



Lewes District Council

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

Submission Document

Regulation 22(1)(c) Consultation Statement

December 2018

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1.0 Introduction

- 1.1 The Lewes District Local Plan will form part of the approved development plan for the area and will comprise of two documents:
- Local Plan Part 1: Joint Core Strategy 2010-2030
 - Local Plan Part 2: Site Allocations and Development Management Policies
- 1.2 The primary document, the Local Plan Part 1, is a strategic level plan for the whole district. This was adopted by Lewes District Council on 11 May 2016 and the South Downs National Park Authority on 23 June 2016 and now forms part of the statutory development plan for the area.
- 1.3 The Local Plan Part 2 will only apply to the area of Lewes district covered by the Lewes District Planning Authority (i.e. excluding the area within South Downs National Park). The LPP2 seeks to deliver the strategic objectives and spatial strategy of LPP1 by:
- allocating additional sites to meet development growth identified in Local Plan Part 1
 - setting out detailed (non-strategic) development management policies to guide development and change
- 1.4 This report provides a summary of the consultation that has taken place on the various formal stages from the publication of the 'Issues and Options' Topic Papers to the publication of the Pre-Submission Local Plan Part 2.
- 1.5 This document is broken down into the different consultation stages. Each section sets out how the consultation was carried out, in terms of who was notified, how the document was made available and the publicity that took place. Also, each section provides a summary of the representations received for each policy or topic area, how the representations have been addressed by the Council, and how they have influenced the preparation of the Draft Local Plan Part 2.
- 1.6 This document has been produced to demonstrate compliance with Regulation 22(1) c of the Town and Country Planning (Local Planning) (England) Regulations 2012 which requires a statement setting out the following:
- which bodies and persons the local planning authority invited to make representations under regulation 18;
 - how those bodies and persons were invited to make representations under regulation 18;
 - a summary of the main issues raised by the representations made pursuant to regulation 18;
 - how any representations made pursuant to regulation 18 have been taken into account;
 - if representations were made pursuant to regulation 20, the number of

representations made and a summary of the main issues raised in those representations

- 1.7 In line with the planning regulations mentioned above, this document will be submitted to the Secretary of State along with the Local Plan Part 2 Submission Document, Sustainability Appraisal, copies of all representations and any other supporting documents that the Council deem appropriate. A Planning Inspector, appointed by the Secretary of State, will consider the representations when determining whether the Local Plan Part 2 is legally compliant and sound. Non-duly made representations will also be submitted to the Secretary of State, although they will be identified as 'non-duly made'.

2.0 Overview of the Local Plan Part 2 Consultation to Date

- 2.1 There have been a number of consultation stages during the preparation of the Draft Local Plan Part 2, as set out in the table below. This consultation has played a key role in informing and helping to shape the Submission Local Plan Part 2.

When?	Stage
22 nd Nov 2013 - 17 Jan 2014	Issues and Options Topic Papers [1]
30 th Nov 2017 - 25 th Jan 2018	Consultation Draft Local Plan Part 2 [1]
24 th Sept - 5 th Nov 2018	Pre-submission Local Plan Part 2 [2]

[1] These stages constituted Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

[2] Regulation 19 of the above regulations

2.2 Consultation Database

The Council maintains a database of people and organisations who have asked to be kept informed about the progress of the Local Plan or have previously made representations on the Local Plan Part 1. The database is a vital tool in engaging with various stakeholders and is constantly updated with new contacts and amended details. The database is made up of the following consultees:

2.3 **Specific Consultation Bodies**

These are the statutory consultees listed in the regulations that are required to be

consulted during the preparation, publication and submission of a local plan. They include the Environment Agency, Natural England, Historic England, neighbouring authorities and utility providers. A list of these bodies can be found in Appendix 4. Town and Parish Councils within and adjoining Lewes District are also identified as specific consultation bodies and are separately listed in Appendix 5.

2.4 General Consultation Bodies

The regulations also require local planning authorities to consult general consultation bodies where appropriate. Those consultation bodies who have expressed a desire to be involved in planning process are listed in Appendix 4.

2.5 Other Consultees

In addition to the specific and general consultation bodies, the regulations require local planning authorities to consult residents or other persons carrying on business in the area where appropriate. The Consultation Database includes a large number of residents and other organisations and agencies which have expressed a desire to be involved in the planning process. All Lewes District Councillors are included on the Consultation Database and have been fully engaged in the preparation of the Local Plan Part 2 and the various consultations that have taken place over the years.

3.0 Issues and Options Topic Papers

3.1 Introduction

3.1.1 The Council initially undertook a 'Call for Sites' exercise in Spring 2013. This provided an opportunity for people and organisations to submit sites that they would like to be considered for development for different uses, including sites to meet the accommodation needs of Gypsies and Travellers. A site registration form could be downloaded from the Council's web site.

3.1.2 Meetings/workshops

All of the Town and Parish Councils within the plan area were invited to a workshop on 22 April 2013 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.

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 took place on 16 September 2013

3.1.3 Consultation

The first public consultation on the Local Plan Part 2 took place when the 'Issues and Options' Topic Papers were published for the submission of comments between 22nd November 2013 and 17th January 2014. There were 5 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

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

3.1.4 **Who was invited to make representations?**

A letter or email about the consultation on the Topic Papers was sent to the specific consultation bodies and other persons and organisations on the

Consultation Database, including members of the public, District Councillors, and MPs, as well as non-statutory organisations. The full list of statutory organisations who were notified can be found in Appendix 4.

3.1.5 **How were representations made?**

Each Topic Paper explained that responses could be made by email to ldf@lewes.gov.uk and by post to The Planning Policy Team, Southover House, Southover Road, Lewes, BN7 1AB. We received 332 comments from on the Topic Papers. Section 3.2. summarises the main issues raised by respondents, how they were considered by the Council and how they influenced the next stage of the Local Plan Part 2.

3.1.6 **Publicity**

The Topic Papers were published on the Council's website and hard copies were available at the main Council office (Southover House, Lewes). Hard copies of the Topic Papers were also available in the public libraries at Lewes, Newhaven, Peacehaven, Ringmer and Seaford. In addition, copies were placed in libraries outside of the District at Burgess Hill, Haywards Heath, Saltdean and Uckfield.

3.1.12 A press release was also issued and the Sussex Express printed a front page article about the consultation on 20 December 2013.

3.2 Summary of the representations received on the Topic Papers

- 3.2.1 A summary of comments made on the Topic Papers is set out below, summarising the main issues raised by respondents and how these comments were considered and influenced the emerging Local Plan Part 2.

Topic Paper 2: Housing

Infrastructure Capacity

Number of respondents	7
<p>Summary of the comments received</p> <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. Telscombe Town Council stated that they support the need for a clear CIL/S106 Policy.</p> <p>A number of respondents from across this district commented on how new developments could negatively impact the district's existing infrastructure, particularly the road network.</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>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 the road network, to accommodate housing growth 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, it is acknowledged that new infrastructure provision will be needed to support development in the district. Core Policy 7 (Infrastructure) of the Local Plan Part 1 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 Numbers

Number of respondents	33
<p>Summary of the comments received</p> <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 has a preconceived view.</p> <p>One respondent stated that some towns within the district should have larger housing targets, a view supported by another respondent who commented that allocations in the coastal strip in particular should be higher. Another 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</p>	

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.

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.

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.

Housing 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</p>	

Green.

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.

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.

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

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.

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 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
<p>Summary of the comments received</p> <p>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.</p> <p>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.</p> <p>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.</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>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.</p> <p>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.</p>	

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</p>	

the need for a buffer zone between development and ancient woodland.

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.

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 the district has high quality and diverse landscapes which in 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 Housing Sites within Towns and 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	
<p>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).</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>CH/A05- Chailey Parish Council considered that B1 and B2 or mixed use would be most appropriate use for site.</p> <p>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</p>	

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
<p>Summary of the comments received</p> <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>	
<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 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></p> <p><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
<p>Summary of the comments received</p> <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</p>	

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 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	
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.

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.

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.

NW/A05- One respondent supported site option due to it having good access and being close to vital infrastructure.

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.

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.

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.

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 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.</p> <p>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</p>	

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</p>	

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.

PT/A06- One response supported site option.

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</p>	

space between Ringmer and Broyleside.

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.

RG/A06- Ringmer Parish Council commented that part of the site has already been redeveloped, garden of the South Norlington House.

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'.

RG/A11- One respondent commented that site excludes a triangular piece of land to the West which should be part of the site.

RG/A12- Ringmer Parish Council supported site option owing to the fact there is no flooding history.

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.

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.

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.

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</p>	

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.

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.

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.

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.

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.

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.

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.

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
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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.

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

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.

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</p>	

creative industries should be considered in areas with access/ congestion issues as they have less traffic impacts.

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.

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.

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

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 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	
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.

Site 2: Land at Hoyle Road, Peacehaven – East Sussex County Council and Peacehaven Town Council supported retention of the site for employment use.

Site 3: Cradle Hill Industrial Estate, Seaford – East Sussex County Council supported retention of the site for employment use.

Site 4: Land at Balcombe Pit, Glynde - East Sussex County Council supported retention of the site for employment use.

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.

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.

Site 7: Woodgate Dairy, Sheffield Park - Chailey Parish Council and Newick Village Society both supported retention of the site for business use.

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.

Topic Paper 4: Infrastructure

General

Number of respondents	4
Summary of the comments received	
<p>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.</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 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 CIL. It is not considered appropriate or necessary to repeat this policy framework in the Draft Document.</p>	

Education

Number of respondents	4
<p>Summary of the comments received</p> <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>	
<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 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	

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.

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).

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 Neighbourhood Plan is made.</p> <p>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</p>	

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

Topic Paper 5: Development Management Policies

Spatial Strategy

Number of respondents	4
Summary of the comments received	
<p>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.</p>	
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	
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	
How these comments have influenced the Draft Document and further information relating to this section of the Local Plan Part 2.	
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.	

Housing Type, Density and Mix

Number of respondents	3
Summary of the comments received	
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.

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
<p>Summary of the comments received</p> <p>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</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 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.</p> <p>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.</p>	

The Visitor Economy

Number of respondents	1
<p>Summary of the comments received</p> <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>	
<p>How these comments have influenced the Draft Document and further</p>	

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

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. ‘Glamping’ is defined in the Oxford English Dictionary as *a form of camping involving accommodation and facilities more luxurious than those associated with traditional camping*. 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.

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.	
<p>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.</p>	

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
Summary of the comments received	
<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</p>	

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.

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.

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.

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

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.

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).

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 Pevensey Levels), it is not considered appropriate for the Wealden Design Guide to be adopted by Lewes 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
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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
Summary of the comments received	
<p>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.</p>	
How these comments have influenced the Draft Document and further information relating to this section of the Local Plan Part 2.	
<p>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</p>	

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

Seaford

Number of respondents	1
<p>Summary of the comments received</p> <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>	
<p>How these comments have influenced the Draft Document and further information relating to this section of the Local Plan Part 2.</p> <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>	

4.0 Consultation Draft Local Plan Part 2

4.1 Introduction

- 4.1.1 The Consultation Draft Local Plan Part 2 was published for consultation purposes over an 8 week period between 30th November 2017 and 25th January 2018. Over the same period, a further 'Call for Sites' exercise was undertaken to provide an opportunity for people and organisations to submit potential sites to meet the accommodation needs of Gypsies and Travellers.

Who was invited to make representations?

- 4.1.2 E-mails relating to the consultation were sent to all statutory consultees, together with individuals and organisations who had either asked to be kept informed about the progress of planning policy documents or had previously made representations on the Local Plan Part 1. Letters were also sent to individuals who had specifically asked to be notified by post. The list of the statutory consultation bodies is provided in Appendix 4

Availability of the Consultation Draft Document

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

Summary of the Consultation Process

- 4.1.4 Comments could be submitted via the Council's on-line consultation portal or by email, post or fax.

The questions that were asked via the consultation website were

Q1. Which policy do you wish to comment on?

Q2. Do you support the policy approach?

Q2b. Do you have any further comments on the policy you selected in Question 1?

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

4.2 Summary of Representations on Consultation Draft Local Plan Part 2

- 4.2.1 Representations on the Consultation Draft Local Plan Part 2 were received from over 80 individuals and organisations. Most of these were submitted via the on-

line consultation portal but some people responded via email or letter. The tables below summarise the main issues raised by the representations and how these representations were taken into account by the Council in preparing the Pre-Submission Local Plan Part 2.

HOUSING ALLOCATIONS

NH01 LAND SOUTH OF VALLEY ROAD, NEWHAVEN	
Support policy approach	
Number of respondents	1
Summary of comments received	
Natural England is supportive. They note the proximity to the boundary of the National Park, and would welcome a requirement to assess the impact of development on the views.	
How these comments have influenced the Proposed Submission Document	
Support noted. Natural England's comments are noted. The site NH01 is located west of existing residential development and east a swath of land that now has planning permission for 85 residential dwellings. It is considered that future development within NH01 is, and will be, seen within the context of an urban area. Therefore impacts of development on views from the South Downs National Park will be minimal.	
Accordingly, no amendments to the wording of Draft Policy NH01 are proposed.	
Object to policy approach	
Number of respondents	5
Summary of comments received	
East Sussex County Council states that the development should be informed by an Ecological Impact Assessment. The Sussex Wildlife Trust agrees on this.	
A developer questions the deliverability of the site as it has been allocated since the 1970's and has only been partially developed. Alternative, more deliverable sites should be allocated instead.	
Another developer agrees with this, and states that the Town Council will not be allocating any sites due to the impact upon services and infrastructure. This respondent suggests a site at Telscombe Road.	
The Council's Specialist Advisor (Coastal Engineering) warns of a flooding risk at the Meeching Valley, below this site. The Sustainable Drainage System implemented must not increase the risk of flooding downhill.	
How these comments have influenced the Proposed Submission Document	
In response to comments made by East Sussex County Council and Sussex Wildlife Trust an additional criterion requiring an ecological impact assessment is incorporated in Draft Policy NH01. The deliverability of the site has been assessed through the Strategic Housing and Economic Land Availability Assessment (SHELAA). Part of site has been recently promoted for residential development, demonstrating availability.	
The statement made by the developer that Peacehaven Town Council will not be allocating housing sites is incorrect. Peacehaven and Telscombe are progressing a joint neighbourhood plan which will identify housing site allocations. Suggested additional housing site at Telscombe Road (Peacehaven) is within the South Down National Park and therefore cannot be considered as an allocation through Local Plan Part 2.	

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

NH02 LAND AT THE MARINA, NEWHAVEN

Support policy approach

Number of respondents

1

Summary of comments received

The Council's Specialist Advisor (Coastal Engineering) is supportive. They draw attention to the integrity of the river bank separating the lower lying land to the west, as it 'leaks.' This needs to be assessed and resolved.

How these comments have influenced the Proposed Submission Document

Support noted.

Object to policy approach

Number of respondents

4

Summary of comments received

Southern Water states that this site will be close to the Newhaven East Wastewater Treatment Works (WTW), owned and operated by Southern Water. Unpleasant odours inevitably will arise. Paragraph 109 of the NPPF endorses this issue.

East Sussex County Council states the development should be informed by an Ecological Impact Assessment. Sussex Wildlife Trust agrees with this. They draw attention to the intertidal priority habitat (section 41 of the NERC Act) which needs to be explicitly protected through the policy.

A developer feels the proposed density for this site is very high, and therefore may not be deliverable.

How these comments have influenced the Proposed Submission Document

In response to Southern Water's concerns, an additional criterion requiring a noise and odour assessment to be undertaken is incorporated into Draft Policy NH02.

Criterion (g) now requires an ecological impact assessment to be undertaken, with the supporting text highlighting the importance of intertidal habitats.

The suitability of the site is assessed through the Strategic Housing and Economic Land Availability Assessment (SHELAA). The principle of this level of development has already been established through the previous permitted proposal for 331 dwellings.

Other comments received

Number of respondents

2

Summary of comments received

Newhaven Port and Properties Ltd request an amendment to the policy that requires a robust Noise Impact Assessment is submitted with any planning application.

The Environment Agency points at the fact that the site is in Flood Zones 2 and 3 and therefore a Sequential Test needs to be carried out. If, following the Sequential Test, the plan still seeks to allocate housing at this location, an Exception Test will be required.

How these comments have influenced the Proposed Submission Document

In response to Newhaven Port and Properties' concerns, an additional criterion requiring a noise and

odour assessment to be undertaken is incorporated into Draft Policy NH02. Since the 2017 Draft Plan consultation the Council has been in correspondence with the Environment Agency. An update to the site specific Flood Risk Assessment, which accompanied the 2007 planning application for the development of 331 dwellings (LW/07/1475), has been undertaken to support the review and retention of the housing allocation. The update includes the appropriate Sequential and Exception Tests, concluding

BH01 and BH02 EDGE OF BURGESS HILL (GENERAL)

Object to policy approach

Number of respondents

Summary of comments received

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

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

How these comments have influenced the Proposed Submission Document

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

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

BH01 LAND AT THE NUGGETS, VALEBRIDGE ROAD

Support policy approach

Number of respondents

2

Summary of comments received

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

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

How these comments have influenced the Proposed Submission Document

Support noted.

In response to MSDC's comment, it is acknowledged that there may be circumstances where development along, or close to, the boundary will create additional demand on infrastructure over the border. However, it is not considered appropriate for LPP2 to 'prioritise' CIL monies outside of

the proper process. Accordingly, no amendments to wording are proposed.

Object to policy approach

Number of respondents

8

Summary of comments received

East Sussex County Council objects to the proposed site allocation. Although there are no recorded heritage assets within the site they suggest that the area may be of archaeological interest, and advise the inclusion of an archaeological assessment.

Natural England, the Woodland trust and Sussex Wildlife Trust note that the site allocation is surrounded by ancient woodland and networks of natural habitats; therefore there should be strong consideration for the biodiversity. They state that the current policy doesn't address the importance of ancient woodland, or the fact a buffer of 15 meter is to be respected, according to the NPPF.

The Council's Specialist Advisor (Coastal Engineering) states that there were incidents of surface water flooding and Sustainable Drainage Systems are needed to mitigate the problem. They will have to be maintained in the future.

Many residents, including the Wivelsfield Parish Council object to the proposed site allocation. They put forward that the proposal fails to meet the Wivelsfield Neighbourhood Plan. The site is too large and they do not wish to have houses on the western side. Rewording paragraph 2.28 is suggested.

Other objections include:

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

How these comments have influenced the Proposed Submission Document

In response to East Sussex County Council's concerns, an additional criterion has been incorporated into the Draft Policy BH01 requiring an appropriate assessment and evaluation of archaeological potential to be undertaken.

It is acknowledged that ancient woodland and the existing natural habitat plays an important role in supporting biodiversity and that the wording of Draft Policy BH01 could be strengthened to reflect this. Accordingly, amendments to the wording of the Draft policy and supporting text have been made.

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

BH02 LAND AT OAKFIELDS, THEOBALDS ROAD

Support policy approach

Number of respondents

2

Summary of comments received

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

West Sussex County Council supports the statement that discusses the issues of access and impact of additional traffic on the local road network, which will need to be considered by both County Councils.

How these comments have influenced the Proposed Submission Document

Support noted.

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

Object to policy approach

Number of respondents

31

Summary of comments received

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

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

How these comments have influenced the Proposed Submission Document

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

Draft Policy BH02 is deleted.

BA01 BA02 BA03 BARCOMBE CROSS (GENERAL)

Support policy approach

Number of respondents

1

Summary of comments received

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

How these comments have influenced the Proposed Submission Document

Support noted. Amendment to wording made.

Object to policy approach	
Number of respondents	2
Summary of comments received	
<p>Several respondents, resident to the area, object to all site developments in Barcombe Cross. Their arguments are:</p> <ul style="list-style-type: none"> - Visual impact: Barcombe is a hilltop village and at present retains this characteristic within the existing village boundary. Such villages are rare in East Sussex and are of significant historical and visual amenity value. - There is no need for affordable housing. - Access to the village is insufficient as the roads are too narrow, there is no train station and the bus service is rudimentary. - Environmental impact of 30-50 houses (75-150 cars). - Discharge of untreated sewage into local watercourses is becoming frequent and the drainage system is already overloaded. - The proposed sites are a considerable distance from the rest of the village. - The underlying data to support the proposed allocations is incorrect. For instance, the information on who is using the access 'track' to the proposed sites is wrong, as is the information regarding the involvement of adjacent landowners. The information on effects on views from surrounding properties is incorrect: as well as the two mentioned in the plan, there are at least two more. - There are more properties, besides 'Willow Cottage', which are buildings of significant historical interest. - 	
How these comments have influenced the Proposed Submission Document	
<p>Comments on the suitability of the site are considered through the SHELAA.</p> <p>In response to other concerns raised, the Councils Housing Needs Register indicates that there remains a need for affordable housing within Barcombe Cross. Southern Water has confirmed that the local waste water treatment works will need to be monitored and upgraded to accommodate future growth, but this is not a constraint to development proposed in the Draft Plan. The wording of the supporting text is amended to clarify inaccuracies and errors.</p>	

Object to policy approach	
Support policy	
Number of respondents	1
Summary of comments received	
<p>We received one supportive representation stating that the owners of BA01 and BA02 were discussing access to BA01, although they have yet to come to a solution.</p>	
How these comments have influenced the Proposed Submission Document	
<p>Support noted. Subsequent enquiries have shown that access for sites BA01 and BA02 is deliverable without third party land, or the use is available via an extant easement in the case of BA02. The supporting text has been amended accordingly.</p>	
Object to policy approach	
Number of respondents	7
Summary of comments received	
<p>The Council's Specialist Advisor (Coastal Engineering) states that there were incidents of surface</p>	

water flooding and Sustainable Drainage Systems are needed to mitigate the problem. They will have to be maintained in the future.

Seven residents object to the proposed site allocation. The reasons given are:

- The site is marked for the potential expansion of a play area.
- Negative impact on visual amenity. Barcombe is considered a hilltop village, rare in East Sussex, and of significant historical and visual amenity value.
- The sewage system is becoming overloaded.

One developer questions how the site will be delivered due to the access depending on a third party.

How these comments have influenced the Proposed Submission Document

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

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

It is acknowledged that whilst the 2003 retained 'saved' Policy BA1 had not been delivered there remains a need for the additional recreation space within Barcombe Cross. Draft Policy BA01 has been amended to secure an area of land for the provision of suitable recreation space.

Since the 2017 Draft Consultation further enquiries have concluded that the necessary widths to provide access within the same land ownership can be achieved.

Other comments received

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

BA02 LAND ADJACENT TO THE HIGH STREET, BARCOMBE CROSS

Support policy approach

Number of respondents	1
Summary of comments received	
Southern Water supports the proposed policy without comment.	
How these comments have influenced the Proposed Submission Document	
Support noted.	
Object to policy approach	

Number of respondents	3
Summary of comments received	
<p>The Council's Specialist Advisor (Coastal Engineering) objects to the proposed site allocation because there are incidents of surface water flooding. They suggest that a Sustainable Drainage System is needed.</p> <p>Other respondents object with the following reasons:</p> <ul style="list-style-type: none"> - The site will be of limited accessibility to the elderly, as the buildings will be on a slope. - The access to the site is dangerous. - The roads into Barcombe are too narrow to support more vehicles. - The deliverability of the site is questionable as the access depends on a third party. 	
How these comments have influenced the Proposed Submission Document	
<p>In response to the Council's Specialist Advisor's concerns, it is considered that the requirement for new development to consider potential flood risk and incorporate SuDS where appropriate is appropriately addressed by Core Policy 12: Flood Risk, Coastal Erosion, Sustainable Drainage and Slope Stability of the adopted Local Plan Part 1.</p> <p>Comments on the suitability of the site are considered through the SHELAA. The local highway authority commented on the principle of the development of the site and did not identify any insurmountable constraints to development. Since the 2017 Draft Consultation further enquiries have concluded that BA02 has the necessary rights of access to the track, via an easement, for access to be achieved.</p> <p>Accordingly no change is made to Draft Policy BA02.</p>	
Other comments received	
Number of respondents	1
Summary of comments received	
<p>One respondent, representing the owners of the site, suggests an amendment on the wording of the policy: "approximately" 25 dwellings can be replaced by "a minimum of" 25 dwellings.</p>	
How these comments have influenced the Proposed Submission Document	
<p>The SHELAA considers that 25 dwellings is suitable, having assessed it previously for 30 dwellings and concluding it to be too dense. It is considered that 'Approximately' provides sufficient flexibility and is consistent with the wording of other draft housing site allocations.</p> <p>Accordingly no change is made to Draft Policy BA02.</p>	

BA03 LAND AT BRIDGELANDS, BARCOMBE CROSS	
Support policy approach	
Number of respondents	1
Summary of comments received	
<p>There is one representation, which comes from a developer on behalf of the owners. They note the site represents a sustainable small-scale development, which is close to the edge of the existing settlement, on its western edge. It is also opposite the existing ribbon of development along Bridgelands. The site is in joint ownership, and available, and therefore can be delivered in a timely manner.</p>	
How these comments have influenced the Proposed Submission Document	
Support noted.	

Object to policy approach	
Number of respondents	8
<p>Summary of comments received</p> <p>Natural England advises the inclusion of the consideration of 'Ecosystems services' and the suggestion to use of Sustainable Drainage Systems. The Council's Specialist Advisor (Coastal Engineering) agrees on this aspect.</p> <p>Sussex Wildlife Trust stresses the potential ecological value of the pond and the ditches mentioned, which should be clarified to ensure that any ecological impact assessments will be carried out will include these features.</p> <p>The residents responding to this proposed site agree on the following arguments:</p> <ul style="list-style-type: none"> - The density of the proposed development is three times the density of the existing development and doesn't complement the character of the current form of the local buildings. - There is a possible ecological impact. An assessment should be carried out. - The focus of the development is within a sensitive landscape. 	
<p>How these comments have influenced the Proposed Submission Document</p> <p>In response to Natural England's and the Council's Specialist Advisor's comments, it is acknowledged that there are localised surface water flooding issues. The draft policy (criteria (e)) and supporting text requires a site specific flood risk assessment and for appropriate mitigation, including SuDS, to be implemented. Accordingly no change is made to Draft Policy BA03.</p> <p>In response to Sussex Wildlife Trust's comments, it is recognised that the existing ponds and ditches have potential ecological value. The wording to the supporting text has been amended accordingly.</p> <p>Comments on the suitability of the site are considered through the Strategic Housing and Economic Land Availability Assessment (SHELAA). Draft Policy BA03 (criteria g) requires an ecological impact assessment. No amendment is made to Draft Policy BA03 in respect of these concerns.</p>	

CH01 CH02 CHO3 CHAILEY (GENERAL)	
Support policy approach	
Number of respondents	3
<p>Summary of comments received</p> <p>We received three representations, one of which was on behalf of a residents group, which were supportive to the allocation of sites put forward in the LPP2.</p>	
<p>How these comments have influenced the Proposed Submission Document</p> <p>Support noted.</p>	
Object to policy approach	
Number of respondents	1
<p>Summary of comments received</p> <p>One representation objected to the allocated sites. They state that the two smaller sites in North Chailey will not be large enough to provide much the needed affordable housing. The respondent suggests that land at Buckles Wood Field should be utilized.</p>	
<p>How these comments have influenced the Proposed Submission Document</p>	

Objection noted. The suggested additional site of Buckle's Wood Field has been assessed through the Strategic Housing and Economic Land Availability Assessment (SHELAA) process. No amendments are proposed to the wording in response to this objection.

CH01 GLENDENE, STATION ROAD

Support policy approach

Number of respondents

3

Summary of comments received

We received one supportive representation which had no additional further comments. Natural England notes that ancient woodland lies adjacent to the site and therefore refers to their standing advice with regard to this. This includes a requirement for a buffer of at least 15m between the woodland and the development. They are pleased Sustainable Drainage Systems are cited and that full ecological surveys are included.

How these comments have influenced the Proposed Submission Document

Support noted.
In response to Natural England's comment the wording to Draft Policy CH01 and supporting text has been amended to require the provision of at least 15m buffer between the development and ancient woodland.

Object to policy approach

Number of respondents

2

Summary of comments received

East Sussex County Council comments that the site is close to listed buildings, and advises that an archaeological assessment should be conducted. This should be included in the policy. Sussex Wildlife state the criterion (e) on the buffer should be amended to state that this buffer is at a *minimum* 15m wide.

How these comments have influenced the Proposed Submission Document

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

CH02 LAYDEN HALL, EAST GRINSTEAD ROAD

Support policy approach

Number of respondents

5

Summary of comments received

Four respondents, including Chailey Parish Council, support the allocation of this site and have no further comments. One respondent supports the policy, but speaking on behalf of the landowner, feels that the land could accommodate more than six dwellings.

How these comments have influenced the Proposed Submission Document

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

Object to policy approach

Number of respondents	2
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Summary of comments received

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

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

How these comments have influenced the Proposed Submission Document

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

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

CH03 LAND ADJACENT TO MILL LANE

Support policy approach

Number of respondents	2
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Summary of comments received

The Chailey Parish Council supports the site without any further comments.

Another respondent also states support, and notes that additional sites could be allocated.

How these comments have influenced the Proposed Submission Document

Support noted.

Other comments received

Number of respondents	1
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Summary of comments received

The Council's Specialist Advisor (Coastal Engineering) draws attention to the fact that the site is a former mill site and there may be a risk of land contamination, which needs to be addressed in the planning allocation.

How these comments have influenced the Proposed Submission Document

In response to the Council's Specialist Advisor, an additional criterion (g) has been incorporated into Draft Policy CH03 requiring investigation into potential land contamination onsite.

RG01 CABURN FIELD, RINGMER

Object to policy approach

Number of respondents	8
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Summary of comments received

Ringmer Parish Council objects to the site. They argue that the target of 60 houses on this site would result in a density of over 45 dwellings/ha, which is well above the densities envisaged in the policies of the Lewes Local Plan Part 1 and the Ringmer Neighbourhood Plan. The additional housing will not be delivered within the boundary shown on Figure 11. They also request a rewording of paragraph 2.98, where a shortfall of 32 is mentioned. Any shortfall arose at later stage.

Southern Water have conducted a preliminary assessment which reveals that the local sewerage system has limited capacity to accommodate additional development. This is not a constraint to development however, planning policy for this site should ensure that proposed development makes a connection to the sewerage network at the nearest point of adequate capacity.

Sport England objects to the loss of a playing field unless it is proposed to replace it with one of equal quality and size. The Environment Agency supports this.

East Sussex County Council notes that the development should be informed by an Ecological Impact Assessment.

The Sussex Wildlife Trust notes that the greenfield site in the centre the village likely contributes to the village's ecological network. The Council should assess the value of the site within the green infrastructure network before it is allocated.

One respondent states that the plan fails to meet the tests of soundness, because the minimum housing needs for Ringmer are not met. A shortfall of at least 32 dwellings is identified, while the proposed plan only allocates 20 homes.

Another respondent states that the policy RG01 is not consistent with the policies set out in the Local Plan part 1, and this could jeopardise the spatial strategy of the Local Plan Part2. They also provide an alternative allocation, which they say is available and deliverable, at Broyle Gate Farm. They make several arguments: the shortfall of 32 is not met, the density at Caburn Field will be too high and that the centric location of the football field is an asset for Ringmer. They also raise a concern that an alternative site adjacent to Ringmer Community College might not come forward.

How these comments have influenced the Proposed Submission Document

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

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

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

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

requirements of Spatial Policy 2.

Other comments received

Number of respondents

1

Summary of comments received

The Council's Specialist Advisor (Coastal Engineering) suggests that the development assists in reducing flood risk in the future by delivery of an integrated Sustainable Drainage System that includes protection of properties downstream. Many of the streams in this part of Ringmer were placed in culverts including a possible culvert which runs along the southern boundary of this site. If Caburn Fields was brought forward for development, consideration should be given to removing the culverts that the streams and drainage assets in that lie within this area, along with a wider assessment of the capacity of the downstream assets and structures to accommodate further surface water flows. There was a pond on the south eastern edge of the site and a drainage system, much of which has fallen into disrepair.

How these comments have influenced the Proposed Submission Document

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

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

SUGGESTIONS FOR NEW HOUSING SITES

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

BARCOMBE CROSS

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

How these comments have influenced the Proposed Submission Document

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

HAMSEY BRICKWORKS

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

How these comments have influenced the Proposed Submission Document

The site has planning permission for mixed use residential and commercial development. A new allocation is therefore not required for this site.

Accordingly, no changes are made in response to this comment.

NEWICK

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

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

How these comments have influenced the Proposed Submission Document

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

PLUMPTON GREEN

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

How these comments have influenced the Proposed Submission Document

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

RINGMER

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

There is a suggestion for an allocation Avery Nursery (Lower Clayhill Business Area, Uckfield Road, NP Policy EMP20) This is a site for mixed use that would deliver the new employment floor space that the Ringmer Neighbourhood Plan identifies for the area.

How these comments have influenced the Proposed Submission Document

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

Local Plan Part 1 does not require new employment allocations to be identified through Local Plan Part 2. The need for new employment allocations will be considered through a future review of Local Plan Part 1 or the Ringmer Neighbourhood Plan.

SOUTH CHAILEY

One developer suggests that land to the west of the A275, South Chailey (see development brief at Appendix 2) is allocated for residential development. The site extends to 2.6 hectares and is well related to the existing built environment. The site would be capable of delivering circa 55 dwellings.

How these comments have influenced the Proposed Submission Document

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

WIVELSFIELD

There is a suggestion for land at East of Ditchling Road, Wivelsfield for 95 dwellings or a potentially

slightly smaller scheme for 40-50 dwellings

How these comments have influenced the Proposed Submission Document

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

DEVELOPMENT MANAGEMENT POLICIES

DM1 PLANNING BOUNDARY

Support policy approach

Number of respondents

9

Summary of comments received

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

How these comments have influenced the Pre-Submission Document

Support noted.

Object to policy approach

Number of respondents

12

Summary of comments received

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

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

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

How these comments have influenced the Pre-Submission Document

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

The key issue that Policy DM1 seeks to address is the need to positively focus development growth on sustainable settlements, reduce the need to travel, and protect the intrinsic character and beauty of the countryside in accordance with the spatial strategy set out in the Local Plan Part 1. It is

considered that the specific need to protect biodiversity is appropriately addressed by both Core Policy 10 and Policy DM24, which would be considered alongside Policy DM1 in the determination of planning applications where necessary.

In terms of the impact of development on the Ashdown Forest, the Local Plan clearly states the development management policies should not be read in isolation. The 7km Ashdown Forest zone is defined on the Local Plan Policies Map and Paragraph 6.43 of the Local Plan Part 1 states that Newick village falls almost entirely within this zone. Further repetition in this respect is considered unnecessary and unjustified.

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

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

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

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

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

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

DM2 AFFORDABLE HOMES EXCEPTION SITES	
Support policy approach	
Number of respondents	3
<p>Summary of comments received</p> <p>Respondents generally supported the policy due to the lack of sufficient affordable housing in rural areas. However, whilst supporting the policy, the Lewes branch of CPRE considers that allowing an element of market housing does not seem to align with national planning policy and appears unwise.</p>	
<p>How these comments have influenced the Pre-Submission Document</p> <p>Support noted. The NPPF requires local planning authorities to consider whether allowing some market housing on exception sites would facilitate the provision of additional affordable housing to meet local needs. As stated in the supporting text to Policy DM2, a proportion of market housing would only be permitted where it can be demonstrated that an affordable housing scheme would be unviable without cross-subsidy. No amendment is therefore proposed to Draft Policy DM2 in this respect.</p>	
Object to policy approach	
Number of respondents	4
<p>Summary of comments received</p> <p>East Sussex County Council and Natural England recommend that the policy should add a criterion on biodiversity, having regard to NPPF paragraph 117. Ringmer Parish Council is concerned that the wording of the final paragraph of the policy may detract from delivery of affordable houses, and encourages developers to offer larger market homes. Another respondent objects to the policy because it implies that housing in rural areas should only be provided to meet the local need; the respondent considers this doesn't reflect NPPF par. 54 and 55.</p>	
<p>How these comments have influenced the Pre-Submission Document</p> <p>In response to the concerns of Natural England and East Sussex County Council, it is acknowledged that biodiversity is an important consideration in the determination of planning applications. However, the Council has followed Government guidance that local plans should be as focused and concise as possible, avoiding undue repetition or duplication by the use of generic policies to set out principles that may be common to different types of development. It is considered that the specific need to protect biodiversity is appropriately addressed by both Core Policy 10 (<i>Natural Environment and Landscape Character</i>) of the adopted Local Plan Part 1 and Draft Policy DM24 (<i>Protection of Biodiversity and Geodiversity</i>), which would be considered alongside Policy DM2 where appropriate in the determination of planning applications.</p> <p>In response to Ringmer Parish Council's concerns, the NPPF requires local planning authorities to consider whether allowing some market housing on exception sites would facilitate the provision of additional affordable housing to meet local needs. As stated in the supporting text to Policy DM2, a proportion of market housing would only be permitted where it can be demonstrated that an affordable housing scheme would be unviable without cross-subsidy.</p> <p>In response to the remaining concern, the Council does not accept that it has misunderstood national housing policy. The use of rural exception sites to provide affordable housing to meet local needs is a long-standing planning policy tool which has been carried forward by Core Policy 1 (<i>Affordable Housing</i>) of the adopted Local Plan Part 1. Accordingly, no amendment is proposed to Draft Policy DM2 in the light of the comments received.</p>	

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

DM4 RESIDENTIAL CONVERSIONS IN THE COUNTRYSIDE	
Support policy approach	
Number of respondents	2
Summary of comments received East Sussex County Council supports the policy but suggests that the words 'habitat survey' in the supporting text is replaced by 'ecological impact assessment'. Natural England also supports the policy but recommends the inclusion of the requirement that the developer needs a licence from Natural England when the development will impact bats. It also recommends the inclusion within the policy of a requirement of a protected species survey.	
How these comments have influenced the Pre-Submission Document Support noted. The supporting text to the policy has been amended in the light of East Sussex County Council's comments. In response to Natural England's recommended changes, it should be noted that the Council has followed Government guidance that local plans should be as focussed and concise as possible. The supporting text to the policy clearly states that the potential presence of protected species will be an important consideration. Such species are protected by statute. It is not considered necessary for planning policies to repeat statutory requirements that are subject to other legislative regimes. No amendment is therefore proposed to Draft Policy DM4 in this respect.	
Object to policy approach	
Number of respondents	2
Summary of comments received Sussex Wildlife Trust suggests that the policy includes an additional criterion to address the potential impact on biodiversity. It also suggests that the term 'habitat survey' is replaced by 'ecological assessment'.	
How these comments have influenced the Pre-Submission Document The term 'habitat survey' in the supporting text has been amended to reflect this advice. It is also acknowledged that biodiversity is an important consideration in the determination of planning applications. However, the Government is clear that local plans should be concise and should avoid undue repetition or duplication by using generic policies to set out principles that may be common to different types of development. It is considered that the specific need to protect biodiversity is appropriately addressed by both Core Policy 10 (<i>Natural Environment and Landscape Character</i>) of the adopted Local Plan Part 1 and Draft Policy DM24 (<i>Protection of Biodiversity and Geodiversity</i>) which would be considered alongside Policy DM4 in the determination of planning applications where appropriate. No amendment is therefore proposed to Draft Policy DM4 in this respect.	
Other comments received	
Number of respondents	1

Summary of comments received

The Council's Specialist Advisor (Coastal Engineering) suggests the text should include the possibility of site contamination as agricultural buildings may have been used for storage of vehicles, fuels and pesticides. He also recommends that applicants should be required to assess surface and ground water flood risks.

How these comments have influenced the Pre-Submission Document

It is acknowledged that contamination is often a key issue that needs to be addressed in development proposals involving former agricultural land and buildings. The concerns regarding flood risk are also recognised. The supporting text to Draft Policy DM4 has been amended accordingly.

DM5 REPLACEMENT DWELLINGS IN THE COUNTRYSIDE**Support policy approach****Number of respondents**

1

Summary of comments received

No additional comment provided.

How these comments have influenced the Pre-Submission Document

Support noted.

Object to policy approach**Number of respondents**

2

Summary of comments received

East Sussex County Council recommends that biodiversity benefits should be added to criterion 2. The other respondent comments that the requirement to locate the replacement dwelling "on the footprint of the existing dwelling" offers no flexibility. It is suggested that the words "is located in the same or similar position to that of the existing dwelling..." or words along those lines would provide some scope for variation from the existing footprint.

How these comments have influenced the Pre-Submission Document

In response to the East Sussex County Council's suggestion, it is acknowledged that biodiversity can be an important consideration in the determination of planning applications. However, the Government is clear that local plans should be as focused and concise as possible and concentrate on the critical issues facing the area. There is no local evidence to demonstrate that relocating an existing dwelling from its original position is likely to be justified for reasons of biodiversity benefit. Accordingly, no amendment is proposed to Draft Policy DM5 in this respect.

In response to the other comment, it is acknowledged that the wording of the policy may be overly prescriptive in terms of requiring a replacement dwelling to be located on the exact footprint of the existing dwelling. The wording of Policy DM5 has therefore been amended as suggested by the respondent.

DM6 EQUESTRIAN DEVELOPMENT**Support policy approach****Number of respondents**

2

Summary of comments received

Natural England supports the policy. However, it recommends that impacts on biodiversity should be included because such developments, if poorly designed, can have deleterious impacts on statutory

wildlife sites, protected species, priority habitats and species and networks of natural habitats.

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

How these comments have influenced the Pre-Submission Document

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

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

Object to policy approach

Number of respondents

2

Summary of comments received

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

How these comments have influenced the Pre-Submission Document

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

Other comments received

Number of respondents

1

Summary of comments received

The Council's Specialist Advisor (Coastal Engineering) suggests the need for an assessment of the cumulative impact of increased hardstanding, and the creation of surface water run-off and the use of SuDS. He also recommends that smoke from burning horse manure, flies, rodents and odours should be a consideration.

How these comments have influenced the Pre-Submission Document

It is considered that Core Policy 12 (Flood Risk, Coastal Erosion, Sustainable Drainage and Slope Stability) of the adopted Local Plan Part 1 provides an adequate framework for the consideration of flood risk arising from development proposals and for ensuring that SuDS are incorporated where appropriate. In terms of nuisance from smoke, pests and odours, the Government expects local planning authorities to focus on whether the development itself is an acceptable use of the land rather than the control of processes or emissions. The potential nuisances listed by the respondent are subject to control under other legislative regimes and it must be assumed that these regimes will operate effectively. Accordingly, no amendment is proposed to Draft Policy DM6 in this respect.

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

DM8 RESIDENTIAL SUB-DIVISIONS AND SHARED HOUSING	
Support policy approach	
Number of respondents	1
Summary of comments received The respondent supports the policy because it will help to deliver an increase in the availability of one and two bedroom dwellings.	
How these comments have influenced the Pre-Submission Document Support noted.	
Object to policy approach	
Number of respondents	1
Summary of comments received The respondent suggests that the scope of the policy should be extended to include the residential subdivision of an existing dwelling into two or more dwellings.	
How these comments have influenced the Pre-Submission Document It is considered that the criteria listed in Policy DM8 can be applied to the conversion of a single dwelling to two or more dwelling units where appropriate. No amendment is therefore proposed to Draft Policy DM8 in this respect.	
Other comments received	
Number of respondents	1
Summary of comments received Brighton and Hove City Council notes that student housing is classed as falling within the broader definition of 'shared housing' within the draft Plan. This suggests that accommodation for students within Lewes District is only expected to take the form of conversions of existing residential properties to HMOs. An increasing demand for purpose built student accommodation to serve the universities is likely to require location outside of the city, particularly along the railway linking the campuses at Moulsecombe and Falmer with Lewes town, Newhaven and Seaford.	
How these comments have influenced the Pre-Submission Document The demand for purpose built student accommodation in Brighton & Hove is acknowledged and the Council supports the principle of providing this form of accommodation within Lewes District,	

subject to compliance with the policies of the approved development plan for the area. There is no expectation that student accommodation should only be provided through the conversion of existing residential properties. No amendment is therefore proposed to Draft Policy DM8 in this respect.

DM9 FARM DIVERSIFICATION

Support policy approach

Number of respondents

4

Summary of comments received

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

How these comments have influenced the Pre-Submission Document

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

Object to policy approach

Number of respondents

2

Summary of comments received

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

How these comments have influenced the Pre-Submission Document

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

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

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

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

Other comments received

Number of respondents

1

Summary of comments received

The Council's Specialist Advisor (Coastal Engineering) recommends the inclusion of a criterion on noise, fumes, dust, and odour pollution.

How these comments have influenced the Pre-Submission Document

The Government is clear that local plans should be focussed and concise and avoid undue repetition or duplication by using generic policies to set out principles that may be common to different types of development. It is considered that Core Policy 9 (*Air Quality*) of the adopted Local Plan Part 1, Draft Policy DM20 (*Pollution Management*) and Draft Policy DM23 (*Noise*) provide an appropriate policy framework to address the issues raised by the respondent. Accordingly, no amendments are proposed to Draft Policy DM9 in this respect.

DM10 EMPLOYMENT DEVELOPMENT IN THE COUNTRYSIDE

Support policy approach

Number of respondents

2

Summary of comments received

Natural England supports the policy but suggests that it should be amended to require a survey for protected species. The other respondent acknowledges the strong demand for rural employment sites.

How these comments have influenced the Pre-Submission Document

Support noted. In response to Natural England's suggested amendment, the supporting text clearly states that the potential presence of protected species will be an important consideration. Such species are protected by statute. It is not considered necessary to repeat statutory requirements that are subject to other legislative regimes within the policy itself. Accordingly, no amendments are proposed to Draft Policy DM10 in this respect.

Object to policy approach

Number of respondents

2

Summary of comments received

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

How these comments have influenced the Pre-Submission Document

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

It is considered that Core Policy 10 (*Natural Environment & Landscape Character*) of the adopted Local Plan Part 1 sets out a suitable policy framework for ensuring that development would not have

an unacceptable impact on landscape conservation and enhancement. A policy requirement for all applications for employment development to submit a Landscape and Visual Assessment is considered unduly onerous and may threaten the viability of development, in conflict with the principles set out in the NPPF.

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

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

Other comments received

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

DM11 EXISTING EMPLOYMENT SITES IN THE COUNTRYSIDE

Support policy approach

Number of respondents	3
Summary of comments received	
Sussex Wildlife Trust support the requirement for any expansion of sites to include measures to secure environmental improvements, but recommend that the word 'or' in the final sentence of the policy is replaced with 'and,' as enhanced landscaping and biodiversity gains are not mutually exclusive. The Lewes branch of the CPRE supports the policy, recognising the strong demand for rural employment sites. The third respondent notes that this policy would support the redevelopment of Balcombe Pit.	
How these comments have influenced the Pre-Submission Document	
Support noted. Policy DM11 has been amended in accordance with the comments from the Sussex Wildlife Trust.	
Object to policy approach	
Number of respondents	1
Summary of comments received	
East Sussex County Council (ESCC) requests the inclusion of a Landscape and Visual Assessment requirement with development applications.	

How these comments have influenced the Pre-Submission Document	
It is considered that Core Policy 10 (<i>Natural Environment & Landscape Character</i>) of the adopted Local Plan Part 1 sets out a suitable policy framework for ensuring that development would not have an unacceptable impact on landscape conservation and enhancement. A policy requirement for all applications for employment development to submit a Landscape and Visual Assessment is considered unduly onerous and may threaten the viability of development, in conflict with the principles set out in the NPPF.	
Other comments received	
Number of respondents	1
Summary of comments received	
The Council's Specialist Advisor (Coastal Engineering) recommends the inclusion of a criterion addressing noise, dust and fumes to be consistent with Draft Policy DM10 (<i>Employment Development in the Countryside</i>).	
How these comments have influenced the Pre-Submission Document	
It is acknowledged that Draft Policy DM11 should be consistent with Draft Policy DM10 and it has been amended accordingly.	

DM12 CARAVAN AND CAMPING SITES	
Support policy approach	
Number of respondents	1
Summary of comments received	
The Lewes branch of the CPRE supports the policy.	
How these comments have influenced the Pre-Submission Document	
Support noted.	
Object to policy approach	
Number of respondents	2
Summary of comments received	
Natural England seeks a requirement to conserve and enhance biodiversity, whilst East Sussex County Council seeks a requirement for a Landscape and Visual Assessment to support all development applications.	
How these comments have influenced the Pre-Submission Document	
The Government is clear that local plans should be focussed and concise and avoid undue repetition or duplication by using generic policies to set out principles that may be common to different types of development. It is considered that the criteria Core Policy 10 (<i>Natural Environment & Landscape Character</i>) of the adopted Local Plan Part 1 and draft Policy DM12 provide a suitable policy framework for ensuring that development would not have an unacceptable impact on landscape conservation and enhancement. A policy requirement for all planning applications for caravan and camping sites to submit a Landscape and Visual Assessment is considered unduly onerous and may threaten the viability of small-scale proposals, in conflict with the principles set out in the NPPF.	
It is also considered that Core Policy 10 (<i>Natural Environment & Landscape Character</i>) of the adopted Local Plan Part 1 and draft Policy DM24 (<i>Protection of Biodiversity and Geodiversity</i>) set out a suitable framework for ensuring that development does not have an unacceptable impact on biodiversity. Accordingly, no amendments are proposed to Draft Policy DM12 in this respect.	

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

DM14 MULTIFUNCTIONAL GREEN INFRASTRUCTURE	
Support policy approach	
Number of respondents	4
Summary of comments received	
The Environment Agency, Natural England and East Sussex County Council support the policy. Natural England recommends that Green Infrastructure is mapped at a spatial scale, so that forthcoming developments will be able to recognise opportunities to contribute. The Lewes branch of CPRE support the policy but suggest that it is rephrased in order to encourage the protection of existing green corridors and the creation of new ones.	
How these comments have influenced the Pre-Submission Document	
Support noted. Green corridors and other ecological networks are protected by Core Policy 8 (<i>Green Infrastructure</i>) and Core Policy 10 (<i>Natural Environment and Landscape Character</i>) of the adopted Local Plan Part 1. Accordingly, no amendment is proposed to Draft Policy DM14 in this respect.	
Object to policy approach	
Number of respondents	2
Summary of comments received	
The Woodland Trust objects to the policy because it fails to recognise that woodland creation is especially important for green infrastructure and delivers a wide range of benefits. The Sussex Wildlife Trust objects because the policy is called 'multi-functional green infrastructure' and should therefore relate to all types of GI. They seek the following amendments: in the first sentence of the policy, delete the word "would" and replace with the word "will," and delete the words "the character of the area or the need for outdoor playing space" and replace with word "need."	
How these comments have influenced the Pre-Submission Document	
The benefits associated with trees and woodland is set out in the supporting text to Draft Policy DM27 (<i>Landscape Design</i>). Repeating this text elsewhere in the local plan would fail to have regard to Government advice that local plans should be concise and avoid undue repetition or duplication.	
In response to the wording amendment proposed by the Sussex Wildlife Trust, it is considered that, without further qualification, the term 'need' is vague and imprecise. Hence, it fails to have regard to	

the NPPF which states that local plan policies should be clearly written and unambiguous so it is evident how a decision maker should react to development proposals.

Accordingly, no amendment is proposed to Draft Policy DM14.

Other comments received

Number of respondents

1

Summary of comments received

The Council's Specialist Advisor (Coastal Engineering) suggests that the policy should acknowledge the potential contribution of green infrastructure to managing and alleviating the impact of climate change.

How these comments have influenced the Pre-Submission Document

The contribution of green infrastructure to mitigating the impacts of climate change is acknowledged and set out in the supporting text to Core Policy 8 (Green Infrastructure) of the adopted Local Plan Part 1. In view of Government guidance that local plans should be concise and avoid undue repetition or duplication, no amendment is proposed to Draft Policy DM14 in this respect.

DM15 PROVISION FOR OUTDOOR PLAYING SPACE

Object to policy approach

Number of respondents

4

Summary of comments received

Sport England objects to the policy because the use of generic standards does not satisfy the CIL regulation 122 tests and does not account for Sport England's latest advice on the approach to providing for sports facilities in new development. Ringmer Parish Council is concerned that the proposed standards for outdoor play provision is considerably more than is currently provided in the village and maintenance and renewal cost could be unaffordable. The Parish Council is also considers that the policy should promote access to the countryside. Other respondents believe that the standard for children's play space is overly prescriptive and lacking in flexibility and that the Council should be clearer about how the required provision will be secured in relation to CIL or other contributions.

How these comments have influenced the Pre-Submission Document

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

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

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

Accordingly, no amendment is proposed to Draft Policy DM15.

DM16 CHILDREN'S PLAY SPACE IN NEW HOUSING DEVELOPMENT

Object to policy approach

Number of respondents

4

Summary of comments received

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

How these comments have influenced the Pre-Submission Document

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

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

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

Accordingly, no amendment is proposed to Draft Policy DM16.

DM17 FORMER LEWES/SHEFFIELD PARK RAILWAY LINE

Support policy approach

Number of respondents

2

Summary of comments received

East Sussex County Council supports the policy but points out that increased public access should not

be to the detriment of biodiversity. The Mid Sussex Area Bridleways Group also supports policy but wish to see it apply to all off-road routes used by horses.

How these comments have influenced the Pre-Submission Document

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

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

Object to policy approach

Number of respondents

2

Summary of comments received

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

How these comments have influenced the Pre-Submission Document

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

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

DM18 RECREATION AND RIVERS

Support policy approach

Number of respondents

2

Summary of comments received

The Environment Agency and East Sussex County Council both support the policy without further comment.

How these comments have influenced the Pre- Submission Document

Support noted.

Object to policy approach	
Number of respondents	2
<p>Summary of comments received</p> <p>Sport England objects on the grounds that a specific policy is required in order to protect existing playing fields and sport facilities. Paragraph 74 of the NPPF states that existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless a number of conditions are met. A policy along these lines should be included in the local plan. The NPPF also refers to the need for an assessment of existing sport facilities in order to satisfy its criteria for the potential loss of playing fields or sports facilities. Without this there is a significant concern that decisions about planning to meet the current and future sports facility needs of the community will not be based on an up-to-date and robust evidence base.</p> <p>Sussex Wildlife Trust seeks reference to the natural functioning of the river and associated wetlands, and the need for any recreational activities to be accommodated with affecting the integrity of the river or tidal defence embankment.</p>	
<p>How these comments have influenced the Pre-Submission Document</p> <p>It is considered that the NPPF provides adequate policy protection against the loss of playing fields to development within the district. The Government is clear that there should be no need for local plans to re-iterate policies that are already set out in the NPPF. An assessment of existing playing space in the district was carried out in 2014 and will be published as a background paper to the Pre-Submission Local Plan Part 2 in order to inform future planning decisions on development proposals which would result in the loss of existing playing fields or other outdoor play space.</p> <p>The comments of the Sussex Wildlife Trust in relation to ensuring that development proposals will not have an adverse impact on the natural functioning of the river and associated wetlands are acknowledged and Draft Policy DM18 has been amended accordingly.</p> <p>The need to ensure that development can be accommodated without adversely affecting the integrity of the river or tidal defence embankment is referred to in the supporting text and is addressed by other legislative powers. The Environment Agency is the responsible body for maintaining the tidal defence embankments and has not sought an amendment to the policy in this respect. Consequently, no amendment is proposed to Draft Policy DM18 in this respect.</p>	
Other comments received	
Number of respondents	1
<p>Summary of comments received</p> <p>The Council's Specialist Advisor (Coastal Engineering) recommends that this policy includes a statement that development proposals should demonstrate that there is no adverse impact upon the water conveying capacity of the river, or adjacent flood plains.</p>	
<p>How these comments have influenced the Pre-Submission Document</p> <p>It is acknowledged that development proposals should not have an adverse impact on the natural functioning of the river and associated wetlands and Draft Policy DM18 has been amended accordingly.</p>	

DM19 PROTECTION OF AGRICULTURAL LAND	
Support policy approach	
Number of respondents	2

Summary of comments received	
Natural England and the Lewes branch of the CPRE support this policy without further comment.	
How these comments have influenced the Pre-Submission Document	
Support noted.	
Object to policy approach	
Number of respondents	1
Summary of comments received	
One respondent considers the policy is overly restrictive having regard to the NPPF.	
How these comments have influenced the Pre-Submission Document	
It is considered that Draft Policy DM19 is a balanced and reasonable interpretation of the NPPF. No amendment is proposed in the light of the respondent's comments.	

DM20 POLLUTION MANAGEMENT	
Support policy approach	
Number of respondents	2
Summary of comments received	
The Environment Agency and the Sussex Wildlife Trust both support the policy approach.	
How these comments have influenced the Pre-Submission Document	
Support noted.	
Other comments received	
Number of respondents	1
Summary of comments received	
One respondent suggests that the Council should come out more strongly in support of reducing air quality and require developers to include an 'air quality plan' which would demonstrate how they meet current and potentially new government regulations as well as minimising CO2 emissions.	
How these comments have influenced the Pre-Submission Document	
Whether or not air quality is relevant to a planning decision will depend upon the proposed development and its location. It is considered that Core Policy 4 (<i>Air Quality</i>) of the adopted Local Plan Part 1 sets out an appropriate decision-making framework to sustain and contribute towards compliance with relevant national standards for air pollutants, taking into account the presence of Air Quality Management Plans. A policy requiring all new development to include an 'air quality plan' would fail to have regard to the NPPF and also national Planning Practice Guidance, which clearly sets out how considerations of air quality fit into the development management process. Accordingly, no amendment is proposed to Draft Policy DM20.	

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

DM22 WATER RESOURCES AND WATER QUALITY	
Support policy approach	
Number of respondents	4
Summary of comments received The Environment Agency, Natural England, East Sussex County Council and Sussex Wildlife Trust support the policy. The Environment Agency and the Sussex Wildlife Trust suggests some minor wording amendments to the supporting text.	
How these comments have influenced the Pre-Submission Document Support noted. The supporting text to Draft Policy DM22 has been amended in accordance with the comments submitted by the Environment Agency and the Sussex Wildlife Trust.	
Object to policy approach	
Number of respondents	1
Summary of comments received Ringmer Parish Council objects to this policy on the grounds that river water quality in the District, especially in Glynde Reach, is very poor. The policy should therefore include a commitment by the Council, working together with the relevant other authorities, to implement an improvement plan.	
How these comments have influenced the Pre- Submission Document Development management policies are intended to provide a clear framework for the consideration of planning applications for development. The suggested amendment to Policy DM22 fails to have regard to the NPPF, which states that policies should be written so it is evident how a decision maker should react to development proposals. Accordingly, no amendment is proposed to Draft Policy DM22 in this respect.	
Other comments received	
Number of respondents	2
Summary of comments received One respondent seeks a provision to ensure that water use in new housing developments does not exceed 110 litres of water per person per day, regardless of technical feasibility or financial viability. The Council's Specialist Advisor (Coastal Engineering) states that there are also private water supplies that could be flagged to make developers aware of them.	
How these comments have influenced the Pre-Submission Document The Local Plan Part 2 policies must accord with the strategic policies of the adopted Local Plan Part 1. Any amendment to Core Policy 4, which requires all new dwellings to achieve water consumption of more than 110 litres per day unless it would not be technically feasible or financially viable, would be considered through a future review of the Local Plan . No amendment is therefore proposed to Draft Policy DM22 in this respect.	

DM23 NOISE	
Other comments received	
Number of respondents	1
Summary of comments received The Council's Specialist Advisor (Coastal Engineering) stresses that noise is also important for general wellbeing, and merely treating noise only as a nuisance understates the matter.	

How these comments have influenced the Pre-Submission Document

The quality of life or 'wellbeing' is encompassed by the term 'amenity' in planning policies. It is considered that paragraph 2 of the policy adequately addresses the need to protect the amenity of the existing and future users in terms of noise levels. No amendment is therefore proposed to Draft Policy 23 in this respect.

DM24 PROTECTION OF BIODIVERSITY AND GEODIVERSITY**Support policy approach****Number of respondents**

3

Summary of comments received

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

How these comments have influenced the Pre-Submission Document

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

Object to policy approach**Number of respondents**

3

Summary of comments received

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

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

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

How these comments have influenced the Pre-Submission Document

The first paragraph of Draft Policy DM24 has been amended to include the words ‘and suitable compensation is provided’ and the third and fourth paragraphs of the policy have also been amended in the light of these comments.

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

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

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

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

DM25 DESIGN

Support policy approach

Number of respondents	2
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Summary of comments received
Historic England and another respondent support the policy.

How these comments have influenced the Pre-Submission Document

Support noted.

Object to policy approach

Number of respondents	3
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Summary of comments received
Natural England recommends the inclusion of Green Infrastructure and Sustainable Drainage Systems (SuDS). The Sussex Wildlife Trust suggests including the concept of connectivity and green and blue infrastructure. Sport England suggests that the policy would be strengthened by including

the design principles to encourage healthy and active lifestyles set out in 'Active Design' (Sport England & Public Health England).

How these comments have influenced the Pre-Submission Document

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

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

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

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

Other comments received

Number of respondents	1
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Summary of comments received

The Council's Specialist Advisor (Coastal Engineering) recommends the policy should ensure the delivery of buildings that are adaptable to changing power generation and energy storage technology.

How these comments have influenced the Pre-Submission Document

Core Policies 11 (*Built & Historic Environment and High Quality Design*) and 14 (*Renewable and Low Carbon Energy and Sustainable Use of Resources*) of the adopted Local Plan Part 1 both seek to promote and encourage low carbon energy technology in new development. It is not considered necessary or appropriate to repeat the requirements of these strategic policies in draft Policy DM25. Accordingly, no amendments are proposed in this respect.

DM26 REFUSE AND RECYCLING

Support policy approach

Number of respondents	2
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Summary of comments received

East Sussex County Council and Peacehaven Town Council support the policy.

How these comments have influenced the Pre-Submission Document

Support noted.

DM27 LANDSCAPE DESIGN

Support policy approach	
Number of respondents	2
Summary of comments received East Sussex County Council and the Lewes branch CPRE Sussex support the policy.	
How these comments have influenced the Pre-Submission Document Support noted.	
Object to policy approach	
Number of respondents	1
Summary of comments received The Sussex Wildlife Trust seeks amendments to require that landscape schemes are an integral part of a development's design process and the provision of permeable boundaries to both private and public space.	
How these comments have influenced the Pre-Submission Document The supporting text to Policy DM27 sets out the Council's expectation that landscape schemes should be an integral part of the design process. It is not considered appropriate or necessary to repeat this expectation as a policy requirement. A policy requirement for development to provide permeable boundaries to both private and public space is considered overly prescriptive and as such fails to have regard to the NPPF. Accordingly, no amendments are proposed to Draft Policy DM27 in the light of these comments.	

DM30 BACKLAND DEVELOPMENT	
Support policy approach	
Number of respondents	4
Summary of comments received The Sussex Wildlife Trust, Newick Village Society and two other respondents support the policy.	
How these comments have influenced the Pre-Submission Document Support noted.	
Object to policy approach	
Number of respondents	1
Summary of comments received Applications for additional homes in back gardens in Newick continue to be approved, despite Policy HO1.6, which will lead to an increase above 100 new dwellings over the plan period.	
How these comments have influenced the Pre-Submission Document Spatial Policy 2 of the adopted Local Plan Part 1 clearly states that the planned housing growth at Newick is for a <i>minimum</i> of 100 net additional dwellings. No amendment is proposed to Draft Policy DM30 in this respect.	
Other comments received	
Number of respondents	2
Summary of comments received The Newick Parish Council suggests that the wording of the policy is strengthened to make the building of new homes in back gardens less acceptable in rural areas. The Council's Specialist Advisor (Coastal Engineering) recommends that applicants are required to carry out a flood risk assessment to ensure that backland development does not increase the risk of surface water flooding elsewhere.	

How these comments have influenced the Pre-Submission Document

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

DM31 ADVERTISEMENTS**Object to policy approach****Number of respondents**

2

Summary of comments received

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

How these comments have influenced the Pre-Submission Document

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

DM33 HERITAGE ASSETS**Support policy approach****Number of respondents**

2

Summary of comments received

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

How these comments have influenced the Pre-Submission Document

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

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

Object to policy approach**Number of respondents**

3

Summary of comments received

Ringmer Parish Council objects on the grounds that the non-designated heritage assets listed in Appendices 4 and 5 are out of date and not clearly identified, and that Conservation Areas should be

specifically included in the policy. One respondent objects on the grounds that the policy is inadequate to meet the aims of Core Policy 11 of the Local plan Part 1 and should designate extensions to the Church Road and The Green Conservation Areas in Newick. Another respondent suggests that the policy should refer specifically to Paras. 133, 134 and 135 of the NPPF.

How these comments have influenced the Pre-Submission Document

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

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

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

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

DM34 AREAS OF ESTABLISHED CHARACTER

Object to policy approach

Number of respondents

1

Summary of comments received

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

How these comments have influenced the Pre-Submission Document

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

DM35 FOOTPATH, CYCLE AND BRIDLEWAY NETWORK

Support policy approach

Number of respondents

4

Summary of comments received

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

How these comments have influenced the Pre-Submission Document

Support noted. Core Policy 8 (*Green Infrastructure*) of the adopted Local Plan Part 1 requires

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

Object to policy approach

Number of respondents	1
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Summary of comments received

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

How these comments have influenced the Pre-Submission Document

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

DM36 STATION PARKING

Object to policy approach

Number of respondents	1
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Summary of comments received

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

How these comments have influenced the Pre-Submission Document

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

Other comments received

Number of respondents	1
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Summary of comments received

One respondent states that the plan should include the importance of bus/rail interchange at railway stations.

How these comments have influenced the Pre-Submission Document

Core Policy 13 (*Sustainable Transport*) of the adopted Local Plan Part 1 clearly states that the Council will encourage new or enhanced interchanges between bus and rail services across the district. In view of Government guidance that local plans should be concise and avoid undue repetition or duplication, no amendment is proposed to Draft Policy 36 in this respect.

POLICIES MAP

POLICIES MAP AND INSET MAPS	
Support policy approach	
Number of respondents	1
Summary of comments received <i>Inset Map 14 Sheffield Park</i> The Mid Sussex Area Bridleways Group supports Policy DM17 but notes that the protected route of the former Lewes/Sheffield park railway line is bisected by the planning boundary defined on Inset Map 14. The group would like the opportunity to review any alternative routes if new development is proposed in this location.	
How these comments have influenced the Proposed Submission Document Support noted. It is proposed to delete the development boundary in this location due the presence of ancient woodland. However, the Mid Sussex Area Bridleways Group's request has been recorded in the event that future development in this location is required to make provision for an alternative route in accordance with Draft Policy DM17.	
Object to policy approach	
Number of respondents	3
Summary of comments received <i>Inset Map 14 Sheffield Park</i> Newick Parish Council and two other respondents express concern about the loss of 'saved' Policy NW2 of the Lewes District Local Plan 2003 and its replacement with the planning boundary defined on Inset Map 14. The requirement for a woodland landscape and wildlife management plan appears to have been deleted from Inset Map 14, which may put at risk the ancient woodland adjacent to the Sheffield Park Business Estate.	
How these comments have influenced the Proposed Submission Document The concerns expressed are acknowledged. The site allocated for employment development in 'saved' Policy NW2 of the Lewes District Local Plan 2003 was intended to enable the expansion of Woodgate Dairies, which was at the time a thriving local business providing employment opportunities in the rural area. This policy has not been carried forward into the Local Plan Part 2 because the allocated land has since been designated as ancient woodland, the loss or deterioration of which would fail to accord with Para.175 of the NPPF. As such, the planning boundary defined on the Policies Map around the allocated NW2 site and the former Woodgate Dairies buildings is no longer considered appropriate. Proposals for the redevelopment or intensification of the existing business and commercial units on the former Woodgate Dairies site (now the Sheffield Park Business Estate) for employment purposes would be acceptable under Draft Policy DM11 (<i>Existing Employment Sites in the Countryside</i>), subject to compliance with other local plan policies. It is therefore proposed to amend Inset Map 14 by deleting the planning boundary.	
Other comments received	
Number of respondents	4
Summary of comments received <i>Inset Map 13, Newick</i> Newick Parish Council note that the boundary of the SNCI should be updated to remove areas of land which no longer have any ecological interest.	

Inset Map 2, Newhaven.

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

How these comments have influenced the Proposed Submission Document

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

OTHER COMMENTS

Support	
Number of respondents	5
Summary of comments received	
<p>The National Grid and Sussex Police support the plan without further comment. Three other representations of support made comments relating to the Habitat Regulations Assessment (HRA):</p> <ul style="list-style-type: none"> - Mid Sussex District Council notes that the proposed Development Management policies have been assessed as having no HRA implications. It reasons that the improvement of vehicle emission factors are forecast to more than offset the increase in nitrogen deposition from an increase in the volume of vehicles. - Natural England is satisfied that the HRA has correctly identified all relevant designated sites for the assessment and agrees with all the conclusions. It concurs that there will be no adverse effect on the integrity of any of the sites assessed. It has one minor recommendation regarding Policy DM12: Caravan and Camping Sites in Table 2, which is that the justification should make clear that any new or extended caravan or camping site within 7km of Ashdown Forest would still need to comply with Core Policy 10(3) of the Local Plan Part 1. - The South Downs National Park Authority supports the conclusions of the HRA 	
How these comments have influenced the Proposed Submission Document	
<p>Support noted. Both the HRA for LPP2 and the HRA Addendum on Ashdown Forest have been updated for the Pre-Submission Local Plan Part 2 publication. Natural England's recommendation regarding caravan and camping sites is also noted. However, Core Policy 10(3) of the adopted Local Plan Part 1 applies to residential development only, not to proposals for touring caravan or camping sites. The detailed development management policies in the Local Plan Part 2 must be in accordance with the strategic planning policies of the Local Plan Part 1, which have been subject to scrutiny and challenge through the examination in public process. Accordingly, no amendment is proposed in this respect.</p>	
Object	
Number of respondents	24
Summary of comments received	
<p><i>Overall development strategy and additional sites</i></p> <p>A number of respondents object to the overall development strategy. Most note that it was acknowledged during the examination of the Local Plan Part 1 that the district's objectively assessed housing need could not be met but the plan was found sound and adopted. It is argued that, within this context, it is imperative that the development management policies contain sufficient flexibility</p>	

to allow sustainable development in the event that the Council is unable to demonstrate a 5 year supply of housing land. Concern is also raised over the risk of relying on Neighbourhood Plans to bring forward sufficient sites for development.

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

- Hamsey Brickworks
- Barcombe Cross
- Rear of Allington Road, Newick
- Nolands Farm, Plumpton Green
- Land east of Diplocks Industrial Estate, Ringmer
- Lewes Road, Ringmer
- South Chailey
- East of Ditchling Road, Wivelsfield
- South of South Road, Wivelsfield
- Avery Nursery (Uckfield Rd) for mixed residential/employment use

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

Gypsy and Traveller sites

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

Newhaven

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

Newhaven Town Council is also concerned that there will be a policy vacuum in the areas of Newhaven Port located within the settlement planning boundary but outside of the designated area of the Newhaven Neighbourhood Plan.

East Sussex County Council recommends that the Port area is defined on the Policies Map and Policy NH20 is replaced with an updated policy (wording supplied) so that the lack of clarity in this area is addressed. The County Council also notes that the Local Plan Part 1 predates the designation of the Newhaven Enterprise Zone and asks whether there is evidence to suggest that the demand and need for employment land set out in the Local Plan Part 1 has changed since 2016.

Peacehaven

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

Wivelsfield

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

Habitat Regulation Assessment

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

How these comments have influenced the Proposed Submission Document

Overall development strategy and additional sites

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

Bridge Farm. Bridge Farm is allocated for employment purposes in the Ringmer Neighbourhood Plan, approved following examination in 2015. The Lewes District Employment & Economic Land Assessment, commissioned in 2010 and updated in 2012, concluded that there was no justification for further employment site allocations within the rural areas of the district. Economic growth in the rural areas through the conversion of existing buildings or well-designed new buildings is supported by Core Policy 4 (*Encouraging Economic Development and Regeneration*) of the adopted Local Plan Part 1 and Draft Policies DM9 (*Farm Diversification*), DM10 (*Employment Development in the Countryside*) and DM11 (*Existing Employment Sites in the Countryside*). In the light of this evidence, it is considered that a further employment allocation at Bridge Farm would be more appropriately considered through a review of the Ringmer Neighbourhood Plan, rather than through the Local Plan Part 2.

Gypsy and Traveller sites

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

Newhaven

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

Within the area covered by 'saved' Policy NH21 (Railway Quay) of the Lewes District Local Plan 2003, the former Marine Workshops have been refurbished to create the Newhaven University Technical College and the river frontage has been developed for public access. The remainder of the site is still in use, principally as operational land and access for the Newhaven-Dieppe ferry service. There is no evidence to demonstrate that this land will become surplus to the operational requirements of the port over the next 12 years and it therefore is considered that 'saved' Policy NH21 is neither justified

nor deliverable over the plan period. Consequently it is not proposed to carry forward this policy in the Local Plan Part 2.

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

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

In quantitative terms, the Council's latest monitoring data demonstrates that Newhaven has sufficient employment space to meet the business needs arising from future growth scenarios to 2030 (Source: Newhaven Employment Land Review July 2017).

It is not clear what purpose would be served by an additional planning policy that reflects the Port's status within the district. The Council must have regard to the NPPF which states local plans should contain policies that are clearly written and unambiguous so that it is evident how a decision maker should react to development proposals. The adopted Local Plan Part 1 sets out the role of the Port in relation to the district's economy and its potential contribution to the regeneration of Newhaven and the coastal towns. Core Policy 4 contains a clear statement that the District Council supports the Port Authority's plans for the expansion and modernisation of the Port. No amendment is therefore proposed to the Local Plan Part 2 in this respect.

Peacehaven

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

Wivelsfield

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

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

Spatial Policy 2.

Habitat Regulation Assessment

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

Other comments received

Number of respondents

36

Summary of comments received

Additional policies

A number of different respondents seek additional policies to address the following issues:

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

Climate Change

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

Employment Land

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

Flooding

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

Habitat Regulation Assessment

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

Infrastructure

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

Newick

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

Seaford

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

Sites for Gypsies and Travellers

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

Sustainable Development

One respondent states that there is no reference to the principles of sustainability in the draft, quoting the definition in the NPPF. Guidance should be provided to applicants as to what the meaning of sustainable development is, irrespective of location.

How these comments have influenced the Proposed Submission Document*Additional policies*

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

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

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

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

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

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

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

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

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

Locally sourced food: Core Policy 5 (*The Visitor Economy*) sets out the Council's support for local food

and produce. In view of Government guidance that local plans should be concise and avoid undue repetition or duplication, no amendment is proposed to the Local Plan Part 2 in this respect.

Climate change

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

Employment Land

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

Habitat Regulations Assessment

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

Infrastructure

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

Newick

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

Seaford

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

Sites for Gypsies and Travellers

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

Sustainable Development

The definition of sustainable development is set out in both the NPPF and the Local Plan Sustainability Appraisal. In view of Government advice that local plans should be as concise as possible and not reiterate national policies in the NPPF, it is not considered necessary or appropriate to duplicate this definition in the Local Plan Part 2. However, the Council is currently preparing a corporate sustainability checklist to set out its expectations in respect of how new development should meet its

sustainability vision for the district. No amendment is therefore proposed to the Local Plan Part 2 in this respect.

SUSTAINABILITY APPRAISAL

Number of respondents	12
<p>Summary of the comments received</p> <p><u>Introduction</u></p> <p>The Sustainability Appraisal seeks to split Wivelsfield Parish into two although the Wivelsfield Neighbourhood Plan met the housing requirement for the neighbourhood area.</p> <p><u>Appraising the policy options</u></p> <p>Barcombe Cross</p> <p>The Sustainability Appraisal fails to consider reasonable alternative by not assessing the larger site at Hillside Nurseries</p> <p>North Chailey</p> <p>The Kings Head development should be considered as a windfall development and additional sites such as the Buckles Wood Field should be considered to meet the number at North Chailey.</p> <p>North Chailey and Newick benefiting from the same bus service, it is considered that the assessments of the transport provision for the site options at North Chailey are inconsistent with recent decisions.</p> <p>Table 39: the loss of the green gap as Oxbottom Lane should be expressed as a concern within the Local Plan rather than just having a negative impact on the community objective.</p> <p>Edge of Burgess Hill</p> <p>Table 46: inaccurate assessment of the land at Oakfields (Edge of Burgess Hill)</p> <p>It is unclear how the scoring was arrived at and additional explanations would be welcomed. Respondents provided a re-appraisal of the option.</p> <p>Ringmer</p> <p>The report fails to justify why the minimum housing requirement is not met for Ringmer, to appraise additional options to fulfil the requirement and therefore consider all reasonable alternatives.</p> <p>General comments</p> <p>The Sustainability Appraisal fails to appropriately identify the positive sustainability benefits of new development.</p> <p><u>Other</u></p> <p>Renewable energy and low carbon energy and the sustainable use of resources are not adequately addressed in the Local Plan Part 2 and related documents.</p> <p>The consultation documents did not reach the relevant team at the Environment Agency in time to allow a review of the sustainability appraisal.</p> <p>Sussex Wildlife Trust advised that the effect of the draft plan on habitats of principle importance needed to be included within the baseline data and the sustainability</p>	

framework should reflect this through additional questions to consider. Further explanations on the scoring could be added to clarify the outcome of the assessments.

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

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

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

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

5.0 Pre-Submission Local Plan Part 2

5.1 Introduction

- 5.1.1 The consultation on the Pre-Submission Local Plan Part 2 ran for a 6 week period between 24th September and 5th November 2018.

Who was invited to make representations?

- 5.1.2 The Pre-Submission Local Plan Part 2 was approved for consultation by Full Council on 17th September 2018. An email alert notifying the period for the submission of representations, how representations could be submitted and where the Local Plan Part 2 and supporting documents could be viewed was sent to everyone on the Consultation Database. This included members of the public, statutory bodies, District Councillors, Town and Parish Councils, MPs as well as non-statutory organisations. See:

- Appendix 1 for the Representation Form
- Appendix 2 for the Guidance Notes for making representations.
- Appendix 3 for the Statement of Representations Procedure
- Appendix 4 for the List of Statutory Consultees
- Appendix 5 for the List of Town and Parish Councils

Availability of the Pre-Submission Local Plan Part 2

- 5.1.3 The Pre-Submission Local Plan Part 2 was published on the Council's Consultation Portal and on the Council's website (www.lewes-eastbourne.gov.uk/planning-policy/lewes-local-plan-part-2-site-allocations-and-development-management-policies/) along with the Sustainability Appraisal. Hard copies of these documents were also placed at the main Council offices (Southover House) and were available at all the libraries in Lewes District, as well as libraries in Haywards Heath, Burgess Hill, Saltdean and Uckfield.

Publicity

- 5.1.5 In addition to the notification to the contacts on the Consultation Database, a press release was issued.

5.2 Summary of Representations on the Pre-Submission Local Plan Part 2.

- 5.2.1 The number of representations made pursuant to regulation 20 and a summary of the main issues raised in those representations is set out below.
- 5.2.2 708 representations were received on the Pre-Submission Local Plan Part 2 from 502 individuals and organisations. The number of representations submitted on each policy is set out in the table below.

Policy	Reps
BA01: Land at Hillside Nurseries, High Street	14
BA02: Land adjacent to the High Street	6
BA03: Land at Bridgelands	5
BH01: Land at The Nuggets, Valebridge Road	10
CH01: Glendene, Station Road	6
CH02: Layden Hall, East Grinstead Road	4
CH03: Land adjacent to Mill Lane	3
NH01: South of Valley Road	4
NH02: Land at The Marina	6
RG01: Caburn Field	8
GT01: Land south of The Plough	224
E1: Land at East Quay, Newhaven Port	241
E2: Land Adjacent to American Express Community Stadium	5
DM1: Planning Boundary	11
DM2: Affordable Homes Exception Sites	2
DM4: Residential Conversions in the Countryside	2
DM6: Equestrian Development	4
DM8: Residential Sub-Divisions and Shared Housing	1
DM9: Farm Diversification	3
DM10: Employment Development in the Countryside	1
DM11: Existing Employment Sites in the Countryside	1
DM14: Multi-functional Green Infrastructure	6
DM15: Provision for Outdoor Playing Space	7
DM16: Children's Play Space in New Housing Development	6
DM17: Former Lewes/Sheffield Park Railway Line	7
DM18: Recreation and Rivers	3
DM19: Protection of Agricultural Land	3
DM22: Water Resources and Water Quality	1
DM24: Protection of Biodiversity and Geodiversity	5
DM25: Design	2
DM27: Landscape Design	2
DM30: Backland Development	1
DM31: Advertisements	2
DM32: Telecommunications Infrastructure	1
DM33: Heritage Assets	5

DM35: Footpath, Cycle and Bridleway Network	6
DM36: Station Parking	2

5.2.3 No representations were made on Policies DM3, DM5, DM7, DM12, DM13, DM20, DM21, DM23, DM26, DM28, DM29, DM34, and DM37. There were 22 representations relating to the planned number of homes, together with six representations proposing additional housing sites. A further six representations were made on the Habitats Regulations Assessment, four on the Sustainability Appraisal and four related to the Duty to Cooperate.

5.2.4 The main issues raised by the representations are summarised below:

5.2.5 **Housing Delivery**

A number of respondents, including Mid Sussex District Council, express concerns over the reliance on emerging Neighbourhood Plans to deliver the residual housing requirements set out in Spatial Policy 2 of the Local Plan Part 1: Joint Core Strategy (JCS). It is argued that there is no guarantee that the emerging Neighbourhood Plans will come forward quickly or that they will allocate sufficient sites to meet the minimum requirements of the JCS. There is currently no mechanism to speed up the delivery of Neighbourhood Plans, nor any sanctions that could be used should a Neighbourhood Plan fail to come forward over an appropriate timescale. Consequently there is no certainty that Lewes District Council will be able to meet its minimum housing requirements or maintain a 5 year supply of housing land.

5.2.6 **Flexibility**

Several respondents argue that there is little flexibility in the Plan to meet the housing requirements of Spatial Policy 2 and have consequently put forward additional housing sites.

5.2.7 **Biodiversity**

Natural England (NE) and the Sussex Wildlife Trust (SWT) recommend that the wording of all the housing site allocation policies, together with Policy DM24 (*Protection of Biodiversity and Geodiversity*), are amended to make them consistent with the revised NPPF. The SWT also seeks amendments to Policies DM4 (*Residential Conversions in the Countryside*), DM6 (*Equestrian Development*), DM9 (*Farm Diversification*), and DM10 (*Employment Development in the Countryside*) in order to embed biodiversity considerations more firmly in the local plan. Both NE and SWT raise concerns about Policy DM14 (*Multi-functional Green Infrastructure*) in relation to the determining factors for justifying additional green infrastructure provision as part of new developments.

5.2.8 **Policy BA01: Land at Hillside Nurseries**

A number of respondents, including Barcombe Parish Council, raise concerns to the policy due to insufficient land identified for play space to meet the shortfall of children's equipped play space within Barcombe Cross. Sport England states that

a ball strike assessment is required due to the proximity of the proposed housing to the adjacent recreation ground used to play cricket.

5.2.9 **RG01: Caburn Field**

A number of respondents, including Ringmer Parish Council, have raised concerns due to considered overdevelopment of the site, relocation of the Ringmer Football Club and deliverability. Sport England consider that the Plan is not sound due to the overall loss of playing field in Ringmer as a consequence of this development.

5.2.10 **Policy GT01: Land south of The Plough**

Brighton & Hove City Council, Mid Sussex District Council and the South Downs National Park Authority support the allocation of a site for five permanent Gypsy and Traveller pitches to meet the identified need for the area outside the South Downs National Park, as set out in Core Policy 3 or LPP1. Other respondents, including Plumpton Parish Council, object to the policy of the following grounds:

- Location of development: proposed site allocation is outside the planning boundary; in an unsustainable location and beyond walking distances and with no footpath to the, limited, services and facilities within the village;
- Development would result in the loss of greenfield and agricultural land, with the risk of further loss through potential encroachment into adjacent land;
- Development of the site for residential use would have an adverse impact on the rural character of the area;
- Potential loss of employment at the existing light industrial business park (Old Brickworks) due to concerns of new adjacent development impacting on the operation of businesses and local rural economy if businesses chose to relocate;
- Development of the site would encroach into a green corridor used by local wildlife;
- The site has unsafe vehicular and pedestrian access due to lack of visibility, heavy and fast traffic and lack of footpath. The village and countryside are largely unlit. Bus services are limited;
- The site is located within at risk of flooding;
- Inconsistency with the 'made' neighbourhood plan policies and national policy (Planning for traveller sites);
- There is no evidence of need for Gypsy and Travellers pitches; and
- There has been a lack of consultation on the proposed policy.

5.2.11 **Policy E1: Land at East Quay, Newhaven Port**

East Sussex County Council, Brighton & Hove City Council and Newhaven Port & Properties support the policy in terms of its contribution towards meeting the strategic priorities of the Brighton City Deal and supporting employment growth and regeneration in Newhaven. Historic England and the South Downs National Park Authority seek wording amendments to protect the setting of the Newhaven Fort Scheduled Monument and the special qualities of the National Park. Other respondents, including the Environment Agency, Natural England, Sussex Wildlife

Trust, Newhaven Town Council and Seaford Town Council, object to the policy on the following grounds:

- The site falls within Flood Zones 2 and 3 but there is no evidence to demonstrate that the sequential test has been satisfied
- The site forms part of a Local Wildlife Site and contains priority habitats of coastal vegetated shingle and floodplain grazing marsh
- Development would have an adverse landscape impact on the South Downs National Park
- Development would exacerbate existing traffic congestion and air quality problems in Newhaven town centre
- Development would have an adverse impact on the local heritage assets at Tide Mills
- Loss of public access and amenity
- There is no requirement for further employment sites in Newhaven and hence no justification for permitting employment development which is not associated with Newhaven Port.

5.2.12 Policy E2: Land adjacent to the American Express Community Stadium, Village Way, Falmer

The Community Stadium supports the policy but consider that the range of uses should include a retail store associated with the stadium. It also argues that the wording of the policy is too prescriptive in relation to the provision of sustainable transport infrastructure, green infrastructure and a training place agreement. The South Downs National Park Authority similarly supports the policy but seeks additional references to the setting of the National Park.

5.2.13 Policy DM1: Planning Boundary

Objectors to the policy argue that the restrictive wording, combined with the tightly drawn nature of the boundaries themselves, provide insufficient flexibility to accommodate sustainable development and is therefore inconsistent with national planning policy.

5.2.14 Policy DM2: Affordable Homes Exception Sites

It is argued that the policy is inconsistent with the national planning policy because it focusses on rural sites and does not support the delivery of 'starter homes'.

5.2.15 Policies DM15 & DM16: Outdoor Playing Space

Sport England considers that the plan cannot be found sound due to the lack of policy protection for existing playing fields and sports facilities and the Council's failure to prepare an up-to-date sports facility (indoor and outdoor sport) strategy incorporating a comprehensive assessment of needs. Other objectors argue that the requirements for the provision of children's play space set out in Policy DM16 cannot be justified without up-to-date viability evidence.

5.2.16 Policy DM19: Protection of Agricultural Land

It is argued that the policy is inconsistent with national planning policy and no evidence has been provided to justify the sequential approach proposed.

5.2.17 Employment Omission Site

Land south-west of the Sheffield Park Business Estate, Chailey, should be allocated for employment purposes. 'Saved' Policy NW2 of the Lewes District Local Plan 2003 allocated this land for an extension to the former Woodgate Diaries site but this policy has not been carried forward in the Local Plan Part 2. Whilst the site is now designated ancient woodland, there is evidence of strong market demand for B1, B2 and B3 accommodation in this location.

Appendix 1: Representation Form

Consultation of Pre-Submission Local Plan Part 2.

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

Pre-Submission Document Representation Form

Lewes District Council is seeking representations on the Pre-Submission Local Plan Part 2, which will allocate sites for different uses and set out detailed (non-strategic) planning policies to guide development over the period to 2030. Representations will be considered by an independent planning inspector, appointed by the Secretary of State, at a public examination to determine whether the plan is 'sound'. Representations are also sought on the Sustainability Appraisal.

The Local Plan Part 2 is available at <https://www.lewes-eastbourne.gov.uk/planning-policy/lewes-local-plan-part-2-site-allocations-and-development-management-policies/> Hard copies are also available to view at the Council offices (see address below) and local libraries.

All representations must be received by midnight on Monday 5th November 2018

The quickest and easiest way to submit comment is via the online consultation website at: www.lewes-eastbourne.gov.uk/planningconsultation . Alternatively comments can be sent to the District Council by:

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

E-mail: ldf@lewes.gov.uk

A guidance note accompanies this form and can be used to help with its completion.

Part A

	1. Personal Details	2. Agent's Details (if applicable)
Name	<input type="text"/>	<input type="text"/>
Job Title (where relevant)	<input type="text"/>	<input type="text"/>
Organisation (where relevant)	<input type="text"/>	<input type="text"/>
Address	<input type="text"/>	<input type="text"/>
Regulation 22 Consult	<input type="text"/>	<input type="text"/>

Telephone Number

Email Address

Part B – Please use a separate sheet for each representation

Name or Organisation:

3. To which part of the Local Plan Part 2 does this representation relate?

Paragraph Policy Proposals Map

4. Do you consider that the Local Plan Part 2 is in accordance with/ is:

(1) Legal and procedural requirements Yes No

(2) Sound* Yes No

* For an explanation please refer to the accompanying Guidance Note which can be found on the website.

If you have entered 'No' to Q4 (2), please continue to Q5. In all other circumstances, please go straight to Q6.

5. Do you consider the Local Plan Part 2 is unsound because it is not:

- (1) Positively prepared
- (2) Justified
- (2) Effective
- (4) Consistent with national policy

6. Please explain why you consider that the Local Plan Part 2 is not legally compliant or unsound, if that is the case. Please be as precise as possible. If you wish to support the soundness of the document, please also use this box to set out your comments.

R

7. Please set out what change(s) you consider necessary to make the Local Plan Part 2 legally compliant or sound, having regard to the test you have identified at Q5 above where this relates to soundness. You will need to say why this change will make the Local Plan Part 2 legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please note: Your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage. **After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.**

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note: The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

Date:

Do you wish to be notified of any of the following?

(i) The submission of the Local Plan Part 2 for independent examination

Yes

No

(ii) The publication of the recommendations of the Inspector appointed to carry out the examination of the Local Plan Part 2

Yes

No

(iii) The adoption of the Local Plan Part 2

Yes

No

Thank you for taking time to respond to this consultation

Please note that written representations not using this form will still be accepted, provided they are received by the specified date and time.

Appendix 2: Guidance Notes for making representations.



Lewes District Council

Lewes District Local Plan Part 2 – Pre-Submission Document Guidance Notes for making representations

Introduction

These guidance notes have been produced to assist anyone who wishes to make a formal representation on the Lewes District Local Plan Part 2 prior to its submission to the Government for independent examination. They provide a detailed explanation of legal compliance and soundness against which the Local Plan Part 2 will be examined. Further details on making a representation are included in the *Statement of Representations Procedure*, available on the Council website.

Representations must be made between Monday 24 September and midnight on Monday 5 November 2018.

All representations will be considered alongside the submitted Lewes District Local Plan Part 2 (the Plan), which will be examined by an independent Planning Inspector. At public examination, the Planning Inspector will consider whether the Plan complies with legal requirements, the duty to co-operate, and is 'sound'.

Making Representations

If you are seeking to make representations on the **way** in which the District Council has prepared the Plan, it is likely that your comments or objections will relate to a matter of **legal compliance**.

If it is the actual **content** on which you wish to comment or object to, it is likely it will relate to whether the Plan is 'sound' in terms of being **positively prepared, justified, effective or consistent with national policy**.

Legal Compliance

The Inspector will firstly check that the Plan meets the legal requirements and the duty to co-operate under section 20(5) of the Planning and Compulsory Purchase Act 2004, before moving on to test whether the Plan is 'sound'. You should consider the following before making a representation on legal compliance:

- The Plan should be included within the current Local Development Scheme (LDS) and the key stages should have been followed. The LDS is effectively a

programme of work which identifies planning policy documents that Council proposes to produce. It sets out the key stages in the production of any plans which the Council proposes to bring forward for independent examination.

The LDS is available on the Council website at: <https://www.lewes-eastbourne.gov.uk/planning-policy/local-development-scheme/>

- The process of consultation undertaken during the preparation of the Plan should be in general accordance with the Statement of Community Involvement (SCI). The SCI sets out how the Council will involve the community in the preparation and revision of Local Plans and the consideration of planning applications. The SCI is available on the Council website at: <https://www.lewes-eastbourne.gov.uk/planning-policy/statement-of-community-involvement/>
- On publication of the Pre-Submission Plan, the Council must publish the documents prescribed in the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) and make them available at its main offices and on its website. The Council must also notify various consultees (as set out in the Regulations) and any persons who have requested to be notified.
- The Council is also required to provide a Sustainability Appraisal Report when it publishes the Plan. The Sustainability Appraisal is a tool for appraising policies to ensure they reflect social, environmental, and economic factors. This should identify the process by which the Sustainability Appraisal has been carried out, the baseline information used to inform the process, and the outcomes of that process. The Sustainability Appraisal is available at the main Council offices (Southover House), local libraries and the Council website at <https://www.lewes-eastbourne.gov.uk/planning-policy/lewes-local-plan-part-2-site-allocations-and-development-management-policies/>

Soundness

The Council considers that the Plan it intends to submit for examination is ‘sound’, i.e. it is positively prepared, justified, effective and consistent with national policy. These terms are explained below:

Positively prepared – the Plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.

Justified – the Plan should be the most appropriate strategy when considered against reasonable alternatives, and should be based on robust but proportionate evidence.

Effective – the Plan should be deliverable over the plan period and based on effective joint working on cross-boundary strategic matters

Consistent with national policy – the Plan should enable the delivery of sustainable development in accordance with the National Planning Policy Framework (NPPF).

N.B. A revised NPPF was issued in July 2018 but, under the transitional arrangements, it is anticipated that the Plan will be examined in the context of the previous NPPF issued in 2012

If you think the Plan is not ‘sound’ because it does not include a policy where you think it should, you should consider the following questions when making representations:

- Is the issue which concerns you already covered specifically by national planning policy? If so, it does not need to be included.
- Is what concerns you covered by other policies in the Plan or in the Local Plan Part 1 (Joint Core Strategy)? There is no need for repetition between documents.
- If the policy is not covered elsewhere, in what way is the Plan unsound without the policy?
- If the Plan is unsound without the policy, what do you consider that the policy should say?

General advice

If you wish to make a representation seeking a modification to the Plan, you should make it clear in what way the Plan is not sound having regard to legal compliance, duty to co-operate and the four tests set out and explained above. You should try to support your representation by submitting evidence showing why the Plan should be modified. It will be helpful if you also say precisely how you think the Plan should be modified.

Representations should cover succinctly all the evidence and supporting information necessary to justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further submissions based on the original representation made at publication. After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Careful consideration should be given by those making a representation in deciding how the representation should be dealt with, i.e. by written representation or by exercising the right to be heard. Only where a change is sought to the Plan is there a right for the representation to be heard at the hearing session. However, appearance at the hearing session will be at the discretion of the Planning Inspector. It is important to note that written and oral representations carry exactly the same weight and will be given equal consideration in the examination process. You can tell us if and why you consider it necessary to participate at the hearing session.

Please be aware that representations cannot be treated as confidential. As well as being sent to the Secretary of State, copies of representations must be publicly available. The Council will provide names and associated representations on its website but will not publish personal information such as telephone numbers, e-mails or private addresses. Further information is contained within the Council's Privacy Notice available at:

<https://www.lewes-eastbourne.gov.uk/resources/assets/inline/full/0/272748.pdf>

Submitting representations

Representations can be made on-line via the Council's consultation portal at <https://www.lewes-eastbourne.gov.uk/consultations/consultation-on-lewes-district-local-plan-part-2/>

Alternatively, a representation form can be downloaded via website at <https://www.lewes-eastbourne.gov.uk/planning-policy/lewes-local-plan-part-2-site-allocations-and-development-management-policies/> This can be completed and sent by:

Email – ldf@lewes.gov.uk

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

Guidance on completing the written representation form

1. It is important that a separate form is used for each representation you wish to make.
2. Each form should be completed fully, with your name and address on each.
3. Please use BLOCK CAPITALS and BLACK INK when completing the form.
4. You may submit the form yourself or on behalf of an organisation or company. Alternatively you may ask someone to do it for you if you need help, or you can appoint an agent. If an agent is appointed their full details should also be given and all future correspondence will be sent to this agent.
5. It is important that you clearly state which section of the document you are referring to, i.e. paragraph, section or policy number.
6. Your objection should be clearly based on the tests of soundness as explained in detail in this guide. Please clearly indicate which test of soundness you think is not being met.

7. If you are objecting, you should clearly state what changes you think should be made to make the Plan sound and legally compliant.
8. Please remember to sign and date the form.

For further information or assistance, please contact the Planning Policy Team on 01273 471600 or email ldf@lewes.gov.uk

Appendix 3: Statement of Representations Procedure



Lewes District Council

Statement of Representations Procedure

Title

Lewes District Local Plan Part 2: Site Allocations and Development Management Policies – Pre-Submission Document.

Subject

The Local Plan Part 2 covers the area of Lewes district outside of the South Downs National Park. The document supports and seeks to deliver the strategic objectives and spatial strategy of the Local Plan Part 1: Joint Core Strategy by allocating additional sites for development and setting out detailed (non-strategic) development management policies to guide development and change over the period to 2030.

Period within which representations must be made

Representations can be made over a 6 week period between **Monday 24 September and midnight on 5 November 2018**. Please note that representations received after midnight on 5 November will not be accepted.

How to submit representations

The quickest and easiest way to submit comments is electronically using the online consultation portal at www.lewes-eastbourne.gov.uk/planningconsultation

Alternatively representations can be sent by:

Email – ldf@lewes.gov.uk

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

Guidance notes for making representations are available. Please note that we cannot take account of responses which are submitted to us confidentially. Only those representations made via the on-line consultation portal, by e-mail or by writing which arrive at the address specified within the specified consultation period will have a right to be considered. The Council's Privacy Notice is available at:

https://www.lewes-eastbourne.gov.uk/_resources/assets/inline/full/0/272748.pdf

Any person who has made representations may withdraw those representations at any time by giving notice in writing to the Council either by email or by post at the address given above.

Request to be notified

Any person who makes a representation about the Pre-Submission Local Plan Part 2 may request the right to be heard at the Public Examination. This request must be submitted in writing before the end of the consultation period on Monday 5 November 2018.

Representations may also be accompanied by a request to be notified of any of the following:

- the submission of the Local Plan Part 2 for independent examination under section 20 of the Planning & Compulsory Purchase Act 2004
- the publication of the recommendations of the person appointed to carry out an independent examination of the Local Plan Part 2 under section 20 of the Planning & Compulsory Purchase Act 2004
- the adoption of the Local Plan Part 2 by the Council.

Availability of Documents

The Local Plan Part 2 – Pre-Submission Document and the accompanying Sustainability Appraisal are available to view online at <https://www.lewes-eastbourne.gov.uk/planning-policy/lewes-local-plan-part-2-site-allocations-and-development-management-policies/>

Reference copies of the documents are also available for public inspection at the Council Offices at Southover House, Lewes, and all libraries in Lewes District, as well as libraries in Haywards Heath, Burgess Hill, Saltdean and Uckfield. Opening times are as follows:

Council Offices, Southover House, Southover Road, Lewes, BN7 1AB
Monday – Friday 8.30am – 5pm

Lewes Library, Styles Field, Friars Walk, Lewes, BN7 2LZ

Mon 10am – 2pm

Tue 10am – 5pm

Wed Closed

Thu 10am – 6pm
 Fri 10am – 5pm
 Sat 10am – 5pm

Newhaven Library, 36-38 High Street, Newhaven BN9 9PD

Mon 10am – 1pm
 Tue 10am – 4.30pm
 Wed Closed
 Thu 10am – 4.30pm
 Fri 1pm – 4.30pm
 Sat 10am – 4.30pm

Peacehaven Library, Meridian Centre, Peacehaven, BN10 8BB

Mon Closed
 Tue 10am – 5pm
 Wed Closed
 Thu 10am – 6pm
 Fri 10am – 5pm
 Sat 10am - 4pm

Seaford Library, 15-17 Sutton Park Road, Seaford, BN25 1QX

Mon 2pm – 5pm
 Tue 10am – 5pm
 Wed 10am – 1pm
 Thu 11am – 6pm
 Fri 10am – 5pm
 Sat 10am – 4.30pm

Haywards Heath Library, 34 Boltro Road, Haywards Heath, RH16 1BN

Mon 9.30am – 7pm
 Tue 9.30am – 6pm
 Wed 9.30am – 6pm
 Thu 9.30am – 6pm
 Fri 9.30am – 5pm
 Sat 9.30am – 5pm

Burgess Hill Library, The Martlets, Burgess Hill RH15 9NN

Mon 9.30am – 5.30pm
 Tue 9.30am – 5.30pm
 Wed 9.30am – 5.30pm
 Thu 9.30am – 5.30pm
 Fri 9.30am – 5.30pm
 Sat 9.30am – 4pm

Saltdean Library, Saltdean Lido, Saltdean BN2 8SP

Tue 9am – 1pm 2pm – 5pm
 Fri 9am – 1pm 2pm – 5pm
 Sat 9.30am – 1pm 2pm – 5pm

Uckfield Library, Library Way, High Street, Uckfield TN22 1AR

Mon 10am – 1pm
Tue 10am – 4.30pm
Wed 10am – 4.30pm
Thu 10am – 6pm
Fri 10am – 4.30pm
Sat 10am – 4.30pm

Appendix 4: List of Statutory Consultees

Specific Consultation Bodies

Town and Parish Councils (See Appendix 5)
 Brighton and Hove City Council
 Mid Sussex District Council
 South Downs National Park Authority
 Wealden District Council
 East Sussex County Council
 West Sussex County Council
 Sussex Police
 The Coal Authority
 Environment Agency
 Historic England
 Marine Management Organisation
 Natural England
 Network Rail
 Highways England
 British Telecom
 Cable and Wireless
 Hutchinson G3 UK Ltd
 Mobile Operators Association
 Orange Personal Communications Ltd
 O2 UK Ltd
 T-Mobile
 Virgin Media
 Vodaphone Ltd
 NHS Eastbourne, Hailsham & Seaford CCG
 NHS High Weald Lewes Havens CCG
 National Grid
 Southern Electric
 UK Power Networks
 Southern Gas Networks
 Southern Water
 South East Water
 Homes and Communities Agency
 Mayor of London
 Civil Aviation Authority
 Office of Rail Regulation
 Transport for London
 Coast2Capital Local Enterprise Partnership
 South East Local Enterprise Partnership

Secretary of State for Transport
NHS Commissioning Board
Sussex Local Nature Partnership

General Consultation Bodies

Adur & Worthing Councils
British Horse Society
Conservancy Office (Forestry Commission)
Crawley Borough Council
East Sussex Fire and Rescue
Equality and Human Rights Commission
Friends Families and Travellers
Friends of Lewes
Horsham District Council
Lewes Chamber of Commerce
Lewes District Branch CPRE Sussex
Mid Sussex Area Bridleways Group
Ministry of Housing, Communities and Local Government
National Farmers Union
National Federation of Gypsy Liaison Groups
Newhaven Chamber of Commerce
Newhaven Port and Properties
NHS England
NHS Property Services
Office of Rail and Road
Open Spaces Society
Southdown Housing Association
Sport England
Sussex Ornithological Society
Sussex Ramblers
Sussex Wildlife Trust
Woodland Trust

Appendix 5: List of Town and Parish Councils

Lewes District

Barcombe Parish Council
 Chailey Parish Council
 Ditchling Parish Council
 Falmer Parish Council
 Firle Parish Council
 Glynde And Beddingham Parish Council
 Hamsey Parish Council
 Newhaven Town Council
 Newick Parish Council
 Peacehaven Town Council
 Plumpton Parish Council
 Ringmer Parish Council
 Seaford Town Council
 South Highton Parish Council
 Southease Parish Meeting
 St John (Without) Parish Meeting
 Streat Parish Meeting
 Tarring Neville Parish Meeting
 Telscombe Town Council
 Westmeston Parish Council
 Wivelsfield Parish Council

Lewes District wholly within the National Park

East Chiltington Parish Council
 Iford Parish Meeting
 Kingston Parish Council
 Lewes Town Council
 Piddinghoe Parish Council
 Rodmell Parish Council
 St Ann (Without) Parish Meeting

Wealden District

Alciston Parish Meeting
 Alfriston Parish Council
 Chalvington with Ripe Parish Council
 Cuckmere Valley Parish Council

 Fletchling Parish Council
 Isfield Parish Council

Laughton Parish Council
Little Horsted Parish Council
Selmeston Parish Meeting

Mid Sussex District

Ansty and Staplefield Parish Council
Burgess Hill Town Council
Hassocks Parish Council
Haywards Heath Town Council
Horsted Keynes Parish Council
Lindfield Rural Parish Council
Pycombe Parish Council

Brighton & Hove City Council

Rottingdean Parish Council