Lewes District Council

Lewes District Local Plan Part 2: Site Allocations and Development Management Policies

Summary of Consultation on the Consultation Draft Document (30 November 2017 – 25 January 2018)

September 2018

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1. Introduction

1.1 This report has been produced in support of the Pre-Submission version of the Lewes District Local Plan Part 2: Site Allocations and Development Management Policies. It sets out the details of the consultation undertaken on the Consultation Draft Local Plan Part 2 under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

1.2 This consultation took place over an 8 week period between 30 November 2017 and 25 January 2018. Section 3 of this report provides a summary of the methods used to notify and invite representations on the Consultation Draft document, whilst Section 4 summarises the main issues raised by the representations received and how these issues have been addressed by the Council in producing the Pre-Submission version of the Plan.

2. Background

2.1 The Lewes District Local Plan Part 2 supports and seeks to deliver the strategic objectives and spatial strategy of the Local Plan Part 1: Joint Core Strategy. Once adopted, it will form part of the statutory development plan for the area and be used for determining planning applications in that part of the District outside of the South Downs National Park.

2.2 The main stages in preparing the Local Plan Part 2 are identified below, showing the stages at which formal public consultation has been, or will be, undertaken in italics:

Stages of the Local Plan Part 2 preparation

Issues & Options Topic Papers	*Winter 2013/14*
Consultation Draft Plan	*Nov 2017- Jan 2018*
Pre-Submission Plan	*Autumn 2018*
Formal Submission to Secretary of State	Early 2019
Examination in Public	Spring 2019
Adoption	Summer 2019

2.3 A summary of the consultation at the earlier stage in the document's production – the Issues & Options Topic Papers – can be viewed at: https://www.lewes-eastbourne.gov.uk/planning-policy/lewes-local-plan-part-2-site-allocations-and-development-management-policies/

3. Summary of Consultation

Notification of consultation

3.1 The Council published the Consultation Draft Local Plan Part 2 on 30 November 2017. E-mails relating to the consultation were sent to all statutory consultees, together with individuals and organisations who had either asked to be kept informed about the progress of planning policy documents or had previously made representations on the Local Plan Part 1. Letters were also sent to individuals who had specifically asked to be notified by post.

Availability of the Consultation Draft document

3.2 The Consultation Draft Local Plan Part 2, together with the accompanying Sustainability Appraisal, was published on the Council's website on 30 November 2017. Hard copies were also made available to view at the District Council Offices in Lewes and at public libraries in Burgess Hill, Haywards Heath, Lewes, Newhaven, Peacehaven, Ringmer, Saltdean, Seaford, and Uckfield.

How stakeholders were invited to make representations

3.3 Comments could be submitted via the Council's on-line consultation portal or by email, post or fax over an 8 week period to 25 January 2018. The questions that were asked via the consultation website were

Q1. Which policy do you wish to comment on?
Q2. Do you support the policy approach?
Q2b. Do you have any further comments on the policy you selected in Question 1?

3.4 A press release was also issued, resulting in an article in the Sussex Express, a newspaper that covers the whole plan area, on Friday 1st December 2017.

4. Summary of Representations

4.1 Representations on the Consultation Draft Local Plan Part 2 were received from over 80 individuals and organisations. Most of these were submitted via the on-line consultation portal but some people responded via email or letter. The tables below summarise the main issues raised by the representations and how these representations have been taken into account by the Council in producing the Pre-Submission Local Plan Part 2.

HOUSING ALLOCATIONS

NH01 LAND SOUTH OF VALLEY ROAD, NEWHAVEN

Support policy approach	
Number of respondents	1

Summary of comments received

Natural England is supportive. They note the proximity to the boundary of the National Park, and would welcome a requirement to assess the impact of development on the views.

How these comments have influenced the Proposed Submission Document

Support noted. Natural England's comments are noted. The site NH01 is located west of existing residential development and east a swath of land that now has planning permission for 85 residential dwellings. It is considered that future development within NH01 is, and will be, seen within the context of an urban area. Therefore impacts of development on views from the South Downs National Park will be minimal.

Accordingly, no amendments to the wording of Draft Policy NH01 are proposed.

NH01 LAND SOUTH OF VALLEY ROAD, NEWHAVEN

Object to policy approach	
Number of respondents	5

Summary of comments received

East Sussex County Council states that the development should be informed by an Ecological Impact Assessment. The Sussex Wildlife Trust agrees on this.

A developer questions the deliverability of the site as it has been allocated since the 1970's and has only been partially developed. Alternative, more deliverable sites should be allocated instead.

Another developer agrees with this, and states that the Town Council will not be allocating any sites due to the impact upon services and infrastructure. This respondent suggests a site at Telscombe Road.

The Council's Specialist Advisor (Coastal Engineering) warns of a flooding risk at the Meeching Valley, below this site. The Sustainable Drainage System implemented must not increase the risk of flooding downhill.

How these comments have influenced the Proposed Submission Document

In response to comments made by East Sussex County Council and Sussex Wildlife Trust an additional criterion requiring an ecological impact assessment is incorporated in Draft Policy NH01.

The deliverability of the site has been assessed through the Strategic Housing and Economic Land Availability Assessment (SHELAA). Part of site has been recently promoted for residential development, demonstrating availability.

The statement made by the developer that Peacehaven Town Council will not be allocating housing sites is incorrect. Peacehaven and Telscombe are progressing a joint neighbourhood plan which will identify housing site allocations. Suggested additional housing site at Telscombe Road (Peacehaven) is within the South Down National Park and therefore cannot be considered as an allocation through Local Plan Part 2.

In response to the Council's Specialist Advisor's concerns, it is considered that the requirement for new development to consider potential flood risk, including seeking to reduce overall flood risk, is appropriately addressed by Core Policy 12: Flood Risk, Coastal Erosion, Sustainable Drainage and Slope Stability of the adopted Local Plan Part 1.

NH02 LAND AT THE MARINA, NEWHAVEN	
Support policy approach	
Number of respondents	1
Summary of comments received The Council's Specialist Advisor (Coastal Engineering) is supportive. They draw attention to the integrity of the river bank separating the lower lying land to the west, as it 'leaks.' This needs to be assessed and resolved.	
How these comments have influenced the Proposed Submission Document Support noted.	

NH02 LAND AT THE MARINA, NEWHAVEN	
Object to policy approach	
Number of respondents	4
Summary of comments received Southern Water states that this site will be close to the Newhaven East Wastewater Treatment Works (WTW), owned and operated by Southern Water. Unpleasant odours inevitably will arise. Paragraph 109 of the NPPF endorses this issue. East Sussex County Council states the development should be informed by an Ecological Impact Assessment. Sussex Wildlife Trust agrees with this. They draw attention to the intertidal priority habitat (section 41 of the NERC Act) which needs to be explicitly protected through the policy. A developer feels the proposed density for this site is very high, and therefore may not be deliverable.	
How these comments have influenced the Proposed Submission Document In response to Southern Water's concerns, an additional criterion requiring a noise and odour assessment to be undertaken is incorporated into Draft Policy NH02. Criterion (g) now requires an ecological impact assessment to be undertaken, with the supporting text highlighting the importance of intertidal habitats. The suitability of the site is assessed through the Strategic Housing and Economic Land Availability Assessment (SHELAA). The principle of this level of development has already been established through the previous permitted proposal for 331 dwellings.	

NH02 LAND AT THE MARINA, NEWHAVEN	
Other comments received	
Number of respondents	2
Summary of comments received Newhaven Port and Properties Ltd request an amendment to the policy that requires a robust Noise Impact Assessment is submitted with any planning application. The Environment Agency points at the fact that the site is in Flood Zones 2 and 3 and therefore a Sequential Test needs to be carried out. If, following the Sequential Test, the plan still seeks to allocate housing at this location, an Exception Test will be required.	
How these comments have influenced the Proposed Submission Document In response to Newhaven Port and Properties' concerns, an additional criterion requiring a noise and odour assessment to be undertaken is incorporated into Draft Policy NH02. Since the 2017 Draft Plan consultation the Council has been in correspondence with the Environment Agency. An update to the site specific Flood Risk Assessment, which accompanied the 2007 planning application for the development of 331 dwellings (LW/07/1475), has been undertaken to support the review and retention of the housing allocation. The update includes the appropriate Sequential and Exception Tests, concluding	

BH01 and BH02 EDGE OF BURGESS HILL (GENERAL)

Object to policy approach	
Number of respondents	

Summary of comments received

Some respondents have comments on both proposed allocation sites. These comments were put forward alongside more extensive representations on another site; therefore they are not counted as new respondents.

Wivelsfield Parish Council states that the description of the housing requirement in paragraph 2.28 is not clear. New wording is suggested. They strongly object to the way the sites have been assessed. Several residents complain that both sites are recorded as the 'edge of Burgess Hill,' when they are actually part from Wivelsfield Parish.

How these comments have influenced the Proposed Submission Document

In response to Wivelsfield Parish Council's concerns, the wording of paragraph 2.28 (now paragraphs 2.40 and 2.41) has been amended to provide clarification. The assessment of sites is considered through the Strategic Housing and Economic Land Availability Assessment (SHELAA).

With regards to the reference of 'Edge of Burgess Hill' this is consistent with the adopted Local Plan Part 1 and Spatial Policy 2. Where appropriate the wording '(Within Wivelsfield Parish)' has been added to highlight that the proposed housing allocation is within Wivelsfield Parish. Otherwise no amendment to the wording is made.

BH01 LAND AT THE NUGGETS, VALEBRIDGE ROAD

Support policy approach	
Number of respondents	2

Summary of comments received

Southern Water supports the allocation but notes that the existing drainage infrastructure will have to be taken into account in design of the proposed development. Access to the existing sewerage infrastructure must be ensured.

Mid Sussex District Council notes that the impact on West Sussex infrastructure should be acknowledged in the supporting text, together with a statement that Lewes District Council would look favourably on requests from MSDC for CIL monies to mitigate the impact of the development.

How these comments have influenced the Proposed Submission Document

Support noted.

In response to MSDC's comment, it is acknowledged that there may be circumstances where development along, or close to, the boundary will create additional demand on infrastructure over the border. However, it is not considered appropriate for LPP2 to 'prioritise' CIL monies outside of the proper process. Accordingly, no amendments to wording are proposed.

BH01 LAND AT THE NUGGETS, VALEBRIDGE ROAD

Object to policy approach	
Number of respondents	8

Summary of comments received

East Sussex County Council objects to the proposed site allocation. Although there are no recorded heritage assets within the site they suggest that the area may be of archaeological

interest, and advise the inclusion of an archaeological assessment.
Natural England, the Woodland trust and Sussex Wildlife Trust note that the site allocation is surrounded by ancient woodland and networks of natural habitats; therefore there should be strong consideration for the biodiversity. They state that the current policy doesn't address the importance of ancient woodland, or the fact a buffer of 15 meter is to be respected, according to the NPPF.
The Council's Specialist Advisor (Coastal Engineering) states that there were incidents of surface water flooding and Sustainable Drainage Systems are needed to mitigate the problem. They will have to be maintained in the future.
Many residents, including the Wivelsfield Parish Council object to the proposed site allocation. They put forward that the proposal fails to meet the Wivelsfield Neighbourhood Plan. The site is too large and they do not wish to have houses on the western side. Rewording paragraph 2.28 is suggested. Other objections include:

- Schools and health provision do not have the capacity to absorb more demand.
- The access from the site to Valebridge Road is unsafe; a speed limit on Valebridge Road will be required.
- The development will totally change the character of the landscape, and a heritage asset will be lost.
- Wildlife, biodiversity and ancient woodland will be at risk.
- Flooding is already a problem in the area; the drainage system would need to be designed to ensure there is no adverse impact on existing properties.
- Parking provision should be ensured.

How these comments have influenced the Proposed Submission Document
In response to East Sussex County Council's concerns, an additional criterion has been incorporated into the Draft Policy BH01 requiring an appropriate assessment and evaluation of archaeological potential to be undertaken.
It is acknowledged that ancient woodland and the existing natural habitat plays an important role in supporting biodiversity and that the wording of Draft Policy BH01 could be strengthened to reflect this. Accordingly, amendments to the wording of the Draft policy and supporting text have been made.
In response to the Council's Specialist Advisor's concerns, it is considered that the requirement for new development to consider potential flood risk and incorporate SuDS where appropriate is appropriately addressed by Core Policy 12: Flood Risk, Coastal Erosion, Sustainable Drainage and Slope Stability of the adopted Local Plan Part 1.

BH02 LAND AT OAKFIELDS, THEOBALDS ROAD

Support policy approach	
Number of respondents	2

Summary of comments received
Mid Sussex District Council notes that the impact on West Sussex infrastructure should be acknowledged in the supporting text, together with a statement that Lewes District Council would look favourably on requests from MSDC for CIL monies to mitigate the impact of the development.
West Sussex County Council supports the statement that discusses the issues of access and impact of additional traffic on the local road network, which will need to be considered by both County Councils.

How these comments have influenced the Proposed Submission Document
Support noted.
In response to MSDC's comment, it is acknowledged that there may be circumstances where development along, or close to, the boundary will create additional demand on

infrastructure over the border. However, it is not considered appropriate for LPP2 to 'prioritise' CIL monies outside of the proper process. Accordingly, no amendments to wording are proposed.

BH02 LAND AT OAKFIELDS, THEOBALDS ROAD	
Object to policy approach	
Number of respondents	31

Summary of comments received

A considerable number of representations objected to the policy for the following reasons:

- Increased traffic will make Theobalds Road unsafe, and too much traffic will cause congestion
- Emergency services and lorries will not have proper access.
- Theobalds Road is a private road, and a unique, ancient bridleway.
- The access to and from Valebridge Road will be too difficult.
- The plan will impact on West Sussex County Council infrastructure; urbanisation of the area will cause pressure on public services.
- The proposed site is not compliant to the Neighbourhood Plan.
- There should be no net loss of green space. Proposals for housing development outside the boundaries will only be granted if they are consistent with the countryside policies of the development plan.
- There will be the destruction of unique landscape and the disturbance of ancient woodland and wildlife
- A loss of privacy, light and amenity for the residents
- Flooding
- The development should be subject to assessment and evaluation of archaeological potential
- The new development will have a negative impact on heritage assets and listed buildings.
- There is no more need for affordable housing in Wivelsfield.

How these comments have influenced the Proposed Submission Document

Objections noted. Following the 2017 Draft Local Plan Part 2 consultation the Council was made aware that the intentions of the site proponent had changed to the extent that Local Plan Part 2 is no longer able to identify it as a potential housing allocation.
Draft Policy BH02 is deleted.

BA01 BA02 BA03 BARCOMBE CROSS (GENERAL)

Support policy approach	
Number of respondents	1

Summary of comments received

There was one respondent supportive to all proposed sites. They proposed an amendment to the text of 2.38; affirming the delivery of 38 dwellings, as that is the number of houses planned for in the three allocated sites.

How these comments have influenced the Proposed Submission Document

Support noted. Amendment to wording made.

BA01 BA02 BA03 BARCOMBE CROSS (GENERAL)	
Object to policy approach	
Number of respondents	2

Summary of comments received

Several respondents, resident to the area, object to all site developments in Barcombe Cross. Their arguments are:

- Visual impact: Barcombe is a hilltop village and at present retains this characteristic within the existing village boundary. Such villages are rare in East Sussex and are of significant historical and visual amenity value.
- There is no need for affordable housing.
- Access to the village is insufficient as the roads are too narrow, there is no train station and the bus service is rudimentary.
- Environmental impact of 30-50 houses (75-150 cars).
- Discharge of untreated sewage into local watercourses is becoming frequent and the drainage system is already overloaded.
- The proposed sites are a considerable distance from the rest of the village.
- The underlying data to support the proposed allocations is incorrect. For instance, the information on who is using the access 'track' to the proposed sites is wrong, as is the information regarding the involvement of adjacent landowners. The information on effects on views from surrounding properties is incorrect: as well as the two mentioned in the plan, there are at least two more.
- There are more properties, besides 'Willow Cottage', which are buildings of significant historical interest.

How these comments have influenced the Proposed Submission Document

Comments on the suitability of the site are considered through the SHELAA.

In response to other concerns raised, the Councils Housing Needs Register indicates that there remains a need for affordable housing within Barcombe Cross. Southern Water has confirmed that the local waste water treatment works will need to be monitored and upgraded to accommodate future growth, but this is not a constraint to development proposed in the Draft Plan. The wording of the supporting text is amended to clarify inaccuracies and errors.

BA01 LAND AT HILLSIDE NURSERIES, HIGH STREET, BARCOMBE CROSS

Support policy	
Number of respondents	1

Summary of comments received

We received one supportive representation stating that the owners of BA01 and BA02 were discussing access to BA01, although they have yet to come to a solution.

How these comments have influenced the Proposed Submission Document

Support noted. Subsequent enquiries have shown that access for sites BA01 and BA02 is deliverable without third party land, or the use is available via an extant easement in the case of BA02. The supporting text has been amended accordingly.

BA01 LAND AT HILLSIDE NURSERIES, HIGH STREET, BARCOMBE CROSS	
Object to policy approach	
Number of respondents	7
Summary of comments received The Council's Specialist Advisor (Coastal Engineering) states that there were incidents of surface water flooding and Sustainable Drainage Systems are needed to mitigate the problem. They will have to be maintained in the future. Seven residents object to the proposed site allocation. The reasons given are: - The site is marked for the potential expansion of a play area. - Negative impact on visual amenity. Barcombe is considered a hilltop village, rare in East Sussex, and of significant historical and visual amenity value. - The sewage system is becoming overloaded. One developer questions how the site will be delivered due to the access depending on a third party.	
How these comments have influenced the Proposed Submission Document Comments on the suitability of the site are considered through the SHELAA. In response to the Council's Specialist Advisor's concerns, it is considered that the requirement for new development to consider potential flood risk and incorporate SuDS where appropriate is appropriately addressed by Core Policy 12: Flood Risk, Coastal Erosion, Sustainable Drainage and Slope Stability of the adopted Local Plan Part 1. It is acknowledged that whilst the 2003 retained 'saved' Policy BA1 had not been delivered there remains a need for the additional recreation space within Barcombe Cross. Draft Policy BA01 has been amended to secure an area of land for the provision of suitable recreation space. Since the 2017 Draft Consultation further enquiries have concluded that the necessary widths to provide access within the same land ownership can be achieved.	

BA01 LAND AT HILLSIDE NURSERIES, HIGH STREET, BARCOMBE CROSS	
Other comments received	
Number of respondents	1
Summary of comments received A developer, representing the landowner of the site, proposes an increase to the number of houses. They state that any recreation space can only be delivered as a collaborated proposal between the landowner and the Parish and District Councils. The landowner declares to be amenable for such discussions. This respondent gives more details on the design of the plan and states that the visual impact can be minimised.	
How these comments have influenced the Proposed Submission Document It is acknowledged that whilst the 2003 retained 'saved' Policy BA1 had not been delivered there remains a need for the additional recreation space within Barcombe Cross. The increased capacity is considered to be deliverable having been assessed through the Council's SHELAA. Draft Policy BA01 has been amended to reflect the increased site size and yield and secures an area of land for the provision of suitable recreation space.	

BA02 LAND ADJACENT TO THE HIGH STREET, BARCOMBE CROSS	
Support policy approach	
Number of respondents	1
Summary of comments received Southern Water supports the proposed policy without comment.	
How these comments have influenced the Proposed Submission Document Support noted.	

BA02 LAND ADJACENT TO THE HIGH STREET, BARCOMBE CROSS	
Object to policy approach	
Number of respondents	3
Summary of comments received The Council's Specialist Advisor (Coastal Engineering) objects to the proposed site allocation because there are incidents of surface water flooding. They suggest that a Sustainable Drainage System is needed. Other respondents object with the following reasons: - The site will be of limited accessibility to the elderly, as the buildings will be on a slope. - The access to the site is dangerous. - The roads into Barcombe are too narrow to support more vehicles. - The deliverability of the site is questionable as the access depends on a third party.	
How these comments have influenced the Proposed Submission Document In response to the Council's Specialist Advisor's concerns, it is considered that the requirement for new development to consider potential flood risk and incorporate SuDS where appropriate is appropriately addressed by Core Policy 12: Flood Risk, Coastal Erosion, Sustainable Drainage and Slope Stability of the adopted Local Plan Part 1. Comments on the suitability of the site are considered through the SHELAA. The local highway authority commented on the principle of the development of the site and did not identify any insurmountable constraints to development. Since the 2017 Draft Consultation further enquiries have concluded that BA02 has the necessary rights of access to the track, via an easement, for access to be achieved. Accordingly no change is made to Draft Policy BA02.	

BA02 LAND ADJACENT TO THE HIGH STREET, BARCOMBE CROSS	
Other comments received	
Number of respondents	1
Summary of comments received One respondent, representing the owners of the site, suggests an amendment on the wording of the policy: "approximately" 25 dwellings can be replaced by "a minimum of" 25 dwellings.	
How these comments have influenced the Proposed Submission Document The SHELAA considers that 25 dwellings is suitable, having assessed it previously for 30 dwellings and concluding it to be too dense. It is considers that 'Approximately' provides sufficient flexibility and is consistent with the wording of other draft housing site allocations. Accordingly no change is made to Draft Policy BA02.	

BA03 LAND AT BRIDGELANDS, BARCOMBE CROSS

Support policy approach	
Number of respondents	1

Summary of comments received

There is one representation, which comes from a developer on behalf of the owners. They note the site represents a sustainable small-scale development, which is close to the edge of the existing settlement, on its western edge. It is also opposite the existing ribbon of development along Bridgelands. The site is in joint ownership, and available, and therefore can be delivered in a timely manner.

How these comments have influenced the Proposed Submission Document

Support noted.

BA03 LAND AT BRIDGELANDS, BARCOMBE CROSS

Object to policy approach	
Number of respondents	8

Summary of comments received

Natural England advises the inclusion of the consideration of 'Ecosystems services' and the suggestion to use of Sustainable Drainage Systems. The Council's Specialist Advisor (Coastal Engineering) agrees on this aspect.

Sussex Wildlife Trust stresses the potential ecological value of the pond and the ditches mentioned, which should be clarified to ensure that any ecological impact assessments will be carried out will include these features.

The residents responding to this proposed site agree on the following arguments:

- The density of the proposed development is three times the density of the existing development and doesn't complement the character of the current form of the local buildings.
- There is a possible ecological impact. An assessment should be carried out.
- The focus of the development is within a sensitive landscape.

How these comments have influenced the Proposed Submission Document

In response to Natural England's and the Council's Specialist Advisor's comments, it is acknowledged that there are localised surface water flooding issues. The draft policy (criteria (e)) and supporting text requires a site specific flood risk assessment and for appropriate mitigation, including SuDS, to be implemented. Accordingly no change is made to Draft Policy BA03.

In response to Sussex Wildlife Trust's comments, it is recognised that the existing ponds and ditches have potential ecological value. The wording to the supporting text has been amended accordingly.

Comments on the suitability of the site are considered through the Strategic Housing and Economic Land Availability Assessment (SHELAA). Draft Policy BA03 (criteria g) requires an ecological impact assessment. No amendment is made to Draft Policy BA03 in respect of these concerns.

CH01 CH02 CHO3 CHAILEY (GENERAL)

Support policy approach	
Number of respondents	3
Summary of comments received We received three representations, one of which was on behalf of a residents group, which were supportive to the allocation of sites put forward in the LPP2.	
How these comments have influenced the Proposed Submission Document Support noted.	

CH01 CH02 CHO3 CHAILEY (GENERAL)	
Object to policy approach	
Number of respondents	1
Summary of comments received One representation objected to the allocated sites. They state that the two smaller sites in North Chailey will not be large enough to provide much the needed affordable housing. The respondent suggests that land at Buckles Wood Field should be utilized.	
How these comments have influenced the Proposed Submission Document Objection noted. The suggested additional site of Buckle's Wood Field has been assessed through the Strategic Housing and Economic Land Availability Assessment (SHELAA) process. No amendments are proposed to the wording in response to this objection.	

CH01 GLENDENE, STATION ROAD

Support policy approach	
Number of respondents	3
Summary of comments received We received one supportive representation which had no additional further comments. Natural England notes that ancient woodland lies adjacent to the site and therefore refers to their standing advice with regard to this. This includes a requirement for a buffer of at least 15m between the woodland and the development. They are pleased Sustainable Drainage Systems are cited and that full ecological surveys are included.	
How these comments have influenced the Proposed Submission Document Support noted. In response to Natural England's comment the wording to Draft Policy CH01 and supporting text has been amended to require the provision of at least 15m buffer between the development and ancient woodland.	

CH01 GLENDENE, STATION ROAD	
Object to policy approach	
Number of respondents	2
Summary of comments received East Sussex County Council comments that the site is close to listed buildings, and advises that an archaeological assessment should be conducted. This should be included in the policy. Sussex Wildlife state the criterion (e) on the buffer should be amended to state that this buffer is at a *minimum* 15m wide.	
How these comments have influenced the Proposed Submission Document In response to East Sussex County Council's concerns, an additional criterion requiring an	

archaeological assessment is incorporated into Draft Policy CH01. However, the site is over 700m (as the crow flies) west of the nearest Listed Building (St Mary's Church). Given its distance from the site it is not considered necessary to reference the LB.
Criterion (e) is amended to state 'at least 15m' in reference to the buffer required between the development and ancient woodland.

CH02 LAYDEN HALL, EAST GRINSTEAD ROAD

Support policy approach	
Number of respondents	5

Summary of comments received

Four respondents, including Chailey Parish Council, support the allocation of this site and have no further comments.

One respondent supports the policy, but speaking on behalf of the landowner, feels that the land could accommodate more than six dwellings.

How these comments have influenced the Proposed Submission Document

Support noted. The suitability of the site, including capacity, is considered through the Council's Strategic Housing and Economic Land Availability Assessment (SHELAA). No alternative capacity figure was suggested or subsequently evidenced. It is considered that the Draft Policy's 'approximately 6 net additional dwellings' wording provides some flexibility if a suitable proposal come forward through the planning application process.

CH02 LAYDEN HALL, EAST GRINSTEAD ROAD

Object to policy approach	
Number of respondents	2

Summary of comments received

East Sussex County Council comments the site is close to listed buildings and an archaeological assessment is advised. This should be included in the policy.

Natural England express their concern that the site lies adjacent to Chailey Common, a Site of Special Scientific Interest (NPPF, 118). The policy in the LPP2 doesn't contain information on the potential impact upon it, and the request this is included. Furthermore Natural England notes that some houses fall outside of the planning boundary.

How these comments have influenced the Proposed Submission Document

In response to East Sussex County Council's concerns, an additional criterion requiring an archaeological assessment is incorporated into Draft Policy CH01. However, the site is over 250m (as the crow flies) south west of the nearest Listed Building (St Mary's Church). Given its distance from the site it is not considered necessary to reference the LB.

It is acknowledged that Chailey Common SSSI is an internationally designated site. Accordingly, and in response to Natural England's concerns, amendments to the wording of Draft Policy CH02 and supporting text to acknowledge the site's proximity to the Chailey Common SSSI.

CH03 LAND ADJACENT TO MILL LANE	
Support policy approach	
Number of respondents	2
Summary of comments received The Chailey Parish Council supports the site without any further comments. Another respondent also states support, and notes that additional sites could be allocated.	
How these comments have influenced the Proposed Submission Document Support noted.	

CH03 LAND ADJACENT TO MILL LANE	
Other comments received	
Number of respondents	1
Summary of comments received The Council's Specialist Advisor (Coastal Engineering) draws attention to the fact that the site is a former mill site and there may be a risk of land contamination, which needs to be addressed in the planning allocation.	
How these comments have influenced the Proposed Submission Document In response to the Council's Specialist Advisor, an additional criterion (g) has been incorporated into Draft Policy CH03 requiring investigation into potential land contamination onsite.	

RG01 CABURN FIELD, RINGMER	
Object to policy approach	
Number of respondents	8
Summary of comments received Ringmer Parish Council objects to the site. They argue that the target of 60 houses on this site would result in a density of over 45 dwellings/ha, which is well above the densities envisaged in the policies of the Lewes Local Plan Part 1 and the Ringmer Neighbourhood Plan. The additional housing will not be delivered within the boundary shown on Figure 11. They also request a rewording of paragraph 2.98, where a shortfall of 32 is mentioned. Any shortfall arose at later stage. Southern Water have conducted a preliminary assessment which reveals that the local sewerage system has limited capacity to accommodate additional development. This is not a constraint to development however, planning policy for this site should ensure that proposed development makes a connection to the sewerage network at the nearest point of adequate capacity. Sport England objects to the loss of a playing field unless it is proposed to replace it with one of equal quality and size. The Environment Agency supports this. East Sussex County Council notes that the development should be informed by an Ecological Impact Assessment. The Sussex Wildlife Trust notes that the greenfield site in the centre the village likely contributes to the village's ecological network. The Council should assess the value of the site within the green infrastructure network before it is allocated. One respondent states that the plan fails to meet the tests of soundness, because the minimum housing needs for Ringmer are not met. A shortfall of at least 32 dwellings is identified, while the proposed plan only allocates 20 homes. Another respondent states that the policy RG01 is not consistent with the policies set out in the Local Plan part 1, and this could jeopardise the spatial strategy of the Local Plan Part2. They also provide an alternative allocation, which they say is available and deliverable, at	

Broyle Gate Farm. They make several arguments: the shortfall of 32 is not met, the density at Caburn Field will be too high and that the centric location of the football field is an asset for Ringmer. They also raise a concern that an alternative site adjacent to Ringmer Community College might not come forward.

How these comments have influenced the Proposed Submission Document

In response to Ringmer Parish Council's concerns, the suitability of the site to deliver a scheme of 60 net dwellings, and the now revised figure of 90 net dwellings, has been assessed through the Strategic Housing and Economic Land Availability Assessment (SHELAA). The site's sustainable and village centre location offers the opportunity to maximise development potential. Consequently, the density of the proposed development is above that set out for rural areas (20-30 dwellings per hectare) in Core Policy 2: Housing Type, Mix and Density. The housing site allocation map has been amended to reflect the total site area which is proposed to be redeveloped. Additional explanation has been provided at the start of the Housing section and paragraph 2.124 to clarify the origin of the 32 shortfall and how this is now addressed through Local Plan Part 2.

It is acknowledged that due to the limited capacity of the local sewerage system requires the Draft Policy RG01 to ensure that development connects at the nearest point of capacity. As such, an additional criterion (g) is included to phase the occupation of development as the necessary sewerage infrastructure is delivered.

In response to East Sussex County Council and Sussex Wildlife Trust's comments, the principle of development on this site is already established as a retained 'saved' 2003 Lewes District Local Plan housing allocation. However, the wording of Draft Policy RG01 has been amended to include an additional criterion requiring an ecological impact assessment.

The suggested allocation of Broyle Gate Farm has been assessed through the Strategic Housing and Economic Land Availability Assessment (SHELAA) process. However, no amendments are proposed in response to this comment as sufficient housing site allocations are identified to meet the requirements of Spatial Policy 2.

RG01 CABURN FIELD, RINGMER	
Other comments received	
Number of respondents	1

Summary of comments received

The Council's Specialist Advisor (Coastal Engineering) suggests that the development assists in reducing flood risk in the future by delivery of an integrated Sustainable Drainage System that includes protection of properties downstream. Many of the streams in this part of Ringmer were placed in culverts including a possible culvert which runs along the southern boundary of this site.

If Caburn Fields was brought forward for development, consideration should be given to removing the culverts that the streams and drainage assets in that lie within this area, along with a wider assessment of the capacity of the downstream assets and structures to accommodate further surface water flows. There was a pond on the south eastern edge of the site and a drainage system, much of which has fallen into disrepair.

How these comments have influenced the Proposed Submission Document

In response to the Council's Specialist Advisor's concerns, it is considered that the requirement for new development to consider potential flood risk, including seeking to reduce overall flood risk, is appropriately addressed by Core Policy 12: Flood Risk, Coastal Erosion, Sustainable Drainage and Slope Stability of the adopted Local Plan Part 1.

Accordingly, no amendments to the wording of Draft policy RG01 are proposed.

SUGGESTIONS FOR NEW HOUSING SITES

In the consultation form, respondents could comment at a general level as well. There are also respondents who suggested alternative allocation sites in a response to a specific housing site policy.

BARCOMBE CROSS

The parcel of land of 3.7 hectares is well positioned relating to the existing pattern of the settlement, and its release for development would form a suitable, sustainable extension to Barcombe Cross. It has the capacity to deliver 50-70 houses

How these comments have influenced the Proposed Submission Document

Sufficient proposed housing sites have been identified through Local Plan Part 2 to meet the minimum housing requirement of Spatial Policy 2. Additional potential housing sites have been assessed through the SHELAA. A future review of the Local Plan Part 1 will consider whether additional housing allocations are required.

HAMSEY BRICKWORKS

There is a suggestion for an allocation at Hamsey Brickworks, to respond to the lack of housing identified in the sustainability appraisal baseline data. The proposed site is within an area where the principle of development as a broad allocation has been accepted.

How these comments have influenced the Proposed Submission Document

The site has planning permission for mixed use residential and commercial development. A new allocation is therefore not required for this site.
Accordingly, no changes are made in response to this comment.

NEWICK

There is a suggestion for an allocation at the rear of Allington Road, Newick for 20 new dwellings.

There is a suggestion for an allocation at Woods Fruit Farm, Newick. This is the extended area of the already allocated HO4 site for 38 dwellings in the Newick Neighbourhood Plan. The entire site could deliver 69 dwellings and would help go beyond minimum figures as stipulated in the Core Strategy.

How these comments have influenced the Proposed Submission Document

Sufficient housing sites have been identified through the 'made' Newick Neighbourhood Plan to meet the minimum housing requirement of Spatial Policy 2 for Newick. Additional potential housing sites have been assessed through the SHELAA. A future review of the Local Plan Part 1 will consider whether additional housing allocations are required.

PLUMPTON GREEN

There is a suggestion for an allocation at Land at Nolands Farm, Plumpton Green for 45 new dwellings

How these comments have influenced the Proposed Submission Document

Sufficient housing sites have been identified through the 'made' Plumpton Neighbourhood Plan to meet the minimum housing requirement of Spatial Policy 2. Additional potential housing sites have been assessed through the SHELAA. A future review of the Local Plan Part 1 will consider whether additional housing allocations are required.

RINGMER

There is a suggestion for an allocation at Land east of Diplocks Industrial Estate, Ringmer for 75 net additional dwellings.

There is a suggestion for an allocation Avery Nursery (Lower Clayhill Business Area, Uckfield Road, NP Policy EMP20) This is a site for mixed use that would deliver the new employment floor space that the Ringmer Neighbourhood Plan identifies for the area.
How these comments have influenced the Proposed Submission Document Sufficient housing sites have been proposed or identified through Local Plan Part 2 or the 'made' Ringmer Neighbourhood Plan to meet the minimum housing requirement of Spatial Policy 2. Additional potential housing sites have been assessed through the SHELAA. A future review of the Local Plan Part 1 will consider whether additional housing allocations are required. Local Plan Part 1 does not require new employment allocations to be identified through Local Plan Part 2. The need for new employment allocations will be considered through a future review of Local Plan Part 1 or the Ringmer Neighbourhood Plan.
SOUTH CHAILEY One developer suggests that land to the west of the A275, South Chailey (see development brief at Appendix 2) is allocated for residential development. The site extends to 2.6 hectares and is well related to the existing built environment. The site would be capable of delivering circa 55 dwellings.
How these comments have influenced the Proposed Submission Document Sufficient proposed housing sites have been identified through Local Plan Part 2 to meet the minimum housing requirement of Spatial Policy 2 for South Chailey. Additional potential housing sites have been assessed through the SHELAA. A future review of the Local Plan Part 1 will consider whether additional housing allocations are required.
WIVELSFIELD There is a suggestion for land at East of Ditchling Road, Wivelsfield for 95 dwellings or a potentially slightly smaller scheme for 40-50 dwellings
How these comments have influenced the Proposed Submission Document Sufficient housing sites have been identified through the 'made' Wivelsfield Neighbourhood Plan to meet the minimum housing requirement of Spatial Policy 2 for Wivelsfield Green. Additional potential housing sites have been assessed through the SHELAA. A future review of the Local Plan Part 1 will consider whether additional housing allocations are required.

DEVELOPMENT MANAGEMENT POLICIES

DM1 PLANNING BOUNDARY

Support policy approach	
Number of respondents	9

Summary of comments received

Most respondents supported the policy without providing further comment. Newick and Chailey Parish Councils, together with a number of residents, endorsed the way coalescence of settlements would be avoided through this policy approach.

How these comments have influenced the Pre-Submission Document

Support noted.

DM 1 PLANNING BOUNDARY	
Object to policy approach	
Number of respondents	12

Summary of comments received

Natural England expressed concern that the policy does not provide for the protection of biodiversity. It also recommends that reference should be made to the fact Newick village is located within the 7km Ashdown Forest zone.

Two respondents expressed concern that the restrictive wording of the policy and the tight nature of the planning boundaries create a situation with very little flexibility to accommodate development, as it is left unclear where the additional 468 'windfall' dwellings are to be provided. It is argued that the draft policy is too restrictive and inconsistent with national policy; the NPPF seeks only to recognise the intrinsic character of the countryside and is to be contrasted with the Green Belt which does remain protected.

Two respondents were concerned that the policy does not give sufficient protection to vulnerable gaps of countryside between settlements. Other respondents sought amendments to the defined planning boundaries to either exclude certain sites or include alternative sites.

How these comments have influenced the Pre-Submission Document

In response to Natural England's concerns, it is acknowledged that biodiversity is an important consideration in the determination of planning applications. However, the Council has followed Government guidance that local plans should be as focussed and concise as possible, avoiding undue repetition or duplication by the use of generic policies to set out principles that may be common to different types of development.

The key issue that Policy DM1 seeks to address is the need to positively focus development growth on sustainable settlements, reduce the need to travel, and protect the intrinsic character and beauty of the countryside in accordance with the spatial strategy set out in the Local Plan Part 1. It is considered that the specific need to protect biodiversity is appropriately addressed by both Core Policy 10 and Policy DM24, which would be considered alongside Policy DM1 in the determination of planning applications where necessary.

In terms of the impact of development on the Ashdown Forest, the Local Plan clearly states the development management policies should not be read in isolation. The 7km Ashdown

Forest zone is defined on the Local Plan Policies Map and Paragraph 6.43 of the Local Plan Part 1 states that Newick village falls almost entirely within this zone. Further repetition in this respect is considered unnecessary and unjustified.

In response to the concerns that Draft Policy DM1 is too restrictive, 'planning' or 'development' boundaries are a well-established policy tool which seeks to positively focus growth on sustainable settlements, reduce the need to travel, and protect the intrinsic character and beauty of the countryside. The argument that such boundaries are only applicable to protect the Green Belt is not accepted. The Council's view is supported by the national Planning Practice Guidance which states that 'Local plans should include strategic policies for the conservation and enhancement of the natural environment, including landscape. This includes designated landscapes but also the wider countryside'.

Draft Policy DM1 essentially carries forward 'saved' Policy CT1 of the Lewes District Local Plan 2003. In Baroness Cumberlege and Patrick Cumberlege v. Secretary of State for Communities and Local Government, John Howell QC rejected the submission that the protection of the countryside under 'saved' Policy CT1 is inconsistent with national planning policy in the NPPF. This opinion was upheld by Lindblom LJ in DLA Delivery Ltd v Baroness Cumberlege and Patrick Cumberlege and Secretary of State for Communities and Local Government (June 2018).

The Planning Practice Guidance also states that local authorities can consider following approaches that have been accepted as 'sound' in local plan examinations that have been undertaken since the NPPF was introduced, provided that they are both relevant and appropriate. It is noted that a similar approach to planning boundaries has been taken in the Mid Sussex District Plan adopted in 2018, and the Hinkley & Bosworth Site Allocations and Development Management Policies DPD adopted in 2016.

The 'windfall' or unidentified sites allowance was recommended by the Inspector who conducted the Examination in Public of the Local Plan Part 1. Such sites have consistently come forward for housing development in the past and are expected to be a reliable source of housing supply over the plan period. By their very nature, such sites are unidentified and it is therefore not possible for the Local Plan Part 2 provide any further clarity about where this supply will be delivered in the future.

In response to the concern that the policy does not give sufficient protection to vulnerable gaps of countryside between settlements, it should be noted that the supporting text to the policy clearly states that the planning boundaries have been defined to take account, inter alia, of the need to protect important 'gaps' of countryside between settlements. Suggested amendments to the planning boundary itself are addressed elsewhere in this document.

No amendment is therefore proposed to Draft Policy DM1 in the light of the comments received.

DM 1 PLANNING BOUNDARY	
Other comments received	
Number of respondents	1
Summary of comments received Newhaven Town Council is concerned that there will be a policy vacuum in the areas of Newhaven Port located within the settlement planning boundary but outside of the designated area of the Newhaven Neighbourhood Plan.	

How these comments have influenced the Pre-Submission Document

The concern of Newhaven Town Council is acknowledged. The Local Plan Part 2 has been amended by the inclusion of a new employment site allocation (Policy E1: Land at East Quay) which carries forward 'saved' Policy NH20 of the Lewes District Local Plan 2003, suitably updated to reflect the change in circumstances since 2003. The proposed allocation excludes the area with planning consent for the refurbishment of the existing multi-purpose berth at East Quay, including the construction of a new berth and slipway and associated space for offices, warehouses, workshops, and welfare facilities for staff and contractors. As part of this consent, a nature reserve will be established on the land defined as Area B in 'saved' Policy NH20.

Within the area covered by saved' Policy NH21 (Railway Quay) of the Lewes District Local Plan 2003, the former Marine Workshops have been refurbished to create the Newhaven University Technical College and the river frontage has been developed for public access. The remainder of the site is still in use, principally as operational land and access for the Newhaven-Dieppe ferry service. There is no evidence to demonstrate that this land will become surplus to the operational requirements of the port over the next 12 years and it therefore is considered that 'saved' Policy NH21 is neither justified nor deliverable over the plan period. Consequently it is not proposed to carry forward this policy in the Local Plan Part 2.

'Saved' Policy NH24 (North Quay) of the Lewes District Local Plan 2003 has effectively been superseded by the policy framework set out in the adopted Waste & Minerals Plan and the Waste & Minerals Sites Plan. Policies WMP15 and SP9 safeguard the wharves and rail sidings at North Quay for the landing, processing, handling and associated storage of minerals. Policy SP2 also identifies North Quay as a site where waste management development will be supported, whilst Policy SP10 safeguards the existing facilities for concrete batching, coated materials manufacture and other concrete products.

In 2012 Newhaven Port & Properties published a Port Masterplan which provides a strategic framework for how the port will develop over the next 20-30 years. Lewes District Council, East Sussex County Council and Newhaven Town Council have jointly agreed to work with Newhaven Port & Properties to achieve the implementation of this Masterplan. In the light of this agreement, the carrying forward of the remaining 'saved' policies within the operational port area (Policies NH22 and NH23 of the Lewes District Local Plan 2003) is not considered necessary.

DM2 AFFORDABLE HOMES EXCEPTION SITES

Support policy approach	
Number of respondents	3

Summary of comments received

Respondents generally supported the policy due to the lack of sufficient affordable housing in rural areas. However, whilst supporting the policy, the Lewes branch of CPRE considers that allowing an element of market housing does not seem to align with national planning policy and appears unwise.

How these comments have influenced the Pre-Submission Document

Support noted. The NPPF requires local planning authorities to consider whether allowing some market housing on exception sites would facilitate the provision of additional affordable housing to meet local needs. As stated in the supporting text to Policy DM2, a proportion of market housing would only be permitted where it can be demonstrated that an affordable housing scheme would be unviable without cross-subsidy. No amendment is therefore proposed to Draft Policy DM2 in this respect.

DM2 AFFORDABLE HOMES EXCEPTION SITES

Object to policy approach	
Number of respondents	4

Summary of comments received

East Sussex County Council and Natural England recommend that the policy should add a criterion on biodiversity, having regard to NPPF paragraph 117. Ringmer Parish Council is concerned that the wording of the final paragraph of the policy may detract from delivery of affordable houses, and encourages developers to offer larger market homes. Another respondent objects to the policy because it implies that housing in rural areas should only be provided to meet the local need; the respondent considers this doesn't reflect NPPF par. 54 and 55.

How these comments have influenced the Pre-Submission Document

In response to the concerns of Natural England and East Sussex County Council, it is acknowledged that biodiversity is an important consideration in the determination of planning applications. However, the Council has followed Government guidance that local plans should be as focussed and concise as possible, avoiding undue repetition or duplication by the use of generic policies to set out principles that may be common to different types of development. It is considered that the specific need to protect biodiversity is appropriately addressed by both Core Policy 10 (*Natural Environment and Landscape Character)* of the adopted Local Plan Part 1 and Draft Policy DM24 (*Protection of Biodiversity and Geodiversity*), which would be considered alongside Policy DM2 where appropriate in the determination of planning applications.

In response to Ringmer Parish Council's concerns, the NPPF requires local planning authorities to consider whether allowing some market housing on exception sites would facilitate the provision of additional affordable housing to meet local needs. As stated in the supporting text to Policy DM2, a proportion of market housing would only be permitted where it can be demonstrated that an affordable housing scheme would be unviable without cross-subsidy.

In response to the remaining concern, the Council does not accept that it has misunderstood national housing policy. The use of rural exception sites to provide affordable housing to meet local needs is a long-standing planning policy tool which has been carried forward by Core Policy 1 (*Affordable Housing*) of the adopted Local Plan Part 1.

Accordingly, no amendment is proposed to Draft Policy DM2 in the light of the comments received.

DM3 ACCOMODATION FOR AGRICULTURAL WORKERS	
Support policy approach	
Number of respondents	1
Summary of comments received The Lewes branch of CPRE supports the policy, including the extension of the definition of 'rural workers' beyond agriculture and forestry.	
How these comments have influenced the Pre-Submission Document Support noted.	

DM4 RESIDENTIAL CONVERSIONS IN THE COUNTRYSIDE	
Support policy approach	
Number of respondents	2
Summary of comments received East Sussex County Council supports the policy but suggests that the words 'habitat survey' in the supporting text is replaced by 'ecological impact assessment'. Natural England also supports the policy but recommends the inclusion of the requirement that the developer needs a licence from Natural England when the development will impact bats. It also recommends the inclusion within the policy of a requirement of a protected species survey.	
How these comments have influenced the Pre-Submission Document Support noted. The supporting text to the policy has been amended in the light of East Sussex County Council's comments. In response to Natural England's recommended changes, it should be noted that the Council has followed Government guidance that local plans should be as focussed and concise as possible. The supporting text to the policy clearly states that the potential presence of protected species will be an important consideration. Such species are protected by statute. It is not considered necessary for planning policies to repeat statutory requirements that are subject to other legislative regimes. No amendment is therefore proposed to Draft Policy DM4 in this respect.	

DM4 RESIDENTIAL CONVERSIONS IN THE COUNTRYSIDE	
Object to policy approach	
Number of respondents	2
Summary of comments received Sussex Wildlife Trust suggests that the policy includes an additional criterion to address the potential impact on biodiversity. It also suggests that the term 'habitat survey' is replaced by 'ecological assessment'.	
How these comments have influenced the Pre-Submission Document The term 'habitat survey' in the supporting text has been amended to reflect this advice. It is also acknowledged that biodiversity is an important consideration in the determination of planning applications. However, the Government is clear that local plans should be concise and should avoid undue repetition or duplication by using generic policies to set out principles that may be common to different types of development. It is considered that the specific need to protect biodiversity is appropriately addressed by both Core Policy 10	

(*Natural Environment and Landscape Character)* of the adopted Local Plan Part 1 and Draft Policy DM24 (*Protection of Biodiversity and Geodiversity*) which would be considered alongside Policy DM4 in the determination of planning applications where appropriate. No amendment is therefore proposed to Draft Policy DM4 in this respect.

DM4 RESIDENTIAL CONVERSIONS IN THE COUNTRYSIDE	
Other comments received	
Number of respondents	1
Summary of comments received The Council's Specialist Advisor (Coastal Engineering) suggests the text should include the possibility of site contamination as agricultural buildings may have been used for storage of vehicles, fuels and pesticides. He also recommends that applicants should be required to assess surface and ground water flood risks.	
How these comments have influenced the Pre-Submission Document It is acknowledged that contamination is often a key issue that needs to be addressed in development proposals involving former agricultural land and buildings. The concerns regarding flood risk are also recognised. The supporting text to Draft Policy DM4 has been amended accordingly.	

DM5 REPLACEMENT DWELLINGS IN THE COUNTRYSIDE	
Support policy approach	
Number of respondents	1
Summary of comments received No additional comment provided.	
How these comments have influenced the Pre-Submission Document Support noted.	

DM5 REPLACEMENT DWELLINGS IN THE COUNTRYSIDE	
Object to policy approach	
Number of respondents	2
Summary of comments received East Sussex County Council recommends that biodiversity benefits should be added to criterion 2. The other respondent comments that the requirement to locate the replacement dwelling "on the footprint of the existing dwelling" offers no flexibility. It is suggested that the words "is located in the same or similar position to that of the existing dwelling…" or words along those lines would provide some scope for variation from the existing footprint.	
How these comments have influenced the Pre-Submission Document In response to the East Sussex County Council's suggestion, it is acknowledged that biodiversity can be an important consideration in the determination of planning applications. However, the Government is clear that local plans should be as focused and concise as possible and concentrate on the critical issues facing the area. There is no local evidence to demonstrate that relocating an existing dwelling from its original position is likely to be justified for reasons of biodiversity benefit. Accordingly, no amendment is proposed to Draft Policy DM5 in this respect. In response to the other comment, it is acknowledged that the wording of the policy may be overly prescriptive in terms of requiring a replacement dwelling to be located on the exact footprint of the existing dwelling. The wording of Policy DM5 has therefore been amended as suggested by the respondent.	

DM6 EQUESTRIAN DEVELOPMENT

Support policy approach	
Number of respondents	2

Summary of comments received

Natural England supports the policy. However, it recommends that impacts on biodiversity should be included because such developments, if poorly designed, can have deleterious impacts on statutory wildlife sites, protected species, priority habitats and species and networks of natural habitats.

The Mid Sussex Area Bridleways Group supports the policy, but would like the access and egress points of the proposed development to be included. They request all developments are assessed in terms of the effect on a current Right of Way network and there is consideration of the impact caused by developments on roads and lanes regularly used by horses.

How these comments have influenced the Pre-Submission Document

Support noted. In response to Natural England's concerns, it is acknowledged that the impact of equestrian developments on biodiversity can be a particularly significant issue, due both to the nature of the activities and their generally rural location. Policy DM6 has therefore been amended accordingly.

The concerns of the Mid Sussex Area Bridleways Group are recognised. However, the Council has followed Government guidance that local plans should be as concise as possible and should avoid undue repetition or duplication by using generic policies to set out principles that may be common to different types of development. It is considered that Core Policy 13 (*Sustainable Travel*) of the adopted Local Plan Part 1 and Draft Policy DM35 (*Footpath, Cycle & Bridleway Network*) provide an appropriate framework for the consideration of development proposals that may have a harmful impact on the safety of the local road and bridleway network. No amendment is therefore proposed to Draft Policy DM6 in this respect.

DM6 EQUESTRIAN DEVELOPMENT	
Object to policy approach	
Number of respondents	2

Summary of comments received

East Sussex County Council comment that floodlighting should not have an unacceptable, adverse impact on biodiversity and the Sussex Wildlife Trust recommend that the possible cumulative impact of equestrian developments on biodiversity should be included as a relevant policy consideration.

How these comments have influenced the Pre-Submission Document

It is acknowledged that the impact of equestrian developments on biodiversity can be a particularly significant issue, due both to the nature of the activities and their generally rural location. Policy DM6 has been amended accordingly in response to the comments received.

DM6 EQUESTRIAN DEVELOPMENT	
Other comments received	
Number of respondents	1
Summary of comments received The Council's Specialist Advisor (Coastal Engineering) suggests the need for an assessment of the cumulative impact of increased hardstanding, and the creation of surface water run-off and the use of SuDS. He also recommends that smoke from burning horse manure, flies, rodents and odours should be a consideration.	
How these comments have influenced the Pre-Submission Document It is considered that Core Policy 12 (Flood Risk, Coastal Erosion, Sustainable Drainage and Slope Stability) of the adopted Local Plan Part 1 provides an adequate framework for the consideration of flood risk arising from development proposals and for ensuring that SuDS are incorporated where appropriate. In terms of nuisance from smoke, pests and odours, the Government expects local planning authorities to focus on whether the development itself is an acceptable use of the land rather than the control of processes or emissions. The potential nuisances listed by the respondent are subject to control under other legislative regimes and it must be assumed that these regimes will operate effectively. Accordingly, no amendment is proposed to Draft Policy DM6 in this respect.	

DM7 INSTITUTIONAL SITES	
Object to policy approach	
Number of respondents	1
Summary of comments received Peacehaven Town Council objects to the policy on the grounds that redundant institutional sites should be considered as assets of community value.	
How these comments have influenced the Pre-Submission Document If a community wishes to nominate a property or land for inclusion as an Asset of Community Value, they need to follow the process set out on the Council's web site. This is not the role for a Local Plan. Accordingly, no amendment is proposed to Draft Policy DM7.	

DM8 RESIDENTIAL SUB-DIVISIONS AND SHARED HOUSING	
Support policy approach	
Number of respondents	1
Summary of comments received The respondent supports the policy because it will help to deliver an increase in the availability of one and two bedroom dwellings.	
How these comments have influenced the Pre-Submission Document Support noted.	

DM8 RESIDENTIAL SUB-DIVISIONS AND SHARED HOUSING	
Object to policy approach	
Number of respondents	1
Summary of comments received The respondent suggests that the scope of the policy should be extended to include the residential subdivision of an existing dwelling into two or more dwellings.	
How these comments have influenced the Pre-Submission Document It is considered that the criteria listed in Policy DM8 can be applied to the conversion of a single dwelling to two or more dwelling units where appropriate. No amendment is therefore proposed to Draft Policy DM8 in this respect.	

DM8 RESIDENTIAL SUB-DIVISIONS AND SHARED HOUSING	
Other comments received	
Number of respondents	1
Summary of comments received Brighton and Hove City Council notes that student housing is classed as falling within the broader definition of 'shared housing' within the draft Plan. This suggests that accommodation for students within Lewes District is only expected to take the form of conversions of existing residential properties to HMOs. An increasing demand for purpose built student accommodation to serve the universities is likely to require location outside of the city, particularly along the railway linking the campuses at Moulsecoombe and Falmer with Lewes town, Newhaven and Seaford.	
How these comments have influenced the Pre-Submission Document The demand for purpose built student accommodation in Brighton & Hove is acknowledged and the Council supports the principle of providing this form of accommodation within Lewes District, subject to compliance with the policies of the approved development plan for the area. There is no expectation that student accommodation should only be provided through the conversion of existing residential properties. No amendment is therefore proposed to Draft Policy DM8 in this respect.	

DM9 FARM DIVERSIFICATION

Support policy approach	
Number of respondents	4

Summary of comments received

The Lewes branch of the CPRE and two other respondents support the policy in terms of supporting the local rural economy. Natural England also supports the policy but recommends that it should include the potential for ecological enhancement as part of diversification schemes.

How these comments have influenced the Pre-Submission Document

Support noted. In response to Natural England's suggestion, the Council has followed Government guidance that local plans should be as concise as possible and should avoid undue repetition or duplication by using generic policies to set out principles that may be common to different types of development. It is considered Core Policy 10 (*Natural Environment & Landscape Character*) of the adopted Local Plan Part 1 and draft Policy DM24 (*Protection of Biodiversity and Geodiversity*) set out a suitable framework for seeking ecological conservation and enhancement as part of development proposals. No amendment is therefore proposed to Draft Policy DM9 in this respect.

DM9 FARM DIVERSIFICATION

Object to policy approach	
Number of respondents	2

Summary of comments received

East Sussex County Council states that a Landscape and Visual Assessment should be a policy requirement, whilst the Sussex Wildlife Trust suggests the addition of a criterion to ensure that farm diversification achieves net gains on biodiversity.

How these comments have influenced the Pre-Submission Document

It is acknowledged that the impact of farm diversification proposals on landscape character and biodiversity is an important consideration. However, the Council has followed Government guidance that local plans should be as focussed and concise as possible and avoid undue repetition or duplication by using generic policies to set out principles that may be common to different types of development.

It is considered that Core Policy 10 (*Natural Environment & Landscape Character*) of the adopted Local Plan Part 1 sets out a suitable policy framework for ensuring that development would not have an unacceptable impact on landscape conservation and enhancement. The supporting text to Policy DM9 states that the Council will encourage the submission of Farm Business Plans that address landscape management issues where appropriate. A policy requirement for every farm diversification proposal to submit a Landscape and Visual Assessment is considered unduly onerous and may threaten the viability of development, in conflict with the principles set out in the NPPF.

It is also considered Core Policy 10 (*Natural Environment & Landscape Character*) of the adopted Local Plan Part 1 and Draft Policy DM24 (*Protection of Biodiversity and Geodiversity*) set out a suitable framework for seeking ecological conservation and enhancement as part of development proposals.

Accordingly, no amendments are proposed to Draft Policy DM9 in the light of the comments received.

DM9 FARM DIVERSIFICATION	
Other comments received	
Number of respondents	1
Summary of comments received The Council's Specialist Advisor (Coastal Engineering) recommends the inclusion of a criterion on noise, fumes, dust, and odour pollution.	
How these comments have influenced the Pre-Submission Document The Government is clear that local plans should be focussed and concise and avoid undue repetition or duplication by using generic policies to set out principles that may be common to different types of development. It is considered that Core Policy 9 (*Air Quality*) of the adopted Local Plan Part 1, Draft Policy DM20 (*Pollution Management*) and Draft Policy DM23 (*Noise*) provide an appropriate policy framework to address the issues raised by the respondent. Accordingly, no amendments are proposed to Draft Policy DM9 in this respect.	

DM10 EMPLOYMENT DEVELOPMENT IN THE COUNTRYSIDE	
Support policy approach	
Number of respondents	2
Summary of comments received Natural England supports the policy but suggests that it should be amended to require a survey for protected species. The other respondent acknowledges the strong demand for rural employment sites.	
How these comments have influenced the Pre-Submission Document Support noted. In response to Natural England's suggested amendment, the supporting text clearly states that the potential presence of protected species will be an important consideration. Such species are protected by statute. It is not considered necessary to repeat statutory requirements that are subject to other legislative regimes within the policy itself. Accordingly, no amendments are proposed to Draft Policy DM10 in this respect.	

DM10 EMPLOYMENT DEVELOPMENT IN THE COUNTRYSIDE	
Object to policy approach	
Number of respondents	2
Summary of comments received East Sussex County Council states that a requirement for a Landscape and Visual Assessment should be applied, whilst the Sussex Wildlife Trust suggests adding a criterion to ensure that farm diversification achieves net gains on biodiversity.	
How these comments have influenced the Pre-Submission Document It is acknowledged that the impact of employment development on landscape character and biodiversity is an important consideration. However, the Council has followed Government guidance that local plans should be as focussed and concise as possible and should avoid undue repetition or duplication by using generic policies to set out principles that may be common to different types of development. It is considered that Core Policy 10 (*Natural Environment & Landscape Character*) of the adopted Local Plan Part 1 sets out a suitable policy framework for ensuring that development would not have an unacceptable impact on landscape conservation and enhancement. A policy requirement for all applications for employment development to	

submit a Landscape and Visual Assessment is considered unduly onerous and may threaten the viability of development, in conflict with the principles set out in the NPPF.

It is also considered Core Policy 10 (*Natural Environment & Landscape Character*) of the adopted Local Plan Part 1 and draft Policy DM24 (*Protection of Biodiversity and Geodiversity*) set out a suitable framework for seeking ecological conservation and enhancement as part of employment development proposals.

Accordingly, no amendments are proposed to Draft Policy DM10 in this respect.

DM10 EMPLOYMENT DEVELOPMENT IN THE COUNTRYSIDE	
Other comments received	
Number of respondents	1
Summary of comments received The policy recognises that the re-use of agricultural buildings can be more carbon and waste efficient than demolition and rebuilding. However, it should support the replacement of modern eyesores by efficient modern buildings that are fit for purpose, sit well within the rural landscape and have much higher levels of thermal efficiency. They would offer higher quality working conditions for business use with more longevity and so could well come within the criteria of sustainable development.	
How these comments have influenced the Pre-Submission Document The draft policy does give positive support to the demolition and replacement of existing agricultural or other rural buildings where this would result in a more sustainable development than could be achieved through converting the building. Accordingly, no amendment is proposed to Draft Policy DM10 in this respect.	

DM11 EXISTING EMPLOYMENT SITES IN THE COUNTRYSIDE	
Support policy approach	
Number of respondents	3
Summary of comments received Sussex Wildlife Trust support the requirement for any expansion of sites to include measures to secure environmental improvements, but recommend that the word 'or' in the final sentence of the policy is replaced with 'and,' as enhanced landscaping and biodiversity gains are not mutually exclusive. The Lewes branch of the CPRE supports the policy, recognising the strong demand for rural employment sites. The third respondent notes that this policy would support the redevelopment of Balcombe Pit.	
How these comments have influenced the Pre-Submission Document Support noted. Policy DM11 has been amended in accordance with the comments from the Sussex Wildlife Trust.	

DM11 EXISTING EMPLOYMENT SITES IN THE COUNTRYSIDE	
Object to policy approach	
Number of respondents	1
Summary of comments received East Sussex County Council (ESCC) requests the inclusion of a Landscape and Visual Assessment requirement with development applications.	
How these comments have influenced the Pre-Submission Document It is considered that Core Policy 10 (*Natural Environment & Landscape Character*) of the adopted Local Plan Part 1 sets out a suitable policy framework for ensuring that development would not have an unacceptable impact on landscape conservation and enhancement. A policy requirement for all applications for employment development to submit a Landscape and Visual Assessment is considered unduly onerous and may threaten the viability of development, in conflict with the principles set out in the NPPF.	

DM11 EXISTING EMPLOYMENT SITES IN THE COUNTRYSIDE	
Other comments received	
Number of respondents	1
Summary of comments received The Council's Specialist Advisor (Coastal Engineering) recommends the inclusion of a criterion addressing noise, dust and fumes to be consistent with Draft Policy DM10 (*Employment Development in the Countryside*).	
How these comments have influenced the Pre-Submission Document It is acknowledged that Draft Policy DM11 should be consistent with Draft Policy DM10 and it has been amended accordingly.	

DM12 CARAVAN AND CAMPING SITES	
Support policy approach	
Number of respondents	1
Summary of comments received The Lewes branch of the CPRE supports the policy.	
How these comments have influenced the Pre-Submission Document Support noted.	

DM12 CARAVAN AND CAMPING SITES	
Object to policy approach	
Number of respondents	2
Summary of comments received Natural England seeks a requirement to conserve and enhance biodiversity, whilst East Sussex County Council seeks a requirement for a Landscape and Visual Assessment to support all development applications.	
How these comments have influenced the Pre-Submission Document The Government is clear that local plans should be focussed and concise and avoid undue repetition or duplication by using generic policies to set out principles that may be common to different types of development. It is considered that the criteria Core Policy 10 (*Natural*	

Environment & Landscape Character) of the adopted Local Plan Part 1 and draft Policy DM12 provide a suitable policy framework for ensuring that development would not have an unacceptable impact on landscape conservation and enhancement. A policy requirement for all planning applications for caravan and camping sites to submit a Landscape and Visual Assessment is considered unduly onerous and may threaten the viability of small-scale proposals, in conflict with the principles set out in the NPPF.

It is also considered that Core Policy 10 (*Natural Environment & Landscape Character*) of the adopted Local Plan Part 1 and draft Policy DM24 (*Protection of Biodiversity and Geodiversity*) set out a suitable framework for ensuring that development does not have an unacceptable impact on biodiversity. Accordingly, no amendments are proposed to Draft Policy DM12 in this respect.

DM12 CARAVAN AND CAMPING SITES	
Other comments received	
Number of respondents	1
Summary of comments received The Council's Specialist Advisor (Coastal Engineering) raises the issue of flooding risk, given the changing climate, and advises that the sites are made appropriate to withstand adverse weather.	
How these comments have influenced the Proposed Submission Document It is acknowledged that flood risk is an important consideration in respect of development proposals for caravan and camping sites. However, the Government is clear that local plans should be focussed and concise and avoid undue repetition or duplication by using generic policies to set out principles that may be common to different types of development. It is considered that Core Policy 12 (*Flood Risk, Coastal Erosion, Sustainable Drainage and Slope Stability*) of the adopted Local Plan Part 1 sets an appropriate framework for the consideration of flood risk in relation to development proposals. Accordingly, no amendments are proposed to Draft Policy DM12 in this respect.	

DM14 MULTIFUNCTIONAL GREEN INFRASTRUCTURE	
Support policy approach	
Number of respondents	4
Summary of comments received The Environment Agency, Natural England and East Sussex County Council support the policy. Natural England recommends that Green Infrastructure is mapped at a spatial scale, so that forthcoming developments will be able to recognise opportunities to contribute. The Lewes branch of CPRE support the policy but suggest that it is rephrased in order to encourage the protection of existing green corridors and the creation of new ones.	
How these comments have influenced the Pre-Submission Document Support noted. Green corridors and other ecological networks are protected by Core Policy 8 (*Green Infrastructure*) and Core Policy 10 (*Natural Environment and Landscape Character*) of the adopted Local Plan Part 1. Accordingly, no amendment is proposed to Draft Policy DM14 in this respect.	

DM14 MULTIFUNCTIONAL GREEN INFRASTRUCTURE	
Other comments received	
Number of respondents	1
Summary of comments received The Council's Specialist Advisor (Coastal Engineering) suggests that the policy should acknowledge the potential contribution of green infrastructure to managing and alleviating the impact of climate change.	
How these comments have influenced the Pre-Submission Document The contribution of green infrastructure to mitigating the impacts of climate change is acknowledged and set out in the supporting text to Core Policy 8 (Green Infrastructure) of the adopted Local Plan Part 1. In view of Government guidance that local plans should be concise and avoid undue repetition or duplication, no amendment is proposed to Draft Policy DM14 in this respect.	

DM14 MULTIFUNCTIONAL GREEN INFRASTRUCTURE	
Object to policy approach	
Number of respondents	2
Summary of comments received The Woodland Trust objects to the policy because it fails to recognise that woodland creation is especially important for green infrastructure and delivers a wide range of benefits. The Sussex Wildlife Trust objects because the policy is called 'multi-functional green infrastructure' and should therefore relate to all types of GI. They seek the following amendments: in the first sentence of the policy, delete the word "would" and replace with the word "will," and delete the words "the character of the area or the need for outdoor playing space" and replace with word "need."	
How these comments have influenced the Pre-Submission Document The benefits associated with trees and woodland is set out in the supporting text to Draft Policy DM27 (*Landscape Design*). Repeating this text elsewhere in the local plan would fail to have regard to Government advice that local plans should be concise and avoid undue repetition or duplication. In response to the wording amendment proposed by the Sussex Wildlife Trust, it is considered that, without further qualification, the term 'need' is vague and imprecise. Hence, it fails to have regard to the NPPF which states that local plan policies should be clearly written and unambiguous so it is evident how a decision maker should react to development proposals. Accordingly, no amendment is proposed to Draft Policy DM14.	

DM15 PROVISION FOR OUTDOOR PLAYING SPACE	
Object to policy approach	
Number of respondents	4
Summary of comments received Sport England objects to the policy because the use of generic standards does not satisfy the CIL regulation 122 tests and does not account for Sport England's latest advice on the approach to providing for sports facilities in new development. Ringmer Parish Council is concerned that the proposed standards for outdoor play provision is considerably more than	

is currently provided in the village and maintenance and renewal cost could be unaffordable. The Parish Council is also considers that the policy should promote access to the countryside. Other respondents believe that the standard for children's play space is overly prescriptive and lacking in flexibility and that the Council should be clearer about how the required provision will be secured in relation to CIL or other contributions.

How these comments have influenced the Pre-Submission Document

Whilst recognising Sport England's concern that the FiT benchmark standards are national standards, and therefore have obvious limitations, these standards are nevertheless used by an estimated 70% of local authorities in their local plans. The Government is clear that local planning authorities can use the same approaches that have been accepted as sound in other Local Plans adopted since the introduction of the NPPF.

In response to Ringmer Parish Council's concern, the proposed standard will be applied consistently across the local plan area. Nevertheless, town and parish councils can adopt their own standards for outdoor playing space provision in neighbourhood plans. In terms of providing public access to the countryside, without further information and evidence it is not clear how this can be delivered by Policy DM15. The footpath, cycle and bridleway network has the potential to provide safe, attractive and convenient access from towns and villages into the countryside and is protected by Draft Policy DM35.

In terms of children's play space, other Local Plans adopted since 2015 require on-site provision above comparable development size thresholds and it is therefore not accepted that Policies DM15 and DM16 are overly prescriptive. The Council's Community Infrastructure Levy Regulation 123 List (November 2015) is publically available on the web site and clearly states that site-specific green infrastructure, which includes children's play space, will be provided through the use of planning obligations.

Accordingly, no amendment is proposed to Draft Policy DM15.

DM16 CHILDREN'S PLAY SPACE IN NEW HOUSING DEVELOPMENT

Object to policy approach	
Number of respondents	4

Summary of comments received

It is argued that the policy is overly prescriptive and lacks flexibility: the proposed threshold for on-site provision of children's play space is too low and this may jeopardise the delivery of housing. The policy should make clear that contributions/on-site provision should only be sought where necessary. Ringmer Parish Council objects to the requirement for on-site provision on the grounds that maintenance of these equipped sites will become a problem. Sussex Wildlife Trust suggests the inclusion of a new criterion requiring play space to be designed with the concept of natural play.

How these comments have influenced the Pre-Submission Document

The threshold of 20 dwellings is considered appropriate because the application of the Council's proposed minimum standards for children's play space to a development of 20 homes with two or more bedrooms would enable the provision of a suitably sized play space. The Government has advised that local planning authorities can use the same approaches that have been accepted as sound in other Local Plans adopted since the introduction of the NPPF. Other Local Plans adopted since 2015 require on-site provision of children's play space above comparable development size thresholds.

In terms of flexibility, Draft Policy DM16 clearly states that the requirement for on-site children's play space will not be applied in the case of one-bedroom dwellings or specialist accommodation for older people or students, whilst Draft Policy DM16 states that the provision of new, or the enhancement of existing, outdoor playing space and facilities will only be sought where there is a local deficiency of outdoor playing space.

The benefits of 'natural play' are acknowledged but it is considered overly prescriptive to make such provision a policy requirement for all residential developments of 20 houses or more. The supporting text states that the design of play space should take account of existing national guidance, including '*Design for Play: A guide to creating successful play spaces'* (Play England 2008) which contains advice and best practice on natural play.

Accordingly, no amendment is proposed to Draft Policy DM16.

DM17 FORMER LEWES/SHEFFIELD PARK RAILWAY LINE

Support policy approach	
Number of respondents	2

Summary of comments received

East Sussex County Council supports the policy but points out that increased public access should not be to the detriment of biodiversity. The Mid Sussex Area Bridleways Group also supports policy but wish to see it apply to all off-road routes used by horses.

How these comments have influenced the Pre-Submission Document

Support noted. It is acknowledged that much of the undeveloped route of the former Lewes/Sheffield Railway Line now provides a valuable wildlife habitat and that it is important to ensure that the biodiversity value of the route is maintained or enhanced by future proposals for informal recreation use. Draft Policy DM17 has therefore been amended to reflect the comments of East Sussex County Council in this respect.

It is not clear why the Mid Sussex Area Bridleways Group seek the application of Policy DM17 to other off-road routes. Core Policy 13 (*Sustainable Travel*) of the adopted Local Plan Part 1 and Draft Policy DM35 (*Footpath, Cycle & Bridleway Network*) provide an appropriate framework for the consideration of development proposals that may have a harmful impact on the convenience, safety and amenity of the bridleway network. No amendment is proposed to Draft Policy DM17 in this respect.

DM17 FORMER LEWES/SHEFFIELD PARK RAILWAY LINE	
Object to policy approach	
Number of respondents	2

Summary of comments received

Sussex Wildlife Trust objects to the policy on the grounds of the need to protect and enhance the valuable wildlife habitats and ancient woodland along the route. The land owner of a section of the route states that there is no intention to permit public access in future and it is therefore nonsensical to preclude development on the basis of safeguarding non-existent informal recreational uses.

How these comments have influenced the Pre-Submission Document

It is acknowledged that much of the undeveloped route of the former Lewes/Sheffield Railway Line now provides a valuable wildlife habitat and that it is important to ensure that the biodiversity value of the route is maintained or enhanced by future proposals for

informal recreation use. Draft Policy DM17 has therefore been amended to reflect the comments of the Sussex Wildlife Trust in this respect.

The comments submitted by the other respondent are noted. However, the use of the former Lewes/Sheffield park railway line for informal recreation has been a long standing aspiration of the Council and the route has been protected by planning policy since the adoption of the Lewes District Local Plan in 2003. This approach accords with the NPPF which states that local authorities should seek opportunities to provide better facilities for users, for example by adding links to existing rights of way networks.

DM18 RECREATION AND RIVERS

Support policy approach	
Number of respondents	2
Summary of comments received The Environment Agency and East Sussex County Council both support the policy without further comment.	
How these comments have influenced the Pre- Submission Document Support noted.	

DM18 RECREATION AND RIVERS	
Object to policy approach	
Number of respondents	2
Summary of comments received Sport England objects on the grounds that a specific policy is required in order to protect existing playing fields and sport facilities. Paragraph 74 of the NPPF states that existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless a number of conditions are met. A policy along these lines should be included in the local plan. The NPPF also refers to the need for an assessment of existing sport facilities in order to satisfy its criteria for the potential loss of playing fields or sports facilities. Without this there is a significant concern that decisions about planning to meet the current and future sports facility needs of the community will not be based on an up-to-date and robust evidence base. Sussex Wildlife Trust seeks reference to the natural functioning of the river and associated wetlands, and the need for any recreational activities to be accommodated with affecting the integrity of the river or tidal defence embankment.	
How these comments have influenced the Pre-Submission Document It is considered that the NPPF provides adequate policy protection against the loss of playing fields to development within the district. The Government is clear that there should be no need for local plans to re-iterate policies that are already set out in the NPPF. An assessment of existing playing space in the district was carried out in 2014 and will be published as a background paper to the Pre-Submission Local Plan Part 2 in order to inform future planning decisions on development proposals which would result in the loss of existing playing fields or other outdoor play space. The comments of the Sussex Wildlife Trust in relation to ensuring that development proposals will not have an adverse impact on the natural functioning of the river and associated wetlands are acknowledged and Draft Policy DM18 has been amended	

accordingly. The need to ensure that development can be accommodated without adversely affecting the integrity of the river or tidal defence embankment is referred to in the supporting text and is addressed by other legislative powers. The Environment Agency is the responsible body for maintaining the tidal defence embankments and has not sought an amendment to the policy in this respect. Consequently, no amendment is proposed to Draft Policy DM18 in this respect.

DM18 RECREATION AND RIVERS	
Other comments received	
Number of respondents	1
Summary of comments received The Council's Specialist Advisor (Coastal Engineering) recommends that this policy includes a statement that development proposals should demonstrate that there is no adverse impact upon the water conveying capacity of the river, or adjacent flood plains.	
How these comments have influenced the Pre-Submission Document It is acknowledged that development proposals should not have an adverse impact on the natural functioning of the river and associated wetlands and Draft Policy DM18 has been amended accordingly.	

DM19 PROTECTION OF AGRICULTURAL LAND	
Support policy approach	
Number of respondents	2
Summary of comments received Natural England and the Lewes branch of the CPRE support this policy without further comment.	
How these comments have influenced the Pre-Submission Document Support noted.	

DM19 PROTECTION OF AGRICULTURAL LAND	
Object to policy approach	
Number of respondents	1
Summary of comments received One respondent considers the policy is overly restrictive having regard to the NPPF.	
How these comments have influenced the Pre-Submission Document It is considered that Draft Policy DM19 is a balanced and reasonable interpretation of the NPPF. No amendment is proposed in the light of the respondent's comments.	

DM20 POLLUTION MANAGEMENT	
Support policy approach	
Number of respondents	2
Summary of comments received	

The Environment Agency and the Sussex Wildlife Trust both support the policy approach.
How these comments have influenced the Pre-Submission Document Support noted.

DM20 POLLUTION MANAGEMENT	
Other comments received	
Number of respondents	1
Summary of comments received One respondent suggests that the Council should come out more strongly in support of reducing air quality and require developers to include an 'air quality plan' which would demonstrate how they meet current and potentially new government regulations as well as minimising CO2 emissions.	
How these comments have influenced the Pre-Submission Document Whether or not air quality is relevant to a planning decision will depend upon the proposed development and its location. It is considered that Core Policy 4 (*Air Quality*) of the adopted Local Plan Part 1 sets out an appropriate decision-making framework to sustain and contribute towards compliance with relevant national standards for air pollutants, taking into account the presence of Air Quality Management Plans. A policy requiring all new development to include an 'air quality plan' would fail to have regard to the NPPF and also national Planning Practice Guidance, which clearly sets out how considerations of air quality fit into the development management process. Accordingly, no amendment is proposed to Draft Policy DM20.	

DM21 LAND CONTAMINATION	
Support policy approach	
Number of respondents	1
Summary of comments received The Environment Agency supports the policy.	
How these comments have influenced the Pre-Submission Document Support noted	

DM22 WATER RESOURCES AND WATER QUALITY	
Support policy approach	
Number of respondents	4
Summary of comments received The Environment Agency, Natural England, East Sussex County Council and Sussex Wildlife Trust support the policy. The Environment Agency and the Sussex Wildlife Trust suggests some minor wording amendments to the supporting text.	
How these comments have influenced the Pre-Submission Document Support noted. The supporting text to Draft Policy DM22 has been amended in accordance with the comments submitted by the Environment Agency and the Sussex Wildlife Trust.	

DM22 WATER RESOURCES AND WATER QUALITY	
Object to policy approach	
Number of respondents	1
Summary of comments received Ringmer Parish Council objects to this policy on the grounds that river water quality in the District, especially in Glynde Reach, is very poor. The policy should therefore include a commitment by the Council, working together with the relevant other authorities, to implement an improvement plan.	
How these comments have influenced the Pre- Submission Document Development management policies are intended to provide a clear framework for the consideration of planning applications for development. The suggested amendment to Policy DM22 fails to have regard to the NPPF, which states that policies should be written so it is evident how a decision maker should react to development proposals. Accordingly, no amendment is proposed to Draft Policy DM22 in this respect.	

DM22 WATER RESOURCES AND WATER QUALITY	
Other comments received	
Number of respondents	2
Summary of comments received One respondent seeks a provision to ensure that water use in new housing developments does not exceed 110 litres of water per person per day, regardless of technical feasibility or financial viability. The Council's Specialist Advisor (Coastal Engineering) states that there are also private water supplies that could be flagged to make developers aware of them.	
How these comments have influenced the Pre-Submission Document The Local Plan Part 2 policies must accord with the strategic policies of the adopted Local Plan Part 1. Any amendment to Core Policy 4, which requires all new dwellings to achieve water consumption of more than 110 litres per day unless it would not be technically feasible or financially viable, would be considered through a future review of the Local Plan . No amendment is therefore proposed to Draft Policy DM22 in this respect.	

DM23 NOISE	
Other comments received	
Number of respondents	1
Summary of comments received The Council's Specialist Advisor (Coastal Engineering) stresses that noise is also important for general wellbeing, and merely treating noise only as a nuisance understates the matter.	
How these comments have influenced the Pre-Submission Document The quality of life or 'wellbeing' is encompassed by the term 'amenity' in planning policies. It is considered that paragraph 2 of the policy adequately addresses the need to protect the amenity of the existing and future users in terms of noise levels. No amendment is therefore proposed to Draft Policy 23 in this respect.	

DM24 PROTECTION OF BIODIVERSITY AND GEODIVERSITY

Support policy approach	
Number of respondents	3

Summary of comments received

The Environment Agency, East Sussex County Council and the Lewes branch of CPRE support the policy. The CPRE suggests that the policy includes the protection of ancient woodland, long-established hedgerows, ponds and ditches.

How these comments have influenced the Pre-Submission Document

Support noted. Draft Policy DM24 has been amended to include the protection of irreplaceable habitats such as ancient woodland.

DM24 PROTECTION OF BIODIVERISTY AND GEODIVERISTY

Object to policy approach	
Number of respondents	3

Summary of comments received

Natural England and the Sussex Wildlife Trust comment that the policy should be aiming to minimise impacts on all biodiversity, not just designated sites or priority habitats. In addition, the following amendments are suggested :

- Policy DM24 should include networks of natural habitats, biodiversity on a landscape-scale, including opportunities to enhance the Biosphere, Ecosystems Services, Natural capital and brownfield land
- Amend the first paragraph of Policy DM24 to include the words 'and suitable compensation is provided', and to make reference to the potential need for a Habitats Regulations Assessment
- Amend the third paragraph of Policy DM24 to include the words 'at this site', which is a key test in the NPPF, and 'Marine Conservation Zones'
- Amend the fourth paragraph of Policy DM24 to encompass irreplaceable habitats and species of principle importance for biodiversity
- Amend the fifth paragraph of Policy DM24 by the inclusion of the words "All development proposals must provide adequate up-to-date information about the biodiversity which may be affected and any avoidance, mitigation and compensation measures required to ensure no net loss to biodiversity and net gains where possible."
- Amend Para. 3.70 of the supporting text to make it clear that any development that may have an impact on a European Site will be required to undertake a Habitats Regulations Assessment and that if this assessment concludes a likely significant effect then an Appropriate Assessment will be required
- Amend Para. 3.76 of the supporting text to reference the requirement to promote the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species populations, linked to national and local targets.
- Amend Para. 3.81 of the supporting text which does not comply with the provisions of the NPPF to adopt a mitigation hierarchy to avoid and reduce impacts, with compensation only in exceptional circumstances.

Ringmer Parish Council seeks the protection of ancient woodland and important hedgerows.

How these comments have influenced the Pre-Submission Document

The first paragraph of Draft Policy DM24 has been amended to include the words 'and

suitable compensation is provided' and the third and fourth paragraphs of the policy have also been amended in the light of these comments.

In terms of the need to minimise the adverse impact on all biodiversity resources, this requirement is set out in Core Policy 10 (*Natural Environment & Landscape Character*) of the adopted Local Plan Part 1. Core Policy 10 also requires that development maintains and improves wildlife corridors and ecological corridors, avoids habitat fragmentation in both rural and urban areas, and commits the Council to work with neighbouring local authorities to contribute to delivering biodiversity improvements within the Brighton & Hove Biosphere. It is not considered necessary to repeat these policy requirements in Draft Policy DM24, particularly in view of Government guidance that local plans should be concise as possible and avoid undue repetition or duplication.

A policy requirement for all development proposals to submit information on biodiversity is considered to be unduly onerous and unlikely to be justified for the majority of planning applications. It would therefore fail to have regard to the NPPF and no amendment is proposed to Draft Policy DM24 in this respect.

The need to undertake a Habitat Regulations Assessment is a statutory requirement, which it is considered neither necessary nor appropriate to repeat within the policy itself. However, the supporting text at Para.3.70 has been amended to more accurately reflect this legislation, as suggested by Natural England. The supporting text has also been amended to reflect the comments received in relation to Para.3.76.

It is not considered that Para.3.81 of the supporting text, which needs to be read in the context of the preceding Paras.3.77 - 3.80, fails to comply with the NPPF. The NPPF is clear that significant harm to biodiversity arising from development may, as a last resort, be compensated for. The supporting text seeks to provide clarity to applicants about the Council's requirements with regard to implementing this national policy. Accordingly, no amendment is proposed to the supporting text in this respect.

DM25 DESIGN

Support policy approach	
Number of respondents	2
Summary of comments received Historic England and another respondent support the policy.	
How these comments have influenced the Pre-Submission Document Support noted.	

DM25 DESIGN	
Object to policy approach	
Number of respondents	3
Summary of comments received Natural England recommends the inclusion of Green Infrastructure and Sustainable Drainage Systems (SuDS). The Sussex Wildlife Trust suggests including the concept of connectivity and green and blue infrastructure. Sport England suggests that the policy would be strengthened by including the design principles to encourage healthy and active lifestyles set out in 'Active Design' (Sport England & Public Health England).	

How these comments have influenced the Pre-Submission Document
It is acknowledged that all the above considerations can be important in determining planning applications for development. However, the Council has followed Government guidance that local plans should be as focussed and concise as possible, avoiding undue repetition or duplication by the use of generic policies to set out principles that may be common to different types of development.

The provision of green infrastructure is addressed by Core Policy 8 (*Green Infrastructure*) of the adopted Local Plan Part 1, Draft Policy DM14 (*Multi-functional Green Infrastructure*) and Draft Policy DM27 (*Landscape Design*), whilst the provision of SuDS is addressed by Core Policy 12 (*Flood Risk, Coastal Erosion, Sustainable Drainage, and Slope Stability*).

The need for connectivity for people and wildlife is addressed by Core Policy 8 (*Green Infrastructure*), Core Policy 10 ((*Natural Environment & Landscape Character*), Core Policy 11 (*Built & Historic Environment and High Quality Design*) and Draft Policy 27 (*Landscape Design*), whilst the design principles set out in 'Active Design' are addressed across a range of policies in both the Local Plan Part 1 and the draft Local Plan Part 2.

It is not considered necessary or appropriate to repeat the requirements of these policies in Draft Policy DM25. Accordingly, no amendments are proposed in this respect.

DM25 DESIGN	
Other comments received	
Number of respondents	1
Summary of comments received The Council's Specialist Advisor (Coastal Engineering) recommends the policy should ensure the delivery of buildings that are adaptable to changing power generation and energy storage technology.	
How these comments have influenced the Pre-Submission Document Core Policies 11 (*Built & Historic Environment and High Quality Design*) and 14 (*Renewable and Low Carbon Energy and Sustainable Use of Resources*) of the adopted Local Plan Part 1 both seek to promote and encourage low carbon energy technology in new development. It is not considered necessary or appropriate to repeat the requirements of these strategic policies in draft Policy DM25. Accordingly, no amendments are proposed in this respect.	

DM26 REFUSE AND RECYCLING	
Support policy approach	
Number of respondents	2
Summary of comments received East Sussex County Council and Peacehaven Town Council support the policy.	
How these comments have influenced the Pre-Submission Document Support noted.	

DM27 LANDSCAPE DESIGN	
Support policy approach	
Number of respondents	2
Summary of comments received East Sussex County Council and the Lewes branch CPRE Sussex support the policy.	
How these comments have influenced the Pre-Submission Document Support noted.	

DM27 LANDSCAPE DESIGN	
Object to policy approach	
Number of respondents	1
Summary of comments received The Sussex Wildlife Trust seeks amendments to require that landscape schemes are an integral part of a development's design process and the provision of permeable boundaries to both private and public space.	
How these comments have influenced the Pre-Submission Document The supporting text to Policy DM27 sets out the Council's expectation that landscape schemes should be an integral part of the design process. It is not considered appropriate or necessary to repeat this expectation as a policy requirement. A policy requirement for development to provide permeable boundaries to both private and public space is considered overly prescriptive and as such fails to have regard to the NPPF. Accordingly, no amendments are proposed to Draft Policy DM27 in the light of these comments.	

DM30 BACKLAND DEVELOPMENT	
Support policy approach	
Number of respondents	4
Summary of comments received The Sussex Wildlife Trust, Newick Village Society and two other respondents support the policy.	
How these comments have influenced the Pre-Submission Document Support noted.	

DM30 BACKLAND DEVELOPMENT	
Object to policy approach	
Number of respondents	1
Summary of comments received Applications for additional homes in back gardens in Newick continue to be approved, despite Policy HO1.6, which will lead to an increase above 100 new dwellings over the plan period.	
How these comments have influenced the Pre-Submission Document Spatial Policy 2 of the adopted Local Plan Part 1 clearly states that the planned housing growth at Newick is for a *minimum* of 100 net additional dwellings. No amendment is proposed to Draft Policy DM30 in this respect.	

DM30 BACKLAND DEVELOPMENT	
Other comments received	
Number of respondents	2

Summary of comments received

The Newick Parish Council suggests that the wording of the policy is strengthened to make the building of new homes in back gardens less acceptable in rural areas. The Council's Specialist Advisor (Coastal Engineering) recommends that applicants are required to carry out a flood risk assessment to ensure that backland development does not increase the risk of surface water flooding elsewhere.

How these comments have influenced the Pre-Submission Document

In response to Newick Parish Council's suggested amendment, it is considered that the planning issues that need to be addressed in respect of backland development are the same, irrespective of whether such sites are located within a town or a village. In terms of flood risk, Core Policy 12 (*Flood Risk, Coastal Erosion, Sustainable Drainage and Slope Stability*) of the adopted Local Plan Part 1 addresses the need to ensure that new development does not increase the risk of flooding elsewhere. No amendments are proposed to Draft Policy DM30 in the light of these comments.

DM31 ADVERTISEMENTS

Object to policy approach	
Number of respondents	2

Summary of comments received

Ringmer Parish Council and the Lewes branch of CPRE argue that there should be a more restrictive policy to prevent illuminated advertisements in rural areas.

How these comments have influenced the Pre-Submission Document

Draft Policy DM31 clearly states that the impact of illumination on the location will be one of the factors to be taken into account in the determination of applications for advertisements. The suggested amendment is considered overly prescriptive and therefore fails to accord with the NPPF. No amendment is proposed to Draft Policy DM33 in this respect.

DM33 HERITAGE ASSETS

Support policy approach	
Number of respondents	2

Summary of comments received

Two respondents support the policy. However, concern is expressed that the non-designated heritage assets listed in Appendices 4 and 5 are out of date and not clearly identified. One respondent suggests that Conservation Areas should be specifically included in the policy.

How these comments have influenced the Pre-Submission Document

Support noted. It is acknowledged that the lists of non-designated heritage assets were compiled by the Council many years ago and are not clearly identified geographically.

Appendices 4 (Buildings of Local, Visual or Historic Interest) and 5 (Parks and Gardens of Local Historic Interest) have therefore been deleted.

Conservation Areas fall within the definition of 'heritage assets' in the Glossary at Appendix 1 of the document and are also identified as such in the supporting text to Draft Policy DM33. No amendment is proposed to the policy in this respect.

DM33 HERITAGE ASSETS	
Object to policy approach	
Number of respondents	3

Summary of comments received

Ringmer Parish Council objects on the grounds that the non-designated heritage assets listed in Appendices 4 and 5 are out of date and not clearly identified, and that Conservation Areas should be specifically included in the policy. One respondent objects on the grounds that the policy is inadequate to meet the aims of Core Policy 11 of the Local plan Part 1 and should designate extensions to the Church Road and The Green Conservation Areas in Newick. Another respondent suggests that the policy should refer specifically to Paras. 133, 134 and 135 of the NPPF.

How these comments have influenced the Pre-Submission Document

It is acknowledged that the lists of non-designated heritage assets were compiled by the Council many years ago and are not clearly identified geographically. Appendices 4 (Buildings of Local, Visual or Historic Interest) and 5 (Parks and Gardens of Local Historic Interest) have therefore been deleted.

Conservation Areas fall within the definition of 'heritage assets' in the Glossary at Appendix 1 of the document and are also identified as such in the supporting text to Draft Policy DM33. The Council's powers to designate Conservation Areas are provided by the Planning (Listed Buildings and Conservation Areas) Act 1990; it is not the role of a local plan to designate Conservation Areas.

In response to the suggestion that the policy should reference Paras. 133, 134 and 135 of the NPPF, the Government is clear that local plans should be focussed and concise and that there should be no need to reiterate policies that are already set out in the NPPF.

Accordingly, no amendments are proposed to Draft Policy DM33 in the light of these comments.

DM34 AREAS OF ESTABLISHED CHARACTER	
Object to policy approach	
Number of respondents	1

Summary of comments received

The respondent asks how this policy can be justified in view of recent development that has been permitted within Newick village.

How these comments have influenced the Pre-Submission Document

The Council is confident that Draft Policy DM34 is justified and sound. It carries forward 'saved' Policy H12 of the Lewes District Local Plan 2003, which has been supported by Planning Inspectors in previous appeal decisions and has helped to retain the distinctive character of the district.

DM35 FOOTHPATH, CYCLE AND BRIDLEWAY NETWORK

Support policy approach	
Number of respondents	4

Summary of comments received

Natural England, Peacehaven Town Council, Lewes branch of CPRE and another respondent support the policy but make various suggestions for improvement. These include opportunities to link Green Infrastructure networks, extending the footpath, cycle and bridleway network, supporting long distance rights of way, and constructing a new coastal path.

How these comments have influenced the Pre-Submission Document

Support noted. Core Policy 8 (*Green Infrastructure*) of the adopted Local Plan Part 1 requires development to make provision for linkages to existing green infrastructure where appropriate, whilst Core Policy 13 (*Sustainable Transport*) clearly states that the Council will support the development of a network of high quality walking and cycling routes throughout the district. In view of Government guidance that local plans should be concise and avoid undue repetition or duplication, it is not considered necessary or appropriate to reiterate these strategic policy requirements within Policy DM35. However, an amendment to the supporting text is proposed to highlight the importance of long-distance rights of way within the district.

DM35 FOOTHPATH, CYCLE AND BRIDLEWAY NETWORK

Object to policy approach	
Number of respondents	1

Summary of comments received

Ringmer Parish Council objects to the policy on the grounds that 'twittens' should be included.

How these comments have influenced the Pre-Submission Document

Twittens comprise part of the footpath network and are therefore protected by Draft Policy DM35. No amendment to the policy is therefore proposed in this respect.

DM36 STATION PARKING

Object to policy approach	
Number of respondents	1

Summary of comments received

Ringmer Parish Council objects on the grounds that the word "adjacent" is inappropriate because not all car parks used by rail passengers are adjacent to a station.

How these comments have influenced the Pre-Submission Document

'Adjacent' is a clearly defined term that is considered entirely appropriate in the context of Draft Policy DM36. A policy seeking to retain every public car parking space with the potential to be used by a rail passenger would be neither justified nor deliverable. No amendment to the policy is proposed in this respect.

DM36 STATION PARKING	
Other comments received	
Number of respondents	1
Summary of comments received One respondent states that the plan should include the importance of bus/rail interchange at railway stations.	
How these comments have influenced the Pre-Submission Document Core Policy 13 (*Sustainable Transport*) of the adopted Local Plan Part 1 clearly states that the Council will encourage new or enhanced interchanges between bus and rail services across the district. In view of Government guidance that local plans should be concise and avoid undue repetition or duplication, no amendment is proposed to Draft Policy 36 in this respect.	

POLICIES MAP

POLICIES MAP AND INSET MAPS

Support policy approach	
Number of respondents	1

Summary of comments received

Inset Map 14 Sheffield Park

The Mid Sussex Area Bridleways Group supports Policy DM17 but notes that the protected route of the former Lewes/Sheffield park railway line is bisected by the planning boundary defined on Inset Map 14. The group would like the opportunity to review any alternative routes if new development is proposed in this location.

How these comments have influenced the Proposed Submission Document

Support noted. It is proposed to delete the development boundary in this location due the presence of ancient woodland. However, the Mid Sussex Area Bridleways Group's request has been recorded in the event that future development in this location is required to make provision for an alternative route in accordance with Draft Policy DM17.

POLICIES MAP AND INSET MAPS	
Object to policy approach	
Number of respondents	3

Summary of comments received

Inset Map 14 Sheffield Park

Newick Parish Council and two other respondents express concern about the loss of 'saved' Policy NW2 of the Lewes District Local Plan 2003 and its replacement with the planning boundary defined on Inset Map 14. The requirement for a woodland landscape and wildlife management plan appears to have been deleted from Inset Map 14, which may put at risk the ancient woodland adjacent to the Sheffield Park Business Estate.

How these comments have influenced the Proposed Submission Document

The concerns expressed are acknowledged. The site allocated for employment development in 'saved' Policy NW2 of the Lewes District Local Plan 2003 was intended to enable the expansion of Woodgate Dairies, which was at the time a thriving local business providing employment opportunities in the rural area. This policy has not been carried forward into the Local Plan Part 2 because the allocated land has since been designated as ancient woodland, the loss or deterioration of which would fail to accord with Para.175 of the NPPF.

As such, the planning boundary defined on the Policies Map around the allocated NW2 site and the former Woodgate Dairies buildings is no longer considered appropriate. Proposals for the redevelopment or intensification of the existing business and commercial units on the former Woodgate Dairies site (now the Sheffield Park Business Estate) for employment purposes would be acceptable under Draft Policy DM11 (*Existing Employment Sites in the Countryside*), subject to compliance with other local plan polices. It is therefore proposed to amend Inset Map 14 by deleting the planning boundary.

POLICIES MAP AND INSET MAPS	
Other comments received	
Number of respondents	4

Summary of comments received

Inset Map 13, Newick

Newick Parish Council note that the boundary of the SNCI should be updated to remove areas of land which no longer have any ecological interest.

Inset Map 2, Newhaven.

The boundary of the SNCI (identified as a 'Local Wildlife Site' on the Proposals Map) should be updated to remove any areas of land which clearly no longer have any ecological interest, including areas of hard standing within the boundary of Newhaven Port.

How these comments have influenced the Proposed Submission Document

Local Wildlife Sites (formerly known as Sites of Nature Conservation Importance) in East Sussex were originally surveyed and designated in the early 1990s. The suggested amendments have been forwarded to the Technical Panel which has responsibility for the selection, modification or deletion of Local Wildlife Sites. The Local Plan Policies Map will be updated as circumstances change in this respect.

OTHER COMMENTS

Support	
Number of respondents	5

Summary of comments received

The National Grid and Sussex Police support the plan without further comment. Three other representations of support made comments relating to the Habitat Regulations Assessment (HRA):

- Mid Sussex District Council notes that the proposed Development Management policies have been assessed as having no HRA implications. It reasons that the improvement of vehicle emission factors are forecast to more than offset the increase in nitrogen deposition from an increase in the volume of vehicles.
- Natural England is satisfied that the HRA has correctly identified all relevant designated sites for the assessment and agrees with all the conclusions. It concurs that there will be no adverse effect on the integrity of any of the sites assessed. It has one minor recommendation regarding Policy DM12: Caravan and Camping Sites in Table 2, which is that the justification should make clear that any new or extended caravan or camping site within 7km of Ashdown Forest would still need to comply with Core Policy 10(3) of the Local Plan Part 1.
- The South Downs National Park Authority supports the conclusions of the HRA

How these comments have influenced the Proposed Submission Document

Support noted. Both the HRA for LPP2 and the HRA Addendum on Ashdown Forest have been updated for the Pre-Submission Local Plan Part 2 publication. Natural England's recommendation regarding caravan and camping sites is also noted. However, Core Policy 10(3) of the adopted Local Plan Part 1 applies to residential development only, not to proposals for touring caravan or camping sites. The detailed development management policies in the Local Plan Part 2 must be in accordance with the strategic planning policies of the Local Plan Part 1, which have been subject to scrutiny and challenge through the examination in public process. Accordingly, no amendment is proposed in this respect.

Object	
Number of respondents	22

Summary of comments received

Overall development strategy and additional sites

A number of respondents object to the overall development strategy. Most note that it was acknowledged during the examination of the Local Plan Part 1 that the district's objectively assessed housing need could not be met but the plan was found sound and adopted. It is argued that, within this context, it is imperative that the development management policies contain sufficient flexibility to allow sustainable development in the event that the Council is unable to demonstrate a 5 year supply of housing land. Concern is also raised over the risk of relying on Neighbourhood Plans to bring forward sufficient sites for development.

Additional housing site allocations are proposed by a number of different respondents at:

- Hamsey Brickworks
- Barcombe Cross
- Rear of Allington Road, Newick
- Nolands Farm, Plumpton Green
- Land east of Diplocks Industrial Estate, Ringmer
- Lewes Road, Ringmer
- South Chailey

- East of Ditchling Road, Wivelsfield
- South of South Road, Wivelsfield
- Avery Nursery (Uckfield Rd) for mixed residential/employment use

An extension to the employment site allocation at Bridge Farm (Policy EMP23 of the Ringmer Neighbourhood Plan) is also proposed.

Gypsy and Traveller sites
The National Federation of Gypsy Liaison Groups argues the plan cannot be regarded as sound, as it doesn't provide for the needs of Gypsies and Travellers.

Newhaven
Newhaven Port & Properties considers that the existing site allocations at Newhaven Port should be updated to reflect the change in circumstances since the Lewes District Local Plan Part 1 was adopted in 2003. It also seeks an additional policy that reflects the Port's status as a key piece of infrastructure and employment area within the district. Another representation considers that the 'Newhaven Workshop Site' should be mixed use, rather than solely for employment.

Peacehaven
Peacehaven Town Council considers that infrastructure is inadequate to accommodate additional development and that coastal erosion issues should be addressed to ensure that the continued existence of the A259.

Wivelsfield
Wivelsfield Parish Council is opposed to the delivery of a minimum of 100 homes on the edge of Burgess Hill (within Wivelsfield Parish) as required by Spatial Policy 2 of the adopted Local Plan Part 1. It argues that the proposed housing site allocations in this location contradict the Neighbourhood Plan by promoting development on greenfield sites.

Habitat Regulation Assessment
Wealden District Council (WDC) objects and suggests there will be significant effects demonstrated when a HRA is carried out. If Part 2 of the Local Plan relies upon the Local Plan Part 1 HRA, then WDC's comments in relation to the South Downs National Park Authority Habitat Regulations Assessment is relevant, i.e. proposed developments in all neighbouring districts have to be taken into account.

How these comments have influenced the Proposed Submission Document
Overall development strategy and additional sites
Draft Local Plan Part 2, together with 'made' and emerging neighbourhood plans, identifies sufficient deliverable sites to meet the requirements of Spatial Policy 2 of the adopted Local Plan Part 1. Additional proposed housing sites have been assessed within the Strategic Housing and Economic Land Availability Assessment. A future review of the Local Plan will consider if further housing numbers, and in turn housing allocations, are required.

Bridge Farm. Bridge Farm is allocated for employment purposes in the Ringmer Neighbourhood Plan, approved following examination in 2015. The Lewes District Employment & Economic Land Assessment, commissioned in 2010 and updated in 2012, concluded that there was no justification for further employment site allocations within the rural areas of the district. Economic growth in the rural areas through the conversion of existing buildings or well-designed new buildings is supported by Core Policy 4 (*Encouraging Economic Development and Regeneration*) of the adopted Local Plan Part 1 and Draft Policies DM9 (*Farm Diversification*), DM10 (*Employment Development in the Countryside*) and DM11 (*Existing Employment Sites in the Countryside*). In the light of this evidence, it is

considered that a further employment allocation at Bridge Farm would be more appropriately considered through a review of the Ringmer Neighbourhood Plan, rather than through the Local Plan Part 2.

Gypsy and Traveller sites
It is acknowledged that Local Plan Part 1 requires the provision of 5 net additional permanent pitches to be identified. Since the 2017 Draft Consultation Plan the Council has worked in with East Sussex County Council to identify a deliverable site for permanent Gypsy and Traveller site. A new proposed site allocation, GT01: Land south of The Plough, for 5 permanent pitches is now included within Local Plan Part 2.

Newhaven
It is acknowledged that the existing employment site allocations at Newhaven Port should be carried forward and updated where appropriate. The Local Plan Part 2 has been amended by the inclusion of a new employment site allocation (Policy E1: Land at East Quay) which carries forward 'saved' Policy NH20 of the Lewes District Local Plan 2003, suitably updated to reflect the change in circumstances since 2003. The proposed allocation excludes the area with planning consent for the refurbishment of the existing multi-purpose berth at East Quay, including the construction of a new berth and slipway and associated space for offices, warehouses, workshops, and welfare facilities for staff and contractors. As part of this consent, a nature reserve will be established on the land defined as Area B in 'saved' Policy NH20.

Within the area covered by 'saved' Policy NH21 (Railway Quay) of the Lewes District Local Plan 2003, the former Marine Workshops have been refurbished to create the Newhaven University Technical College and the river frontage has been developed for public access. The remainder of the site is still in use, principally as operational land and access for the Newhaven-Dieppe ferry service. There is no evidence to demonstrate that this land will become surplus to the operational requirements of the port over the next 12 years and it therefore is considered that 'saved' Policy NH21 is neither justified nor deliverable over the plan period. Consequently it is not proposed to carry forward this policy in the Local Plan Part 2.

'Saved' Policy NH24 (North Quay) of the Lewes District Local Plan 2003 has effectively been superseded by the policy framework set out in the adopted Waste & Minerals Plan and the Waste & Minerals Sites Plan. Policies WMP15 and SP9 safeguard the wharves and rail sidings at North Quay for the landing, processing, handling and associated storage of minerals. Policy SP2 also identifies North Quay as a site where waste management development will be supported, whilst Policy SP10 safeguards the existing facilities for concrete batching, coated materials manufacture and other concrete products.

In 2012 Newhaven Port & Properties published a Port Masterplan which provides a strategic framework for how the port will develop over the next 20-30 years. Lewes District Council, East Sussex County Council and Newhaven Town Council have jointly agreed to work with Newhaven Port & Properties to achieve the implementation of this Masterplan. In the light of this agreement, 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.

It is not clear what purpose would be served by an additional planning policy that reflects the Port's status as a key piece of infrastructure and employment area within the district. The Council must have regard to the NPPF which states local plans should contain policies that are clearly written and unambiguous so that it is evident how a decision maker should react to development proposals. The adopted Local Plan Part 1 sets out the role of the Port

in relation to the district's economy and its potential contribution to the regeneration of Newhaven and the coastal towns. It also contains a clear statement that the District Council supports the Port Authority's plans for the expansion and modernisation of the Port. No amendment is therefore proposed to the Local Plan Part 2 in this respect.

Peacehaven
It is acknowledged that the planned housing growth in Peacehaven needs to be supported by new or improved infrastructure provision. There is no evidence to suggest that the necessary infrastructure cannot be delivered within an appropriate timeframe to enable the delivery of the housing requirements set out in the Local Plan Part 1, as demonstrated by the Infrastructure Delivery Plan.

Wivelsfield
Spatial Policy 2 of the adopted Local Plan Part 1 requires a minimum of 100 net additional dwellings to be delivered at the Edge of Burgess Hill (within Wivelsfield Parish) and minimum 30 net additional dwellings at Wivelsfield Green. The 'made' Wivelsfield Neighbourhood Plan identifies housing allocations only for Wivelsfield Green. The task of identifying the minimum 100 net additional dwellings therefore falls upon Local Plan Part 2. Without doing so, Local Pan Part 2 would fail to comply with the adopted Part 1.

It is acknowledged that where possible it is preferable to utilise previously developed land (brownfield) to deliver new development. However, to meet the minimum housing requirements, it is necessary for some housing allocations, both in Local and neighbourhood plans, to be identified on greenfield land and in areas outside the planning boundary. The Strategic Housing and Economic Land Availability Assessment (SHELAA) is unable to identify sufficient deliverable housing sites on previously developed land and within the planning boundary to meet the housing requirement of Spatial Policy 2.

Habitat Regulation Assessment
The HRA for Local Plan Part 2 and an Addendum HRA 2017 on Ashdown Forest air quality were both available and formed part of the consultation documents. Nonetheless, the HRA Addendum has been updated to address the comments WDC made to the SDNPA (and by extension to LDC) and undertake sensitivity testing against WDC's bespoke approach to ensure the conclusions can be defended. Appendix E of the HRA Addendum 2018 specifically responds point by point to the WDC representation and robustly justifies the scientific approach it has taken, which is not undermined by WDC's recent (August 2018) HRA publication. An update of the LPP2 and Neighbourhood Plan HRA has been undertaken to support the Pre-Submission Local Plan Part 2.

Other comments received	
Number of respondents	38

Summary of comments received
Additional policies
A number of different respondents seek additional policies to address the following issues:

- electric vehicle charging infrastructure
- new cycleways
- trees, hedges, and woodlands
- light pollution
- flood risk
- size of new dwellings
- the coast
- renewable energy
- Protecting the safety and tranquillity of 'special county lanes'
- Locally sourced food

Climate Change
One respondent expresses concern that there is nothing that describes how the Council will adapt to the effects of climate change and question if the plan is "future proof" against the impacts. Another wants the plan strengthening to cover the provision of renewable energy fuel supplies for new planning applications. They conclude that we need to move to zero-carbon and reducing CO2 emissions should be applied across the district.

Employment Land
One respondent highlights that there is no new employment space allocated in the draft plan. Another respondent supports a focus on home, small and micro-businesses that grow out of the local countryside, using resources and skills, noting that large enterprise zones could lead to traffic congestion.

Flooding
East Sussex County Council suggests that the scope for an update to the Strategic Flood Risk Assessment will be agreed between ESCC and LDC.

Habitat Regulation Assessment
Natural England proposes an alternative wording for paragraph 1.17 on the Habitat Regulations Assessment: where "significant effect" is mentioned it should read "likely significant effect."

Infrastructure
One respondent argues that the Council should protect its landscape from large road projects.

Newhaven
East Sussex County Council note that 'saved' Policies NH20, NH21, NH22, NH23 and NH24 of the Lewes District Local Plan 2003 will be superseded on adoption of the Local Plan Part 2. It is recommended that the Port area is defined on the Policies Map and Policy NH20 is replaced with an updated policy (wording supplied) so that the lack of clarity in this area is addressed. The County Council also note that the Local Plan Part 1 predates the designation of the Newhaven Enterprise Zone and asks whether there is evidence to suggest that the demand and need for employment land set out in the Local Plan Part 1 has changed since 2016.

Newick
One respondent states that Newick Common will possibly be designated as a Local Wildlife Site, and hopes that Inset Map 13 will be updated as soon as this has occurred.

Seaford
Seaford Town Council expresses concern about the lack of infrastructure, particularly education, health and transport.

Sites for Gypsies and Travellers
Brighton and Hove City Council note the lack of suitable locations identified for new gypsy and traveller pitch development within Lewes district. The City Council has undertaken a similar site search exercise and has also been unable to identify any suitable sites. The continuing search for sites to incorporate permanent pitches for Gypsy and Traveller use is strongly supported.

Sustainable Development
One respondent states that there is no reference to the principles of sustainability in the

draft, quoting the definition in the NPPF. Guidance should be provided to applicants as to what the meaning of sustainable development is, irrespective of location.

How these comments have influenced the Proposed Submission Document

Additional policies

Electric vehicle charging infrastructure: The new NPPF states that applications for development should be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations. The Council has produced an 'Electrical Vehicle Charging Points Technical Guidance Note' which sets out how it will implement this national planning policy. In view of Government advice that there should be no need to reiterate policies that are already set out in the NPPF, no amendment is proposed to the Local Plan Part 2 in this respect.

New cycleways: The Council's support for the development of a network of high quality cycling routes throughout the district is set out in Core Policy 13 (*Sustainable Transport*) of the adopted Local Plan Part 1. In view of Government advice that in drafting policies local planning authorities should avoid undue repetition or duplication, no amendment is proposed to the Local Plan Part 2 in this respect.

Trees, hedges and woodland: It is considered that the retention and enhancement of trees, hedges and woodland is adequately addressed by Core Policies 10 (*Natural Environment and Landscape Character*) and 11 (*Built and Historic Environment and High Quality Design)* of the adopted Local Plan Part 1 and Draft Policies DM24 (*Protection of Biodiversity and Geodiversity*), DM25 (*Design*) and DM27 (*Landscape Design*). In view of Government advice that in drafting policies local planning authorities should avoid undue repetition or duplication, no amendment is proposed to the Local Plan Part 2 in this respect.

Light pollution: The Government is clear that Local Plans should concentrate on the critical issues facing the area. It is considered that the potential impact of light pollution on local amenity and nature conservation is adequately addressed by Draft Policies DM6 (*Equestrian Development*), DM10 (*Employment Development in the Countryside*), DM24 (*Protection of Biodiversity and* Geodiversity), DM25 (*Design*), DM30 (*Backland Development*) and DM31 (*Advertisements*). There is no evidence to demonstrate that the local plan area contains intrinsically dark landscapes that need to be protected by planning policy. Accordingly, no amendment is proposed to the Local Plan Part 2 in this respect.

Flood risk: It is considered that the issue of flood risk is adequately addressed by Core Policy 12 (*Flood Risk, Coastal Erosion, Sustainable Drainage and Slope Stability*) of the adopted Local Plan Part 1 and, where appropriate, by the draft residential site allocations. In view of Government advice that in drafting policies local planning authorities should avoid undue repetition or duplication, no amendment is proposed to the Local Plan Part 2 in this respect.

Size of new dwellings: It is considered that the types and sizes of dwellings in new housing developments are adequately addressed by Core Policy 2 (*Housing Type, Mix and Density*) of the adopted Local Plan Part 1. The Council has been unable to identify any suitable sites for special needs housing, although such sites may come forward through the Neighbourhood Plans currently being produced within the area covered by Local Plan Part 2. Accordingly, no amendment is proposed to the Local Plan Part 2 in this respect.

The coast: Core Policy 12 (*Flood Risk, Coastal Erosion, Sustainable Drainage and Slope Stability*) of the adopted Local Plan Part 1 states that the local planning authority will work with partners and applicants to implement the current Shoreline Management Plan,

Catchment Flood Management Plan and other relevant flood/coastal protection strategies and plans. The District Council has recently commissioned a Brighton to Newhaven Coastal Management Implementation Plan to provide a detailed understanding of how this stretch of coastline is changing due to the actions of the sea. However, this is at an early stage of consideration by the Council and no decision has been taken about how or if its recommendations should be progressed. It therefore considered more appropriate that the implications of coastal erosion on the district and the measures necessary to tackle them are addressed in the review of the Local Plan, which is programmed to commence in 2020. In the meantime, development proposals on the undeveloped or unstable areas of coastline will be considered against Core Policy 12 of the adopted Local Plan Part 1.

Renewable energy: It is considered that Core Policy 14 (*Renewable and Low Carbon Energy and Sustainable Use of Resources*) provides an appropriate policy framework for making decisions on proposals for low carbon and renewable energy installations. All renewable energy applications would be expected to address the criteria in Core Policy 14, whilst the potential impacts on landscape character, biodiversity, geodiversity, recreation, water quality, air quality, access, recreation and local amenity would be considered against other relevant policies in the Local Plan. The planning considerations that relate to specific types of renewable energy developments, such as solar farms and wind turbines, are also set out in detail in the national Planning Practice Guidance and there is also a considerable body of best practice guidance to assist in the determination of development proposals. No amendment is therefore proposed to the Local Plan Part 2 in this respect.

Special country lanes: The potential impact of new development on the safety and character of rural lanes is recognised. Core Policy 13 (*Sustainable Transport*) of the adopted Local Plan Part 1 requires all new development to mitigate for any transport impacts that may arise from the development and the Council works in partnership with East Sussex County Council, as the local highway authority, to ensure that road safety considerations are fully addressed by all development proposals. Draft Policies DM9 (*Farm Diversification*) and DM10 (*Employment Development in the Countryside*) seek to ensure that development for employment purposes does not harm the landscape or ecological value of rural roads in the district. The Council does not currently have any relevant or up-to-date evidence to justify the definition of some rural roads as 'special country lanes', as suggested by the respondent, although this is an issue which could potentially be pursued through the future review of the Local Plan. No amendment is therefore proposed to the Local Plan Part 2 in this respect.

Locally sourced food: Core Policy 5 (*The Visitor Economy*) sets out the Council's support for local food and produce. In view of Government guidance that local plans should be concise and avoid undue repetition or duplication, no amendment is proposed to the Local Pan Part 2 in this respect.

Climate change

The strategic objectives of the Local Plan include seeking to reduce both the causes of climate change and the district's vulnerability to the impacts of climate change. These objectives will be delivered through both the spatial strategy of the Local Plan and the application of its policies. The Council has applied a sequential, risk-based approach to the location of development growth, taking into account the current and future impacts of climate change, so as to avoid flood risk to people and property. This approach was found to be sound during the public examination of the Local Plan Part 1. The need to mitigate and adapt to climate change is also embedded in many of the Local Plan policies, particularly those which address issues of flood risk, coastal change, water supply, sustainable drainage, sustainable travel, renewable and low carbon energy, green infrastructure and biodiversity. No amendment is therefore proposed to the Local Plan Part 2 in this respect.

Employment Land
The Local Plan Part 2 has been amended by the inclusion of Section 3: Employment Site Allocations.

Habitat Regulations Assessment
It is acknowledged that the term 'significant adverse effect' should be replaced with 'likely significant effect' in accordance with Natural England's recommendation and Para.1.17 has been amended accordingly.

Infrastructure
Core Policy 10 (*Natural Environment and Landscape Character*) of the adopted Local Plan Part 1 seeks to ensure that landscape qualities and characteristics of the district are maintained and, where possible, enhanced. New infrastructure proposals requiring planning permission would be considered against this policy where appropriate. It should be noted that, with the exception of the Newhaven Port Access Road which has already received planning consent, there are no large-scale road projects programmed for delivery in the district over the plan period.

Newhaven
It is acknowledged that the existing employment site allocations at Newhaven Port should be carried forward and updated where appropriate. The Local Plan Part 2 has been amended by the inclusion of a new employment site allocation (Draft Policy E1: Land at East Quay) which carries forward 'saved' Policy NH20 of the Lewes District Local Plan 2003, suitably updated to reflect the change in circumstances since 2003. The allocated site now excludes the area where Newhaven Port & Properties (NPP) has received planning consent for the refurbishment of the existing multi-purpose berth at East Quay, including the construction of a new berth and slipway and associated space for offices, warehouses, workshops, and welfare facilities for staff and contractors. As part of the consent, a nature reserve will be established on the land defined as Area B in 'saved' Policy NH20.

At Railway Quay ('saved' Policy NH21 of the Lewes District Local Plan 2003), the former Marine Workshops have been refurbished to create the Newhaven University Technical College and the river frontage has been developed for public access. The remainder of the site is still in use, principally as operational land and buildings for the Newhaven-Dieppe ferry service and berth. There is no evidence to demonstrate that this land will become surplus to the operational requirements of the port over the next 12 years and consequently it is considered that 'saved' Policy NH21 is neither justified nor deliverable over the plan period. It is therefore not proposed to carry forward the policy in the Local Plan Part 2.

'Saved' Policy NH24 (North Quay) of the Lewes District Local Plan 2003 has effectively been superseded by the policy framework set out in the adopted Waste & Minerals Plan and the Waste & Minerals Sites Plan. Policies WMP15 and SP9 safeguard the wharves and rail sidings at North Quay for the landing, processing, handling and associated storage of minerals. Policy SP2 identifies North Quay as a site where waste management development will also be supported, whilst Policy SP10 safeguards the existing facilities in this location for concrete batching, coated materials manufacture and other concrete products.

In 2012 Newhaven Port & Properties published a Port Masterplan which provides a strategic framework for how the port will develop over the next 20-30 years. Lewes District Council, East Sussex County Council and Newhaven Town Council have jointly agreed to work with Newhaven Port & Properties to achieve the implementation of this Masterplan. In the light of this agreement, 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).

Newick
The citation and boundary of the Newick Common Local Wildlife Site are currently being prepared and the site will be shown on the Policies Map once it has been formally designated.

Seaford
It is acknowledged that the planned housing growth in Seaford needs to be supported by new or improved infrastructure provision. There is no evidence to suggest that the necessary infrastructure cannot be delivered within an appropriate timeframe to enable the delivery of the housing requirements set out in the Local Plan Part 1, as demonstrated by the Infrastructure Delivery Plan.

Sites for Gypsies and Travellers
Support noted. The Local Plan Part 2 now proposes a draft Gypsy and Traveller site (GT01: Land south of The Plough, Plumpton Green) for 5 net additional permanent pitches.

Sustainable Development
The definition of sustainable development is set out in both the NPPF and the Local Plan Sustainability Appraisal. In view of Government advice that local plans should be as concise as possible and not reiterate national policies in the NPPF, it is not considered necessary or appropriate to duplicate this definition in the Local Plan Part 2. However, the Council is currently preparing a corporate sustainability checklist to set out its expectations in respect of how new development should meet its sustainability vision for the district. No amendment is therefore proposed to the Local Plan Part 2 in this respect.

SUSTAINABILITY APPRAISAL

Number of respondents	12

Summary of the comments received

Introduction

The Sustainability Appraisal seeks to split Wivelsfield Parish into two although the Wivelsfield Neighbourhood Plan met the housing requirement for the neighbourhood area.

Appraising the policy options

Barcombe Cross

The Sustainability Appraisal fails to consider reasonable alternative by not assessing the larger site at Hillside Nurseries

North Chailey

The Kings Head development should be considered as a windfall development and additional sites such as the Buckles Wood Field should be considered to meet the number at North Chailey.

North Chailey and Newick benefiting from the same bus service, it is considered that the assessments of the transport provision for the site options at North Chailey are inconsistent with recent decisions.

Table 39: the loss of the green gap as Oxbottom Lane should be expressed as a concern within the Local Plan rather than just having a negative impact on the community objective.

Edge of Burgess Hill

Table 46: inaccurate assessment of the land at Oakfields (Edge of Burgess Hill)

It is unclear how the scoring was arrived at and additional explanations would be welcomed. Respondents provided a re-appraisal of the option.

Ringmer

The report fails to justify why the minimum housing requirement is not met for Ringmer, to appraise additional options to fulfil the requirement and therefore consider all reasonable alternatives.

General comments

The Sustainability Appraisal fails to appropriately identify the positive sustainability benefits of new development.

Other

Renewable energy and low carbon energy and the sustainable use of resources are not adequately addressed in the Local Plan Part 2 and related documents.

The consultation documents did not reach the relevant team at the Environment Agency in time to allow a review of the sustainability appraisal.

Sussex Wildlife Trust advised that the effect of the draft plan on habitats of principle importance needed to be included within the baseline data and the sustainability framework should reflect this through additional questions to consider. Further explanations on the scoring could be added to clarify the outcome of the assessments.

How these comments have influences the Proposed Submission Sustainability Appraisal and further information relating to the Sustainability Appraisal

The Sustainability Appraisal has taken into account the comments on the assessment of the options and has been updated to reflect up-to-date information. Further work was carried on the appraisal of each option to ensure that all reasonable alternatives were appraised consistently against the sustainability framework considering objective criteria.

A section was added to clarify the options considered and the preferred approach taken in relation to the overall housing number.

It was not felt that the sustainability framework should be modified at this stage of the preparation of the Sustainability Appraisal. However, it should be noted that the 'questions to consider' are purely indicative and does not restrict as such the assessment of the options but provide general guidance of the criteria considered. Further investigation was carried to include additional information on a site-by-site basis for habitats of principle importance.