:28  
**To:** ldf  
**Subject:** New policy E1 and Tide Mills Beach  
  
**Categories:** LPP2 comment to code - stakeholder details have been added

I am strongly opposing the plans for future development at the western end of Tide Mills Beach in Newhaven. Any proposals will lead to increased traffic and significant air, noise and water pollution. Newhaven is already a highly polluted area and has a serious traffic and air quality issue. At busy times of the day all roads in and out of Newhaven in every direction are grid locked, this development with its increase in traffic will only make an unacceptable situation worse. Please be reminded that Newhaven One Way System is already an Air Quality Management Area and emissions already breach legal limits!

It is heart breaking to think that we could lose our designated Local Wildlife Site for nature including internationally rare vegetated shingle. This site is popular with both locals and tourists for many leisure activities and is busy at all times of the year.

This policy does not reflect the "clean green marine" vision of the enterprise zone or "renewable energy cluster" of the port master plan. I wonder why this is the case and what the reason could be for ignoring these important goals?

Judy Preece  
[REDACTED]

<b>Representation ID:</b> REP/359/E1
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Representor Details:

<b>Representor ID:</b>	REP/359
<b>Name:</b>	John Prout
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>E1 - Land at East Quay, Newhaven Port</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	Yes
<b>Sound:</b>	No Not Effective
<b>Representation:</b>  Any 'employment development' in the land adjacent to the port in the Tide mills area should be strictly restricted to activities which directly enhance the operating capacity of the port. Generalised development in this area will only serve to degrade the local environment, detract from the aesthetic value of the south downs national park, add to the already serious traffic congestion which afflicts the A259 at peak times, and increase the strain on already overstretched services and infrastructure in the area. LDC needs to	

move beyond its obsession for 'development' at any cost and its seemingly insatiable desire to fill in any open space with ill thought through projects (residential and commercial) which inevitably lead to ever increasing, and ultimately unsustainable, densities of people, traffic and buildings. Development of the port infrastructure / facilities is one thing but generalised commercialisation and urbanisation is a serious environmental blight which also creates a self perpetuating strain on public services and infrastructure.

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

Any development in the land at east quay should be strictly limited to that which directly enhances port capacity and infrastructure.

**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/360/GT01**Representor Details:

<b>Representor ID:</b>	REP/360
<b>Name:</b>	Jean M Rainger
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>GT01 - Land south of The Plough</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	
<b>Sound:</b>	
<b>Representation:</b>  I wish to voice my feelings against the proposed planning of the above as being totally unsuitable for families.  Plumpton Green is a village in the middle of a very rural area. The nearest towns are approximately 7, 5 and 6 miles away. Transport to any of the nearest towns is very, very limited. Burgess Hill has a bus travelling only twice a week!!! The Lewes – Haywards	

Heath bus service is every two hours with no buses at the weekend. Plumpton has, very recently, lost one of its hourly train services. Therefore, travelling in and out of the village is very difficult.

Any medical help is also several miles away, getting to medical help for a family is not easy.

Finally, I don't actually know whether the local school is full to capacity, but I expect it is or very close to full capacity.

To place families in Plumpton Green is ill-advised. With a County the size of East Sussex there is, surely, a more suitable area to place families closer to towns.

**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?**





1<sup>st</sup> October 2018

Planning Policy Team  
Lewes District Council  
LEWES BN7 1AB

Dear Sirs,

Re: Proposed Permanent Gypsy & Travellers Site at Plumpton Green

I wish to voice my feelings against the proposed planning of the above as being totally unsuitable for families.

Plumpton Green is a village in the middle of a very rural area. The nearest towns are approximately 7, 5 and 6 miles away. Transport to any of the nearest towns is very, very limited. Burgess Hill has a bus travelling only twice a week!!! The Lewes – Haywards Heath bus service is every two hours with no buses at the weekend. Plumpton has, very recently, lost one of its hourly train services. Therefore, travelling in and out of the village is very difficult.

Any medical help is also several miles away, getting to medical help for a family is not easy.

Finally, I don't actually know whether the local school is full to capacity, but I expect it is or very close to full capacity.

To place families in Plumpton Green is ill-advised. With a County the size of East Sussex there is, surely, a more suitable area to place families closer to towns.

Yours faithfully,

Mrs J M Rainger

**Representation ID: REP/361/E1**Representor Details:

<b>Representor ID:</b>	REP/361
<b>Name:</b>	Tony Ramsay
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>E1 - Land at East Quay, Newhaven Port</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	
<b>Sound:</b>	
<b>Representation:</b>  I am writing to express my deep concern over the proposed development at tidemills. It is vital that yourselves, as a local council, stand up to corporate power, and act to protect what remains of the natural beauty in the Newhaven area. The proposed development will mean yet more needless destruction, that cannot be supported on either a local or a global scale. As a local resident, I have concerns about the increased air pollution this will bring. The proposal as a whole clearly contravenes any sustainable development proposals outlined in your mandate. This cannot be allowed to go ahead.	
<b>What changes do you suggest to make the document legally compliant or sound?</b>	

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

## Hodgson, Lilly

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**From:** TONY RAMSAY <[REDACTED]>  
**Sent:** 03 November 2018 16:00  
**To:** ldf  
**Subject:** Proposed development plan for tidemills  
  
**Categories:** LPP2 comment to code - stakeholder details have been added

Dear sir/madam,

I am writing to express my deep concern over the proposed development at tidemills. It is vital that yourselves, as a local council, stand up to corporate power, and act to protect what remains of the natural beauty in the Newhaven area. The proposed development will mean yet more needless destruction, that cannot be supported on either a local or a global scale.

As a local resident, I have concerns about the increased air pollution this will bring. The proposal as a whole clearly contravenes any sustainable development proposals outlined in your mandate. This cannot be allowed to go ahead.

Yours sincerely,

Tony Ramsay

[Sent from Yahoo Mail on Android](#)

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**Representation ID: REP/362/BH01**Representor Details:

<b>Representor ID:</b>	REP/362
<b>Name:</b>	Sarah Rayfield
<b>Organisation:</b>	<b>British Horse Society</b>
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Other group or organisation

Agent Details:

<b>Name:</b>
<b>Organisation:</b>

Contact Details:

<b>Email Address:</b>	sarah.rayfield@bhs.org.uk
<b>Address:</b>	British Horse Society Abbey Park, Stareton Kenilworth Warwickshire CV8 2XZ

Representation:

<b>Policy/Section:</b>	<b>BH01 - Land at The Nuggets, Valebridge Road</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	
<b>Sound:</b>	
<b>Representation:</b>  Point 1 "Access, including provision for pedestrians and cyclists, to be provided from Valebridge Road" needs "equestrians" including in this provision. Existing bridleways should not be used as 'private access' for these developments or alternative provision of new publicly maintainable rights of way of adequate amenity and convenience should be supplied in their place for all users.	

<b>What changes do you suggest to make the document legally compliant or sound?</b>
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<b>Do you consider it necessary to participate at the Examination in Public?</b>
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<b>Why do you feel it is necessary to participate at the Examination in Public?</b>
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**Representation ID: REP/362/BA01**Representor Details:

<b>Representor ID:</b>	REP/362
<b>Name:</b>	Sarah Rayfield
<b>Organisation:</b>	<b>British Horse Society</b>
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Other group or organisation

Agent Details:

<b>Name:</b>
<b>Organisation:</b>

Contact Details:

<b>Email Address:</b>	sarah.rayfield@bhs.org.uk
<b>Address:</b>	British Horse Society Abbey Park, Stareton Kenilworth Warwickshire CV8 2XZ

Representation:

<b>Policy/Section:</b>	<b>BA01 - Land at Hillside Nurseries, High Street</b>
<i>Do you consider the document to be:</i> <b>Legally Compliant:</b> <b>Sound:</b>	
<b>Representation:</b>  Point 1 "Access, including provision for pedestrians and cyclists..." "equestrians" should be added in to this provision.	
<b>What changes do you suggest to make the document legally compliant or sound?</b>	

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



<b>Representation ID: REP/362/BA02</b>
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Representor Details:

<b>Representor ID:</b>	REP/362
<b>Name:</b>	Sarah Rayfield
<b>Organisation:</b>	<b>British Horse Society</b>
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Other group or organisation

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	sarah.rayfield@bhs.org.uk
<b>Address:</b>	British Horse Society Abbey Park, Stareton Kenilworth Warwickshire CV8 2XZ

Representation:

<b>Policy/Section:</b>	<b>BA02 - Land adjacent to the High Street</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	
<b>Sound:</b>	
<b>Representation:</b>	
Point 1 "Access, including provision for pedestrians and cyclists..." "equestrians" should be added in to this provision.	
<b>What changes do you suggest to make the document legally compliant or sound?</b>	

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

**Representation ID: REP/362/DM6**Representor Details:

<b>Representor ID:</b>	REP/362
<b>Name:</b>	Sarah Rayfield
<b>Organisation:</b>	<b>British Horse Society</b>
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Other group or organisation

Agent Details:

<b>Name:</b>
<b>Organisation:</b>

Contact Details:

<b>Email Address:</b>	sarah.rayfield@bhs.org.uk
<b>Address:</b>	British Horse Society Abbey Park, Stareton Kenilworth Warwickshire CV8 2XZ

Representation:

<b>Policy/Section:</b>	<b>DM6: Equestrian Development</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	
<b>Sound:</b>	
<b>Representation:</b>	
* "Commercial riding schools, livery stables and other commercial facilities should have satisfactory access to the public bridleway network without the use of unsuitable roads." "Unsuitable roads" is subjective, even amongst equestrians, and this needs clarification with the relevant parties.	

<b>What changes do you suggest to make the document legally compliant or sound?</b>
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<b>Do you consider it necessary to participate at the Examination in Public?</b>
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<b>Why do you feel it is necessary to participate at the Examination in Public?</b>
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**Representation ID: REP/362/DM9**Representor Details:

<b>Representor ID:</b>	REP/362
<b>Name:</b>	Sarah Rayfield
<b>Organisation:</b>	<b>British Horse Society</b>
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Other group or organisation

Agent Details:

<b>Name:</b>
<b>Organisation:</b>

Contact Details:

<b>Email Address:</b>	sarah.rayfield@bhs.org.uk
<b>Address:</b>	British Horse Society Abbey Park, Stareton Kenilworth Warwickshire CV8 2XZ

Representation:

<b>Policy/Section:</b>	<b>DM9: Farm Diversification</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	
<b>Sound:</b>	
<b>Representation:</b>	
<p>"4. The proposed development would not create an unacceptable impact on the local road network or require highway improvements that would harm the landscape or ecological value of rural roads in the area."</p> <p>Priority should be given to schemes where additional off road access for ALL vulnerable road users would be provided as a result of such schemes via dedicated bridleways</p>	

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and/or long term permissive routes.

**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?**

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<b>Representation ID: REP/362/DM14</b>
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Representor Details:

<b>Representor ID:</b>	REP/362
<b>Name:</b>	Sarah Rayfield
<b>Organisation:</b>	<b>British Horse Society</b>
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Other group or organisation

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	sarah.rayfield@bhs.org.uk
<b>Address:</b>	British Horse Society Abbey Park, Stareton Kenilworth Warwickshire CV8 2XZ

Representation:

<b>Policy/Section:</b>	<b>DM14: Multi-functional Green Infrastructure</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	
<b>Sound:</b>	
<b>Representation:</b>	<p>"Development will be permitted where opportunities for the provision of additional green infrastructure have been fully considered and would be provided where justified by the character of the area or the need for outdoor playing space."</p> <p>Provision of public rights of way (for ALL NMUs) should be included within this policy as it fulfils NPPF section 91c and 96.</p>

<b>What changes do you suggest to make the document legally compliant or sound?</b>
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<b>Do you consider it necessary to participate at the Examination in Public?</b>
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<b>Why do you feel it is necessary to participate at the Examination in Public?</b>
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<b>Representation ID: REP/362/DM15</b>
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Representor Details:

<b>Representor ID:</b>	REP/362
<b>Name:</b>	Sarah Rayfield
<b>Organisation:</b>	<b>British Horse Society</b>
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Other group or organisation

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	sarah.rayfield@bhs.org.uk
<b>Address:</b>	British Horse Society Abbey Park, Stareton Kenilworth Warwickshire CV8 2XZ

Representation:

<b>Policy/Section:</b>	<b>DM15: Provision for Outdoor Playing Space</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	
<b>Sound:</b>	
<b>Representation:</b>	<p>"The Council will seek to achieve provision of outdoor playing space, which is as a matter of practise and policy available for public use, to the following minimum standards:</p> <p>1.6 ha per 1000 population for outdoor sports, including playing pitches, tennis courts, and bowling greens;"</p>

Within the UK, there are 2.7 million horse riders compared with approximately 0.4 million tennis players and 0.4 million bowls players. We would suggest that the need for equestrian access vastly exceeds the requirement for further tennis courts and bowling greens and so should be given, at the very least, equal 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?**

**Representation ID: REP/362/DM17**Representor Details:

<b>Representor ID:</b>	REP/362
<b>Name:</b>	Sarah Rayfield
<b>Organisation:</b>	<b>British Horse Society</b>
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Other group or organisation

Agent Details:

<b>Name:</b>
<b>Organisation:</b>

Contact Details:

<b>Email Address:</b>	sarah.rayfield@bhs.org.uk
<b>Address:</b>	British Horse Society Abbey Park, Stareton Kenilworth Warwickshire CV8 2XZ

Representation:

<b>Policy/Section:</b>	<b>DM17: Former Lewes/Sheffield Park Railway Line</b>
<i>Do you consider the document to be:</i> <b>Legally Compliant:</b> <b>Sound:</b>	
<b>Representation:</b>  "Development which would prejudice such uses will not be permitted unless proposals are accompanied by alternative route provision."  We support this and propose that this should extend to all development, not just the specific project mentioned.  However, of concern is the phrase above the policy in section 4.57:	

"The Council will therefore encourage opportunities to increase access to the countryside by enabling the provision of a footpath, cycleway or bridleway along the undeveloped part of the former line."

This sentence must be amended to

"The Council will therefore encourage opportunities to increase access to the countryside by enabling the provision of a bridleway/restricted byway along the undeveloped part of the former line."

This provides for equestrians, cyclists AND walkers whereas "footpath, cycleway or bridleway" excludes equestrians from at least two of the options.

**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?**

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**Representation ID: REP/362/DM35**Representor Details:

<b>Representor ID:</b>	REP/362
<b>Name:</b>	Sarah Rayfield
<b>Organisation:</b>	<b>British Horse Society</b>
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Other group or organisation

Agent Details:

<b>Name:</b>
<b>Organisation:</b>

Contact Details:

<b>Email Address:</b>	sarah.rayfield@bhs.org.uk
<b>Address:</b>	British Horse Society Abbey Park, Stareton Kenilworth Warwickshire CV8 2XZ

Representation:

<b>Policy/Section:</b>	<b>DM35: Footpath, Cycle and Bridleway Network</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	
<b>Sound:</b>	
<b>Representation:</b>  DM35 – we welcome the inclusion of this policy but would further comment that bridleways over which there is currently limited private vehicular access ought not to be used as access routes for further development. Where it is possible that unofficial use of the public right of way could happen then steps should be taken wherever possible to prevent this in the form of vehicle barriers and/or the provision of alternative routes of	

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equal value and 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?**

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**Representation ID: REP/362/SS**Representor Details:

<b>Representor ID:</b>	REP/362
<b>Name:</b>	Sarah Rayfield
<b>Organisation:</b>	<b>British Horse Society</b>
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Other group or organisation

Agent Details:

<b>Name:</b>
<b>Organisation:</b>

Contact Details:

<b>Email Address:</b>	sarah.rayfield@bhs.org.uk
<b>Address:</b>	British Horse Society Abbey Park, Stareton Kenilworth Warwickshire CV8 2XZ

Representation:

<b>Policy/Section:</b>	<b>Spatial Strategy</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	
<b>Sound:</b>	
<b>Representation:</b>  Further to our correspondence in April of this year, please find below comments relating to the current consultation regarding the above in respect of the plan's provision for equestrians within the plan.  You will be aware that equestrian access is limited to just 22% of the public rights of way network nationally (significantly less for carriage drivers) and even this figure is	

somewhat misleading as much of it is fragmented, resulting in dead-end bridleways or restricted byways. Increased traffic on roads which puts the most vulnerable road users at still more risk at a time when the limited off road access they have is being threatened by development. It is within the scope of each local plan to provide, not just for walkers and cyclists, but also for equestrians at no additional cost, simply by recording paths as "bridleways" rather than cycleways or footpaths.

Policies contained within the National Planning Policy Framework which support our requests are as follows:

Section 91c of 'Promoting Healthy and Safe Communities':

"Planning policies and decisions should aim to achieve healthy, inclusive and safe places which:[...]enable and support healthy lifestyles, especially where this would address identified local health and well-being needs"

Section 96 of 'Open Space & Recreation':

"Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities. Planning policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision."

Incorporating the requirement to actively seek every opportunity to create new links and/or new circular routes within Lewes DC area for ALL non motorised users, including equestrians would help support the policies above.

Within the local plan we welcome the Council's acknowledgement that,

"4.23 Horse riding and other equestrian activities are increasingly popular forms of recreation in the countryside that can complement agricultural activities and help to diversify rural economies"

We are pleased to note that you recognise equestrianism as an increasingly popular form of exercise. Within an area such as Lewes DC, a good, connected, well maintained rights of way network at the higher status will also result in increased equine tourism as can be witnessed by the number of summer camps run at Plumpton College. Worthy of note also is that The British Horse Society operates a "Horses Welcome" scheme where B&Bs can be approved by the BHS for equine tourism. Along with tourism, the cost of keeping a horse was estimated nationally by BETA in 2015 at £3600 pa per horse with costs in the South East being substantially higher (a small survey in West Sussex in 2017 found the spend was between £4k and £15k pa). Much of this benefits the local economy as it is spent on local businesses: livery yards, vets, farriers, saddlers, feed merchants, forage providers, etc. The value of equestrianism should not be overlooked in any development plan.

Finally, I have attached for your interest a document entitled "The health benefits of horse riding in the UK" which explains the key importance of horse riding for physical and emotional wellbeing. This helps explain why including equestrians fulfils



requirements within the NPPF as mentioned above. Some key findings include:

- \* More than two thirds (68 percent) of questionnaire respondents participate in horse riding and associated activities for 30 minutes or more at least three times a week. Sport England estimate that such a level of sporting activity will help an individual achieve or exceed the government's recommended minimum level of physical activity.
- \* A range of evidence indicates the vast majority (90 percent plus) of horse riders are female and more than a third (37 percent) of the female riders who took part in the survey were above 45 years of age. Horse riding is especially well placed to play a valuable role in initiatives to encourage increased physical activity amongst women of all ages.
- \* Amongst the horse riders who took part in the survey, 39 percent had taken no other form of physical activity in the last four weeks. This highlights the importance of riding to these people, who might otherwise be sedentary.
- \* Horse riders with a long-standing illness or disability who took part in the survey are able to undertake horse riding and associated activities at the same self-reported level of frequency and physical intensity as those without such an illness or disability. The British Horse Society is very happy to advise and be included in any planning with the possibility of inclusion of rights of way.

**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  
Sent via email

2<sup>nd</sup> November 2018

Dear Sir or Madam

Lewes District Local Plan Part 2

Further to our correspondence in April of this year, please find below comments relating to the current consultation regarding the above in respect of the plan's provision for equestrians within the plan.

You will be aware that equestrian access is limited to just 22% of the public rights of way network nationally (significantly less for carriage drivers) and even this figure is somewhat misleading as much of it is fragmented, resulting in dead-end bridleways or restricted byways. Increased traffic on roads which puts the most vulnerable road users at still more risk at a time when the limited off road access they have is being threatened by development. It is within the scope of each local plan to provide, not just for walkers and cyclists, but also for equestrians at no additional cost, simply by recording paths as "bridleways" rather than cycleways or footpaths.

Policies contained within the National Planning Policy Framework which support our requests are as follows:

Section 91c of 'Promoting Healthy and Safe Communities':

*"Planning policies and decisions should aim to achieve healthy, inclusive and safe places which:[...]enable and support healthy lifestyles, especially where this would address identified local health and well-being needs"*

Section 96 of 'Open Space & Recreation':

*"Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities. Planning policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision."*

Incorporating the requirement to actively seek every opportunity to create new links and/or new circular routes within Lewes DC area for ALL non motorised users, *including equestrians* would help support the policies above.

Within the local plan we welcome the Council's acknowledgement that,

*"4.23 Horse riding and other equestrian activities are increasingly popular forms of recreation in the countryside that can complement agricultural activities and help to diversify rural economies"*

Further comment on the benefits of equestrian activities both to the equestrian and the economy are detailed towards the end of this letter.

Specific observations on the document policies are below:

Policy BH01 - Land at The Nuggets, Valebridge Road

Point 1 *"Access, including provision for pedestrians and cyclists, to be provided from Valebridge Road"* needs "equestrians" including in this provision. Existing bridleways should not be used as 'private access' for these developments or alternative provision of new publicly maintainable rights of way of adequate amenity and convenience should be supplied in their place for all users.

Policies BA01, BA02, Barcombe Cross

Point 1 *"Access, including provision for pedestrians and cyclists..."* "equestrians" should be added in to this provision.

Policy DM6

1. *"Commercial riding schools, livery stables and other commercial facilities should have satisfactory access to the public bridleway network without the use of unsuitable roads."*

"Unsuitable roads" is subjective, even amongst equestrians, and this needs clarification with the relevant parties.

Policy DM9: Farm Diversification

*"4. The proposed development would not create an unacceptable impact on the local road network or require highway improvements that would harm the landscape or ecological value of rural roads in the area."*

Priority should be given to schemes where additional off road access for ALL vulnerable road users would be provided as a result of such schemes via dedicated bridleways and/or long term permissive routes.

Policy DM14: Multi-functional Green Infrastructure

*"Development will be permitted where opportunities for the provision of additional green infrastructure have been fully considered and would be provided where justified by the character of the area or the need for outdoor playing space."*

Provision of public rights of way (for ALL NMUs) should be included within this policy as it fulfils NPPF section 91c and 96.

Policy DM15: Provision for Outdoor Playing Space

*"The Council will seek to achieve provision of outdoor playing space, which is as a matter of practise and policy available for public use, to the following minimum standards:*

*1.6 ha per 1000 population for outdoor sports, including playing pitches, tennis courts, and bowling greens;"*

Within the UK, there are 2.7 million horse riders compared with approximately 0.4 million tennis players and 0.4 million bowls players. We would suggest that the need for equestrian access vastly exceeds the requirement for further tennis courts and bowling greens and so should be given, at the very least, equal consideration.

DM17 – Former Lewes/Sheffield Park Railway Line

*"Development which would prejudice such uses will not be permitted unless proposals are accompanied by alternative route provision."*

We support this and propose that this should extend to **all** development, not just the specific project mentioned.

However, of concern is the phrase above the policy in section 4.57:

*"The Council will therefore encourage opportunities to increase access to the countryside by enabling the provision of a footpath, cycleway or bridleway along the undeveloped part of the former line."*

This sentence must be amended to

"The Council will therefore encourage opportunities to increase access to the countryside by enabling the provision of a *bridleway/restricted byway* along the undeveloped part of the former line."

This provides for equestrians, cyclists AND walkers whereas "footpath, cycleway or bridleway" excludes equestrians from at least two of the options.

DM35 – we welcome the inclusion of this policy but would further comment that bridleways over which there is currently limited private vehicular access ought not to be used as access routes for *further* development. Where it is possible that unofficial use of the public right of way could happen then steps should be taken wherever possible to prevent this in the form of vehicle barriers and/or the provision of alternative routes of equal value and amenity.

We are pleased to note that you recognise equestrianism as an increasingly popular form of exercise. Within an area such as Lewes DC, a good, connected, well maintained rights of way network at the higher status will also result in increased equine tourism as can be witnessed by the number of summer camps run at Plumpton College. Worthy of note also is that The British Horse Society operates a "Horses Welcome" scheme where B&Bs can be approved by the BHS for equine tourism. Along with tourism, the cost of keeping a horse was estimated nationally by BETA in 2015 at £3600 pa per horse with costs in the South East being substantially higher (a small survey in West Sussex in 2017 found the spend was between £4k and £15k pa). Much of this benefits the local economy as it is spent on local businesses: livery yards, vets, farriers, saddlers, feed merchants, forage providers, etc. The value of equestrianism should not be overlooked in any development plan.

Finally, I have attached for your interest a document entitled "The health benefits of horse riding in the UK" which explains the key importance of horse riding for physical and emotional wellbeing. This helps explain why including equestrians fulfils requirements within the NPPF as mentioned above. Some key findings include:

- More than two thirds (68 percent) of questionnaire respondents participate in horse riding and associated activities for 30 minutes or more at least three times a week. *Sport England estimate that such a level of sporting activity will help an individual achieve or exceed the government's recommended minimum level of physical activity.*
- A range of evidence indicates the vast majority (90 percent plus) of horse riders are female and more than a third (37 percent) of the female riders who took part in the survey were above 45 years of age. *Horse riding is especially well placed to play a valuable role in initiatives to encourage increased physical activity amongst women of all ages.*

- Amongst the horse riders who took part in the survey, *39 percent had taken no other form of physical activity in the last four weeks. This highlights the importance of riding to these people, who might otherwise be sedentary.*
- Horse riders with a long-standing illness or disability who took part in the survey are able to undertake horse riding and associated activities *at the same self-reported level of frequency and physical intensity as those without such an illness or disability.*

The British Horse Society is very happy to advise and be included in any planning with the possibility of inclusion of rights of way.

Yours faithfully



Sarah Rayfield

Access Field Officer – London & the South East

Email: [sarah.rayfield@bhs.org.uk](mailto:sarah.rayfield@bhs.org.uk)

Tel: 02476 840713

Mob: 07971 059262

# The health benefits of horse riding in the UK



Research undertaken by the University of Brighton and Plumpton College  
on behalf of The British Horse Society

# The health benefits of horse riding in the UK

## Executive Summary

### Key findings

#### The physical health benefits of horse riding and associated activities

- Horse riding and activities associated with horse riding, such as mucking out, expend sufficient energy to be classed as moderate intensity exercise.
- Regular periods of trotting in a riding session may enhance the energy expended and associated health benefits.
- More than two thirds (68 percent) of questionnaire respondents participate in horse riding and associated activities for 30 minutes or more at least three times a week. Sport England estimate that such a level of sporting activity will help an individual achieve or exceed the government's recommended minimum level of physical activity.
- A range of evidence indicates the vast majority (90 percent plus) of horse riders are female and more than a third (37 percent) of the female riders who took part in the survey were above 45 years of age. Horse riding is especially well placed to play a valuable role in initiatives to encourage increased physical activity amongst women of all ages.
- Amongst the horse riders who took part in the survey, 39 percent had taken no other form of physical activity in the last four weeks. This highlights the importance of riding to these people, who might otherwise be sedentary.
- Horse riders with a long-standing illness or disability who took part in the survey are able to undertake horse riding and associated activities at the same self-reported level of frequency and physical intensity as those without such an illness or disability.

#### The psychological and social benefits of horse riding

- Horse riding stimulates mainly positive psychological feelings.
- Horse riders are strongly motivated to take part in riding by the sense of well-being they gain from interacting with horses. This important positive psychological interaction with an animal occurs in a very few sports.
- Being outdoors and in contact with nature is an important motivation for the vast majority of horse riders.

#### Study methods

The British Horse Society commissioned the University of Brighton in partnership with Plumpton College to research the physical health, psychological and well-being benefits of recreational horse riding in the United Kingdom.



Sport England UK have adopted a threshold value for the contribution of sport to meeting Government guidelines on the recommended intensity and frequency of exercise that is likely to achieve physical health benefits. The threshold value measures the degree to which an individual participates in sport of moderate intensity activity for at least 30 minutes or more, three times a week. The research, therefore, assessed whether horse riding can be classified as a moderate intensity exercise and examined the frequency with which individuals take part

The research also examined the psychological and social benefits of horse riding. Reliable existing evidence indicates that physical exercise produces well-being benefits linked to social interactions and changes in mood, anxiety, self esteem and other personal emotions.

Two scientific exercise testing trials were undertaken to analyse the physical exercise intensity of recreational horse riding using validated scientific measurements of energy expended and current definitions of what constitutes moderate intensity exercise in terms of energy expenditure measured in metabolic equivalents (METs).

The first trial involved 17 participants cycling in a laboratory to assess their aerobic fitness levels. Measurements were also taken of their descriptive anthropometric characteristics. In the second trial the same 17 participants rode a horse for 45 minutes at the Plumpton College equestrian centre following a protocol that replicated the pattern of a typical riding lesson.

A questionnaire survey was undertaken of 1,248 horse riders. The quantitative and qualitative data gathered by the questionnaire allowed an analysis of the respondents' self reported measures of exercise intensity and frequency, and their perceptions of the social and psychological benefits of horse riding.

### **Physical health benefits**

The scientific trials indicated general horse riding energy expenditure was equivalent to 3.7 METs and trotting equated to approximately 5.0 METs. These levels are clearly within the moderate intensity exercise band recommended by the UK's ABC of Physical Activity for Health guidelines that considers moderate intensity to be typically characterized as between three-six METs.

The national compendium of physical activities categorises energy expenditures for different recreational physical activities and reports levels of four METs for general horse riding and 6.5 METs for trotting, which are similar to those obtained in the scientific trials. The compendium also reports that the energy expenditure for saddling and grooming was 3.5 METs which is in the moderate intensity band

More than two thirds (68 percent) of questionnaire respondents achieved the government guidelines for exercise intensity and frequency (30 minutes for three times a week or more at moderate intensity) from horse riding and associated activities alone. Of these respondents 69 percent achieved this level of intensity and frequency through horse riding and the other 21 percent did so through associated activities such as mucking out and grooming.

Women have been identified in government studies as a social group with relatively low levels of participation in physical activity. Some 93 percent of questionnaire respondents were women and 49 percent of female respondents were aged 45 or above. These are comparable figures to a major Sport England survey which found that 90 percent of those participating in equestrianism are women and 37 percent of the female participants in equestrianism are aged 45 or above. The gender and age profile of equestrianism is not matched by any other sport in the UK.

Thirty nine percent of questionnaire respondents indicated that horse riding was the only form of physical activity in which they had participated during the last four weeks. These respondents, if they did not ride, would be sedentary people unless they changed their exercise habits, thus stressing the importance of horse riding for these individuals.

Qualitative data obtained in the questionnaire suggests that for some respondents with long-standing illnesses or disability, horse riding had actually improved their physical or mental condition.

### **Psychological and social benefits**

More than 80 percent of questionnaire respondents reported that horse riding made them feel 'quite a lot' or 'extremely' cheerful, relaxed, happy or active. Qualitative data suggests that horse riding can play a role in managing negative feelings relating to anxiety and depression. The experience of these psychological benefits amongst questionnaire respondents was not influenced by the frequency of participation in horse riding and most psychological benefits were experienced by riders who did not participate regularly.

Asked to rate different motivations for going horse riding 82 percent of questionnaire respondents rated the motivation of 'interaction with horses' as either 'very important' or 'extremely important'. No other motivation received such a high importance rating. Existing evidence suggests that companion animals can provide owners with certain psychological benefits. These findings suggest that the interaction with horses may be very positive psychologically for horse riders.

More than 80 percent of questionnaire respondents rated the motivations 'contact with nature' and 'scenery and views' 'important', 'very important' or 'extremely important'. Some personal development motivations identified as important by respondents included 'escape', 'develop skills', 'challenge myself', 'experience excitement', 'to be physically active' and 'to relax'. Participation in horse riding provides a range of psychological and social benefits, some of which are particular to the interaction with animals and nature and therefore would not be gained from other forms of sporting activity.

**Representation ID: REP/363/E1**Representor Details:

<b>Representor ID:</b>	REP/363
<b>Name:</b>	David Reavely
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>E1 - Land at East Quay, Newhaven Port</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	
<b>Sound:</b>	
<b>Representation:</b>	
Dear Sir/Madam,	
I'm writing to express my grave concerns concerning the proposed industrial development of Tide Mills.	
I feel that this development significantly conflicts with the future vision of Newhaven's development as an area in tune with the natural environment and as a place where locals and visitors can enjoy the experience of interacting with nature.	
Once this unique and beautiful area is destroyed by industrial development, as is proposed, we will never be able to get it back. You can't put a price on such precious natural habitats. Therefore, I implore you to do the right thing and abandon the	

aforementioned 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?**

## Hodgson, Lilly

---

**From:** david reavely [REDACTED]  
**Sent:** 03 November 2018 19:36  
**To:** ldf  
**Subject:** E1 plan  
  
**Categories:** LPP2 comment to code - stakeholder details have been added

Dear Sir/Madam,

I'm writing to express my grave concerns concerning the proposed industrial development of Tide Mills.

I feel that this development significantly conflicts with the future vision of Newhaven's development as an area in tune with the natural environment and as a place where locals and visitors can enjoy the experience of interacting with nature.

Once this unique and beautiful area is destroyed by industrial development, as is proposed, we will never be able to get it back. You can't put a price on such precious natural habitats. Therefore, I implore you to do the right thing and abandon the aforementioned proposal.

Yours sincerely,  
David Reavely

Sent from my iPhone

<b>Representation ID:</b> REP/364/E1
--------------------------------------

Representor Details:

<b>Representor ID:</b>	REP/364
<b>Name:</b>	Donna Reid
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>E1 - Land at East Quay, Newhaven Port</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	
<b>Sound:</b>	
<b>Representation:</b>	<p>I am emailing today with regard to the proposal to develop the tidemills area at the western end of Seaford bay.</p> <p>It's already a tragedy that the Brett's development has already been approved and that an access bridge is being built. However to carry on developing the area up to the South Downs National Park boundaries is ridiculous.</p> <p>The area is one of outstanding beauty. The ruins are an amazing insight into the past but the area beyond this towards the port is what makes tidemills such a desirable place to visit.</p> <p>Further development will ruin this not only for visitors but the rich fauna and diverse</p>

wildlife will also be destroyed. The picturesque views of the bay that is such a wonderful sight will be replaced by industry, hardly a place to want to visit.

The most infuriating part of all of this proposal is the amount of derelict building surrounding newhaven all ready. How can it be justified that we would destroy this area when there are already developed area that could be repurposed.

I object fully to any further development in this area and feel that it should be extended into the South Downs National Park so as to stop any silly ideas of development 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?**

## Hodgson, Lilly

---

**From:** D Jay <[REDACTED]>  
**Sent:** 31 October 2018 19:25  
**To:** ldf  
**Subject:** Tidemills & the western end of Seaford bay.  
  
**Categories:** LPP2 comment to code - stakeholder details have been added

I am emailing today with regard to the proposal to develop the tidemills area at the western end of Seaford bay.

It's already a tragedy that the Brett's development has already been approved and that an access bridge is being built. However to carry on developing the area up to the South Downs National Park boundaries is ridiculous.

The area is one of outstanding beauty. The ruins are an amazing insight into the past but the area beyond this towards the port is what makes tidemills such a desirable place to visit.

Further development will ruin this not only for visitors but the rich fauna and diverse wildlife will also be destroyed. The picturesque views of the bay that is such a wonderful sight will be replaced by industry, hardly a place to want to visit.

The most infuriating part of all of this proposal is the amount of derelict building surrounding newhaven all ready. How can it be justified that we would destroy this area when there are already developed area that could be repurposed.

I object fully to any further development in this area and feel that it should be extended into the South Downs National Park so as to stop any silly ideas of development in the future.

Thank you

Donna Reid

Sent from my iPad



**Representation ID: REP/365/E1**Representor Details:

<b>Representor ID:</b>	REP/365
<b>Name:</b>	Stuart Reid
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>E1 - Land at East Quay, Newhaven Port</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	Yes
<b>Sound:</b>	No Not Justified
<b>Representation:</b>  I think any further development to the Western end of Seaford beach is unnecessary and detrimental to the enjoyment of a beautiful beach and habitat enjoyed by local residents, visitors and Wildlife. As such I strongly object to any development on a unique piece of coastline with such historic value.	
<b>What changes do you suggest to make the document legally compliant or sound?</b>  No further development.	

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

**Representation ID: REP/366/E1**Representor Details:

<b>Representor ID:</b>	REP/366
<b>Name:</b>	Marion Reynolds
<b>Organisation:</b>	
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Member of the public

Agent Details:

<b>Name:</b>	
<b>Organisation:</b>	

Contact Details:

<b>Email Address:</b>	
<b>Address:</b>	

Representation:

<b>Policy/Section:</b>	<b>E1 - Land at East Quay, Newhaven Port</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	
<b>Sound:</b>	
<b>Representation:</b>  I am writing in connection with the proposed development of the East Beach and Tide Mills.  It is deeply irresponsible to consider destroying our coastline and the western end of Seaford Bay and Tide Mills. As a council body and individual human beings you have a duty to care for and protect our environment, which is valued most highly by local residents and visitors to this area.  Development does not take priority over our duty as guardians of our natural world. This beautiful natural world takes precedence over human needs. It is not a resource for our use.	

One is left with the sense that council members have been lobbied and no longer are independent of local big business because of the decisions that are being taken that disregard the real values of local people. I do hope this is not the reality.

The imbalances that we are seeing all over the world begin with each of us. The decisions we make individually and collectively make all the difference to the world we create.

sincerely,

Marion Reynolds

Further to my previous email that I have sent just now, I am enclosing a link to a website that a friend sent out to our local transition village group and that I have just looked at now. I would appreciate it if you would kindly take a look at it:

[www.togetherincreation.org/eco-governance-1?fbclid=IwAR2q7I0T\\_E\\_FBYFv8pLMjnEX6ub\\_6Q5bNIAVuBiM49-d\\_FtRxwHCfIDsO](http://www.togetherincreation.org/eco-governance-1?fbclid=IwAR2q7I0T_E_FBYFv8pLMjnEX6ub_6Q5bNIAVuBiM49-d_FtRxwHCfIDsO)

**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:** Marion Reynolds [REDACTED]  
**Sent:** 01 November 2018 13:39  
**To:** ldf  
**Subject:** Tidemills  
  
**Categories:** LPP2 comment to code - stakeholder details have been added

Dear Lewes Council Consultation Team,

I am writing in connection with the proposed development of the East Beach and Tide Mills. It is deeply irresponsible to consider destroying our coastline and the western end of Seaford Bay and Tide Mills. As a council body and individual human beings you have a duty to care for and protect our environment, which is valued most highly by local residents and visitors to this area.

Development does not take priority over our duty as guardians of our natural world. This beautiful natural world takes precedence over human needs. It is not a resource for our use. One is left with the sense that council members have been lobbied and no longer are independent of local big business because of the decisions that are being taken that disregard the real values of local people. I do hope this is not the reality.

The imbalances that we are seeing all over the world begin with each of us. The decisions we make individually and collectively make all the difference to the world we create.

sincerely,

Marion Reynolds



Virus-free. [www.avast.com](http://www.avast.com)

## Thea Davis

---

**From:** Marion Reynolds [REDACTED] >  
**Sent:** 01 November 2018 13:46  
**To:** ldf  
**Subject:** Development at Tide Mills  
  
**Categories:** LPP2 comment to code - stakeholder details have been added

Further to my previous email that I have sent just now, I am enclosing a link to a website that a friend sent out to our local transition village group and that I have just looked at now. I would appreciate it if you would kindly take a look at it:

[www.togetherincreation.org/eco-governance-1?fbclid=IwAR2q7lOT\\_E\\_FBYFv8pLMjnEX6ub\\_6Q5bNIAVuBiM49-d\\_FtRxwHCfIDsO](http://www.togetherincreation.org/eco-governance-1?fbclid=IwAR2q7lOT_E_FBYFv8pLMjnEX6ub_6Q5bNIAVuBiM49-d_FtRxwHCfIDsO)

Thank you.

sincerely,

Marion Reynolds



Virus-free. [www.avast.com](http://www.avast.com)

**Representation ID: REP/367/DM1**Representor Details:

<b>Representor ID:</b>	REP/367
<b>Name:</b>	Rachel Richardson
<b>Organisation:</b>	<b>Thakeham Homes Ltd</b>
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Planning Consultant

Agent Details:

<b>Name:</b>
<b>Organisation:</b>

Contact Details:

<b>Email Address:</b>	rachel.richardson@thakeham.com
<b>Address:</b>	Thakeham House Summers Place, Stane Street Billingshurst West Sussex RH14 9GN

Representation:

<b>Policy/Section:</b>	<b>DM1: Planning Boundary</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	Yes
<b>Sound:</b>	Yes
<b>Representation:</b>  Policy DM1 states that within the development boundaries, as defined on the Proposals Maps, development will be permitted providing it accords with the policies of the development plan.  Accompanying the LPP2, Lewes District Council have published revised proposals maps, which have sought to amend the planning boundaries to include the allocations	

specified within the LPP1, the LPP2 and made neighbourhood plans. We support the revision of the settlement Planning Boundaries to include all allocations.

**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/367/DM15**Representor Details:

<b>Representor ID:</b>	REP/367
<b>Name:</b>	Rachel Richardson
<b>Organisation:</b>	<b>Thakeham Homes Ltd</b>
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Planning Consultant

Agent Details:

<b>Name:</b>
<b>Organisation:</b>

Contact Details:

<b>Email Address:</b>	rachel.richardson@thakeham.com
<b>Address:</b>	Thakeham House Summers Place, Stane Street Billingshurst West Sussex RH14 9GN

Representation:

<b>Policy/Section:</b>	<b>DM15: Provision for Outdoor Playing Space</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	Yes
<b>Sound:</b>	No
<b>Representation:</b>  Policy DM15: Provision of Outdoor Playing Space & Policy DM16: Children's Play Space in New Housing Development  Policy DM15 sets out the requirements for the provision of outdoor playing space, including outdoor sports, equipped/designated children's playing space and MUGAs and skateboard parks.	

Policy DM16 provides a requirement for the provision of on-site Children's Play space, for developments of 20 or more units in accordance with the minimum standards set out in Policy DM15.

Whilst as a housing developer we fully support the inclusion of children's play space within new housing development, in our view this policy is overly prescriptive and lacks flexibility. On a small site which may be able to accommodate 20 units, the provision of an on-site play area to the standards set out in Policy DM15 may jeopardise the delivery of much needed housing, in our view a threshold of 20 units seems quite low and an unreasonable requirement. Additionally, the policy needs to provide clarity regarding the existing local provision and the need for on-site provision if this is deemed to be sufficient or can be upgraded to provide a wider betterment to the existing and future communities.

**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/367/DM16**Representor Details:

<b>Representor ID:</b>	REP/367
<b>Name:</b>	Rachel Richardson
<b>Organisation:</b>	<b>Thakeham Homes Ltd</b>
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Planning Consultant

Agent Details:

<b>Name:</b>
<b>Organisation:</b>

Contact Details:

<b>Email Address:</b>	rachel.richardson@thakeham.com
<b>Address:</b>	Thakeham House Summers Place, Stane Street Billingshurst West Sussex RH14 9GN

Representation:

<b>Policy/Section:</b>	<b>DM16: Children's Play Space in New Housing Development</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	Yes
<b>Sound:</b>	No
<b>Representation:</b>  Policy DM15: Provision of Outdoor Playing Space & Policy DM16: Children's Play Space in New Housing Development  Policy DM15 sets out the requirements for the provision of outdoor playing space, including outdoor sports, equipped/designated children's playing space and MUGAs and	

skateboard parks.

Policy DM16 provides a requirement for the provision of on-site Children's Play space, for developments of 20 or more units in accordance with the minimum standards set out in Policy DM15.

Whilst as a housing developer we fully support the inclusion of children's play space within new housing development, in our view this policy is overly prescriptive and lacks flexibility. On a small site which may be able to accommodate 20 units, the provision of an on-site play area to the standards set out in Policy DM15 may jeopardise the delivery of much needed housing, in our view a threshold of 20 units seems quite low and an unreasonable requirement. Additionally, the policy needs to provide clarity regarding the existing local provision and the need for on-site provision if this is deemed to be sufficient or can be upgraded to provide a wider betterment to the existing and future communities.

**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/367/OM**Representor Details:

<b>Representor ID:</b>	REP/367
<b>Name:</b>	Rachel Richardson
<b>Organisation:</b>	<b>Thakeham Homes Ltd</b>
<b>Consultation Body:</b>	General
<b>Stakeholder Type:</b>	Planning Consultant

Agent Details:

<b>Name:</b>
<b>Organisation:</b>

Contact Details:

<b>Email Address:</b>	rachel.richardson@thakeham.com
<b>Address:</b>	Thakeham House Summers Place, Stane Street Billingshurst West Sussex RH14 9GN

Representation:

<b>Policy/Section:</b>	<b>Housing Policy Context: Omission Site Former Woods Fruit Farm, Newick</b>
<i>Do you consider the document to be:</i>	
<b>Legally Compliant:</b>	
<b>Sound:</b>	
<b>Representation:</b>  (See attached PDF)	
<b>What changes do you suggest to make the document legally compliant or sound?</b>	

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



# THAKEHAM

Planning Policy (Local Plan Consultation)  
Lewes District Council  
Southover House  
Southover Road  
Lewes  
BN7 1AB

5<sup>th</sup> November 2018

Dear Sir/Madam

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

**Re: Former Woods Fruit Farm, Newick**

**Introduction**

Thakeham Homes Ltd are submitting representations to the Lewes Local Plan Part 2: Site Allocations and Development Management Policies ('LPP2') as local stakeholders. Thakeham are a house builder based in Sussex with a track record for delivering high quality, sustainable scheme across the South East. We are progressing a number of potential development sites within this district at varying stages of the planning process, therefore our representations relate to the role of the emerging Local Plan in the delivery of the District's adopted housing objectives over the plan period.

We have previously made representations on Local Plan Part 1 and most recently on Local Plan Part 2: Site Allocations and Development Management policies (Regulation 18) dated 24<sup>th</sup> January 2018. We therefore have a long-standing interest in the Local Plan preparation which we support.

Local Plan Part 2 must have due regard to the primary document which is Local Plan Part 1, given it forms a strategic level plan for the whole district. We have concerns that this has not occurred.

These representations are submitted in respect of Thakeham Homes' interests at the Former Woods Fruit Farm, Newick ('the site'). The site is also known by SHELAA (2018) reference 27NW, with 22NW also forming part of the site which has the benefit of a Neighbourhood Plan allocation (Policy HO4) in the 'Made' Newick Neighbourhood Plan, for 38 net additional residential dwellings. A red line location plan for the site is appended to this representation at Appendix 1.

We confirm within these representations that this site is available and deliverable within the next five years and is set within a highly sustainable location. As such we wish to make representations on the policies contained within the Draft LPP2.

Thakeham House, Summers Place, Stane Street, Billingshurst, West Sussex, RH14 9GN

[www.thakeham.com](http://www.thakeham.com)

We wish to support the progression of the LPP2 and make comments within our representations on the basis that the site allocations document should be prepared to ensure conformity with the spatial requirements of the adopted Lewes Core Strategy: Local Plan Part 2 ('LPP1') and further site allocations should be sought to ensure that the requirements of the National Planning Policy Framework (NPPF) are met.

NPPF, paragraphs 10 and 11 set out the presumption in favour of sustainable development (Section 2),

Paragraph 11(a) identifies a requirement for Local Planning Authorities '*to positively seek opportunities to meet the development needs of their area*'. Whilst Paragraph 119 states that "*Local planning authorities, and other plan-making bodies, should take a proactive role in identifying and helping to bring forward land that may be suitable for meeting development needs*".

Para 120 states that Planning policies and decisions need to reflect changes in the demand for land. They should be informed by regular reviews of both the land allocated for development in plans, and of land availability."

We also wish to make representations to the proposed changes to the planning boundaries and the proposed 'Provision of Outdoor Playing Space' and 'Children's Play Space in New Housing Development' policy. As such, these representations also respond to Policy DM1, DM15 and DM16 of the Draft LPP2.

## Spatial Distribution

Table 3 (Residential site allocations) of the Draft LPP2 provides an indication of the planned level of housing in the District, outside of the National Park:

Table 3 Planned level of housing, outside the National Park

Settlement	SP2 Planned housing growth	Neighbourhood Plan housing (adopted and emerging)	Residual housing growth to be identified in LPP2
Newhaven	425	425	-
Peacehaven & Telscombe	255	255	-
Seaford	185	185	-
Edge of Burgess Hill (within Wivelsfield Parish)	100	0	100
Barcombe Cross	30	0	30
North Chailey	30	0	30
South Chailey	10	0	10
Cooksbridge	30	0	30
Newick	100	100	-
Plumpton Green	50	50	-
Ringmer & Broyle Side	215	183	32
Wivelsfield Green	30	34	-
To be determined	200	-	200
<b>Total</b>	<b>1,660</b>	<b>1,250</b>	<b>432</b>

KEY	
<span style="background-color: #0056b3; color: white; padding: 2px;"> </span>	Housing growth to be delivered through neighbourhood plans
<span style="background-color: #ff9900; color: white; padding: 2px;"> </span>	Housing growth identified in 'made' neighbourhood plans
<span style="background-color: #990099; color: white; padding: 2px;"> </span>	Housing growth identified in Local Plan Part 2



Table 3 which provides residual housing growth to be identified in LPP2, which in the case of Newick is 0. As stated in our earlier representation in January 2018, this is unacceptably low as these figures represent a minimum and all appropriate sites should be assumed to come forwards.

Whilst Spatial Policy 2 of the adopted LPP1 makes clear that all planned housing growth numbers are stipulated as minimums, and the LPP2 does state at paragraph 2.7 that *'It should be borne in mind that the figures contained within the Spatial Policy 2 are expressed as minimums and where appropriate growth should exceed this minimum figure'*, in our view the above table does not address these figures as minimum requirements.

This is because it is clear at Table 2 that most parishes have not sought to exceed their minimum requirements within adopted and emerging Neighbourhood Plans. The Council has not sought to allocate sites within the LPP2 over and above the housing growth identified within these adopted and emerging Neighbourhood Plans, thus only meeting the minimum requirement for most settlements. In our view, this falls short of the requirements of the NPPF as the Plan has not been positively prepared to meet the District's development needs. Additionally, and with particular relevance to Thakeham Homes' interests at the Former Woods Fruit Farm, Newick, the Newick Neighbourhood Plan was adopted prior to the Core Strategy (LPP1). Therefore, as the latest development plan adopted, we would continue to maintain that the Core Strategy requirements should take precedent.

This is particularly since Regulation 18 stage of LPP2, there has been the publication of the revised NPPF (July 2018) which provides additional weight to promoting house building and in maintaining a sufficient supply and delivery of homes. Specifically, Paragraph 59 states:-

*"To support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay".*

Paragraph 16 (a and b) of the NPPF states that Local Plans should "be prepared with the objective of contributing to the achievement of sustainable development and be prepared positively, in a way that is aspirational but deliverable", whilst Paragraph 11(a) makes clear that Local Plans should ensure flexibility to adapt to rapid change. The LPP2 has identified at Table 5 that most parishes have not sought to exceed their minimum requirements within adopted and emerging Neighbourhood Plans. The Council has not sought to allocate sites within the LPP2 over and above the housing growth identified within these adopted and emerging Neighbourhood Plans, thus only meeting the minimum requirement for most settlements. In our view, this falls short of the requirements of the NPPF as the plan has not been positively prepared to meet the district's development needs. Additionally, some Neighbourhood Plans, such as the Ringmer Neighbourhood Plan were adopted prior to the Core Strategy. Therefore, as the latest development plan adopted, the Core Strategy requirements should take precedent.

Table 3 shows that Newick does not have a residual requirement from the minimum requirements set out in Policy S2 of the LPP1. However as all the requirements are minimums it could be questioned as to why the council are not seeking more sites or pursuing

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opportunities where more sites are available for development. A brief explanation is provided at paragraph 2.6:

*'Housing growth at Newick, Plumpton Green, Ringmer and Wivelsfield Green is planning for through their respective 'made' neighbourhood plans (shaded yellow). Neighbourhood Plans are currently progressing and will identify the housing growth for the following settlements (shaded blue):*

- *Peacehaven and Telscombe;*
- *Newhaven; and*
- *Seaford.*

*Local Plan Part 2 is therefore required to identify the planned housing growth at the remaining settlements of Edge of Burgess Hill (within Wivelsfield Parish), North Chailey, South Chailey, Barcombe Cross and Cooksbridge.'*

Whilst paragraphs 2.114 – 2.115 state:

*2.114 Spatial Policy 2 of the Local Plan Part 1 sets the requirements for a minimum of 100 net additional dwellings to be provided within the settlement of Newick.*

*2.115 Newick Parish Council has a 'made' Neighbourhood Plan, adopted July 2015, that allocates sites for 100 net additional dwellings. One allocated site, Newick Hill identified for 30 net additional dwellings. Any future planning applications or potential review of Newick Neighbourhood Plan which considers housing allocations, will need to take into consideration policies within the adopted development plan.*

In our view, the intention to only address minimum requirements is an unsound and obstructive approach as there is no flexibility should development not come forward for a whole variety of reasons.

Land at Woods Fruit Farm, Newick is a sustainable site and would enable the LPP2 to be more robust in its approach to housing delivery. This would ensure that the LPP2 has been more positively prepared for robustness of the plan at examination. We would reiterate that the council should seek to increase the provision of housing in the LPP2 to ensure a robust strategy for housing delivery which conforms with the requirements of the LPP1 and the NPPF.

### **Policy DM1: Planning Boundary**

Policy DM1 states that within the development boundaries, as defined on the Proposals Maps, development will be permitted providing it accords with the policies of the development plan.

Accompanying the LPP2, Lewes District Council have published revised proposals maps, which have sought to amend the planning boundaries to include the allocations specified within

the LPP1, the LPP2 and made neighbourhood plans. We support the revision of the settlement Planning Boundaries to include all allocations.

### **Policy DM15: Provision of Outdoor Playing Space & Policy DM16: Children's Play Space in New Housing Development**

Policy DM15 sets out the requirements for the provision of outdoor playing space, including outdoor sports, equipped/designated children's playing space and MUGAs and skateboard parks.

Policy DM16 provides a requirement for the provision of on-site Children's Play space, for developments of 20 or more units in accordance with the minimum standards set out in Policy DM15.

Whilst as a housing developer we fully support the inclusion of children's play space within new housing development, in our view this policy is overly prescriptive and lacks flexibility. On a small site which may be able to accommodate 20 units, the provision of an on-site play area to the standards set out in Policy DM15 may jeopardise the delivery of much needed housing, in our view a threshold of 20 units seems quite low and an unreasonable requirement. Additionally, the policy needs to provide clarity regarding the existing local provision and the need for on-site provision if this is deemed to be sufficient or can be upgraded to provide a wider betterment to the existing and future communities.

### **Woods Fruit Farm, Newick**

Thakeham Homes recommends the site for residential development and as such seeks to promote the site in its entirety for residential development. The red line for the site has been appended to this representation in Appendix 1.

### **Newick Neighbourhood Plan**

The western area of the site has the benefit of a neighbourhood plan allocation for 38 net additional dwellings.



**Figure 1 Neighbourhood Plan Allocation of the Western Section of the Application Site**

The site has continuously been promoted in its entirety, and whilst the eastern parcel did not emerge as a formal allocation in the Made Newick Neighbourhood Plan, it was considered as part of the Plan's evidence base.

The 'Newick Neighbourhood Plan: Sustainability Appraisal and Development Site Selection' report refers the site as Site 10, which extends the full site area:



**Figure 2 Site 10 as assessed for housing capacity by Newick Parish**

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In reference to Site 10, the Sustainability Appraisal notes the following:

*'Though the whole of Site 10 was taken into account in ranking the sites only the western part of this Site is required to provide space for the balance of the 100 homes required'*

The above note infers that, whilst the whole of Site 10 is suitable for housing on social, economic and environmental grounds, only a portion of it was required as an allocation with a view to meeting the then emerging JCS policy provision of 100 homes in Newick.

The Newick Neighbourhood Plan (NNP) was adopted in 2015, prior to the adoption of the LPP1 in 2016. Whilst the NNP progressed utilising the evidence available at that time, the NNP only sought to meet the housing requirement of the then emerging JCS of 100 units. During the JCS Examination the Inspector requested the wording changed to a 'minimum' of 100 units. It is therefore in our view the council should seek further allocations in Newick over and above the NNP allocations to ensure sufficient flexibility.

#### Lewes District Council 2018 Strategic Housing and Employment Land Availability Assessment (SHELAA)

The 2017 SHELAA assessed the site under reference 27NW, deeming the entire site at 3.6 hectares: suitable, available, achievable and deliverable for the delivery of 69 residential dwellings.

Given the councils own SHELAA assessment, we consider that the whole site could provide much needed housing development within the plan period, help provide the Local Plan with sufficient flexibility to be able to adapt to rapid change in accordance with the NPPF and support the provision of housing in accordance with policy SP2 of the adopted LPP1.

### **Conclusions**

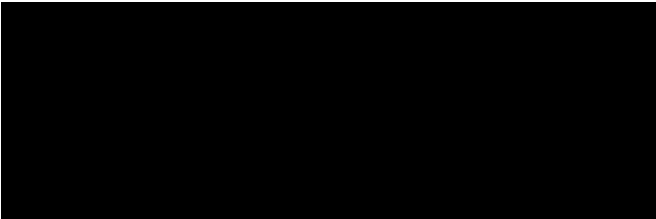
In conclusion, whilst the site has the benefit of a partial housing allocation within the Made Newick Neighbourhood Plan, it is clear the identified housing growth within the Spatial Policy 2 of the adopted LPP1 stipulates minimum requirements. Consequently, in our view the Council should seek to increase the provision of housing in the LPP2 to ensure a robust strategy for housing delivery which conforms with the requirements of SP2 and the NPPF.

We support the revision of the proposals map in accordance with the spatial requirements for housing delivery and would suggest that the council needs to revisit the requirements stipulated in policies DM15 and DM16 to ensure that these represent a feasible approach.

As detailed above, we are actively promoting the site for residential development and we have therefore demonstrated within these representations that we consider the site to be achievable, suitable and available for residential development.

We trust that these representations will be useful and clear and we would be grateful for confirmation of receipt. In the meantime, please do not hesitate to contact me if you have any queries or require any further information.

Yours Sincerely,



**Rachel Richardson**  
**Senior Planner**



THAKEHAM

