



Lewes District Council

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

**Summary of Consultation on the Issues
and Options Topic Papers**

November 2017

Introduction

Background

Lewes District Council is currently preparing the Lewes District Local Plan Part 2: Site Allocations and Development Management Policies. This document 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.

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

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

Summary of Consultation – Issues and Options Topic Papers

At each consultation stage, the Council will prepare a summary of the representations received. This report relates to the first public consultation that took place between 22nd November 2013 to 17th January 2014 on the Issues and Options Topic Papers.

Call for Sites

The Council initially undertook a ‘Call for Sites’ exercise in 2013. This provided an opportunity for people and organisations to submit sites that they would like to be considered for development for different uses.

Meetings/workshops

All of the Town and Parish Councils within the plan area were invited to a workshop to discuss the emerging work on Local Plan Part 2. This was also an opportunity for them to advise the District Council of any identified community needs which could be addressed in any emerging policy. The workshop took place at the Council Offices on 22nd April 2013 and was attended by Newhaven and Seaford Town Councils and Barcombe, Plumpton, and South Heighton Parish Councils.

Following this workshop, all District Councillors were invited to a briefing to update them on the emerging evidence base for the Local Plan Part 2, and to provide a forum for questions on the process and emerging content of the consultation material. This briefing was held on 16th September 2013.

The Topic Papers

On 22nd November 2013, the Council published five Topic Papers covering a number of themes, as follows:

Topic Paper 1: Introduction

Topic Paper 2: Housing

Topic Paper 3: Employment

Topic Paper 4: Infrastructure

Topic Paper 5: Development Management Policies

These papers identified policy options for delivering the vision, objectives and spatial strategy of the Local Plan Part 1: Joint Core Strategy. No opinion was given in the Topic Papers as to whether any of the options were more preferable than others. Instead, one of the main purposes of the papers was to identify as many options as possible and invite views on them.

The Topic Papers were published on the Council's website. Hard copies were also available to view at the Council Offices in Lewes and at public libraries in Burgess Hill, Haywards Heath, Lewes, Newhaven, Peacehaven, Ringmer, Saltdean, Seaford, and Uckfield. Each Topic Paper explained that responses could be sent to the Council's Planning Policy Team by email, post or fax.

Letters and emails relating to the Topic Papers consultation were sent to the required statutory consultees, together with individuals and organisations who had either asked to be kept informed about the progress of the Local Plan or had previously made representations on the Local Plan Part 1.

A press release was also issued, with the Sussex Express printing a front page article about the consultation on 20 December 2013.

A summary of the comments received on the Topic Papers can be found in the next section. This breaks down the comments into the sub-categories that cover different aspects of the Topic Papers and identifies the number of respondents to each aspect.

Summary of Representations on the Local Plan Part 2: Issues and Options Topic Papers

The tables below summarise the representations made on particular sections of the Issue and Options Topic Papers, and indicate how the comments received have influenced the Draft Local Plan Part 2.

Comments on Topic Paper 2: Housing

Infrastructure Capacity

Number of respondents	7
Summary of the comments received	
<p>Southern Water commented that new housing allocations should connect to sewerage system at nearest point of capacity.</p> <p>Ringmer Parish Council commented that infrastructure requirements resulting from housing development should be viewed cumulatively rather than on an individual site basis. Additionally, one respondent stated that before any new development occurred in Ringmer, the existing infrastructure needs to be upgraded. Telscombe Town Council stated that they support the need for a clear CIL/S106 Policy. One respondent commented that developments in Newhaven should contribute to the recreation ground.</p> <p>A number of respondents from across this district commented on how new developments could negatively impact the district's road network. The Peacehaven & District Residents' Association raised their concern about the pressure new development in Peacehaven will have on the A259; they state the road is already threatened with subsidence.</p> <p>One respondent commented that the A272 is already too congested to support new housing in Newick. Additionally, the Newick Village Society stated that congestion and traffic management should be analysed for any new developments.</p>	
How these comments have influenced the Draft Document and further information relating to this section of the Local Plan Part 2.	
<p>Southern Water's comments have been reflected in each of the site allocations within Local Plan Part 2.</p> <p>Issues around the capacity of existing infrastructure, including road networks, to accommodate new development were considered as part of the preparation of Local Plan Part 1. Whilst the accompanying Infrastructure Delivery Plan does not identify any fundamental infrastructure deficits improvements and new infrastructure provision will be needed to support development in the district. Core Policy 7 (Infrastructure) of the Local Plan Part 1 and its supporting text sets out how this will be achieved, including the implications of the Community Infrastructure Levy. No fundamental concerns were raised to the proposed housing site allocations and any potential impacts on local infrastructure from individual developments will be considered at the planning application stage.</p>	

Housing allocation (number)

Number of respondents	33
Summary of the comments received	
<p>Two consultees commented that the housing target for Lewes District is too high. However, in contrast to this a number of respondents, including home developers commented that the overall housing targets too low and will be increased at examination, and for this reason more sites should be considered.</p> <p>One respondent commented that housing targets being set to settlements are misleading as the amount of houses set has not yet been agreed/found sound at examination, also suggests that LDC does have a preconceived view. In addition they state that it should be specifically stated that the targets set are a minimum.</p> <p>One respondent stated that some towns within the district could and should have larger housing targets. This view is supported by another consultee who commented that allocations in the coastal strip in particular should be higher. Additionally one respondent stated that Wivelsfield Green can make a much larger contribution to the housing supply than has been identified; it should not be limited to 30 units.</p> <p>Ringmer Parish Council comments that a minimum level of 6 units for site allocations should not be imposed. They also note that there is reference made to 220 additional units for Ringmer and Broyleside in the appendix, this should be 100 as stated in topic paper 2 and the Core Strategy.</p> <p>Chailey Parish Council commented that Chailey should be considered as one dispersed settlement rather than 2 separate settlements. In light of this, one target of 40 units should be designated for the whole area as opposed to one for 30 and one for 10. Another respondent raised concerns that the table listing sites is misleading (CH/A07 is sites A04 and A06 combined) and this may cause the site to be double counted.</p> <p>A number of respondents commented that allocations seem unfair; in particular allocations for Newhaven, Plumpton and Newick seem too high, another consultee commented that Newick is undesirable for further development. In contrast to this a number of consultees stated that areas within the district had greater capacity than had been allocated. One respondent commented that Cooksbridge should have a higher housing allocation which should be delivered to the north of the settlement where the services are located. Another respondent felt that the housing figure allocated to Seaford could be exceeded. Additionally, a respondent commented that the 220 houses allocated for Peacehaven and Telscombe should not be regarded as an upper limit. One respondent also commented that Wivelsfield Green can make a much larger contribution to the housing supply than has been identified; it should not be limited to 30 units. Telscombe Town Council supports the identification of 220 net additional units in the area and would like to see 40% of these affordable homes.</p> <p>Plumpton Parish Council, and a number of respondents, commented that housing allocations should take into account affordable housing units achieved in an area (Plumpton has begun development of 14 affordable units; these should be removed from their target of 50) and considered 50 units to be overdevelopment. Plumpton Parish Council also considered that the current allocations should be a maximum not a minimum.</p>	

However, in contrast to this one consultee commented that the support the allocation of 50 houses for Plumpton Green.

How these comments have influenced the Draft Document and further information relating to this section of the Local Plan Part 2.

Comments on housing numbers and distribution are noted. Strategic issues such as these were discussed at the Joint Core Strategy examination and planned minimum levels of housing growth are now set out within Spatial Policies 1 and 2 of Local Plan Part 1. Local Plan Part 2, where relevant, identifies housing sites allocations to meet these minimum housing requirement figures. Housing numbers for settlements which fall within the South Downs National Park, or designated neighbourhood plan areas intending to allocate housing sites, will be identified through the South Downs National Park Authority's Local Plan or relevant neighbourhood plan.

Site allocations

Number of respondents	9
Summary of the comments received	
<p>A number of respondents raised concerns about new development within the villages, and lesser extent Peacehaven, as residents would be reliant on cars. Two respondents commented that Newick, and other villages, cannot cope with additional housing and new settlements should be considered. However, Wivelsfield Parish Council supported the allocation of 30 units for Wivelsfield Green.</p> <p>One consultee stated that consultation on sites is premature as the housing targets aren't definite yet. One respondent commented that the proposed housing in Ringmer and Broyleside is misleading as it excludes the strategic site on land north of Bishops lane. One respondent commented that new housing developments should be directed nearer to the borders of the Mid-Sussex District.</p> <p>Plumpton Parish Council and another respondent commented that housing allocations should take account of extant planning permissions which should be delivered before new sites are considered. One respondent commented that other SHLAA sites in Barcombe Cross should be considered. Newick Village Society stated that new housing developments should be integrated with employment units.</p>	
How these comments have influenced the Draft Document and further information relating to this section of the Local Plan Part 2.	
<p>With regards to comments made relating to housing numbers and distribution these comments are noted. Strategic issues such as these were discussed at the Joint Core Strategy examination and are now set out within Spatial Policies 1 and 2 of Local Plan Part 1.</p> <p>Since the Issues and Options consultations a number of additional sites have been assessed as part of the Strategic Housing Land Availability Assessment (now also referred to as the Strategic Housing and Economic Land Availability Assessment). Consequently, a number of additional potential housing sites have been considered</p>	

for allocation through the Local Plan Part 2 process.

Affordable housing

Number of respondents	2
Summary of the comments received	
One respondent supported the provision of affordable housing, preferably at 40%, and another commented that housing units built in Plumpton should be affordable for local people.	
How these comments have influenced the Draft Document and further information relating to this section of the Local Plan Part 2.	
Comments are noted. Levels of affordable housing contributions are set out within Core Policy 1 of Local Plan Part 1. This policy should be considered alongside national policy.	

Housing Type, Density and Mix

Number of respondents	6
Summary of the comments received	
Plumpton Parish Council raised their concern that the basis for determining the nature of housing, in the absence of a Neighbourhood Plan, is not defined.	
A number of respondents commented that C2 residential use should be allocated separately to C3 residential use, as developer preference will always be for C3. Telscombe Town Council supports the need to provide a mixture of housing.	
East Sussex County Council commented that developers should be encouraged to create housing for elderly residents, near to local amenities. Additionally, other respondents stated that the main need in Peacehaven is for retirement and nursing homes, these should be prioritised.	
How these comments have influenced the Draft Document and further information relating to this section of the Local Plan Part 2.	
Plumpton Parish Council is preparing a neighbourhood plan which will allocate housing sites. It will be for the neighbourhood plan to identify the location of housing and define any site specific requirements of these housing allocations. In the event that a neighbourhood plan does not make satisfactory progress, against its timetable, or fail at examination or referendum, then the District Council will identify housing allocations for that settlement within a subsequent development plan document.	
Comments relating to C2 development are noted. Whilst Local Plan Part 1 does not identify a level of C2 accommodation to be delivered it is acknowledged that there is an increasing elderly population and consequently, suitable accommodation. The District Council is continuing to work with East Sussex County Council and other East Sussex local authorities to establish the level and location of this type of residential development.	

Site location/ size

Number of respondents	17
Summary of the comments received	
<p>A number of respondents commented that brownfield sites and sites within the planning boundaries should be prioritised. One respondent commented that in Plumpton specifically smaller sites should be prioritised alongside brownfield land.</p> <p>A number of respondents considered that development would integrate better with the surrounding environment if it were on smaller, rather than larger, sites. One respondent commented that development in Ringmer should be of a small enough scale to avoid it expanding into a town and becoming a suburb of Lewes and maintain the village feel.</p>	
How these comments have influenced the Draft Document and further information relating to this section of the Local Plan Part 2.	
<p>Comments noted. Re-using suitable previously developed land is a key strategic objective within the adopted 2016 Joint Core Strategy. Site allocation options were considered through the Local Plan Part 2 evidence base continues to prioritise previously developed land through their assessment.</p> <p>The made Ringmer Neighbourhood Plan contains a policy (Policy 6.3) around new development respecting the village scale. No additional housing allocations are made in Ringmer through Local Plan Part 2, however should allocations be made in future this policy will need to be considered.</p>	

Environmental impact

Number of respondents	6
Summary of the comments received	
<p>East Sussex County Council commented that noise pollution should be a consideration if considering sites along the A259 Newhaven.</p> <p>Sussex Wildlife Trust stated that a phase one biodiversity survey should be undertaken for each site identified and more in depth information should be provided about the biodiversity of each site. East Sussex County Council stated that there is a need to consider rare and protected species across all sites and habitat surveys will be required for most sites and assessments should include the need for a buffer zone between development and ancient woodland.</p> <p>Natural England commented that consideration needs to be given to the potential impacts of sites within, or in the setting of, designations such as the South Downs National Park (SDNP), SSSIs and Sussex Heritage Coast. Friends of Lewes Society stated that the impacts of housing on areas inside the SDNP should be considered.</p>	
How these comments have influenced the Draft Document and further information relating to this section of the Local Plan Part 2.	
<p>It is acknowledged that the district has high quality and diverse landscapes which in</p>	

turn offer suitable habitats to a number of different species of flora and fauna. The South Downs National Park is one of the district's significant landscape designations. As such, potential impacts on the South Downs National Park from potential housing sites forms part of a site's suitability. Relevant supporting evidence base studies, including ESCC Landscape Character Assessment and LDC Landscape Capacity Study, have also informed this process.

In considering potential sites for housing, both through the SHELAA process and Local Plan Part 2, recordings of rare and protected species and potential impacts on designated protected areas have informed the suitability of the site for development. Further detailed surveys/ assessment have been required where these potential constraints have been identified. Such constraints have also been considered through the Sustainability Appraisal process which in turn informed the proposed housing site allocations.

Comments on specific sites within parishes

Barcombe

Number of respondents	2
Summary of the comments received	
BA/A01 - East Sussex County Council supports site. Opposed by a respondent who owns the access to the site.	
How these comments have influenced the Draft Document and further information relating to this section of the Local Plan Part 2.	
Previously it was thought that potential access was in third party ownership, it has since been confirmed that the access is within the same ownership, albeit still requires improvements to accommodate additional housing hence being identified as 'developable' within 2017 Strategic Housing and Economic Land Availability Assessment (SHELAA).	

Chailey

Number of respondents	10
Summary of the comments received	
CH/A01 – Chailey Parish Council agrees with the assessment of the site (note that the library mentioned is a mobile one which only visits once a month).	
CH/A02 – Chailey Parish Council and a number of other respondents oppose site due to: poor public transport access; congestion; access issues and; that development would constitute ribbon development along the A272. Respondents also considered capacity to be too high and that development would erode the character of the village and result in the loss of green gap between Newick and Chailey. East Sussex County Council considered that proposed site could accommodate development without detracting from landscape.	
CH/A03- Chailey Parish Council supported site option on the grounds that it is a	

logical infill at the number of units suggested. Another respondent supported the site but expressed that it should be developed to a higher capacity than 8. A number of issues such as sewage access, contaminated land and ancient woodland need to be considered. The site is within 500m of local services and access is achievable. East Sussex County Council considered that a development in keeping with adjacent character could be accommodated on proposed site.

CH/A04- Chailey Parish Council, and a number of other respondents, opposed site option due to: poor public transport access; congestion; access issues; and that development would constitute ribbon development along the A272. Respondents also considered capacity to be too high and that development would erode the character of the village and result in the loss of green gap between Newick and Chailey. East Sussex County Council considered that proposed site could accommodate development without detracting from landscape.

CH/A05- Chailey Parish Council considered that B1 and B2 or mixed use would be most appropriate use for site.

CH/A06- Chailey Parish Council along with a number of other respondents opposed site option due to: poor public transport access; congestion; access issues; and that development would constitute ribbon development along the A272. Respondents also considered capacity to be too high and that development would erode the character of the village and result in the loss of green gap between Newick and Chailey. One respondent states that development of this site would cause flooding of neighbouring properties. East Sussex County Council considered that proposed site could accommodate development without detracting from landscape.

CH/A07- Chailey Parish Council along with a number of other respondents oppose site option due to: poor public transport access; congestion; access issues; and that development would constitute ribbon development along the A272. Respondents considered capacity to be too high and that development would erode the character of the village and result in the loss of green gap between Newick and Chailey. This would also be a car dependent development. One respondent supports the development on the grounds that it would include affordable housing, has good access, is deliverable, is close to the services located in Newick and is located outside of the 7km Zone of influence around the Ashdown Forest. They additionally comment that there is no flood risk at this site. East Sussex County Council considered that proposed site could accommodate development without detracting from landscape.

CH/A08- Chailey Parish Council along with one other respondent oppose this development on the grounds that it would be unacceptable ribbon development along the A272, furthermore, visibility splays are not easily achievable. East Sussex County Council considers that proposed site could accommodate development without detracting from landscape.

How these comments have influenced the Draft Document and further information relating to this section of the Local Plan Part 2.

Comments are noted and reflected in evidence to Local Plan Part 2 and the preferred site allocation options identified. East Sussex County Council, as the local highway authority, have provided in principle site specific comments through the SHELAA assessment process which have informed the housing site allocations.

The issue of the 'green gap' between Newick and North Chailey being eroded by potential development is a common concern for sites located between Station Road and Lower Station Road. Potential impacts of development on the existing built environment, including local character, are considerations in the assessment of potential housing site allocations.

CH/A05 is no longer considered available as the site is unlikely to be available for alternative uses within the plan period. Relevant evidence base documents (SHELAA) have been amended to reflect this.

Cooksbridge

Number of respondents	3
Summary of the comments received	
<p>CB/A01- South Downs Society opposed to site option as it is adjacent to the SDNP. If taken forward development should be to a high standard of design, reflecting the sites proximity to the SDNP. Another respondent commented that site option could support higher capacity.</p> <p>CB/A02- Another respondent commented that site option could support higher capacity.</p> <p>CB/A03 (within SDNP) - South Downs Society opposed site option as it is adjacent to the SDNP. If taken forward development should be to a high standard of design, reflecting the sites proximity to the SDNP. Another respondent commented that site option could support higher capacity.</p>	
How these comments have influenced the Draft Document and further information relating to this section of the Local Plan Part 2.	
<p>Comments are noted and reflected in evidence to Local Plan Part 2 and the approach taken to meeting settlement's housing requirement. CB/A02 now has planning permission for 27 dwellings: Chatfields Yard. Due to the absence of any other suitable housing sites, outside the SDNP, completions from this site will contribute to Cooksbridge's settlement housing figure.</p> <p><i>CB/A01 (Land off Beechwood Lane now designated as Local Green Space through Hamsey Neighbourhood Plan – site option no longer available for development).</i> <i>CB/A03 (Land north of Beechwood Lane is within SDNP and therefore cannot be allocated through LPP2)</i></p>	

Newhaven

Number of respondents	43
Summary of the comments received	
<p>NH/A02- East Sussex County Council stated that site is not available as identified for the new Lilac Sky academy primary school. One respondent opposed to site option due to unsuitable access to A259 via Fort Road and South Road causing major traffic problems. Congestion, danger to children along Court Farm Road and flooding also</p>	

identified as concerns.

NH/A03- A number of respondents opposed site option due to the area being considered a valuable public open space and identified to accommodate a cycle path to Lewes. Respondents also commented that development would cause a number of issues including flooding, congestion of the C7 road; impacts on local amenities; negative impacts on wildlife; and site would set a precedent for future development of the area. East Sussex County Council commented that there is a legal agreement between LDC and East Sussex County Council to protect the tree planting carried out at this site.

NH/A05- One respondent supported development of this site.

NH/A06- Site option opposed by a number of respondents on the grounds that development would: put excessive strain on local infrastructure; increase traffic congestion; loss of green infrastructure and semi-rural character of area; impacts on views of current residents; and is an archaeologically important site. A number of respondents also commented that the site acts as a buffer to the SDNP and the suggested capacity (8 units) is too high. Site access identified as an issue; un-adopted road and suggested that land not available to be widened to accommodate access to the site.

NH/A07- One respondent opposed site option due to: unsuitable access to A259 via Fort Road and South Road causing major traffic problems; congestion; danger to children along Court Farm Road; and flooding.

NH/A08- One respondent commented that development should avoid the A259 by opening access on the C7.

NH/A09- One respondent supported site option.

NH/A12- One respondent opposed site option due to: loss of open space; isolation of Castle Hill; and unsuitable access to A259 via Fort Road and South Road causing major traffic problems; congestion; danger to children along Court Farm Road; and flooding. East Sussex County Council states that access for this site would be across East Sussex County Council education land; this will not be possible in light of the lilac sky academy. Another respondent commented that access via Upper Valley Road should be considered.

NH/A14- One respondent supported site option.

NH/A15- Respondents oppose site option due to the largest portion of the site being below the level of reservoir and therefore unsuitable to develop. Part of the site fronting Kings Road is acceptable.

NH/A17- One respondent opposed site option on the grounds of loss of Green Infrastructure. If developed then development should avoid the A259 by opening access on the C7.

NH/A19- A number of respondents opposed site option as: it is outside the settlement boundary; acts as an important buffer; and impacts on the semi-rural character of the area. Additionally, the site is located within the SDNP so not in LDC remit to consider.

NH/A20- A number of respondents oppose site option as: it is outside the settlement

boundary; acts as an important buffer; and impacts on the semi-rural character of the area. Additionally, the site is located within the SDNP so not in LDC remit to consider.

How these comments have influenced the Draft Document and further information relating to this section of the Local Plan Part 2.

Comments noted and, where appropriate, reflected in Local Plan Part 2 evidence. Newhaven's emerging Neighbourhood Plan identifies site allocations to meet the settlement's housing requirement. LPP2 therefore does not identify housing site options for Newhaven. In the event that the neighbourhood plan does not make satisfactory progress, against its timetable, or fail at examination or referendum, then the District Council will identify housing allocations for Newhaven within a subsequent development plan document.

NH/A12 (Land at Tideway School, Harbour Heights, Meeching Quarry and West of Meeching Quarry) – site is now allocated as strategic site (SP7: Land at Harbour Heights), incorporating unimplemented 2003 Local Plan allocation (NH8).

Sites NH/A19 (Land south west of 7 Park Drive Close) and NH/A20 (Land east of Hill Road) are within SDNP and therefore cannot be allocated through LPP2.

Newick

Number of respondents	6
Summary of the comments received	
<p>NW/A01- Site option opposed by a number of respondents on the grounds that development would encourage car use and reduce the green gap between Newick and Chailey. One respondent supported site due to good access to local school.</p>	
<p>NW/A03- One respondent opposed site option. A number of respondents support site option due to close proximity to services and no archaeological, flood risk or access constraints and is supported by the Local Plan.</p>	
<p>NW/A04- One respondent opposed site due to: being adjacent to a conservation area and listed buildings; previous unsuccessful planning history; unsuitable access; requires improvements to the footpath network; and loss of Green Infrastructure. One respondent supported site due to its close proximity to the village green.</p>	
<p>NW/A05- One respondent supported site option due to it having good access and being close to vital infrastructure.</p>	
<p>NW/A06- This site option is opposed by two respondents due to loss of the green gap between Chailey and Newick and encouraging car use.</p>	
<p>NW/A07- One respondent opposes site option due to loss of employment land. Another respondent supports site due to its close proximity to the green, which would not encourage car use.</p>	
<p>NW/A08- East Sussex County Council commented that this is a less favourable site as it would extend the building line south and set a precedent for the release of other large gardens to the south of the lane.</p>	

NW/A09- East Sussex County Council commented that this is a less favourable site as it would extend the building line south and set a precedent for the release of other large gardens to the south of the lane.

NW/A10- This site option is opposed by a number of respondents due to loss of green gap between Chailey and Newick.

NW/A11- Respondent opposed to site option due to loss of green gap between Chailey and Newick. Another respondent supported site with a mixed use with residential (Northern part) and leisure uses. There are no ownership, infrastructure or availability issues.

NW/A12- One respondent supported site option due to close proximity to village services. East Sussex County Council opposed site option on landscape grounds.

NW/A13- East Sussex County Council opposed site option grounds.

NW/A14- A number of respondents opposed site option due to the loss of green space between Chailey and Newick.

How these comments have influenced the Draft Document and further information relating to this section of the Local Plan Part 2.

Comments noted. Evidence has been updated, where appropriate, to reflect comments. The Newick Neighbourhood Plan allocates sites to meet Newick's housing requirement figure, therefore Local Plan Part 2 does not identify housing site options for the settlement.

Plumpton Green

Number of respondents	44
Summary of the comments received	
<p>PL/A01- One respondent supported site. A number of other respondents opposed the site option due to the risk of flooding and potential loss of habitat. One respondent suggested lower density housing as large scale development may inhibit drainage and cause flooding. It was also considered that current infrastructure cannot support proposed large scale development.</p> <p>PL/A02- One respondent supported site. Another opposed site option due to the risk of flooding; increased traffic along Station Road; and access issues. Site PL/A03 or 'to the North of the village' were suggested as alternative sites for development.</p> <p>PL/A03- A number of respondents opposed site option due to: potential for increased risk flooding of neighbouring properties; poor access to site; hazardous land; and current infrastructure cannot support such large scale development. The site was refused planning (on two occasions). One respondent suggested a lower density housing development would be more appropriate.</p> <p>PL/A04- One respondent opposed site option due to issues of flooding and congestion along Riddens Lane. East Sussex County Council stated that the</p>	

southern part of the site should be left undeveloped as a GI and wildlife amenity corridor. One respondent supported site option, albeit access issues are being discussed with the highway authority; resolution seems achievable.

PL/A05- 24 respondents opposed site option due to: increased flood risk to neighbouring properties; increased traffic congesting; poor access; loss of habitat; and extant covenant to protect land from development for 80 years. Respondents felt that this site option would set a precedent and other sites, for example PL/A03 or development 'to the North of the village', would be more suitable for development. One respondent supported the site option as it is free from constraints or designations, adjacent to existing development boundary and access can be adequately provided (master plan work provided). Site option would deliver affordable housing needed locally.

How these comments have influenced the Draft Document and further information relating to this section of the Local Plan Part 2.

Comments noted and, where appropriate, reflected in Local Plan Part 2 evidence. Plumpton's emerging Neighbourhood Plan identifies site allocations to meet the settlement's housing requirement. LPP2 therefore does not identify housing site options for Plumpton Green. In the event that the neighbourhood plan does not make satisfactory progress, against its timetable, or fail at examination or referendum, then the District Council will identify housing allocations for Plumpton Green within a subsequent development plan document.

Peacehaven and Telscombe

Number of respondents	20
Summary of the comments received	
<p>PT/A01- One respondent opposed site option as whilst considered surplus to educational requirements East Sussex County Council predict a shortage of primary and secondary school places and so should be saved so the schools can expand.</p> <p>PT/A02- One respondent supported this site option. Another suggested it would be supported if at a lower density/ different use such as hotel/commercial uses.</p> <p>PT/A03- A number of respondents opposed this site option on the grounds that it is a vital car park which helps to aid congestion and promote local businesses. One respondent opposed site option due to coastal erosion. Telscombe Town Council supported site option.</p> <p>PT/A04- Two respondents supported site option, stating that sites should contribute to the allocation for Peacehaven.</p> <p>PT/A05- One respondent opposed site option due to loss of well-used car park and resultant impacts on businesses and shops. Car park currently encourages onward use of public transport. One other respondent opposed but suggested that they would support site option at lower density/ different use such as hotel/commercial uses. Another respondent commented that they support this site option.</p> <p>PT/A06- One response supported site option.</p>	

PT/A07- A number of respondents, including the Meridian Labour Party, opposed site option considering the car park to be vital for businesses and shops along the A259, helps reduce congestion and promotes use of public transport.

PT/A08- A number of respondents, including the Meridian Labour Party oppose this development due to the site being considered a vital car park for businesses and shops along the A259, the car park helps to reduce congestion and promotes use of public transport.

PT/A09- One respondent supported site option; another suggested that they would support site option at a lower density or different use such as hotel or commercial uses.

PT/A10- A number of respondents, including Telscombe Town Council, supported site option on the grounds that the site is: not an illogical incursion into the countryside; is part brownfield land; has existing access; and is supported by majority of land owners. Telscombe Town Council favour development of elderly nursing care; but also supported housing. A number of respondents, including Peacehaven Town Council and the Meridian Labour Party, opposed site option due to the site: being outside the planning boundary; having a fragmented ownership; considered vital for animal grazing; and pressure on local infrastructure from increased traffic. Respondents stated that policies PT19 and PT20 should be saved.

PT/A11- Respondents supporting site option stated that: the site is no longer suitable for farming; achievable in the short term with little need for infrastructure improvements; capacity should be higher; and larger properties/ plots would be encouraged. A number of respondents, including Peacehaven Town Council, supported site option for a retirement village, stating that it would meet a local need; create local employment and is close to shops, transport and the new medical centre. One respondent commented that the site should be considered for mixed use development.

A number of respondents opposed the site option due to: loss of high quality farmland; is an archaeologically significant site; traffic implications; and considered overdevelopment and sets a precedent for future developments.

PT/A12- A number of respondents opposed site option due to: it being outside the planning boundary; pressure on existing infrastructure from increased traffic; and considered a diverse habitat for wildlife. A number of respondents supported site option as it: would not be an illogical incursion into the countryside; the area is derelict and would significantly benefit from development; the site is accessible; and the area has good transport links. East Sussex County Council stated that the site should only be allocated if housing numbers required cannot be found elsewhere.

How these comments have influenced the Proposed Submission Document and further information relating to this section of the Local Plan Part 2.

Comments noted and, where appropriate, reflected in Local Plan Part 2 evidence. Peacehaven and Telscombe's emerging Neighbourhood Plan identifies site allocations to meet the settlement's housing requirement. LPP2 therefore does not identify housing site options for Peacehaven and Telscombe. The Peacehaven and Telscombe neighbourhood plan will need to review retained 'saved' 2003 Local Plan policies such as PT19 and PT20 to establish if they remain appropriate. . In the event that the neighbourhood plan does not make satisfactory progress against its timetable, or fail at examination or referendum, then the District Council

will identify housing allocations for Newhaven within a subsequent development plan document.

Ringmer and Broyleside

Number of respondents	6
Summary of the comments received	
<p><u>General</u> Ringmer Parish Council noted that a number of greenfield sites in Ringmer have not been noted as high agricultural value.</p>	
<p>RG/A01- Ringmer Parish Council opposed site option due to over-estimated capacity and biodiversity and employment issues.</p>	
<p>RG/A02- East Sussex County Council and another respondent opposed site option on the grounds that the site is on the edge of the SDNP and would encroach on the gap between Ringmer and Broyleside.</p>	
<p>RG/A03- Ringmer Parish Council and another respondent opposed site option due to the listed buildings, loss of employment and encroachment on the green space between Ringmer and Broyleside.</p>	
<p>RG/A04- Ringmer Parish Council opposed this site option due to loss of the green gap between Ringmer and Broyleside and part of the site is within an Area of Established Character.</p>	
<p>RG/A06- Ringmer Parish Council commented that part of the site has already been redeveloped, garden of the South Norlington House.</p>	
<p>RG/A10- Ringmer Parish Council opposed site option as 3 public footpaths across site and it has an unreasonable boundary 'running across the middle of a large, open arable field'.</p>	
<p>RG/A11- One respondent commented that site excludes a triangular piece of land to the West which should be part of the site.</p>	
<p>RG/A12- Ringmer Parish Council supported site option owing to the fact there is no flooding history.</p>	
<p>RG/A13- East Sussex County Council, Ringmer Parish Council and another respondent opposed site option due to: loss of the green gap between Ringmer and Broyleside; access and flooding constraints; and inappropriate scale.</p>	
<p>RG/A14- One respondent supported site option and stated: there has been a lot of support from the local community; development would provide developer contributions to the local college; the site is within a sustainable location. A number of respondents, including Ringmer Parish Council, opposed site option on the grounds that the proposed development is too large and is more suited to delivering outdoor recreation space. East Sussex County Council opposed this site due to its location on the edge of the SDNP and encroachment of open gap between Ringmer and Broyleside.</p>	

RG/A15- East Sussex County Council opposed site option due to it encroaching on the rural land between Ringmer and Broyleside. Ringmer Parish Council also opposed site option due to its history of flooding and loss of valuable children's play area.

RG/A16- One respondent supported site option on the grounds that the site has good access, is contained and surrounded by development, is located close to services and is available to be brought forward within the next five years.

RG/A17- Respondent commented that site should be removed as it is not available. Ringmer Parish Council questioned the area of site and suggested it should be 0.14 ha not 1.4. Also suggested availability is known as owned by Lewes DC.

RG/A18- Ringmer Parish Council stated that site option is considered in the Ringmer Neighbourhood Plan as an exception site only

RG/A19 & RG/A21- Ringmer Parish Council stated that these are duplicate entries and disagree that the site is an 'illogical protrusion into the countryside' suggesting instead that it is 'well contained'.

RG/A22- Ringmer Parish Council stated that the units proposed here are all net additional units.

RG/A24- Ringmer Parish Council commented that the site option has: drainage and access issues; landscape impacts; ancient hedgerow; a public footpath and subsoil issues making suggested capacity unlikely. Also part of a strategic site in Core Strategy, it is therefore important not to duplicate the capacities.

RG/A25- One respondent stated that reference is made to 'up to 30 units' this qualification doesn't appear against any other sites and so should be removed.

RG/A08, RG/A11, RG/A24 and RG/A25- One respondent commented that these sites should be considered as one site (all in control of Gleeson developments and form part of the council's strategic housing site).

RG/ A02, A10, A13, A14, A15, A16, A24 and A25- Ringmer Parish Council stated that between 50 – 100 units are proposed and require traffic congestion mitigation at earwig corner. Also should make completion of the upgraded Neaves Lane sewage works a pre-condition to building commencement.

How these comments have influenced the Draft Document and further information relating to this section of the Local Plan Part 2.

Comments noted. Evidence base documents have been updated, where appropriate, to reflect comments received. The made Ringmer Neighbourhood Plan allocates sites to meet Ringmer's housing requirement figure for the plan period. Local Plan Part 2 therefore does not identify housing site options for the Ringmer. Should future allocations need to be made in Ringmer then these will be considered against the Ringmer Neighbourhood Plan policies and other relevant documents, such as the Infrastructure Delivery Plan, at the time.

Seaford

Number of respondents	26
Summary of the comments received	
<p><u>General</u> – Green spaces with town should be retained for their role in flood protection and pollution mitigation; there are alternative sites which would be more appropriate for development.</p>	
<p>SF/A01- This site option received the most comments of all the sites in Seaford (25), all but two were opposing the development of the site. The two respondents who supported development on the sites commented that the location was highly sustainable, there were opportunities for landscape enhancement and the land was purposely left out of the SDNP so is therefore of less natural value than many other sites. East Sussex County Council and a number of other respondents commented that they opposed the development on the grounds that the site is located outside of the planning boundary and is adjacent to the SDNP. Other respondents commented that the site is needed for recreational use, is of archaeological significance and is an unnecessary extension to the town boundary. Additionally, the site is not within close proximity of services and many individuals commented that there are local brownfield sites in the local area which it would be more appropriate to develop.</p>	
<p>SF/A02- Seaford Town Council, as well as a number of other respondents, opposed site option due to the site being a well-used car park that promotes the vitality of the town centre. One respondent stated that they would only support the development if additional/ replacement car parking was provided.</p>	
<p>SF/A03- Seaford Town Council, along with a number of other respondents, opposed site option due to loss of employment use. Additionally the site has extant permission so should not be included in the allocation; rather it should be a windfall site. Two respondents stated their support for development of this site, however no reasons were stated.</p>	
<p>SF/A04- Seaford Town Council, and a number of other respondents, opposed site option on the grounds that the car park is well used and would have to be replaced or relocated. The site also accommodates public toilets and access to the beach. One respondent supported development but only if the tourism strategy does not apply to that area of the beach.</p>	
<p>SF/A05- A number of respondents, including Seaford Town Council, opposed site option on the grounds that the car park is well used and would have to be replaced or relocated. The site also accommodates public toilets and access to the beach. One respondent supported development but only if the tourism strategy does not apply to that area of the beach.</p>	
<p>SF/A06- Seaford Town Council support site option. However, a number of other respondents opposed site option due to it being a greenfield site which should be kept for recreational use. East Sussex County Council opposed site option due to its proximity to the SDNP and role as a buffer to the SDNP countryside.</p>	
<p>SF/A07- Seaford Town Council, along with a number of other respondents, supported site option. However one supporter raised concerns about flooding. One respondent opposed the site due to it already having extant permission and should therefore be a windfall site.</p>	

SF/A08- A number of respondents including Seaford Town Council supported site option. However, one respondent voiced concern about the provision of adequate parking.

SF/A09- Two respondents commented that they support this development. One respondent opposed development of this site on the grounds that availability is unknown and in their view there are other, more appropriate sites available.

SF/A10- Two respondents supported site option. Seaford Town Council opposed site option due to loss of employment use.

SF/A11- Two respondents opposed site option due to it being valuable green space and a successful business. Seaford Town Council supported site option, as did one other respondent, on the grounds that issues identified, such as retention of Florence House, proximity to SDNP and being in an Archaeological Notification Area can be mitigated.

SF/A12- Seaford Town Council supported site option. However, a number of respondents opposed site option on the grounds that it is a greenfield site required for recreational use, flood protection and pollution mitigation; is in a car dependent location; has a number of Tree Protection Orders; and access constraints.

SF/A13- One respondent supported site option. A number of other respondents opposed site option due to it being allocated in the (2003) local plan but still hasn't been developed suggesting that it isn't achievable. Another respondent commented that the site acts as a buffer between countryside and developed areas.

How these comments have influenced the Draft Document and further information relating to this section of the Local Plan Part 2.

Comments noted and, where appropriate, reflected in Local Plan Part 2 evidence. Seaford's emerging Neighbourhood Plan intends to identify site allocations to meet the settlement's housing requirement. LPP2 therefore does not identify housing site options for Seaford. In the event that the neighbourhood plan does not make satisfactory progress against its timetable, or fail at examination or referendum, then the District Council will identify housing allocations for Seaford within a subsequent development plan document.

Wivelsfield Green

Number of respondents	3
Summary of the comments received	
WV/A01- East Sussex County Council stated that this site is not desirable for development.	
WV/A02- One respondent commented that known issues should be updated to reflect recent developments related to the application on this site.	
WV/A03- East Sussex County Council commented that the part of the site located to the south of the school should be retained as GI parkland and public open space.	

WV/A04- East Sussex County Council commented that the proposed 190 houses is too high a capacity given the space and landscape constraints.
<p>How these comments have influenced the Draft Document and further information relating to this section of the Local Plan Part 2.</p> <p>Comments noted. Evidence updated, where appropriate to reflect comments. Wivelsfield Neighbourhood Plan allocates sites to meet Wivelsfield Green’s housing requirement figure, therefore Local Plan Part 2 does not identify housing site options for the settlement. Should future allocations need to be made in Wivelsfield Green then these will be considered against the Wivelsfield Neighbourhood Plan policies and other relevant documents.</p>

Comments on Topic Paper 3: Employment

General Comments

Number of respondents	8
Summary of the comments received	
<p>A number of Town and Parish Councils felt that more employment was needed and hence no existing employment allocations should be de-allocated or developed for alternative uses. Loss of employment sites should only be allowed following a transport impact assessment. Differing views were made regarding whether employment land should, or should not, be clustered with other uses. Some considered it acceptable if done sympathetically, others thought uses should be limited to specific areas.</p> <p>Some Town and Parish Councils wanted support given to small, flexible start-up businesses. East Sussex County Council and other respondents commented that creative industries should be considered in areas with access/ congestion issues as they have less traffic impacts.</p> <p>Natural England and East Sussex County Council advised that more consideration needs to be given to the potential impacts of sites within, or adjacent to, designated site, important habitats such as ancient woodland, and protected species.</p> <p>Peacehaven Town Council stated that they are working with East Sussex County Council to set up an Enterprise Centre in Greenwich House, Peacehaven requiring the support of Lewes District Council.</p>	
How these comments have influenced the Draft Document and further information relating to this section of the Local Plan Part 2.	
<p>The comments received are noted. Spatial Policy 1 of the Local Plan Part 1 identifies a modest quantitative and qualitative employment floorspace need, focussed around Lewes town. However, as this need can be met through commitments and redevelopment of existing employment sites, no new employment allocations have</p>	

been identified in the Draft Local Plan Part 2. Existing unimplemented allocations have been reviewed taking into consideration the above comments, where relevant.

Core Policy 4 (Encouraging Economic Development and Regeneration) of the Local Plan Part 1 identifies the policy approach to safeguarding and resisting the loss of existing employment sites to ensure a balanced local economy is maintained and encouraged across the district. It also seeks to encourage a flexible framework where development is able to respond to local demand.

Core Policy 4 and its supporting text are considered to offer an adequate policy framework for the protection and provision of employment sites and consequently no additional development management policies are proposed in the Draft Local Plan Part 2. However, Policies DM9 -11 of Draft Local Plan Part 2 seek to provide a more detailed framework for the consideration of proposals for the diversification and growth of the rural economy.

Site specific comments

Number of respondents	10
Summary of the comments received	
<p>Site 1: Land north of Keymer Avenue, Peacehaven - East Sussex County Council commented that residential or mixed residential/light industrial use would be more in character with the surroundings; Peacehaven Town Council noted the site now has planning permission for 48 residential units so is no longer available.</p>	
<p>Site 2: Land at Hoyle Road, Peacehaven – East Sussex County Council and Peacehaven Town Council supported retention of the site for employment use.</p>	
<p>Site 3: Cradle Hill Industrial Estate, Seaford – East Sussex County Council supported retention of the site for employment use.</p>	
<p>Site 4: Land at Balcombe Pit, Glynde - East Sussex County Council supported retention of the site for employment use.</p>	
<p>Site 5: Chailey Brickworks, South Chailey – Chailey Parish Council supported retention of the site for business use. East Sussex County Council would object to any proposals which would prejudice the existing and future use of the brickworks and its reserves at Chailey Brickworks, in accordance with Policy WMP14 of the Waste & Minerals Plan. It also commented that business use would be more appropriate than housing due the close proximity of woodland.</p>	
<p>Site 6: Hamsey Brickworks - Chailey Parish Council supported retention of the site for business use. Two respondents commented that the site should be developed for a residential or mixed use scheme. East Sussex County Council would object to any proposals that would prevent or prejudice implementation of the waste permission at this site in accordance with Policy WMP6 of the Waste & Minerals Plan.</p>	
<p>Site 7: Woodgate Dairy, Sheffield Park - Chailey Parish Council and Newick Village Society both supported retention of the site for business use.</p>	

How these comments have influenced the Draft Document and further information relating to this section of the Local Plan Part 2.

The comments on Sites 1, 2, and 3 are noted. As Seaford and Peacehaven have been formally designated as neighbourhood areas for the purpose of preparing a neighbourhood plan, it is anticipated that site allocations in these towns will be developed through the neighbourhood plan process.

Support for the retention of Site 4 for employment use is noted. As the site is currently occupied by business units, it is not considered necessary to allocate it for employment use in the Draft Local Plan Part 2.

The comments on Site 5 are noted. As the site is currently occupied by employment uses, it is not considered necessary to allocate it for employment use in the Draft Local Plan Part 2.

The objections to Site 6 are noted. This site received planning consent for a mixed residential/business development in November 2015 and it is therefore considered inappropriate to allocate it for employment purposes in the Draft Local Plan Part 2.

Support for the retention of Site 7 for employment use is noted. This site is now included on the Ancient Woodland Inventory for Lewes District (November 2010). The loss of this irreplaceable habitat is not considered to be outweighed by the need for, and benefits of, development in this location. Accordingly, it is not considered appropriate to allocate the site for development in the Draft Local Plan Part 2.

Comments on Topic Paper 4: Infrastructure

General

Number of respondents	4
Summary of the comments received	
Several Town and Parish Councils expressed concern about the ability of existing infrastructure to support the levels of housing growth set out in the Local Plan Part 1: Joint Core Strategy. One respondent commented that the implications of CIL and exact requirements of developers should be provided.	
How these comments have influenced the Draft Document and further information relating to this section of the Local Plan Part 2.	
It is acknowledged that some parts of the District currently experience deficiencies in terms of certain facilities and services. However, the Infrastructure Delivery Plan which accompanies the Local Plan demonstrates that there are no fundamental infrastructure deficits or requirements that would prevent delivery of the development proposed in the period to 2030. There will, nevertheless, be a need for investment in infrastructure improvements and new infrastructure provision to support development in the district. Core Policy 7 (Infrastructure) of the Local Plan Part 1 and its supporting text sets out how this will be achieved, including the implications of the Community Infrastructure Levy. It is not considered appropriate or necessary to repeat this policy framework in the Draft Document.	

Education

Number of respondents	4
Summary of the comments received	
<p>Two respondents supported retaining the existing site allocated in the Lewes District Local Plan 2003 for academic and related teaching, research and development facilities, or other development directly related to University of Sussex (Policy F1). It was noted that this would ensure consistency with the policy approach for the remainder of the University campus set out in the Brighton & Hove City Plan. One respondent also requested a specific allocation for a replacement sports complex for the University of Sussex.</p> <p>Several Town and Parish Councils expressed concerns about primary school provision in their areas. No comments were received on the existing allocations in the Lewes District Local Plan 2003 at Harbour Heights, Newhaven (Policy NH19) or Railway Quay, Newhaven (Policy NH21).</p>	
How these comments have influenced the Draft Document and further information relating to this section of the Local Plan Part 2.	
<p>Comments on the existing allocation for university related development in the Local Plan 2003 and the need for a new allocation for a replacement university sports complex are noted. However, both sites are currently occupied by the uses proposed and no change of use is proposed. It is therefore not considered necessary to allocate either site for such uses.</p> <p>East Sussex County Council, as the local education authority, has provided information on the need for additional primary school places associated with the planned housing growth in the Local Plan Part 1: Joint Core Strategy. It advises that identified shortfalls can be met through the expansion of existing schools or the provision of new schools on existing land within its ownership. Since the publication of Topic Paper 4, the University Technical College at Railway Quay has been constructed and occupied. Accordingly, no additional site allocations for education purposes are deemed necessary.</p>	

Outdoor Playing Space

Number of respondents	11
Summary of the comments received	
<p>Natural England and other respondents expressed concern that the provision of outdoor sports facilities on the site currently allocated in the Lewes Local Plan 2003 for recreational and tourist facilities on land at Lewes Road, Newhaven (Policy NH18) would negatively impact on the biodiversity interest of the site.</p> <p>There were comments both for and against the retention of the site allocated in the Lewes Local Plan 2003 for informal public open space at Roderick avenue, Peacehaven (Policy PT21).</p>	

Peacehaven Town Council support the retention of the site allocated in the Lewes Local Plan 2003 for allotment use at Cornwall Avenue, Peacehaven (Policy PT18) on the grounds that there is a shortage of allotments in the town with over 100 people on the waiting list.

Support was expressed by the relevant Parish Councils for the retention of the sites allocated for sports and recreation facilities in Ringmer (Policy RG3) and an extension to the recreation ground at Newick (Policy NW1). The retention of the site allocated for recreation use at The Broyle (Policy RG4) was not supported by Ringmer Parish Council, due to the lack of support from residents during public consultation on the Ringmer Neighbourhood Plan.

Chailey Parish Council expressed concerns over current pressures on Chailey Common and the North Chailey Sports Field and the need for a fit-for-purpose sports ground and sports pavilion and recreational space with good pedestrian and cycle access in the parish.

One respondent commented that SANGS will be required within the 7km of the Ashdown Forest SPA and recommended following the procedures for calculating contributions as developed by the relevant local authorities for the Thames Basin Heaths SPA.

More generally, a number of respondents commented that a comprehensive Green Infrastructure strategy needs to be produced for the district. One commented that the provision of open space, sports and recreation facilities should be based on an up-to-date assessment of need.

How these comments have influenced the Draft Document and further information relating to this section of the Local Plan Part 2.

The comments of Natural England and other respondents in relation to the existing allocation at Lewes Road, Newhaven, are noted. As Newhaven has been formally designated as a neighbourhood area for the purpose of preparing a neighbourhood plan, it is anticipated that this allocations will be reviewed as part of the neighbourhood plan process. In the meantime, Policies NH18 of the Local Plan 2003 will be 'saved' until the Newhaven Neighbourhood Plan is made.

The comments in relation to the sites allocated at Peacehaven in the Lewes District Local Plan 2003 for informal public open space at Roderick Avenue and for allotment use at Cornwall Avenue are noted. As Peacehaven and Telscombe have been formally designated as a neighbourhood area for the purpose of preparing a neighbourhood plan, it is anticipated that these allocations will be reviewed as part of the neighbourhood plan process. In the meantime, Policies PT18 and PT21 of the Local Plan 2003 will be 'saved' until the Peacehaven and Telscombe Neighbourhood Plan is made

Similarly, Barcombe Parish has been formally designated as a neighbourhood area for the purpose of preparing a neighbourhood plan and it is anticipated that the site allocated for an extension to the village recreation ground will be reviewed as part of the neighbourhood plan process. In the meantime, Policies BA1 of the Local Plan 2003 will be 'saved' until the Barcombe Neighbourhood Plan is made.

Support for the retention of the site allocated for an extension of Newick recreation ground (Policy NW1) is noted. However, for the Local Plan to be found 'sound', its policies and proposals must be effective and deliverable over the plan period (NPPF

para.182). It is unclear how the existing allocation would be funded and delivered in the period to 2030 and there is currently sufficient outdoor sports provision in Newick to meet the needs of existing and future residents when measured against the Council's current adopted standards. Consequently, Policy NW1 has not been carried forward into the Draft Document.

Support for the retention of the sites allocated for sports and recreation facilities in Ringmer (Policy RG3) is noted. However, this site is now allocated for sports facilities in the Ringmer Neighbourhood Plan and consequently there is no need for an allocation in the Local Plan Part 2. The site allocated for recreation use at The Broyle (Policy RG4) has not been carried forward, as it is unclear how this use would be funded or who would be responsible for its delivery and management.

The concerns of Chailey Parish Council are acknowledged. Funding to improve existing outdoor play facilities will be available through CIL receipts when new housing is delivered within the parish, although in view of the limited amount of new housing planned over the Local Plan period, there is unlikely to be sufficient funds to purchase additional land and build new facilities.

The requirement for the provision of SANGs to protect the Ashdown Forest SAC and SPA from recreational pressure is addressed by Policy CP10 of the Local Plan Part 1. A SANG site on the edge of Newick village has been identified and is being delivered in association with housing development in the village. No additional policy is deemed necessary to address this issue.

Transport

Number of respondents	8
Summary of the comments received	
<p>Seaford Town Council supported the retention of the site allocated in the Lewes District Local Plan 2003 for an extension to the Richmond Road car park, Seaford (Policy SF10). No comments were received on the sites allocated or protected for transport infrastructure in the Lewes District Local Plan 2003 at North Quay, Newhaven (Policy NH12) and the Joff Field, Peacehaven (Policy PT11)</p> <p>East Sussex County Council, as the local highway authority, commented that emphasis will be placed on demand management rather than provision of road improvements to tackle congestion. Other respondents' comments related to perceived inadequacies in the transport infrastructure at specific locations, including the A259 corridor, the A26/B2192 junction (Earwig Corner), North Chailey, Chailey Green, South Chailey, and Plumpton.</p>	
How these comments have influenced the Draft Document and further information relating to this section of the Local Plan Part 2.	
<p>The support from Seaford Town Council for the site allocated for car parking at Richmond Road, Seaford (Policy SF10) is noted. As Seaford has been formally designated as a neighbourhood area for the purpose of preparing a neighbourhood plan, it is anticipated that this allocation will be reviewed as part of the neighbourhood plan process. In the meantime, Policy SF10 will be 'saved' until the Seaford</p>	

Neighbourhood Plan is made.

The capacity issues on the A259 and the A26/B2192 junction are recognised and will be addressed by the range of measures set out in the relevant spatial policies in the Local Plan Part 1 and Infrastructure Delivery Plan. The aspiration of some communities for specific transport measures in other locations is acknowledged but planning policies and proposals must reflect and have regard to the transport plans and programmes of the responsible agencies. These are East Sussex County Council and the Highways Agency in respect of the highway network, and Southern Railway and Network Rail in respect of railways, The concerns raised by other respondents have been forwarded to these organisations where appropriate

Water Supply

Number of respondents	3
Summary of the comments received	
Two respondents commented that clarification is needed of the water, sewerage and gas provision needed in respect of new dwellings to be delivered. South East Water commented that land may need to be allocated for the proposed new treatment plant for a water re-use scheme at Newhaven.	
How these comments have influenced the Draft Document and further information relating to this section of the Local Plan Part 2.	
Consultation with Southern Water, SE Water and Southern Gas Networks during the preparation of the Local Plan Part 1 demonstrated that there are no critical infrastructure issues in respect of water, sewerage or gas provision that would prevent delivery of the development planned in the district over the period to 2030, as set out in the Infrastructure Delivery Plan. SE Water has not yet carried out sufficient feasibility investigations to determine the precise land requirements for its proposed water re-use treatment plant at Newhaven. Consequently no specific allocations are included in the Draft Document.	

Comments on Topic Paper 5: Development Management Policies

Spatial Strategy

Number of respondents	4
Summary of the comments received	
Comments were received supporting the retention of settlement 'planning boundaries' and the introduction of criteria-based policies to determine whether or not there is an 'essential need' for rural workers' accommodation. Southern Water commented that	

any policy should recognise that essential utility development will be permitted in the countryside if no alternative site is available and the benefit of the development outweighs the harm

How these comments have influenced the Draft Document and further information relating to this section of the Local Plan Part 2.

Support for the retention of planning boundaries and a criteria-based policy to determine whether or not there is an 'essential need' for rural workers' accommodation is noted. Both policy approaches are included in the Pre-Submission Document (Policies DM1 and DM3). The need for essential infrastructure, including utilities, to be located in the countryside (i.e. outside of the planning boundaries) when no alternative sites are available is acknowledged and appropriately addressed by Policy DM1 of the Draft Document.

Affordable Housing

Number of respondents	1
Summary of the comments received	
<p>One respondent commented that policies are required to address the issue of affordable housing, which should cover suitable locations outside of planning boundaries, type and tenure of affordable housing, density and quality and the need for basic amenities for occupants</p>	
How these comments have influenced the Draft Document and further information relating to this section of the Local Plan Part 2.	
<p>The criteria for assessing proposals for affordable housing outside of the planning boundaries are set out in Policy DM2 of the Draft Document. The importance of issues such as density, design quality and amenity in the consideration of housing proposals is recognised. However, these issues are substantially identical for both affordable and market housing and are considered to be adequately addressed by policies elsewhere in the Local Plan Part 1 and the Draft Local Plan Part 2. Consequently, no additional policies are deemed necessary.</p>	

Housing Type, Density and Mix

Number of respondents	3
Summary of the comments received	
<p>East Sussex County Council commented that there is a need to encourage developers to design in 'age friendly' communities and housing across all tenures which would enable older people to age in situ, whilst another respondent sought a specific policy to secure the provision of special needs housing. A criteria-based approach in relation to the sub-division of existing houses to flats and the conversion of existing properties to multiple occupation was supported.</p>	
How these comments have influenced the Draft Document and further	

information relating to this section of the Local Plan Part 2.

The Council recognises the need to provide an appropriate range of housing for older people. Policy CP2 of the Local Plan Part 1 states that housing developments (both market and affordable) will be expected to provide flexible, socially inclusive and adaptable accommodation to meet the diverse need of the community and the changing needs of occupants over time, including accommodation appropriate to the ageing population. However, to avoid placing undue costs on housing developments that might otherwise be marginal in terms of viability, it was agreed at the Examination in Public that accessibility, adaptability and wheelchair standards above the mandatory building regulations should not be a policy requirement. Accordingly, a more detailed development management policy to address this issue is not considered to be warranted.

Support for a criteria-based approach in relation to the sub-division of existing houses to flats and the conversion of existing properties to multiple occupation is noted. Policy DM8 of the Draft Local Plan Part 2 addresses this issue.

Gypsy & Traveller Accommodation

Number of respondents	0
Summary of the comments received	
No comments were received on whether or not additional development management policies are needed to provide detailed guidance on this topic	
How these comments have influenced the Draft Document and further information relating to this section of the Local Plan Part 2.	
There is no evidence to suggest that more detailed development management policies are required to address gypsy and traveller accommodation. Accordingly no additional policy is included in the Draft Document.	

Encouraging Economic Development and Regeneration

Number of respondents	3
Summary of the comments received	
East Sussex County Council commented that there should be policies to encourage rural industries that are vital to landscape management and to prioritise the redevelopment of disused rural buildings for creative industries. There was support for criteria-based policies for new business development. Southern Water commented that any policy should recognise that essential utility development will be permitted in the countryside if no alternative site is available and the benefit of the development outweighs the harm	
How these comments have influenced the Draft Document and further information relating to this section of the Local Plan Part 2.	
The NPPF requires Local Plans to set out clear policies on what development will or	

will not be permitted and to provide a practical framework within which decision making can be made with a high degree of predictability and efficiency. It is considered that the terms 'vital to landscape management' and 'creative industries' are open to wide interpretation and that the inclusion of the suggested policies would therefore fail to have proper regard to the NPPF.

Support for criteria-based policies for new business development is noted. Policies to address proposals for farm diversification and other employment development in the countryside are included in the Draft Document (Policies DM9, 10 and 11). The need for essential infrastructure, including utilities, to be located in the countryside (i.e. outside of the settlement planning boundaries) when no alternative sites are available is acknowledged and appropriately addressed by Policy DM1 of the Draft Document.

The Visitor Economy

Number of respondents	1
Summary of the comments received	
<p>East Sussex County Council supported the retention of the Policy E17 criteria and suggested that specific policies regarding 'glamping' and its effects on sensitive environments should also be considered.</p>	
How these comments have influenced the Draft Document and further information relating to this section of the Local Plan Part 2.	
<p>Support noted. Policy DM20 of the Draft Document, which replaces Policy E17, also includes additional criteria to address the size, scale, and visual impact of development proposals on the landscape.</p> <p>'Glamping' is defined in the Oxford English Dictionary as <i>a form of camping involving accommodation and facilities more luxurious than those associated with traditional camping</i>. However, it is not considered that this form of visitor accommodation raises any land-use planning issues that are materially different from proposals for caravan and camping sites. Policies elsewhere in the Local Plan seek to protect sensitive environments from harmful development and would be considered, where appropriate, alongside Policy DM20 in the determination of such proposals. A separate policy to address 'glamping' proposals is therefore considered to be unwarranted.</p>	

Retail and Sustainable Town and Local Centres

Number of respondents	1
Summary of the comments received	
<p>One respondent commented that there is a need to promote a mix of uses, encourage evening public transport, and high quality retail units within district and local centres to prevent them becoming abandoned at the end of the working day.</p>	
How these comments have influenced the Draft Document and further information relating to this section of the Local Plan Part 2.	

The importance of the above issues is acknowledged. However, it is considered that the need to promote a mix of uses within district and local centres is adequately addressed by Policy CP6 (Retail and Town Centres) of the Local Plan Part 1, whilst Policy CP 11 (Built and Historic Environment and High Quality Design) and Policy DM25 (Design) of the Draft Local Plan Part 2 seek to secure high quality design in all new development, including retail proposals. As stated in Policy CP12 (Sustainable Travel) of the Local Plan Part 1, the District Council will work with East Sussex County Council and other relevant agencies to encourage and support measures that promote improved accessibility, particularly the expansion and improvement of public transport services. Accordingly, it is not considered that additional policies are required to address the issues raised.

Infrastructure

Number of respondents	1
Summary of the comments received	
One respondent commented that there should be a policy to protect local services.	
How these comments have influenced the Draft Document and further information relating to this section of the Local Plan Part 2.	
The importance of protecting existing community facilities and services is acknowledged. However, this issue is considered to be appropriately addressed by Policy CP7 (Infrastructure) of the Local Plan Part 1. No additional policies have been identified as being necessary to provide more detailed guidance.	

Green Infrastructure

Number of respondents	6
Summary of the comments received	
East Sussex County Council commented that all developments should incorporate green infrastructure into their design and policies should encourage the design of natural and adventurous play space, not restricted to formal play equipment. It also considers that existing green spaces which are special to the local community should be designated as Local Green Space and incorporated into community green infrastructure strategies.	
Comments from other respondents included support for the adoption of the revised Fields in Trust benchmark standards for outdoor play space, the need to protect green spaces between settlements, the need for policies to cover partnership working between the District Council and town and parish councils, and the need to expand Policies RE6 (Lewes/Sheffield Park Railway Line) and RE7 (Recreation and Rivers) of the Lewes District Local Plan 2003 into a more positive policy on the creation of ecological networks if they are retained in the new Local Plan.	
Southern Water commented that any policy should recognise that essential utility development will be permitted if no alternative site is available and the benefit of the	

development outweighs the harm.

How these comments have influenced the Draft Document and further information relating to this section of the Local Plan Part 2.

Whilst acknowledging the benefits of green infrastructure, the suggested requirement for all development to incorporate green infrastructure is considered too onerous, particularly in respect of small-scale proposals such as dwelling extensions or changes of use. However, a detailed planning policy setting out the Council's expectations in respect of the provision of multi-functional green infrastructure within new development is included in the Pre-Submission Document (Policy DM14). This policy is intended to assist with the implementation of the strategic framework set out in Policy CP8 (Green Infrastructure) of the Local Plan Part 1.

The comment on Local Green Space designations is noted. However, it is considered that existing open spaces, outdoor sports facilities and other recreational land, including playing fields, are adequately protected by national planning policy and policies elsewhere in the Local Plan. Whilst recognising that the NPPF states local communities can identify for special protection green areas of particular importance to them, the District Council considers that such designations are more effectively pursued through neighbourhood plans, rather than through the Lewes District Local Plan. Accordingly, no such designations have been included in the Draft Document.

Support for the adoption of the revised Fields in Trust (FiT) benchmark standards for outdoor play space is noted. The standards set out in Policy DM15 of the Proposed Submission Document are based on the latest FiT guidance for outdoor sport and recreation published in October 2015. In terms of the need to protect green spaces between settlements, it is considered that Policy DM1 and the definition of the settlement planning boundaries provide an appropriate level of protection against urban sprawl and the potential merging of towns or villages.

The importance of partnership working between the District Council, town and parish councils, and other stakeholders, is acknowledged. One of the Council's strategic objectives is *'to work with other agencies to improve the accessibility to key community services and facilities and to provide the new and upgraded infrastructure that is required to create and support sustainable communities'* (Local Plan Part 1, page 38). The purpose of the Local Plan policies is to set out how development and change will be managed to ensure that it contributes to achieving the Council's vision and objectives and sustainable development across the district generally. A specific policy addressing partnership working is not considered necessary.

Policies RE6 and RE7 have been retained in the Draft Local Plan Part 2 (Policies DM17 and DM18). However, the suggestion that they should be combined into a single policy for the creation of ecological networks is not considered appropriate, as this would unnecessarily repeat the policy framework set out in Policy CP10 (Natural Environment and Landscape Character) of the Local Plan Part 1.

Southern Water's comments are noted but a specific policy to address essential utility development is not considered necessary or appropriate in view of the framework set out in Policy CP7 (Infrastructure) of the Local Plan Part 1 and the Government's core planning principle that local plans should be succinct (NPPF, Para.17).

Air Quality

Number of respondents	3
Summary of the comments received	
<p>One respondent commented that the wording of Core Policy 9 needs amending to include reference to the 'Air quality and emissions mitigation guidance for Sussex Authorities (2013)'. Others supported the need for additional policies to address contamination and the protection of groundwater supplies. It was pointed out that Policy WMP28b (Water Resources and Water Quality) of the East Sussex, South Downs and Brighton & Hove Waste and Minerals Plan only relates to waste and minerals development.</p>	
How these comments have influenced the Draft Document and further information relating to this section of the Local Plan Part 2.	
<p>Core Policy 9 (Air Quality) is part of the approved development plan for the area and can only be amended by a review of the Local Plan Part 1. Lewes District Council has signed up to the 'Air quality and emissions mitigation guidance for Sussex Authorities (2013)' and, where appropriate, this guidance will be a material consideration in the determination of planning applications. The support for policies to address contamination and the protection of groundwater supplies is noted. Additional policies to address land contamination and water resources and quality are included in the Draft Document (Policies DM21 and 22).</p>	

Natural Environment & Landscape Character

Number of respondents	3
Summary of the comments received	
<p>Several respondents supported the need for an additional policy on biodiversity that reflects the hierarchy of nature conservation sites. A policy to address glare and light pollution was also sought by some respondents. Southern Water commented that any policy should recognise that essential utility development will be permitted if no alternative site is available and the benefit of the development outweighs the harm</p>	
How these comments have influenced the Draft Document and further information relating to this section of the Local Plan Part 2.	
<p>An additional policy on biodiversity that reflects the hierarchy of nature conservation sites is included in the Draft Local Plan Part 2 (Policy DM24). A separate policy to address light pollution is considered unnecessary in view of national policy that planning decisions should limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation (NPPF para. 125) and the specific criteria set out in Policies DM6 (Equestrian Development), DM10 (Employment Development in the Countryside), DM25 (Design) and DM30 (Backland Development) of the Draft Document. The need for essential infrastructure, including utilities, to be located in the countryside when no alternative sites are available is acknowledged and appropriately addressed by Policy DM1 of the Draft Document.</p>	

Built and Historic Environment and High Quality Design

Number of respondents	5
<p>Summary of the comments received</p> <p>Support was received for additional policies which address issues of local distinctiveness, amenity, the location and design of recycling and refuse storage provision, and the scale and design of replacement dwellings & extensions outside of the settlement planning boundaries.</p> <p>One respondent supported the adoption of the national 'Building for Life' standards whilst another suggested that Wealden District Council's Design Guide should be adopted.</p> <p>East Sussex County Council commented that a policy addressing 'Landscape Design' rather than 'Landscaping' is needed; there are some situations where non-native planting could be in character or beneficial; and the loss of soft landscape areas to hard surfacing should be controlled.</p> <p>In relation to the historic environment, East Sussex County Council commented that policies should reflect the importance of the value of the historic environment and the archaeological process for developing a sense of place.</p> <p>Southern Water commented that development adjacent to wastewater treatment works that is sensitive to odour should only be permitted if the distance to the works is sufficient to allow adequate odour dispersion in order to avoid potential land-use conflict, protect the amenity of future occupants, and allow the company to provide wastewater services to meet the demand from existing and future development.</p>	
<p>How these comments have influenced the Draft Document and further information relating to this section of the Local Plan Part 2.</p> <p>The support for the additional policies listed above is noted. The Draft Local Plan Part 2 includes policies addressing the provision of waste and recycling facilities (DM26), replacement dwellings in the countryside (DM5) and residential extensions (DM28). The need to enhance local character and distinctiveness and protect residential amenity is addressed by a number of different policies in the Draft Document (Policies DM4, DM5, DM6, DM7, DM8, DM9, DM10, DM11, DM12, DM18, DM23, DM25, DM26, DM27, DM28, DM29, DM30, DM31, DM33, and DM34) and specific policies to address these issues is therefore not considered necessary.</p> <p>The support for adopting the 'Building for Life' standards is noted. Policy DM25 (Design) requires residential developments of 10 or more dwellings to demonstrate how the 'Building for Life 12' criteria have been taken into account and would be delivered by the development. A policy addressing 'Landscape Design' is also included (Policy DM27).</p> <p>The Wealden Design Guide describes what features make Wealden District special and how development can be delivered in a manner which maintains and enhances the area's essential character and distinctiveness. The character of Wealden District is predominantly shaped by its local landscape areas, and the building materials which originate from those landscapes. As several of these landscape areas do not exist within Lewes District (e.g. the High Weald and the Pevensy Levels), it is not considered appropriate for the Wealden Design Guide to be adopted by Lewes</p>	

District Council.

In terms of the historic environment, it is considered that the need for locally specific planning policies is very limited, given the wealth of national guidance on heritage assets contained within the NPPF and Planning Practice Guidance, together with the relevant legislation applying the individual heritage designations. However, in order to sympathetically manage heritage assets as part of the development process, there must be a clear understanding of the significance of the asset and the contribution of its setting. This requirement is addressed by Policy DM33 (Heritage Assets) of the Draft Document.

The need to manage development that may potentially be adversely affected by unacceptable levels of air pollution, including odour, is recognised and addressed by Policy DM20 (Pollution) of the Draft Document.

Flood Risk, Coastal Erosion and Sustainable Drainage

Number of respondents	2
Summary of the comments received	
Two respondents supported the designation of 'Coastal Change Management Areas' at Cuckmere Haven and Telscombe Cliffs, pointing out that the Beachy Head to Selsey Bill Shoreline Management Plan is out of date.	
How these comments have influenced the Draft Document and further information relating to this section of the Local Plan Part 2.	
Support noted. Cuckmere Haven is within the South Downs National Park and outside of that part of the district covered by the Local Plan Part 2. Telscombe and Telscombe Cliffs are being considered as part of the 'Brighton to Newhaven Western Harbour Arm Coastal Management Implementation Plan', currently being developed by the District Council. This plan will eventually act as a route map setting out what works should be undertaken, and at what time, in order to assist the Council with its future management of this stretch of coastline. However, the preparation of this plan is a long process, with stringent Government regulations and guidance that need to be followed. At this stage, the work is not sufficiently advanced to inform planning policy formulation and hence the designation of a Coastal Change Management Area in the Local Plan Part 2 is not considered appropriate.	

Sustainable Transport

Number of respondents	3
Summary of the comments received	
East Sussex County Council, as the local transport authority, commented that Core Policy 13 (Sustainable Transport) in the Local Plan Part 1 is comprehensive and accords with the priorities of the Local Transport Plan. However, it supports the retention of Policies T3 (Station Parking) and T4 (Lewes-Uckfield railway) of the Lewes District Local Plan 2003.	

Other respondents commented that the existing public rights of way network should be protected and enhanced and that enforceable travel plans should be imposed on schools, employers and visitor attractions to encourage more sustainable methods of transport and reduce congestion.

How these comments have influenced the Draft Document and further information relating to this section of the Local Plan Part 2.

Support for the retention of Policies T3 and T4 of the Local Plan 2003 is noted. Both policies have been carried forward into the Draft Local Plan Part 2 (Policies DM36 and 37). The importance of ensuring that the existing public rights of way network is adequately protected or enhanced to ensure its convenience, safety and attractiveness for users is acknowledged and Policy DM35 of the Draft Document seeks to address this issue. The requirement for Travel Plans, where appropriate, is considered to be adequately addressed by Core Policy 13, as acknowledged by the local transport authority in its comments on the Topic Papers. No further detailed policies are considered to be warranted in respect of this issue.

Renewable and Low Carbon Energy and Sustainable Use of Resources

Number of respondents	1
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Summary of the comments received

There is a need for additional infrastructure provision to mitigate the effects of climate change, e.g wind, solar, electrical charging points for cars, movement by water and rail, broadband provision and development of 4G/5G.

How these comments have influenced the Draft Document and further information relating to this section of the Local Plan Part 2.

Policy CP14 of the Local Plan Part 1 sets out a policy framework for determining planning applications for infrastructure development that would assist in mitigating the effects of climate change, whilst Policy CP11 seeks to ensure that the design of new development adequately addresses the need to reduce resource and energy consumption. In view of the wealth of national planning guidance and best practice publications on renewable and low carbon energy infrastructure, it is not considered that there is a need for additional local policies to address this issue in the Local Plan Part 2.

Newhaven

Number of respondents	0
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Summary of the comments received

No comments were received on whether or not additional development management policies are needed to provide detailed guidance in Newhaven.

How these comments have influenced the Draft Document and further information relating to this section of the Local Plan Part 2.

As Newhaven has been formally designated as a neighbourhood area for the purpose of preparing a neighbourhood plan, it is anticipated that detailed planning policies for the town will be developed through the neighbourhood plan process. In the meantime, Policies NH2, NH4, NH6-7, NH10, and NH12-17, and NH19 will be 'saved' until the Neighbourhood Plan is made.

Peacehaven & Telscombe

Number of respondents	3
Summary of the comments received	
<p>Support received for the retention of Policies PT9, PT10 (Meridian Centre), PT12, PT13 (Coast, Cliff Top and Foreshore), PT19 and PT20 (Valley Road) of the Lewes District Local Plan 2003. One respondent suggested combining PT12 and PT13 to define a protection zone.</p>	
How these comments have influenced the Draft Document and further information relating to this section of the Local Plan Part 2.	
<p>Support noted. As Peacehaven and Telscombe have been formally designated as a neighbourhood area for the purpose of preparing a neighbourhood plan, it is anticipated that detailed planning policies for area will be developed through the neighbourhood plan process. In the meantime, Policies PT5, PT6, PT9-13, and PT18-20 will be 'saved' until the Neighbourhood Plan is made.</p>	

Seaford

Number of respondents	1
Summary of the comments received	
<p>Seaford Town Council seeks the allocation as green open space of the Brickfield, Walmer Road Recreation Ground, Seaford Close Green, Bodiam Close Green, Bishopstone Road and all the town's primary and secondary school playing fields.</p>	
How these comments have influenced the Draft Document and further information relating to this section of the Local Plan Part 2.	
<p>It is acknowledged that the NPPF states that local communities can identify for special protection green areas of particular importance to them. However, the District Council considers that such Local Green Space designations are more effectively pursued through neighbourhood plans, rather than through the Local Plan Part 2. As Seaford has been formally designated as a neighbourhood area for the purpose of preparing a neighbourhood plan, it is anticipated that detailed planning policies for the town will be developed through the neighbourhood plan process. In the meantime, Policies SF5, SF8-9, SF11-12, and SF14-16 will be 'saved' until the Neighbourhood Plan is made.</p>	