

Lewes District Local Plan Part 1

Joint Core Strategy Submission Document

Regulation 22 Consultation Statement

September 2014



Lewes District Council



South Downs
National Park Authority

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1. Introduction

- 1.1 Lewes District Council, in partnership with the South Downs National Park Authority (SDNPA), has prepared a plan that will, once adopted, provide the strategic planning policy to guide new development and change in the district for the period up to 2030. This document is known as the Core Strategy and will form Part 1 of the Lewes District Local Plan.
- 1.2 This report provides a summary of the consultation that has taken place on the various formal stages from the 'Issues and Options' to the Proposed Submission Core Strategy. More recently, the Core Strategy Focussed Amendments were published and a summary of the responses for this consultation has also been included in this statement.
- 1.3 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, section or topic area. This is followed by a section that indicates how the representations have been considered and how they have influenced the Core Strategy Submission document.
- 1.4 This document has been produced to demonstrate compliance with Regulation 22c 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;
- 1.5 In line with the planning regulations mentioned above, this document will be submitted for examination along with the Core Strategy Submission Document, Sustainability Appraisal, copies of all representations and any other supporting documents that the Council and National Park Authority deem appropriate. A Planning Inspector, appointed by the Secretary of State, will consider the representations when determining whether the Core Strategy 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'. The submission document will be made available on the Council's website.

2. Overview of Core Strategy Consultation to Date

2.1 There have been a number of stages to the Core Strategy which have been published for consultation. This process has helped to define the vision, objectives and narrow down strategic and core delivery options and policies. Further to these key stages, it must be pointed out that additional consultation has taken place with various stakeholders which has also played a key role in forming the Submission Document.

When?	Stage
Pre-2010	<p>Core Strategy Preferred Options*</p> <p>http://www.lewes.gov.uk/planning/18883.asp</p>
21 st May – 16 th Jul 2010	<p>Issues and Emerging Options Topic Papers [1]</p> <p>http://www.lewes.gov.uk/planning/20616.asp</p>
30 th Sept - 2 nd Dec 2011	<p>Emerging Core Strategy [1]</p> <p>http://www.lewes.gov.uk/planning/20616.asp</p>
11 th Jan - 22 nd Mar 2013	<p>Proposed Submission Core Strategy [2]</p> <p>http://www.lewes.gov.uk/corestrategy/index.asp</p>
16 th May - 11 th Jul 2014	<p>Proposed Submission Core Strategy Focussed Amendments [2]</p> <p>http://www.lewes.gov.uk/corestrategy/index.asp</p>

[1] These stages will constitute Regulation 18 of The Town and Country Planning (Local Planning) (England) Regulations 2012

[2] Regulations 19 and 20 of the above regulations

[3] Regulation 22 of the above regulations

*Due to changes to the national and regional planning policy, as well as concerns about the Preferred Options document (2006), the Core Strategy was started afresh. The evidence work and stakeholder input during this stage did feed into the Core Strategy Submission Document, however this stage has not been focused on in this Consultation Statement.

Consultation Database

2.2 A consultation database was set up at the start of the Core Strategy process which has been a vital tool in engaging with various stakeholders as the Core Strategy has progressed. The database is constantly updated with new contacts and amended details and so has evolved significantly over the years. The database is made up of the following consultees:

Specific Consultation Bodies

- 2.3 These are the statutory consultees listed in the Local Planning Regulations that are required to be consulted during the preparation, publication and submission of a local plan. These include the Environment Agency, Natural England, English Heritage, neighbouring authorities and utility providers. A list of these bodies can be found in Appendix 4. Town and Parish Councils within and neighbouring Lewes District are also identified as specific consultation bodies. A list of these authorities can be found in Appendix 5.

General Consultation Bodies

- 2.4 The Local Planning Regulations also require local planning authorities to consult general consultation bodies where appropriate. These are bodies or agencies that relate to different ethnic and religious groups, disabled people as well as developers and landowners. These consultees have expressed a desire to be involved in the Core Strategy process. The Consultation Database includes a large number of these bodies which have expressed a desire to be involved in the Core Strategy process.

Other Consultation Bodies

- 2.5 In addition to the specific and general consultation bodies, the Local Planning 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 which have expressed a desire to be involved in the Core Strategy process.
- 2.6 It is also important to mention that Lewes District Councillors are included on the Consultation Database and have been fully engaged in the preparation of the Core Strategy and the various consultations that have taken place over the years. This has involved Members Workshops to inform councillors of the key issues informing and influencing the preparation of the Core Strategy as well as email notifications via the Consultation Database.

3. Issues and Emerging Options Topic Papers

3.1 Introduction

3.1.1 The first public consultation on the Core Strategy took place between **21st May and 16th July 2010** on the Issues and Emerging Options Topic Papers. There were 9 separate Topic Papers (plus an introductory paper). These papers discussed different aspects of the Core Strategy, which included the characteristics of the District, options for strategic sites and options for how we could deliver and accommodate growth.

Who was invited to make representations?

3.1.2 A letter or email notifying of the publication of the Topic Papers and the dates of consultation was sent to everyone on the Consultation Database who had indicated that they wanted to be kept informed of progress on the Core Strategy. This included members of the public, statutory bodies, District Councillors, Town and parish Councils, MPs as well as non-statutory organisations.

3.1.3 The list of all statutory organisation who were contacted can be found in Appendix 4.

How were representations made?

3.1.4 There were different ways for consultees to comment on the content of the Issues and Emerging Options Topic Papers. These are described below:

Representations received on Topic Papers

3.1.5 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 comments from 126 groups and individuals on the topic papers. A summary of the comments we received can be found in Section 3.2. The summary identifies the main issues raised by respondents, how they were considered and how they influenced the next stage of the Core Strategy.

Sessions with Town and Parish Councils/Meetings

3.1.6 All of the 28 Town and Parish Councils/Meetings in the District were invited to one of 6 sessions regarding progress of the Core Strategy and the content of the Topic Papers during April and May 2010. Representatives from 18 of the 28 Councils/Meetings attended. The session ended with a discussion about issues that they would like to see addressed through the Core Strategy. A summary of issues that they raised are detailed in Section 3.3.

Drop-in Sessions

3.1.7 As part of the public consultation, we held 7 'drop in' sessions across the District. These sessions were open to all members of the public and were held between **Monday 24th May and Thursday 10th June**.

3.1.8 There were 12 exhibition boards at each 'drop in' session, summarising the information contained within the topic papers. Two planning officers were present at each of the 'drop-in' sessions to answer any queries, while all of the topic papers as well as background documents were made available to the public. Members of the public were invited to submit comments on the content of

the topic papers by sticking post-it notes on the appropriate spaces of the exhibition boards. Further information can be found in section 3.4.

Discussion Forums

- 3.1.9 Two Discussion Forums were held regarding the emerging Core Strategy. The first was held at The Corn Exchange at Lewes Town Hall and the second was held at the Assembly Hall of Tideway School in Newhaven. They were held on **Thursday 1st July and Monday 5th July**, respectively.
- 3.1.10 A PowerPoint presentation detailing the Core Strategy process and the content of the Issues and Emerging Options Topic Papers was followed by discussions regarding some of the key issues that would need to be considered in progressing the Core Strategy. The comments/questions made were recorded and a summary of the comments made at both events can be found in Section 3.5.

Publicity of Consultation

- 3.1.11 The Topic Papers were published on the Council's website and were placed in the Council's Planning Offices in Lewes. Hard copies were sent to Town and Parish Councils/Meetings, District Councillors and MPs.
- 3.1.12 Hard copies of the Topic Papers were placed 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.
- 3.1.13 Posters were placed on the District Council's notice boards informing of both the 'drop-in' sessions and discussion forums. Posters were also sent to all Town and Parish Councils/Meetings in the District, the District's leisure centres and secondary schools/colleges. These groups were asked to display them on their noticeboards.
- 3.1.14 An advert containing information about the consultation was placed in the Sussex Express on 21st May. Press releases were prepared and circulated and as a result, 2 articles appeared in the Sussex Express regarding the 'drop-in' sessions and the Discussion Forums, on 21st May and 25th June, respectively. In addition, a radio interview was conducted by Bright FM with a member of the Planning Policy Team, which aired in May. The interview explained the purpose of the consultation, where the Topic Papers could be found and how comments on the content of the Topic Papers could be made.

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, picking out the main issues raised by respondents and how those comments were considered and influenced the Emerging Core Strategy. A representation summary has been produced for the Topic Papers which provides a more detailed summary of the comments made during the consultation. The representation summary can be found at the link below:

http://www.lewes.gov.uk/Files/plan_representations2010.pdf

Topic Paper 1 – Characteristics of the district
<ul style="list-style-type: none">• There were no general themes with most comments received on this Topic paper relating to specific geographical areas and either pointing out inaccuracies or highlighting new information.

Topic Paper 2 – Key strategic issues and challenges for the district
<ul style="list-style-type: none">• Some of the key strategic issues and challenges for the district will need changing due to the revocation of the South East Plan• The South Downs National Park (SDNP) merited identification as a separate key strategic issue.

How these issues were taken into account
<ul style="list-style-type: none">• Some of the key strategic issues and challenges were amended in the light of the Government's proposed revocation of the South East Plan.• The importance and specific purposes of the National Park designation are acknowledged and are now identified as an issue that should be specifically addressed by the Core Strategy.• A number of the comments received were related to issues that it was considered had already been addressed and identified as key strategic challenges in this chapter.

Topic Paper 3 – A draft vision for Lewes District
<ul style="list-style-type: none">• A number of comments were received in support of the vision and particularly the emphasis on the need to respond to the challenges of climate change• Some comments were received relating to the district-wide vision being too narrow in scope and that issues such as transport and meeting future housing needs could have been expanded on.• A number of comments were also received relating to the vision for individual settlements and areas. These generally suggested additions to the relevant visions, questioned the omission of subject areas or felt that certain key issues (such as transport constraints along the A259) should be emphasised.

How these issues were taken into account
<ul style="list-style-type: none">• Reference has been included with regards to meeting housing need beyond just affordable housing and to the delivery of sustainable transport options• A number of amendments were made to the district-wide and individual settlement/area visions. In some cases it was not felt that changes were necessary.

Topic Paper 4 – Draft strategic objectives for the Core Strategy

- The majority of comments were in support of the objectives in Topic Paper 4
- A number of consultees put forward additional objectives (for example water efficiency)
- A number of consultees suggested amendments to objectives
- Some respondents suggested that some of the objectives were inappropriate, too generic and did not pick up on the key issues picked up in the other topic papers.
- Some consultees suggested that objectives 1 and 5 were too restrictive in light of revocation of the South East Plan.

How these issues were taken into account

- It was felt that in a lot of cases the objectives in the topic paper already covered some of the new objectives and some of the amendments proposed sufficiently.
- In the topic papers we stated that we planned to deliver 220 homes until 2026 through the Core Strategy, in line with the figure of the South East Plan (SEP). With the SEP now likely to be revoked by the time the Core Strategy is adopted, we agree with some of the respondents and thus have not used the target that it set. Instead, we have used more up to date evidence base documents such as the Strategic Housing Market Assessment (SHMA) to identify a locally derived housing target to 2030.
- Some of the objectives were amended in light of comments. For example Objective 9 was amended to recognise the importance of working with universities.
- A number of amendments were made to the objectives to make them more specific to Lewes District

Topic Paper 5 – Developing a broad strategy for accommodating and delivering growth

Overview

Three options for growth were put forward in this topic paper for the part of the district outside of the Sussex Coast Sub-region:

Option 1 - Focus the majority of housing growth on sites immediately adjoining Haywards Heath and/or Burgess Hill. Minimal growth would take place in the settlements elsewhere in this part of the district

Option 2 - Focus a significant proportion of the growth at Plumpton Green and Cooksbridge and possibly Wivelsfield/Wivelsfield Green. The remaining growth required would be directed to the other settlements in this part of the district.

Option 3 - Growth in this part of the district is directed on a proportional basis, in that the larger villages take the largest proportion of growth and the smaller villages/hamlets take minimal growth.

Further options were put forward for the part of the district covered by the Sussex Coast Sub-region:

Option 4 - Growth within the existing built up area of Lewes town (i.e. no greenfield extensions to the town). This will involve infill development and the redevelopment of certain sites (to be informed by the SHLAA), one or two of which could be significant in size.

Option 5 - As option 4, but allow for small-scale housing developments on land immediately adjoining the town (note: all such sites would be within the National Park).

Option 6 - Growth within the existing built up area of Seaford (i.e. no greenfield extensions to the town). This will involve infill development and the redevelopment of sites (to be informed by the SHLAA).

Option 7 - As option 6, but allow for small-scale developments on land immediately adjoining the town.

Option 8 - Infill and redevelopment of sites in Peacehaven/ Telscombe (to be informed by the SHLAA).

Option 9 - As option 8, but to also allow for greenfield extensions on land that adjoins the existing built up area boundary of Peacehaven/Telscombe, prioritising sites that do not fall within the National Park.

Option 10 - Strategic level development on brownfield land at Newhaven as part of a comprehensive regeneration scheme for the town.

Option 11 - Strategic level development on the fringes of Newhaven (land not within the designated National Park).

Option 12 - Small-scale housing developments to meet local needs for the villages that fall within the National Park (the amount of development that this could equate to will be dependent on the outcomes of the SHLAA and the update that is due to be undertaken of the Housing Needs Survey).

Summary of Main Issues/Comments:

- Topic Paper 5 was written prior to the revocation of the South East Plan, which set out the District's housing requirement. This meant that a number of the comments that were received on this paper related to whether or not it was appropriate to continue with the level of growth that was assigned to the District in the South East Plan. A number of comments received were in favour of planning for this level of growth, whilst others suggested a lower level.
- A number of generic comments were received such as a preference for growth in the coastal towns and within settlements rather than on the edges. Other key issues raised were ensuring sufficient provision of affordable housing, proportionate infrastructure provision and meeting the needs of rural communities.

The majority of representations raised comments on specific options for distributing growth

- **Option 1** (housing growth on sites immediately adjoining Haywards Heath and/or Burgess Hill) – The majority of comments expressed support for this option due to proximity to infrastructure, jobs and key highway and rail routes; and the relatively unconstrained nature of the land in this area. Some expressed opposition due to the distance from the town centres.
- **Option 2** – A number of representations stated opposition to significant additional housing at Plumpton and Cooksbridge for reasons such as the visual impact on the National Park.
- **Option 3** - A significant number of the comments that were made on this option referred to the amount of housing that the South East Plan required to be delivered in the part of the District outside of the Sussex Coast Sub-region. These comments were generally along the lines that a lower level of housing growth should be planned for in the Low Weald area (this comment is made and will be responded to under the first sub-section of this feedback paper).
- **Option 4** - Those representations that commented upon the principle of the option, without considering site specifics, were generally in favour of it being pursued in the Core Strategy due to its sustainable location.
- **Option 5** – Very few respondents commented on this option.
- **Option 6** - The majority of the comments that were made on this option related to the amount of development this option could deliver
- **Option 7** - The vast majority of the representations made on this option were opposed to it. The primary reason for this was due to the possibility of a site to the south of Chyngton Way being developed for housing if this option was to be pursued in the Core Strategy.
- **Options 8 and 9** – Very few comments were made on these options.
- **Option 9** - The majority of those representations that commented upon the principle of the option were generally in favour of it being pursued in the Core Strategy.
- **Option 10** - A number of the representations that commented upon this option concentrated on the possible strategic development site at Eastside, with the majority in favour of development of the site.
- **Options 11 and 12** - Very few comments were made on these options
- Some additional options were proposed by consultees including options for significant growth in villages such as Glynde, Southease and Ringmer

How these issues were taken into account

- Consideration was given to a range of options including a locally derived target, based on current evidence, as it became apparent that the South East would be revoked.
- The Emerging Core Strategy gives weight to and priorities a number of the issues raised such as a preference to brownfield development in the most sustainable locations.
- Evidence at the time indicated a significant affordable housing need throughout the district

and that the delivery of affordable housing is intrinsically linked to the delivery of market housing. As a result the Emerging Strategy recognised the need for both market and affordable housing development in terms of housing needs and the local economy.

- Housing needs have been assessed in the Local Housing Needs Assessment, the outcomes of which have informed the emerging policy approaches.
- **Option 1** – Two options for broad locations for development were identified in the ECS in this area.
- **Option 2** - The updated SHLAA did not identify any strategic scale site options or broad locations for development of strategic scale in Plumpton or Cooksbridge and so no strategic options were included in in the ECS for these locations.
- **Option 3** – It became apparent in the updated SHLAA that some of the settlements in this area have limited potential to accommodate growth and so a simple proportionate distribution according to settlement size was not deemed appropriate and instead took into account a whole range of constraints and evidence documents.
- **Option 4** - North Street was identified as an option for a broad location for growth in the ECS.
- **Option 5** - Old Malling Farm was identified as a broad location for growth in the ECS. National Park purposes remain a key consideration in this emerging option.
- **Options 6 and 7** - No strategic level housing site options were identified for Seaford in the ECS due to the town being particularly constrained by a limited supply of sites available and the close proximity of the National.
- **Option 8** - No strategic level (100+ units) housing options have been identified within Peacehaven and Telscombe in the Emerging Strategy. No suitable sites with sufficient capacity have been identified.
- **Option 9** - Two broad locations for development on the edge of Peacehaven were identified as options in the ECS
- **Option 10** - The Emerging Strategy included the option of allocating Eastside for strategic level development that would be employment –led but mixed use development of the site.
- **Option 11** - No strategic development options were included on the fringes of Newhaven in the ECS.

Topic Paper 6 – Other key elements of the emerging strategy

- Proposed policy areas that received considerable support were climate change, flood risk and environmental resource management. Affordable and appropriate housing was supported by many respondents. This was because they considered that it was essential to have a policy that addressed the need for affordable housing, particularly in rural areas, and to deliver specialist housing that will meet the needs of an ageing population.
- Some consultees suggested additional policy areas. One of the more fundamental issues raised concerned the revocation of the South East Plan and the possible need to include further policy areas in the Core Strategy as the result of a lack of regional policy.
- Some respondents put forward amended policy areas
- A number of policy options for the policy areas were put forward

How these issues were taken into account

- The ECS included policy directions relating to most of the additional or amended policy areas although some were not considered strategic issues and so were not recognised in the ECS.
- Significant elements of the policy options for the policy areas were encapsulated in the Emerging Core Strategy options

Topic Paper 7 – Possible development site at North Street, Lewes

Overview

A number of options were put forward for development at North Street, Lewes:

Option A - Retain the North Street area for employment use, upgrading and redeveloping the existing buildings for employment use as opportunities arise. No upgraded hard flood defences would be provided.

Option B - Comprehensive redevelopment to create a new neighbourhood for the town, with a mix of housing, employment and other uses, which is able to generate sufficient value to provide all necessary supporting infrastructure, including upgraded hard flood defences.

Option C - Clearance of the existing buildings from the area and utilising it for flood storage and/or low key uses such as open space or surface car parking. In effect this restores the flood plain in this location. No upgraded hard flood defences would be provided.

Option D - Restore some of the flood plain, but allow an element of flood resistant and flood resilient development in selected, lower risk, locations within the site and integrate this with a wide package of flood risk management measures both on-site (e.g. open landscaped areas) and off-site (e.g. managing surface water drainage). No upgraded hard flood defences would be provided.

Summary of Main Issues/Comments:

- Most comments supported the identification of the North Street area as a possible strategic development site. Respondents pointed out that the brownfield nature of the land, whilst some comments stated that the site has become dilapidated in recent years and needed to be improved. However, some comments pointed out the flood risk on the site.
- **Option A** - There was little support for this option. Those opposed to it considered that the option was unimaginative, not comprehensive enough, not economically viable and a loss of an opportunity.
- **Option B** - The responses from those who commented on this option were mixed. Some stated that this was their desired option as it provides housing where there is demand, whilst others favoured this approach providing that there was clarity on the mix of uses provided in this development option.
- **Option C** - There was little support for this option. Although there was acknowledgement that this would likely lead to the best environmental outcome, most comments received suggested that this option was impractical, not financially viable, would increase pressure for development elsewhere in Lewes Town and would be difficult to justify in light of the high demand for housing and employment land in the District.
- **Option D** - There was some support for this option, particularly from individuals and groups based in Lewes Town. Those who did not favour this option generally suggested that such a development would not be financially viable. The Environment Agency stated that it will be important for the District Council to consider the vulnerability of the development proposed by this option.

How these issues were taken into account

- **Option A** – It was considered that Option A was unlikely to be sustainable or be able to deliver improvements to flood defences.
- **Option B** – It was considered that mixed uses were likely to be necessary in development viability terms to cover associated costs including flood defences.
- **Option C** - Not a preferred option in the Emerging Core Strategy. It was not a popular option and difficult to justify financially and in terms of limited availability of land in Lewes town for employment and housing needs.
- **Option D** – Questionable financial viability and flood risk issues.

Topic Paper 8 – Possible strategic development at Eastside, Newhaven
<ul style="list-style-type: none"> • The majority of representations that were made on this topic paper supported the principle of change in the area to the east of the River Ouse in Newhaven and the continued use of the Port for freight and passengers. • A number of comments stated that change would need to be mindful of the relationship of Eastside with the Ouse estuary, beach, Tidemills, the National Park and adjacent SSSI.
How these issues were taken into account
<ul style="list-style-type: none"> • The Eastside area was identified as an option for a strategic development site for employment led growth. The continued use of the port and the proximity to environmental designations influenced the emerging strategy for Eastside.

Topic Paper 9 – Sustainability Appraisal objectives and indicators
<ul style="list-style-type: none"> • Most of those who commented felt that the topic paper had correctly captured the key sustainability issues, whilst others suggested new and amended ‘key sustainability issues’ • Most of those who commented felt that the Topic Paper had correctly captured the objectives and indicators, whilst others suggested new and amended objectives and indicators. Some also suggested the deletion of objectives and indicators. • A number of respondents suggested that Objective 12, “to address the causes of climate change through reducing emissions of greenhouse gases and ensure that the District is prepared for its impacts”, should be split up into 2 separate objectives.
How these issues were taken into account
<ul style="list-style-type: none"> • Some amendments were made to the key sustainability issues • Air quality, which was previously attached to another objective (transport), is now a stand-alone objective. • Consideration was given to all comments relating to new/amended indicators. Some new indicators were added, although limitations in data available or data collection deemed others impractical. It was also felt that some of the proposed additions were already covered by other indicators. • A number of amendments were made to objectives and indicators in light of comments received. Also, some indicators were deleted.

Other comments
<ul style="list-style-type: none"> • A number of general comments were received, with many in particular highlighting that since the release of the topic papers for consultation, the South East Plan had been revoked and thus, amongst other things, the regional housing figures had been removed. As a result of this some wondered whether the housing figure had changed and what affect it would have on the preparation process for the Core Strategy. Suggestions to the housing figure were made and are recorded in the summary of responses to Topic Paper 5.
How these issues were taken into account
<ul style="list-style-type: none"> • Although the government had stated its intention to revoke the South East Plan, at this point it was still in place and so a Locally Derived Housing Target was identified in the Emerging Strategy in recognition of the fact that the South East Plan was soon to be abolished.

3.3 Sessions with Town and Parish Councils

3.3.1 The following comments were provided by the Town and Parish Councils/ Meetings at the sessions held in April/May 2010. The comments provided were in response to the following questions put to them;

- What are the issues for your settlement?
- What are the priorities and needs for your settlement?
- Will these priorities and needs address the issues?

Date of meeting: 26th April 2010
Parish Council's in attendance:
<ul style="list-style-type: none"> • Barcombe Parish Council • Chailey Parish Council
A number of issues were raised during the meeting:
<ul style="list-style-type: none"> - A number of local issues were raised such as the need for smaller houses in the area (retained in perpetuity), housing for older people and the poor bus service provision in the parish. - A number of local issues were raised including the search for allotment land in South Chailey, the lack of and accessibility to local services (for example South Chailey has just one village store), the need to improve footpaths and cycle tracks between the different settlements.

Date of meeting: 7th May 2010
Parish Council's in attendance:
<ul style="list-style-type: none"> • Newick Parish Council • Rodmell Parish Council • Iford Parish Council • Kingston Parish Council • Falmer Parish Council
A number of issues were raised during the meeting:
<ul style="list-style-type: none"> - Broadband provision and speed - Public transport provision. It was considered that there should be regular buses running from Uckfield to allow for commuting to train stations. Also, buses could operate earlier in the day in this area to aid commuting to other settlements both within and out of the District. - Traffic issues were also raised including traffic and speeding on the C7 - Some smaller settlements struggled historically because of a lack of development in the past. This has led to a loss of services and reliance on bigger settlements. - Ageing population, especially in isolated areas, means there is a need for villages to expand to accommodate younger people to aid in sustaining/ improving services and facilities. - Affordable housing is good, takes a long time for such development to occur however. - A number of local issues were raised including increased traffic in the area, parking problems, poor public transport provision and a lack of funding for improvements and concern about being more susceptible to development as not in the National Park. The Parish Council also highlighted that Newick is self- sufficient and provides some services for Chailey. - Bus routes should go through settlements, such as Iford, rather than via main roads.

Date of meeting: 12th May 2010
Town/Parish Council's in attendance:
<ul style="list-style-type: none"> • Telscombe Town Council • Peacehaven Town Council • Newhaven Town Council
A number of issues were raised during the meeting:
<ul style="list-style-type: none"> - Lack of community facilities and currently unfit for purpose. - All coastal towns have concerns over the A259, especially condition and proximity to cliffs at Saltdean. Possible solutions were suggested including new link road and/ or better coastal defenses. Commuters are a significant pressure on A259. - Cycling routes are inadequate along coast road. - Need for good quality housing to attract people into these areas. - Lack of adequate school provision. Have to travel to other parts of the District/ County. - A number of local issues were raised, particularly around the need for improvements to transport routes and cycling and walking connections. It was also suggested that development of transport hub at Newhaven is needed. This should include adequate parking to make use of the railway station, which should be improved. - New play space, sensibly located is also needed. Currently, insufficient space for allotments. - A need for family sized affordable housing. Although there is also a need for smaller units - Lacking units for those currently in the Enterprise Centre to move into if they wish to expand. Need to attract long term employment to Newhaven. - Lack of development land for housing. Currently have no allotments and consider there to be a need.

Date of meeting: 17th May 2010
Parish Council's in attendance:
<ul style="list-style-type: none"> • Ringmer Parish Council • Firle Parish Council
A number of issues were raised during the meeting:
<ul style="list-style-type: none"> - Support the current Local Plan policy on farm building conversions to avoid the loss of valuable buildings. - The importance of providing high quality work places was raised. - Ensure that brownfield sites are maximised before greenfield sites - Need affordable housing in villages to enable the next generation of the local community to stay in the villages. - Road capacity is a problem, especially at some of the trunk road junctions. - Infrastructure in villages is unable to support existing development, let alone additional development. - Integration of development into existing settlements, particularly an issue where large developments are built. - A range of other local issues were raised including flooding and parking provision - Out-commuting from villages, especially Ringmer, is a concern. There is a desire for villages to be more sustainable, which includes the provision of local employment opportunities. - Ensure that adequate and suitable play space is provided – particularly an issue in Firle where children play on roads as there is no hard surface play area.

Date of meeting: 19th May 2010

Parish Council's in attendance:

- **Ditchling Parish Council**
- **Streat Parish Council**
- **East Chiltington Parish Council**
- **Hamsey Parish Council**
- **Plumpton Parish Council**

A number of issues were raised during the meeting:

- Loss of employment opportunities (particularly to housing) is a serious issue in the villages.
- Downland villages may not be suitable for future employment land provision.
- Broadband provision and speed to aid the rural economy.
- Need for affordable housing – encourage people to stay in their areas and keep village communities alive. Required in Plumpton to service rural workers.
- Improving transport to health facilities – particular issue for the elderly.
- Public transport provision – poor provision of service in some areas. Better linkages needed to surrounding villages. Need for increased frequency of rail services stopping at Cooksbridge village.
- Villages half in and half out of the National Park is an issue.
- Traffic congestion and speeding, particularly an issue in the National Park

Date of meeting: 24th May 2010

Town Council's in attendance:

- **Lewes Town Council**
- **Seaford Town Council**

A number of issues were raised during the meeting:

- Provision of local services and facilities - health provision in Seaford considered to be inadequate with 2 small surgeries
- Balance between affordable, rentable housing, and free market housing is 'wrong' – affecting sustainability of the settlements as new residents are likely to be commuters. Shared ownership – renting and buying should be considered
- The consideration of disabled housing need and Lifetime Homes was raised.
- Need for family homes (2 and 3 beds) with outdoor play spaces, rather than building flats/apartments for small households.
- Lots of empty industrial units – possibly due to poor condition of buildings. Need for modernisation of some of the existing buildings.
- Concern was raised about the loss of employment units/land
- Newhaven Enterprise Centre has been very successful with not much room for businesses to expand and move out. Could this be provided in Seaford?
- Public transport is needed on estates- especially late evening and on Sundays.
- Railway line from Lewes to Uckfield would open up opportunities for the District.
- Lewes bus Station should be moved close to rail station

3.4 'Drop-in' Sessions

3.4.1 Seven 'Drop-in' sessions were held across the district which were open to members of the public who were invited to submit comments on the content of the topic papers. These sessions were attended by Lewes District Council Planning Policy Officers. In total, 106 people attended the 'drop-in' sessions. Details of the attendance are given in the following table:

Date	Venue	Attendance
24/5/10	Newick Village Hall	3
25/5/10	Lewes Leisure Centre	9
26/5/10	10 High Street, Newhaven	3
27/5/10	Ringmer Village Hall	17
7/6/10	Rodmell Village Hall	10
8/6/10	Meridian Centre, Peacehaven	38
10/6/10	Seaford Baptist Church	26

3.4.2 There were 12 exhibition boards at each session which summarised the information contained in the Topic Papers. A number of comments submitted on post-it notes that were stuck on the various exhibition boards which included the following themes:

- 'Key issues and challenges for the district'**
- 'How to address the issues and challenges?'**
- 'North Street, Lewes'**
- 'Eastside, Newhaven'**
- 'Any Other Comments'**
- 'Finally'**

3.4.3 A summary of the comments received has not been included in this statement, but can be found in the representation summary that was produced for the Topic Papers consultation. This summary can be accessed through the link below.

http://www.lewes.gov.uk/Files/plan_representations2010.pdf

3.5 Discussion Forums

3.5.1 Two discussion forums took place as part of the Topic Papers consultation. Officers and Councillors from Lewes District Council attended these forums to facilitate the discussion which focused on three separate themes. A wide range of feedback was gathered from the forums, details of which can be found in the consultation summary at the following link:

http://www.lewes.gov.uk/Files/plan_representations2010.pdf

Thursday 1st July, The Corn Exchange, Lewes Town Hall

The following themes were discussed during the forums:

Discussion 1: What issues should a plan for Lewes District be addressing?

Discussion 2: Where should new development and change take place in the District?

Discussion 3: What should the future of North Street be?

Monday 5th July, Tideway School, Newhaven

The following themes were discussed during the forums:

Discussion 1: What issues should a plan for Lewes District be addressing?

Discussion 2: Where should new development and change take place in the District?

Discussion 3: What should the future of Eastside be?

4. Emerging Core Strategy Consultation

4.1 Introduction

4.1.1 Following the consultation on the Topic Papers, the comments received and further evidence work built on this and fed into the production of the Emerging Core Strategy. The second consultation stage took place on the Emerging Core Strategy between 30th September until the 2nd December 2011.

Who was invited to make representations?

4.1.2 The Emerging Core Strategy was approved by Lewes District Cabinet and the South Downs National Park Authority Planning Committee for consultation in September 2011. A letter (see Appendix 1) or email alert notifying of the dates of the consultation, how comments could be submitted and where the Core Strategy 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. At the same time, the District Council's website displayed front page information about the consultation.

4.1.3 Initially, the consultation was intended to last until late November 2011, however the decision was made to extend this deadline. Letters and emails were sent to all consultees on 7th November notifying them of the decision to extend the consultation until 2nd December. The front page of the website also clearly stated that the consultation deadline had been changed.

Availability of the Emerging Core Strategy

4.1.4 The Emerging Core Strategy was published on the Council's website at www.lewes.gov.uk/corestrategy and hard copies of the document were placed in the Council's Planning Offices in Lewes and the South Downs National Park Authority's offices in Midhurst. Hard copies of the document were also placed in district's libraries at Lewes, Newhaven, Peacehaven, Ringmer and Seaford and in libraries outside of the district at Burgess Hill, Haywards Heath, Saltdean and Uckfield. Copies of the document were also placed in the mobile libraries that cover the district.

Summary of the Consultation Process

Representations received on the Emerging Core Strategy

4.1.5 Representations on the Emerging Core Strategy were received from over 800 individuals and organisations. While most of these were submitted via email or letter, a number of representations were submitted via an online survey set up specifically for the consultation process, which allowed people to make comments on the key policy areas of the Emerging Core Strategy without having to read the document or its supporting information.

4.1.6 Some people responded through both the online survey and emails/letters, while others submitted more than one written response and as a result the number of different representations approached 900.

Meetings with Town/Parish Councils

4.1.7 The letter sent to Town/Parish Councils indicated that District Council and, where appropriate, National Park officers were available to attend meetings held by Town and Parish Councils to discuss the Emerging Core Strategy if invited to do so. As a result of this letter, a number of Town/Parish Councils invited us to attend one or more meetings. Details of these meetings and a summary of the feedback can be found in Section 4.3.

Publicity of Consultation

4.1.8 In addition to the letters and email sent out, as mentioned above, summary leaflets and posters were publicised providing information about the document and how people could submit their views. These were distributed to Town and Parish Councils for advertising within their respective areas. Leaflets and posters were also placed in the libraries alongside hard copies of the Emerging Core Strategy document. In addition planning officers handed out the leaflet at Lewes Railway Station, at Sainsbury's Supermarket, Newhaven, and at the Meridian Centre, Peacehaven.

4.1.9 Within District News, the Council's quarterly publication produced for every household in Lewes District, the centre pages were devoted to the Emerging Core Strategy and provided a summary of the document. It also explained where the document could be found and how people could submit comments upon it.

4.1.10 Press releases were produced, resulting in two articles in the Sussex Express, a weekly newspaper that covers the whole district, on 28th October and 11th November. The latter article notified people of the extension to the consultation period.

Use of Social Media

4.1.11 The Council's Facebook and Twitter accounts were used to advertise the consultation. Weekly tweets and updates to the Facebook status included links to the location of copies of the Emerging Core Strategy document and methods of submitting comments.

4.2 Summary of Representations on Emerging Core Strategy

4.2.1 The tables below summarises the representations made on particular sections of the Emerging Core Strategy and indicates how the comments received have influenced the Proposed Submission Core Strategy. A representation summary was produced for the Emerging Core Strategy which provides a more detailed summary of the comments made during the consultation. The representation summary can be found at the link below:

http://www.lewes.gov.uk/Files/plan_representations2010.pdf

Section 2 – Portrait of the District
<ul style="list-style-type: none">• A number of comments were received in support of this section• Comments were also received which disagreed with or proposed changes/additions to the section in its entirety or individual settlements
How these issues were taken into account
<ul style="list-style-type: none">• This section was intended to focus on the key issues and opportunities and so some of the suggested changes did not led to changes within the Proposed Submission Core Strategy (PSCS)

Section 3 – Issues and Challenges
<ul style="list-style-type: none">• The majority of respondents agreed with the issues and challenges identified in the Emerging Core Strategy, although a number of additional issues or detailed modifications to the text were suggested by some respondents.• East Sussex County Council sought the inclusion of an additional issue relating to air quality in the section titled ‘Protecting and enhancing the distinctive quality of the environment’.• The Environment Agency recommended that the Catchment Flood Management Plan should be used in conjunction with the Strategic Flood Risk Assessment and the East Sussex Preliminary Flood Risk Assessment in order to address flood risk in the District.
How these issues were taken into account
<ul style="list-style-type: none">• It was felt that it was important to prioritise the <u>key</u> strategic issues and challenges that need to be addressed by the Core Strategy. It was considered that the Emerging Core Strategy achieved this in a succinct and coherent way, reflecting both the Lewes District Sustainable Community Strategy and the feedback from the earlier stages of public consultation and engagement.• One change was made to the text of the section titled ‘Tackling Climate Change’ which was amended to include the Environment Agency’s Catchment Flood Management Plan.

Section 4 – The Vision

- District-wide vision - Overall there was agreement with the Vision set out for the District, although a number of minor amendments were suggested
- Newhaven - The vision for the economic regeneration of Newhaven was supported although two respondents considered that the location of the town adjacent to the National Park should be highlighted. Other amendments were proposed to better reflect the character of the town and to emphasise that the town's regeneration should be achieved around port-related and port hosted activities
- Peacehaven and Telscombe - Respondents were of the opinion that a more positive approach to the town needs to be taken, although no examples were suggested for such an approach.
- Seaford – A small number of amendments were suggested to the vision for Seaford
- Lewes - The vision, or elements of it, was supported by the majority of respondents. However, a number of additions were suggested.
- Low Weald - The majority of comments concerned a perceived disparity between the vision and the spatial strategy for the Low Weald area. This was particularly mentioned by individuals and organisations in the Plumpton and Wivelsfield areas who felt that the housing options being considered for these areas do not accord with the vision.
- Rural part of the National Park – One amendment was suggested to the vision

How these issues were taken into account

- Some amendments were made to the district-wide vision in light of comments made, however it was felt that some of the comments were either too specific or that the vision as worded was sufficient.
- Newhaven - It was felt that some of the comments were already reflected in the changes made to the Newhaven section in the 'Portrait of Lewes District' chapter of the Core Strategy. However, some amendments were made to the vision to reflect comments made by the Town Council and Newhaven Port and Properties.
- Peacehaven and Telscombe - The need to deliver more employment floorspace to help establish a greater presence of local businesses and enhance local job opportunities is acknowledged and the vision has been amended accordingly. The improvement of the local retail offer has also been included as part of the vision.
- Seaford – it was felt that some of the suggestions were too detailed for a strategic document, although an amendment to reflect the need to attract business and investment to the district's town was made.
- Lewes - As with many of the other comments on the vision, most of the suggested changes would result in the creation of an overly detailed vision for Lewes town that would be inappropriate in a high level and strategic document and that some of the suggested changes are already addressed in the District-wide vision.
- Low Weald - Comments about how the vision has been translated into the spatial strategy are for consideration in the formulation of the strategy itself. However, it is worth noting that none of the comments disputed the vision itself.
- Rural part of the National Park – The one suggested amendment was made to the vision.

Section 5 – Strategic Objectives

- Most respondents supported the objectives as a whole but particularly Objectives 1 and 6. Specific support was also given to Objectives 3, 4 and 5.
- Some representations said that they disagreed with certain objectives and sought revisions to the wording of them to highlight additional points. Amendments were specifically suggested to Objectives 1, 3, 4, 6, 7, 8, 9 and 10.
- Some respondents were concerned about the achievability of particular objectives.

- A number of respondents felt that the proposed housing options would not meet the requirements of Strategic Objective 1, in particular the delivery of homes in the most sustainable way.
- Many also considered that the options selected for housing growth were not consistent with Strategic Objective 6, which seeks to maximise opportunities for re-using suitable previously developed land in urban areas.

How these issues were taken into account

- Amendments were made in response to a number of the proposed amendments to the strategic objectives.
- Whilst it is the aim to maximise the use of previously developed land it was considered that as there will not necessarily be sufficient, available and suitable sites to meet the housing and employment need. In the absence of previously developed sites to deliver sustainable development, the development of greenfield sites adjacent to existing settlements is an option that needs to be considered.

Section 6 – Spatial Strategy

- Settlement Hierarchy – The majority of representations that disagreed with the settlement hierarchy generally did so when putting forward the case for a change to be made (e.g. moving a settlement into a different category). A significant number of representations disagreed with Lewes town being categorised as a ‘District Centre’ and felt that this underplayed its function and that it should be reclassified as a ‘Secondary Regional Centre’.

How these issues were taken into account

- It was not considered appropriate to alter the position of Lewes town in the hierarchy, as although it offers a range of services and facilities these are not of a scale comparable to other Secondary Regional Centres. Limited retail on offer especially comparison goods creates leakage to larger towns with a greater range.
- The classification of the villages in the district in the settlement hierarchy has very much been influenced by the Rural Settlement Study. Based on the findings of this work, the villages were assigned to one of the pre-determined categories that were set in the Rural Settlement Study, based on how they had scored against a set of criteria that were related to issues such as access to key services and facilities.

Section 6 – Housing Target

- A number of comments were received supporting the proposed housing target. Reasons included the achievability of the target, the recognition of the environmental sensitivities and helping to meet a significant level of housing need.
- Some comments were received which objected to the target. One reason given was that the level of housing should only be established once a full picture of infrastructure provision and needs of those in the district have been established.
- Some who made comments considered that the overall level of housing planned for the district was too high.
- A number of consultees felt that the housing target was too low and that long term under provision will exacerbate the demand for affordable housing. It was also pointed out that the Core Strategy evidence base supports a higher figure.
- The housing target was not in line with the draft National Planning Policy Framework which says that local planning authorities should ensure that their Local Plan meets the full requirements for market and affordable housing.

How these issues were taken into account
<ul style="list-style-type: none"> • The target is based on numbers that can be reasonably expected to be delivered based on a number of factors, including historic delivery rates, land availability and land owners/developers intentions. At this point the South East Plan was still part of the development plan and housing target in the Proposed Submission document was considered to be in general conformity with the South East Plan housing requirements. • LDC has worked in partnership with a number of partners such as the Environment Agency, the National Park Authority and infrastructure providers when developing the housing target and so it is seen as an appropriate figure. • The Proposed Submission document sought to provide the optimum level of housing delivery, including affordable housing, in a sustainable way within the recognised constraints. The constraints mean that the total level of housing to meet need cannot be achieved in the district. • The housing target proposed was a little higher, on an annualised basis, than the South East Plan target (225 per annum proposed compared to 206 per annum in the SEP).

Section 6 – Office Floor Space Target
<ul style="list-style-type: none"> • A number of consultees supported the target, whilst some noted that the key issue is the generally low quality of many existing employment premises in the district • A number of comments felt that the preferred target was set too low
How these issues were taken into account
<ul style="list-style-type: none"> • The Office Floor Space Target was supported by the findings of the 2010 Economic and Employment Land Assessment. The EELA acknowledged that an issue faced in the district is the relatively low quality of much of the existing employment stock. Therefore there is a need to ensure that the policy supports, and does not present a barrier to, improvement and appropriate intensification of existing stock. The EELA also recognised that, in some instances, the lower quality stock is serving a local need at a relatively low cost.

Section 6 – Industrial Floor space Target
<ul style="list-style-type: none"> • The majority of responses supported the target • Of the respondents that disagreed with the proposed level of industrial floorspace, the majority felt that the target was too high
How these issues were taken into account
<ul style="list-style-type: none"> • The Industrial Floor Space Target was supported by the findings of the 2010 Economic and Employment Land Assessment.

Topic Area: Housing – Lewes Town
<ul style="list-style-type: none"> • The comments were divided between those advocating that Lewes town should accommodate a higher number of homes than that suggested in the Emerging Core Strategy and those that suggested a lower number was more appropriate. • Comments were also received relating to individual sites
How these issues were taken into account
<ul style="list-style-type: none"> • Although some of the arguments advocating a higher housing target for Lewes town are considered reasonable, it should be accepted that the location of the town within a nationally protected landscape does limit the level of housing growth that could be delivered, due to the landscape constraints to developing green field sites.

Topic Area: Housing – Newhaven Town
<ul style="list-style-type: none"> • None of the comments on the proposed housing distribution at Newhaven considered the level of growth proposed to be too high. Instead, most of them considered that additional housing growth should be planned for at Newhaven to aid in the regeneration of the town. • Housing should only be brought forward in association with the provision of adequate highway access and community and green infrastructure requirements.
How these issues were taken into account
<ul style="list-style-type: none"> • In response to the comments advocating a higher housing target for Newhaven, it was considered that Newhaven already benefits from a significant number of committed housing schemes that have yet to be built • All strategic site allocations will identify, either in the policy itself or in the supporting text, the opportunities and constraints to development (including how these can be taken advantage of/overcome), together with the key infrastructure requirements that will be required to service the planned development.

Topic Area: Housing – Peacehaven and Telscombe
<ul style="list-style-type: none"> • Most respondents felt that the range of potential housing numbers in the Emerging Core Strategy document were too high considering the traffic problems on the A259 and that the town does not have the shops, employment and services to support additional population
How these issues were taken into account
<ul style="list-style-type: none"> • In the Emerging Core Strategy the housing figure for Peacehaven and Telscombe was 455 – 1018. This has been revised in the Proposed Submission document to 517 (189 completions, 108 commitments, 0 on strategic sites, and 220 to be delivered through subsequent allocations (Neighbourhood Plans or Site Allocations DPD). • Evidence has been undertaken to assess the impact of additional housing growth on the highway network and in particular the A259. Although this evidence shows an increase in traffic flows on certain routes, including the A259, it is not seen by the highways authority (ESCC) as a 'showstopper' to any further housing development in the town, however this has been a significant constraint on potential development numbers in Peacehaven and Telscombe. • The settlement hierarchy places Peacehaven and Telscombe as a District Centre. This means

that it has a reasonable level of services and facilities and is seen as one of the more appropriate and sustainable areas for growth in the district, in accordance with the National Planning Policy Framework.

Topic Area: Housing – Ringmer and Broyle Side

- The vast majority of respondents raised concerns over future housing development in the village. Some either objected to any additional housing in Ringmer at all, or objected to the targets at the upper end of the range in the Emerging Core Strategy. Others supported a housing delivery target that was at the lower end of the range consulted upon.
- Some comments were received that supported a higher housing target or at the lower end of the range consulted upon.
- A number of comments were received objecting on the grounds of infrastructure constraints, the impact on the village character, transport constraints and the impact on the Ringmer Neighbourhood Plan.

How these issues were taken into account

- Regarding infrastructure constraints, it was accepted that any significant level of housing growth would require improvements made to the existing levels of provision. In particular, ESCC Education Services indicated a potential additional 0.5 form entry at primary school level may be required in the medium to long term and there is currently sufficient capacity at secondary school level. Southern Water indicated that improvements would be required to the sewage treatment infrastructure and ESCC Highways would require improvements to be made to the highway infrastructure (particularly Earwig Corner) if significant development were to be delivered at Ringmer. It was considered that through the work undertaken on the Infrastructure Position Statement and Delivery Plan there was nothing to suggest that such improvements cannot be delivered.
- Ringmer is classified as a Rural Service Centre in the settlement hierarchy. As such is it a more sustainable location for development than most other villages in the district.
- Housing numbers for Ringmer and Broyle Side in the Emerging Core Strategy were indicated to be in the range of 176 – 647 dwellings. Further to the consultation and additional assessment work, the figure was reduced in the Proposed Submission document to 224

Topic Area: Housing – Newick

- Most of these representations supported the approach put forward by the Newick Village Society, which is opposed to a large expansion of the village but supports some new housing development (perhaps 30 houses) to meet the local needs of Newick residents.

How these issues were taken into account

- In the Emerging Core Strategy 120 – 174 homes were proposed for Newick. Following consultation and further site assessments, it was revised to 124
- It was accepted that any new housing at Newick will need to be conditional on contributions being made to the delivery of SANGS (Suitable Alternative Natural Green Space) to mitigate the impact of recreational disturbance on the Ashdown Forest and deflect potential visitors to an alternative site.

Topic Area: Housing – Barcombe Cross
<ul style="list-style-type: none"> All the respondents considered that the figure in the Emerging Core Strategy was too low and that Barcombe Parish Council felt that the village could accommodate additional housing
How these issues were taken into account
<ul style="list-style-type: none"> Work undertaken on the Rural Settlement Study and the Settlement Hierarchy suggests that Barcombe Cross could accommodate between 30 and 100 additional dwellings during the plan period. Despite this, the Emerging Core Strategy only identified a figure of 30 dwellings to be delivered on identified sites during the plan period. This is because the Strategic Housing Land Availability Assessment (SHLAA) 2011 did not identify a potential capacity for housing growth above 30 dwellings. The update to the SHLAA for 2012 has not identified any significant capacity at Barcombe Cross and as such 11 units to be delivered on sites to be allocated subsequently to the Core Strategy has been identified for the village. Despite the above, it is worth noting that the figure of 11 should be seen as a minimum level of growth to be planned for in the village.

Topic Area: Housing – Plumpton Green
<ul style="list-style-type: none"> A large number of comments were received relating to the Plumpton Green housing target and the options consulted upon. The majority of support was for the lower end figure, citing reasons such as the impact on the environment, the impact of additional traffic on the village and a lack of justification for higher levels of housing.
How these issues were taken into account
<ul style="list-style-type: none"> Through consultation with the infrastructure providers, the District Council was not aware of any constraints that would preclude additional development at Plumpton Green that falls within the range of 30 – 100 new dwellings.

Topic Area: Housing – Wivelsfield Green
<ul style="list-style-type: none"> The majority of representations that made reference to the level of housing proposed in Wivelsfield Green (47 units) did so when making comments on the two strategic housing options in Wivelsfield Parish that border Haywards Heath and Burgess Hill, pointing out that the figure of 47 was misleading as the 330 units being considered on the two aforementioned sites should also be added to this figure. There were a few comments received that said that Wivelsfield Green was able to accommodate levels of development above that suggested in the Emerging Core Strategy, citing that it was a sustainable location.
How these issues were taken into account
<ul style="list-style-type: none"> It is acknowledged that the Emerging Core Strategy identified options for development in Wivelsfield Parish in excess of the 30 units proposed for Wivelsfield Green. However, the approach to distributing housing was/is taking an approach to distribute housing on a settlement basis, rather than a strict parish basis. Based on the advice received from the highways authority (ESCC) at the time, a higher level of growth beyond the 30 additional units identified (a total of 47 units over the plan period is proposed in the Proposed Submission document, including commitments and

completions) was not seen as appropriate due to the potential impact upon the highway network, particularly the B2112 through Ditchling.

Topic Area: Housing – Cooksbridge

- The majority of representations suggested that Cooksbridge could, or should, have a higher level of housing allocated to it and that potential growth should not be limited to 10-30 dwellings over the plan period.
- Some objections to further development were also received.

How these issues were taken into account

- Growth beyond the figure identified for Cooksbridge is not considered appropriate on the findings of the evidence base.
- Certain representations advocated planning for significant growth at Cooksbridge as this could help sustain and deliver further services and facilities. To deliver such services and facilities (i.e. village shop, doctor’s surgery, etc) would require a level of growth far in excess of any potential capacity identified through the SHLAA at Cooksbridge. The village is restricted to the south by the National Park designation and, in part, to the north by the open nature of the landscape leading towards the floodplain of the River Ouse.

Topic Area: Housing – Chailey

- Only a small number of comments received

How these issues were taken into account

- No particular concerns were raised over the potential level of growth identified for Chailey.

Topic Area: Housing – Other Settlement’ Distribution

- A number of respondents considered that housing targets should be given to settlements such as Glynde, Firle and Ditchling rather than including them in the ‘other settlements’ category as the Emerging Core Strategy did not plan for any growth in such locations.

How these issues were taken into account

- ‘Other settlements’ have not been allocated a level of housing because they do not have a planning boundary and/or have no deliverable capacity identified in the SHLAA and so have been deemed unsuitable for an allocated number of homes in the Proposed Submission Document.

Topic Area: Housing – Eastside, Newhaven

- The majority of respondents supported the preferred option
- Some respondents supported the retention of the existing Local Plan employment allocation, whilst others favoured the de-allocation of the site for employment uses

How these issues were taken into account
<ul style="list-style-type: none"> • Since the consultation on the Emerging Core Strategy, the Council granted planning permission for up to 190 dwellings, 1,860 sq m of B1 employment floorspace (ref. LW/11/0634) and 6,780 sq m of retail floorspace (ref. LW/11/0635) on the Eastside site.

Topic Area: Housing – Lower Hoddern Farm, Peacehaven
<ul style="list-style-type: none"> • General support for development of the site due to the benefits of meeting an identified housing need. • Some comments noted the close proximity of the Wastewater Treatment Works (WTW) to the site and that careful design would be needed to ensure that residential amenity is not adversely affected. • Objections were also raised concerning the loss of agricultural land and highways constraints.
How these issues were taken into account
<ul style="list-style-type: none"> • Since the publication of the Emerging Core Strategy, East Sussex County Council (the local transport authority) has changed its view on the acceptable level of traffic growth that can be accommodated on the A259 west of Peacehaven. As a result of the ESCC’s transport advice it was decided that no strategic housing allocations would be proposed in Peacehaven and Telscombe at this stage.

Topic Area: Housing – Old Malling Farm, Lewes District Council
<ul style="list-style-type: none"> • A number of respondents supported the development of the site, being the biggest and most accessible site in Lewes. • However, a number of objections were raised concerning the impact on the landscape, the National Park, flood risk and traffic congestion in the town.
How these issues were taken into account
<ul style="list-style-type: none"> • In identifying potential strategic housing options for Lewes brownfield sites were sought in preference to greenfield. Due to the very constrained nature of the town, strategic scale potential housing options were very limited. The North Street site is a strategic option for the town that would include housing and is an entirely brownfield site. Therefore, this site was not taken forward.

Topic Area: Housing – South of Lewes Road, Ringmer
<ul style="list-style-type: none"> • A number of comments in support of the allocation were received • The majority of comments objected to the allocation for reasons such as the impact on the setting of the National Park, flood risk and compromising the strategic gap between Ringmer and Broyle Side.
How these issues were taken into account

- The strategic gap between Ringmer and Broyle Side is recognised as an important feature to the parish by residents. In addition, it is recognised that views to the South Downs National Park will need to be carefully considered.
- Ringmer and Broyle Side was allocated 220 net additional units over the plan period compared to the range of 176 – 647 outlined in the Emerging Core Strategy. The lower figure partly reflects concerns raised by representations but also the options assessed within the Sustainability Appraisal. The level of development allocated within Ringmer and Broyle Side will be considered through the Site Allocations Development Plan Document stage.

Topic Area: Housing – Land North of Bishops Lane, Ringmer

- A number of comments in support of the allocation were received
- The majority of comments objected to the allocation for reasons such as the impact on the local road network and that a proposal for 283 houses in this location was completely out of scale with any village.

How these issues were taken into account

- Through the evidence collected for the Core Strategy, it was considered that a case can be made for the delivery of a strategic housing allocation at Ringmer during the early part of the plan period. However, Ringmer Parish Council was at an advanced stage of producing a Neighbourhood Plan. Therefore, it was decided that a contingency allocation should be included in the Proposed Submission document that would allocate the site at a certain date, should the Ringmer Neighbourhood Plan not be adopted or not having allocated sufficient sites to meet the housing target set in the Core Strategy. This contingency site of 120 units would be Land to the North of Bishops Lane with the aim of ensuring an adequate supply of housing land during the early part of the plan period
- In order to reduce the impact on the local highway network, the development will be required to contribute towards improvements to the Earwig corner junction and to the extension of the partially constructed Lewes-Ringmer cycle path.
- An appropriate surface water management plan will be required to be prepared and implemented (in agreement with the Environment Agency) to ensure appropriate drainage of the development.

Topic Area: Housing – Fingerpost Farm, Ringmer

- A number of comments in support of the allocation were received
- The majority of comments objected to the allocation for reasons such as the highways impact on Broyle Lane and that with this quantum of development, Broyleside would lose its hamlet status

How these issues were taken into account

- The planned level of development for Ringmer and Broyle Side has been set at 220 net additional units, compared to the range of 176 – 647 in the Emerging Core Strategy, to reflect representations made and the outcome of the Sustainability Appraisal. Distribution of housing to meet this figure will be considered through the Ringmer Neighbourhood Plan currently being prepared by Ringmer Parish Council. At this stage this site has not been specifically allocated as a housing site.

Topic Area: Housing – Valley Road, Peacehaven
<ul style="list-style-type: none"> • The majority of comments supported the allocation of this site due to it being located on low quality agricultural land and that it would smarten up low quality scrub land. • Some comments objected to the allocation as the terrain of the site would make development very difficult and the impact on the local transport network.
How these issues were taken into account
<ul style="list-style-type: none"> • Since the publication of the Emerging Core Strategy, East Sussex County Council (the local transport authority) has changed its view on the acceptable level of traffic growth that can be accommodated on the A259 west of Peacehaven. As a result of the ESCC's transport advice it was decided that no strategic housing allocations would be proposed in Peacehaven and Telscombe at this stage.

Topic Area: Housing – Valebridge Road
<ul style="list-style-type: none"> • The majority of comments supported the allocation commenting that it makes sense to develop the site, due to it being a well contained site, good infrastructure, good rail connections and employment opportunities nearby in Haywards Heath and Burgess Hill. There was also mention of the proximity to hospitals, schools and shops, which made it a sustainable location. • A number of objections were also raised, with some respondents pointing out the 4,000 planned new homes across the top of Burgess Hill, very close to Valebridge Road, which should render this development totally unnecessary. It was also pointed out that future residents are likely to access services at Burgess Hill which would impact on Mid Sussex. The potential traffic impact was also a concern of most respondents.
How these issues were taken into account
<ul style="list-style-type: none"> • Burgess Hill is considered a sustainable location for development with shops and services available locally including public transport. However, the site could not be shown to be deliverable at the time due in large part to multiple land ownership and associated uncertainty over access. It was therefore not included as a strategic development site in the Core Strategy.

Topic Area: Housing – Greenhill Way
<ul style="list-style-type: none"> • A large number of objections were received in regards to development of this site. Some of the main issues given as reasons for opposition were: The impact on existing infrastructure and services and in particular those in Mid Sussex; development would threaten ancient woodland and other habitats, such as Asylum Wood; and the site is not sustainable and would encourage car use.
How these issues were taken into account
<ul style="list-style-type: none"> • Development would be phased from 2017 to allow for the prior completion of the Haywards Heath Relief Road. • Ecology/tree surveys will be required. Any necessary mitigation measures would be recommended as a result, which may include a buffer zone from the woodland and TPO trees.

- The impacts of development of this site on traffic and the local highway network will need further assessment through a Transport Assessment/Statement and appropriate mitigation and support for sustainable transport modes through the implementation of a travel plan to ensure reliance on the car is kept to a minimum.
- It is accepted that some infrastructure is more likely to be delivered/accessed in MSDC/WSCC/HHTC administrative area and an appropriate proportion of developer contributions would need to be passed on accordingly to the relevant authority.

Topic Area: North Street, Lewes District Council

A number of options were consulted on for this site:

Preferred Option – Mixed use development of the site

Option 1 – Retain for employment use

Option 2 – Utilise for flood storage and other low key uses

Option 3 - Restore part of the flood plain and allow flood resistant and flood resilient development in areas of lower flood risk.

- A number of comments were received in general support of the preferred option, with the main reason being that it would be brownfield development, would provide much needed affordable housing in Lewes and would make good use of vacant and poor quality units.
- East Sussex County Council stated that reference should be included to the local transport network improvements that would be required to minimise potential traffic impacts arising from development at this location.
- Option 1 – Some support for this option was received from those who felt that the site should be retained for employment use in order to deliver the Core Strategy Vision for reducing out-commuting and securing more business premises for Lewes town
- Option 2 - Some support for this option was received
- Option 3 – Some viewed this option as the most appropriate solution in the light of the challenges presented by climate change

How these issues were taken into account

- Any strategic site allocations included within the Core Strategy will be accompanied by a set of development principles that reflect the constraints that need to be overcome and the opportunities that could be realised should the development proceed.
- Option 1 - It is acknowledged that at present the North Street site is a predominantly used for employment purposes. However, in view of the number of vacant units and units that are also in a poor state of repair, it is seen as an under-performing site in economic terms, particularly when considering its central location in the town. This situation is not expected to improve whilst the site remains at a significant level of flood risk. Therefore retaining the site for employment use is not seen as an appropriate approach, particularly given the unlikelihood of flood defences being delivered in such circumstances.
- Option 3 - Although the support and comments provided on this option have been noted, this option for the strategic site did not perform as well as the chosen policy approach through the Sustainability Appraisal process.

Topic Area: Caburn Enterprise Centre, Ringmer

<ul style="list-style-type: none"> • General support for this topic area was received citing the limited land available in Lewes for employment development and that Ringmer has space for such development • Objections to this policy area, commented either upon the suitability of the site or the principle of significant employment development being directed to Ringmer
How these issues were taken into account
<ul style="list-style-type: none"> • This option has not been progressed due to uncertainty over deliverability in the prevailing economic conditions and the identification of alternative provision in the preferred position as set out in the Employment and Economic Land Review of Lewes town.

Topic Area: Other suggested locations for housing
<ul style="list-style-type: none"> • A number of alternative sites for residential development were put forward as well as the option of a new settlement
How these issues were taken into account
<ul style="list-style-type: none"> • A number of the sites were not considered strategic due to their size • The New Settlement Scoping Report, published in April 2012 concluded that there is no potential for a new settlement to be delivered in the district

Comments on Section 7 (Core Delivery Policies)

Core Policy 1
<ul style="list-style-type: none"> • The majority of comments supported the preferred policy approach as it would aid the delivery of greater levels of affordable housing, particularly in the rural areas of the district, thereby enabling local people to stay in their local communities. • A number of objections were also raised questioning the viability of the approach
How these issues were taken into account
<ul style="list-style-type: none"> • It was agreed that a rigid percentage would not be appropriate, especially given the uncertain economic climate. As such a target percentage (40%) has been set out, which has been shown to be broadly viable across the district, but allowing the in-built flexibility for schemes to include a lower (or higher) proportion of affordable units where viability dictates, provided this is justified. • A district wide Affordable Housing Viability Assessment (AHVA) has been undertaken to inform the proposed policy approach. Viability has been the central thread in determining the best policy approach to ensure that development will not be deterred by the affordable housing policy. The AHVA factored in other costs to developers such as meeting the Code for Sustainable Homes, S106 and CIL contributions. Monitoring is proposed, with policy review where monitoring shows it is appropriate.

Core Policy 2

- A large proportion of respondents agreed with the approach set out.
- A small number objected to the preferred approach and put forward amendments to the policy wording.
- Developers are only interested in profits and that usually that means 4-5 bedroom houses, hence it is doubted as to how effective the policy will be.

How these issues were taken into account

- Some amendments were made to the policy wording to reflect the comments
- Supporting evidence shows that the main areas of need to 2030 will be for smaller units (1-2 beds) and flexibility/adaptability of accommodation. While there will be some call for larger family homes too, it is considered important to direct development, whenever locally appropriate, to meet the overriding need for smaller units.

Core Policy 3

- The majority of comments in support of this approach did so in recognition of Gypsy and Traveller accommodation needs, rather than indicating support of the two specific sites outlined as options for the provision of pitches. Respondents agreed with the approach of identifying sites in the Core Strategy rather than later at the site allocations stage.
- A large number of comments were received objecting to this policy approach in general, the supporting evidence base as well as individual sites at Denton and Offham which were deemed unsuitable for the use.
- A number of alternative sites were put forward as options

How these issues were taken into account

- Insufficient sites were identified for inclusion within the Core Strategy, and therefore it was determined that sites to meet Gypsy and Traveller accommodation needs would be allocated in the Site Allocations Development Plan Document.
- The broad level of need for Gypsy and Traveller permanent pitches was established in earlier work within the Gypsy and Traveller Accommodation Assessment (GTAA) undertaken across the East Sussex Local Authorities with Brighton & Hove City Council. Work will continue with all partners and infrastructure providers to inform the allocation of sites in the Site Allocations Development Plan Document.
- In order to ensure a thorough approach to identifying potential sites, the additional sites suggested by respondents have been assessed.

Core Policy 4

- The majority of respondents supported this policy approach as it promotes economic development in a sustainable manner
- A small number of respondents disagreed with the preferred policy approach, generally focusing on the issue of safeguarding existing employment sites. Some respondents felt that the policy was too flexible and could result in the loss of employment land in areas of high residential land values, whilst others sought the deletion of this part of the policy on the grounds that safeguarding land for employment would be counter to the goals of the draft National Planning Policy Framework.

How these issues were taken into account

- There was specific support for the conversion of redundant farm buildings for small businesses which it was felt had worked very well in the district and should continue to be encouraged in the future. This was also recognised in the Employment and Economic Land Assessment and so Core Policy 4 (point 5) now includes explicit reference to support for economic growth in rural areas in this way.
- Other amendments were made to the policy wording to reflect comments received.
- It is still proposed to safeguard existing employment sites unless there are demonstrable economic viability or environmental amenity reasons not to which is line with the findings of the Lewes District Employment and Economic Land Assessment (EELA).
- A number of comments were received which recommended alterations to the policy. A number of these amendments, such as references to the Local Enterprise Partnerships, were made.

Core Policy 5

- The majority of comments were in support of the preferred policy approach as it recognises the natural assets of the district.
- Some comments objecting to the approach were received with some suggesting that hotel provision in the district was sufficient.
- More emphasis should be given to the need to improve and provide sustainable travel choices for those wishing to visit the district's attractions.

How these issues were taken into account

- It is agreed that there are sufficient hotels of certain types, although a need/opportunity for budget and boutique type hotels has been identified. The policy seeks to be supportive of such proposals where they are sustainable and of a scale, type and appearance appropriate to the locality.
- Sustainable tourism and sustainable transport are included as key policy areas in the Proposed Submission Core Strategy. Core Policy 5 point 5 also supports sustainable transport for visitors to reduce the impacts of visitors on the highway network.

Core Policy 6

- The bulk of comments received related to the policy approaches for Newhaven town centre and Peacehaven, which were mainly in favour of the preferred approaches.
- Concern was raised over the policy that it set a very negative in approach in respect of accepting the change of use of shops to other uses, and in particular to residential development in Newhaven town centre

How these issues were taken into account

- The policy approach seeks to protect local shops and only signals a flexible approach where premises are not viable.
- The approach for Newhaven is supported by the updated Lewes District Shopping and Town Centres Study and the National Planning Policy Framework confirms that residential development can play an important role in ensuring the vitality of centres. However, the centre of Newhaven is still identified as having primary shopping frontage, where there is a presumption against loss of retail to residential at street level. Outside of primary shopping frontages, other non-retail uses will provide opportunities for active frontages and increase

vitality and therefore viability. Accordingly, no change has been made to the Core Strategy in response to the comments received.

Core Policy 7

- The vast majority of respondents supported the proposed approach to this policy area
- South East Water expressed disappointment that the Emerging Core Strategy makes no reference to new water resource development requirements over the Plan period and requested that the text makes specific reference to the provision of water supply infrastructure.
- Burgess Hill and Haywards Heath Town Councils argued that financial contributions towards infrastructure provision should spent within the areas where new development will make a demand on services; they should not be ring-fenced by the boundaries of Lewes District.

How these issues were taken into account

- The Council acknowledges its role in assisting with the timely delivery of new strategic water resource schemes but will need to see the strategic need for any such schemes in the District confirmed by the Secretary of State's endorsement of South East Water's Water Resources Management Plan 2014 before it incorporates specific policy support in the Lewes District LDF Core Strategy. If a need for a new strategic water resource (or resources) within the District is eventually identified in the WRMP 2014, a specific allocation (or allocations) can be made within the Site Allocations and Development Management DPD which will follow adoption of the Core Strategy
- Core Policy 7 will not prevent financial contributions towards infrastructure provision in areas beyond the District boundaries where there is evidence that insufficient capacity is available in existing infrastructure to meet the needs of new development.

Core Policy 8

- The vast majority of respondents welcomed the policy approach to green infrastructure, with supporting representations received from the Environment Agency, Natural England, East Sussex County Council and a number of Town and Parish Councils.
- East Sussex County Council suggested that the policy could also include the production of a Green Infrastructure Strategy for the district
- An objection was raised stressing concerns that the evidence base for this policy was out of date and that a PPG 17 assessment was required.

How these issues were taken into account

- It is considered that an overarching green infrastructure policy, in association with other development plan policies, will be sufficient to support the implementation of multifunctional green infrastructure as opposed to a Green Infrastructure Strategy.
- It is acknowledged that the open space assessments informing this policy are now out-of-date, but it is considered unlikely that there have been significant changes in the level of provision sufficient to negate their value for plan making purposes

Core Policy 9
<ul style="list-style-type: none"> • The vast majority of comments received were in support of the policy approach • East Sussex County Council agreed with much of the approach but thought the policy should include the aim of guiding development away from an AQMA.
How these issues were taken into account
<ul style="list-style-type: none"> • Generally the proposed approach was seen positively by those who commented on the policy and has changed little in nature. • ESCC's position was noted but it is thought that the policy should help with air quality issues in areas and thus development would help to alleviate the situation in AQMAs, meaning that development in such areas shouldn't necessarily be avoided. • An amendment was made to the policy wording to reflect comments received from Lewes District Council Environmental Health team.

Core Policy 10
<ul style="list-style-type: none"> • The vast majority of comments received were in support of the policy approach, although some objections and amendments were proposed.
How these issues were taken into account
<ul style="list-style-type: none"> • Generally the approach outlined in the Emerging Core Strategy was supported and has changed little in nature, although changes have been made to reflect comments, up-to-date information and to ensure clarity. References sought by consultees to a number of different points have generally been added into the policy or supporting text.

Core Policy 11
<ul style="list-style-type: none"> • The majority of comments received were in support of the preferred policy approach. • Concern was raised that generic district-wide guidance on the built environment could impact on the character of individual parts of the district and that applications needed to be considered in respect of a site's surroundings.
How these issues were taken into account
<ul style="list-style-type: none"> • It is considered that the proposed policy requirements for new development to be locally distinctive, to make a positive contribution to the unique character and appearance of the surrounding area, and to respond to its local context will address any concerns that local character may be adversely affected by Core Policy 11. • It was also felt that saved Local Plan policies (ST3) that are to be retained in the Core Strategy address some of the concerns raised.

Core Policy 12
<ul style="list-style-type: none"> • The majority of comments were supportive of the preferred policy approach. • One objector stated that the policy should have a stronger emphasis on resisting development in the floodplain.

How these issues were taken into account
<ul style="list-style-type: none"> • The policy is clear that it seeks to steer development away from areas of flood risk and therefore needn't be stronger • A number of amendments were suggested by statutory consultees which were consequently introduced to the policy wording. • Some amendments were not introduced as it was felt that the wording was too precise or covered by other policies.

Core Policy 13
<ul style="list-style-type: none"> • The majority of comments were supportive of the preferred policy approach; although concern was expressed that implementation may be difficult when the District Council is not the transport authority for its area. • Some respondents were concerned that the policy would not be sufficiently flexible to permit new development within rural areas, particularly job-creation development, due the lack of opportunities for travel by sustainable modes of transport. • A number of respondents considered that the policy should identify or provide solutions to specific existing and future transport problems in various locations around the District
How these issues were taken into account
<ul style="list-style-type: none"> • The need to support thriving rural communities is recognised and it is acknowledged that the opportunities to maximise sustainable transport solutions will vary between urban and rural areas. A balanced approach to the determination of planning applications will therefore be needed to take account of the nature and location of different sites but it is not considered that this requires a change to the overall thrust of Core Policy 13 • The District Council is working in partnership with East Sussex County Council, as the local transport authority, to identify the key transport infrastructure improvements required to support the delivery of the Core Strategy. These infrastructure requirements will be set out in Infrastructure Delivery Plan that will accompany the Core Strategy and will include details on costs, funding, timescales and delivery agencies. It is not considered appropriate to repeat this information within the wording of Core Policy 13.

Core Policy 14
<ul style="list-style-type: none"> • The proposed approach for this policy area received considerable support, including from the Environment Agency, Natural England, Southern Water and a number of the town and parish councils. • The few reasons given for disagreeing with this policy focused on the Energy Opportunities Map • Some respondents were in favour of the alternative approach of relying on Building Regulations as it was felt that the preferred approach would increase build costs whilst others suggested the policy should go even further in seeking higher sustainability standards
How these issues were taken into account
<ul style="list-style-type: none"> • The build costs of meeting the full Code for Sustainable Homes Level 4 was factored into the

Affordable Housing and CIL Viability Assessment. The additional build costs of this policy implication was not found to be significant and did not materially impact on the broad level of viability for housing identified across the district.

Sustainability Appraisal

- Very few consultees made reference to the Sustainability Appraisal (SA) that accompanied the Emerging Core Strategy
- Some objections were raised as to the scoring of certain policies and sites against the sustainability framework
- Some inaccuracies were pointed out

How these issues were taken into account

- Amendments were made to the SA tables in response to some of the comments received and every effort was made to update the document with the latest data and information

4.3 Meetings with Town and Parish Councils

Prior to the start of the Emerging Core Strategy consultation, the District Council asked Town and Parish Councils if they would like officers to attend meetings with them to discuss the Emerging Core Strategy. Meetings were subsequently held with Burgess Hill, Haywards Heath, Lewes, Newhaven, Peacehaven, and Seaford Town Councils and Chailey, Ditchling, Firle, Newick, Plumpton and Ringmer Parish Councils.

A presentation was provided to explain what the Core Strategy is, the status of the Emerging Core Strategy and the issues of relevance to the parishes. An opportunity was then given to attendees to provide their views on some of the policy options being considered in their relevant parishes.

The following part of the report outlines the main topics discussed at the meetings and the issues raised by the Town/Parish Councillors and members of the public who attended. A representation summary has been produced for the Emerging Core Strategy which provides a more detailed summary of the comments made during the consultation, including the views of the Parish Councils during the meetings prior to consultation. The representation summary can be found at the link below:

http://www.lewes.gov.uk/Files/plan_representations2010.pdf

Plumpton Parish Council – 19 September 2011, Plumpton Village Hall

- The Parish Council made the District Council aware of their plans for the delivery of affordable housing in the village (as identified in their Village Action Plan) and it was discussed how this ties in with the housing figures being consulted upon for the village.
- The Council needs to maintain a preference for new development to be on brownfield land, preferably indicating what proportion of new development is expected to be delivered on such sites.
- There were queries raised on how the figure for housing commitments has been established, as well as where the classifications used in the settlement hierarchy had come from.
- The definition of 'affordable' housing needs to be made clear and clarification was sought on what is termed as 'green infrastructure'.
- Concern that developers could use the SHLAA to bring forward development that is shown as green or orange.
- Queries were raised on the issue of when the non-strategic sites will be allocated, the role of neighbourhood plans and how the Community Infrastructure Levy will operate.

Newhaven Town Council – 20 September 2011, Meeching Hall

- Agree that options need to be considered for Eastside as nothing has happened since allocation in 1981
- Suggested that in some circumstances a target percentage range, rather than a set target for affordable housing is employed to ensure that developers do not stop at the lowest target when they are able to deliver more.
- Support the aim to increase footfall in the town centre but in reality may not have the desired outcome and the town centre will become dead.
- Concerns were also expressed with regards to the option of moving the town centre.
- Would like to see a lower target percentage for social housing for Newhaven and instead

improve the amount and quality of open market housing.

- There's a worry that a large increase in new housing would further exacerbate the problem at Newhaven of parking.

Seaford Town Council – 22 September 2011, 37 Church Street

- Questioned the term 'affordable housing' – stating that what is affordable to one, is not for another and asked could the term social housing be used instead.
- Members of the Planning Committee were worried about the SHLAA. They were made clear that allocations in Seaford would follow after adoption of the Core Strategy.

Peacehaven Town Council – 29 September, Peacehaven Town Council Offices, Meridian Centre

- Concern was raised regarding the A259 was a concern and Councillors that it would be unable to accommodate a significant number of additional homes in the town.
- There were concerns that increased congestion on the A259 would impact on the ability of the emergency services to travel to accidents/hospitals during peak times.
- The findings of the transport study and views of ESCC were questioned.
- The availability of the Valley Road area for development was questioned by some.
- There were concerns that the town was unable to meet the future needs for both education and health provision even without additional development.

Chailey Parish Council – 4 October 2011, Reading Room, Chailey Green

- Queries were raised as to how the proposed housing figures for Chailey had been derived.
- The view was that South Chailey is more sustainable than North Chailey.
- It was felt that housing delivered on windfall sites should be taken into account in setting the housing target.
- Concern that the northern half of the District is being allocated more housing due to the designation of the South Downs National Park
- Improved broadband in the rural areas was seen as essential.

Plumpton Parish Council Public Meeting – 5 October 2011, Plumpton Village Hall

- The term 'affordable housing' needs to be made clear and it should include starter homes for local people.
- In deciding how much housing development goes to Plumpton Green there is a need to take into consideration the impact on the local highways
- It was queried why some settlements in the District have little, or no development proposed for them (ie. Ditchling).
- More housing will require more consideration of the impact on local services, policing, sewerage, water, electricity etc.
- There was no obvious consensus over what level of housing should be planned for in Plumpton Green. Some attendees, who spoke, were opposed to any increase in the amount of housing in the village, others would welcome some (although towards the lower end of the range that the Emerging Core Strategy was consulting upon) and some felt a higher

amount is appropriate providing that it can be proven that the infrastructure required to service this amount of additional housing would be forthcoming.

Ditchling Parish Council – 11 October 2011, Old Meeting House, Ditchling

- Further clarification on the proposed affordable housing policy was sought (i.e. thresholds)
- Concern was raised as to whether the design policy would be changing as the parish council didn't want modern buildings which they consider out of keeping
- Traffic congestion was the biggest issue for the parish council, as the village is very congested, not just at rush hours but also at weekends.
- Shouldn't the district's housing target be lower as a result of the National Park as otherwise areas around the periphery have to take too much development?

Ringmer Parish Council – 13 October 2011 at Ringmer Village Hall

- The view of many was that the character of Ringmer will change beyond recognition with significant additional housing. It was considered by some that the lower housing number could be incorporated into village.
- Additional concerns were raised on infrastructure provision, particularly highways and healthcare.
- Additional impact on earwig corner junction
- A number of queries were raised on the Ringmer Neighbourhood Plan process. Concern was expressed that the Core Strategy may undermine the delivery of this plan.

Newick Parish Council – 17 October 2011 at Newick Village Hall

- Lack of smaller homes for the young and elderly
- Need for employment sites in the village
- Concerns about whether the infrastructure will cope, specifically nursery provision, the village primary school and water, sewerage and electricity.
- Concern was raised about the SHLAA with a general misunderstanding that it allocates sites for development.
- Difficulty in identifying any benefits to Newick if the Core Strategy allows more housing in the village.

Lewes Town Council – 18 October 2011 at Lewes Town Hall

- There was concern about raising the affordable housing percentage requirement as a number of developments in the town have failed to meet the current Local Plan requirement of 25%.
- It was queried why the Core Strategy needs to plan for further industrial floorspace in Lewes town
- There is a need to consider North Street in the wider context of the town, particularly if it is to include retail units (consideration will need to be given as to what impact such units could have on the existing shopping areas).
- The North Street site should be considered alongside the Waitrose site and improvements to

the connectivity of the two areas need to be sought.

Firle Parish Council – 1 November 2011

- The Parish Council expressed concerns over the A27 to the east of Lewes and queried whether there was a need to make improvements to it in order to accommodate the planned growth in the District.
- Support for small-scale and decentralised renewable and low carbon energy.

Peacehaven Town Council – 1 November 2011 at Peacehaven Town Council Offices

- A special meeting of the Town Council was held to discuss the conclusions of East Sussex County Council (ESCC), as the local transport authority, on the Peacehaven options for strategic housing allocations/broad locations for growth in the Emerging Core Strategy. The meeting was attended by officers from ESCC, as well as the District Council.
- Concern was raised as to whether the Lower Hoddern Farm option could be accommodated by the local transport network”.
- ESCC’s transport evidence papers which inform the Core Strategy were discussed
- Concern was raised that the A259 between Newhaven and Brighton suffers from severe congestion particularly at peak times and that it cannot take much more traffic.
- Councillors did not consider that the high quality sustainable transport corridor described in the Emerging Core Strategy ‘vision’ for Peacehaven was achievable, because ESCC has no proposals for Phase 2 of the A259 bus corridor between Telscombe Cliffs and Newhaven. They felt that it was impossible to create a new bus lane without the loss of on-street parking.
- Councillors felt that any housing proposals in Peacehaven should be matched by new employment opportunities in the town in order to reduce the need to commute to work along the A259.

Ditchling Parish Council Public Meeting – 7 November 2011, Ditchling Village Hall

- Concern was raised about parking and traffic problems in the village.
- Development proposed in Burgess Hill and Haywards Heath is likely to have the most significant impact on traffic in Ditchling.
- There is a need for housing for the elderly (i.e. smaller purpose built properties) and the Core Strategy should recognise this.
- It was queried how the proposed affordable housing policy had been arrived at. There was some concern that the policy may discourage developers from building in Lewes District.

Meeting with Burgess Hill Town Council and Haywards Heath Town Council – 8 November 2011, Burgess Hill Town Council offices

- Concern expressed by both Town Councils that should either of the two (or both) housing options at Burgess Hill and Haywards Heath be taken forward the infrastructure requirements will be in the towns and not within Lewes District.
- Due to the above, both Town Councils consider that it is essential that any s.106 or CIL

monies associated with these proposals (should they come forward) is spent in the respective towns. The way the s.106 money from the Theobalds development was spent is considered to have set an unwelcome precedent by Burgess Hill Town Council.

- Haywards Heath Town Council are of the opinion that should the Greenhill Way option come forward then it should make a financial contribution to the cost of the Haywards Heath Relief Road.
- Both options could lead to coalescence of the two settlements, particularly the Valebridge Road option.

5. Proposed Submission Core Strategy

5.1 Introduction

5.1.1 The consultation on the Proposed Submission Core Strategy ran for 10 weeks from 11th January and 22nd March 2013.

Who was invited to make representations?

5.1.2 The Proposed Submission Core Strategy was approved by Lewes District Cabinet and the South Downs National Park Authority Planning Committee for consultation in December 2012. A letter (see Appendix 2) or email alert notifying of the dates of the consultation, how comments could be submitted and where the Core Strategy 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. At the same time, the District Council's website displayed front page information about the consultation.

Availability of the Proposed Submission Core Strategy

5.1.3 The Proposed Submission Core Strategy was published on the Council's website (www.lewes.gov.uk/corestrategy) along with the Sustainability Appraisal, Representation Form, Statement of Representations Procedure and accompanying guidance notes. Hard copies of these documents were also placed in the Council's Planning Offices in Lewes and the South Downs National Park Authority's Offices in Midhurst. Hard copies were also sent to the libraries in and around the district, as well as the mobile libraries that cover the district. The background and evidence base documents to the Core Strategy were also made available on the Council website.

Summary of the Consultation Process

Representations received on the Proposed Submission Core Strategy

5.1.4 A total of 283 individuals and organisations submitted representations on the Proposed Submission Core Strategy, primarily via email. This resulted in approximately 500 individual comments, with some respondents submitting multiple representations. The majority of respondents were members of the public.

Publicity of Consultation

5.1.5 In addition to the email notifications and letters sent out to the contacts on the Consultation Database (who had requested to be notified of planning policy updates), a press release was issued which was followed by articles in the local weekly newspapers (Argus and Sussex Express) that cover the district. An article was placed in the District News, the Council's quarterly publication produced for every household in Lewes District, publicising the consultation and explaining where the document could be found and how people could submit comments upon it.

Use of Social Media

5.1.6 The Council's Twitter account was used to advertise the consultation and included links to where the Core Strategy and supporting documents could be found.

5.1.7 A summary of comments made on the proposed Submission Core Strategy is set out below, picking out the main issues raised by respondents and how those comments were considered and influenced the Submission Core Strategy Submission. A representation summary has been produced for the Proposed Submission Core Strategy which provides a more detailed summary of the comments made during the consultation. The representation summary can be found at the link below:

http://www.lewes.gov.uk/Files/plan_PSCS_Representation_Summary.pdf

5.2 Summary of Representations on the Proposed Submission Core Strategy

Core Strategy Sections 1- 5	
Number of representations submitted - 14	
<p>Respondents on this policy (reference number of the respondent is in brackets)</p> <p><u>Support</u></p> <p>Clifford Dann LLP/Santon Group (REP/272) Ringmer Parish Council (REP/018) CPRE Sussex Countryside Trust (REP/292) South East Water (REP/009) Barton Willmore / Glenbeigh (REP/290)</p> <p><u>Support in principle, but propose amendments:</u></p> <p>Newhaven Town Council (REP/016) Seaford Town Council (REP/022)</p> <p><u>Object / amendments</u></p> <p>South East Water (REP/009) Newick Village Society (REP/269) Mid-Sussex District Council (REP/002) Portchester Planning Consultancy/ Croudace Strategic Limited) (REP/283) John Kay (REP/092) Cllr Sharon Davy (REP/012) Gregory Gray Associates/Lewes Garden Centre (REP/293) Newick Parish Council (REP/017)</p>	<p>Summary of the issues raised</p> <p><u>Support</u></p> <ul style="list-style-type: none"> • A number of Town and Parish Councils (Ringmer, Newhaven and Seaford) generally supported Sections 1-5. However, a number of minor amendments were sought, particularly in order to reflect a particular characteristic or issue of relevance to their area (for example the pockets of socio-economic deprivation along the coast). • Various comments by Clifford Dann / Santon in support of Sections 1-5, which is considered to justify the inclusion of North Street allocation. • Section 2 (A portrait of Lewes District) – a typical comment was that this section provides an accurate description of what makes up the district. • Section 3 – a typical comment was that this section accurately identifies the strategic issues and challenges facing the district. The <i>accommodating and delivering growth</i> section was particularly supported by various respondents. • Section 4 (Vision for Lewes District) – Various comments of support, including that it meets the requirements of para 21 of the NPPF. • Section 5 – the strategic objectives were supported by various respondents, in particular Objectives 3, 5 and 10. <p><u>Object / amendments sought</u></p> <ul style="list-style-type: none"> • No reference to the South East Water Resources Management Plan (WRMP) in paragraph 1.27. • Section 2 – Point four of Social Characteristics section does not match DCLG household projections. • Section 3 - No reference to extent of growth appropriate in the Sussex coast area and the remainder of the district. • Also, the section fails to mention that climate change will have a ‘double impact’ on the provision of water infrastructure in terms of supply and demand. • Section 4 – a few comments were made regarding minor amendments to this section, for example one consultee felt more specific visions for the district’s villages were required. • The scale of regeneration and growth should be emphasised within the coastal town visions. • Section 5 – Strategic Objective 8 should be extended to include rural brownfield. • No justification for development at Haywards Heath in the strategic objectives or vision for the district (and that there is no individual vision for Haywards Heath).

	<ul style="list-style-type: none"> • The importance of sustainable growth in the coastal areas should be emphasised in the strategic objectives.
<p>How have these comments influenced the Submission document?</p> <p>Strategic Objective 8 has been amended by deleting the words ‘in urban areas’ in order to support the appropriate re-use of previously developed land in both urban and rural locations.</p>	

<p align="center">Spatial Policy 1 – Provision of Housing and Employment Land Number of representations submitted – 30</p>	
<p>Respondents on this policy (reference number of the respondent is in brackets)</p> <p><u>Support</u></p> <p>Clifford Dann / Santon Group (REP/272) East Sussex County Council (REP/007) The South Downs Society (REP/326)</p> <p><u>Support in principle, but propose amendments:</u></p> <p>Parker Dann / John Lewin (REP/304)</p> <p><u>Object / amendments</u></p> <p>Anthony Padfield Town Planning Consultants / Bluemark Projects (REP/308) Gleasons / Harper Trust (REP/309) Boyer Planning / Thakeham</p>	<p>Summary of the issues raised</p> <p><u>Support</u></p> <ul style="list-style-type: none"> • General support for the need to plan for affordable and market housing, as well as employment space. • The levels of housing and employment growth set an appropriate and deliverable balance between objectively assessed needs, evidence set out in background documents and the district’s development constraints. • The housing target is in excess of the South East Plan requirement. • An appropriate range of housing targets have been tested through the Sustainability Appraisal. • The growth targets are consistent with national policy (NPPF). • General support for the need for employment space, specifically in rural areas to support the rural economy. <p><u>Object / amendments sought</u></p> <p>Housing Target</p> <ul style="list-style-type: none"> • The majority of respondents suggested the proposed housing target is insufficient to meet the district’s objectively assessed needs over the plan period. • However a few respondents, on the contrary, suggested the target was too high. Reasoning given was generally the district’s insufficient infrastructure or the lack of identified improvements to the district’s infrastructure (in the villages as well as the towns). In opposing the housing target for it being too low, the following reasoning (covered in the subsequent bullet points) was generally given; • The policy fails to comply with Duty to Cooperate in working collaboratively with neighbouring authorities (who are also

<p>Homes (REP/317) Newhaven Town Council (REP/016) WS Planning / Archie Mills (REP/310) Strutt & Parker / Appleton family (REP/286) Barton Willmore / Glenbeigh (REP/290) WS Planning / Hatch Homes (REP/312) Plainview Planning / Mr & Mrs Faulke (REP/311) Woolf Bond / Taylor Wimpey (REP/328) Town & Country Planning Solutions / Gleeson Developments LTD (REP/273) Teresa Sutton (REP/119) Ringmer Parish Council (REP/020) Peter and Liz Brooker (REP/193) Prospective Planning / Village Development (REP/289) W P Field (REP/090) Home Builders Federation (REP/268) Portchester Planning / Croudace Strategic LTD (REP/283) Brian Campbell Associates (REP/303) CPRE Sussex (REP/292) Luken Beck (REP/294) The Ditchling Society (REP/270) Tony Perris (REP/37) Savills / Mrs Mundy (REP/315) South East Water (REP/009) St Modwen Properties (REP/287)</p>	<p>unable to meet their housing need) on wider sub-regional issues.</p> <ul style="list-style-type: none"> • The policy does not comply with the ‘presumption in favour of sustainable development’, paragraph 152 and fails the ‘positively planned’ and effective tests of the NPPF. • LDC’s argument that the scale of housing reflects the South East Plan’s (SEP) acknowledgement of the district’s environmental constraints is no longer valid considering the SEP has been effectively (now has been) revoked. • The SEP apportioned housing growth across the region, taking into account areas of growth and restraint – as the plan has now been revoked, and other SE authorities are no longer following this strategy, it is unjustified to rely on these targets. • The background evidence (e.g. housing topic paper and sustainability appraisal) supporting the district’s environmental constraints fails to consider whether some of the constraints could be reviewed to accommodate higher levels of development. • The 2011 Lewes District Local Housing Needs Assessment (LHNA) is the most up to date assessment of housing and recommends a delivery requirement of 300-450 dwellings/year. • The policy has not been produced with the most up to date evidence base. • The housing requirement is unsound as it unjustified in terms of supporting evidence. • The housing target needs to be justified so that key infrastructure such as water provision can be planned for. • Evidence from the SHLAA suggests a higher housing target could be set. • SHLAA sites considered not deliverable or developable could have the potential to deliver housing through more positive planning in overcoming constraints; thus allowing an increased housing target. • The Council has a high number on the Housing Register and an ageing population which both require a higher housing target. • The district has a high house prices to earnings ratio in comparison to the rest of the South East. • The low target set may result in higher affordability pressure, excluding certain household types from the market, encouraging in-migration of higher earners. This may also result in a decline in the economically active population and workplace job numbers, thus impacting on the local economy. • LDC has failed to undertake a comprehensive assessment of all the settlements, in terms of constraints, and so has failed to accurately determine the district’s housing capacity. • The housing figure set out in the policy should be expressed as a ‘target minimum’
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	<ul style="list-style-type: none"> • A housing target should be identified specifically for the National Park area. • Reference should be made to the provision of market housing required to deliver the affordable housing needed in the district’s villages. • An additional policy should be included, providing a mechanism to produce annual updates of the supply of specific deliverable housing sites to meet a five year supply. <p>Employment</p> <ul style="list-style-type: none"> • Current floorspace requirements (being already principally met by existing commitments) may stifle the local economy and opportunities for regeneration. • The policy should be more flexible to allow additional employment opportunities in special circumstances. • There is currently an over provision of office space in Lewes Town, hence the need to plan for additional office space is not considered appropriate. • Reference should be made to the provision of employment space to support the rural economy.
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How have these comments influenced the Submission document?

The revocation of the South East Plan is now acknowledged in the text of the Core Strategy (paragraphs 1.2 & 6.13). References to the South East Plan as part of the statutory development plan have been deleted from Sections 1, 6 & 7.

The overall target for net additional housing in the district has increased to a minimum of 5,600 dwellings between 2010 and 2030, the rationale for which is summarised in new text (paragraphs 6.13 – 6.22) and set out in greater detail in the Core Strategy Background Paper: Justification for the Housing Strategy 2014.

The wording of Spatial Policy 1 has also been amended to commit the District Council and the National Park Authority to undertake a review of Spatial Policies 1 and 2 on completion of cross-authority working to consider longer-term options for strategic development within both the Sussex Coast Housing Market area and adjoining areas if any of these options are demonstrated to be deliverable within Lewes District.

Spatial Policy 2 – Distribution of Housing
Number of representations submitted – 63

Respondents on this policy
(reference number of the respondent is in brackets)

Support

CPRE Sussex (REP/292)
Clifford Dann / Santon Group (REP/272)
ESCC (REP/007)
Natural England (REP/005)
Woolf Bond / Taylor Wimpey (REP/328)

Support in principle, but propose amendments:

Plumpton Parish Council (REP/019)
South Downs Society (REP/326)
Plumpton Residents Opposed to Unnecessary Development (REP/318) (L)

L - Non-duly made representation received after the deadline.

Object / amendments

Parker Dann / John Lewin (REP/304)
Anthony Padfield Town Planning Consultants / Bluemark Projects (REP/308)
Strutt & Parker / Appleton family (REP/286)

Summary of the issues raised

Support

- The policy is sound.
- The focus of new housing provision in Newhaven and Lewes Town is supported.
- The policy approach concerning the distribution of development is sensible in light of the evidence base.
- Current transport evidence supports the housing targets set in the policy.
- The policy has been influenced by the potential impact of development on the road network and the ability to mitigate this.
- The Transport Advice Note produced by ESCC has informed the housing targets set for Peacehaven, Telscombe and Newhaven.
- The proposed housing allocation for Plumpton Green is supported and is consistent with the findings of the Rural Settlement Study.
- General comments offering support for the settlement hierarchy.

Object / amendments sought

- The policy is contrary to the principles of Strategic Objectives 3, 6, 8, 9 and 10 and the vision for the district.
- Higher housing targets for the settlements should be sought which would be more in line with the Government’s aim to deliver sustainable economic growth and deliver additional homes, as well as meeting the district’s objectively assessed needs.
- The allocations are not justified as they do not reflect housing need or where the majority of the district’s residents reside.
- The Core Strategy only allocates enough land to meet a small proportion of the housing requirement set out in SP1. This will lead to developer uncertainty and is not in accordance with government’s growth agenda.
- The housing thresholds for individual settlements should be expressed as a target minimum.
- A phasing element to the policy is needed to control the rate of building.
- In line with the Localism Act and NPPF, windfall sites should be counted towards housing targets in areas where Neighbourhood Plans have been approved.
- Dwellings currently in the pipeline approved/built after the Core Strategy has been adopted should count towards the

<p> Phillippa Hobbs (REP/213) John Jackson (REP/048) Ringmer Parish Council (REP/020) Chailey Parish Council (REP/014) Prospective Planning / Village Development Plc (REP/289) Cllr Sharon Davy (REP/012) Tony Perris (REP/037) CPRE Sussex (REP/292) Mr & Mrs Clark (REP/082) Barton Willmore / Glenbeigh Devts (REP/290) Brian Campbell Assoc. (REP/303) Christine Tutt (REP/058) Colin Mitchell (REP/190) Collins Planning / A Cooper (REP/280) D Bush (REP/196) David Conway (REP/148) David Lock Assoc's / Barratt Homes (REP/277) Dijkman Planning (REP/285) Francis Lang (REP/203) Friends of Lewes (REP/300) Gleeson / Harper Trust (REP/309) Luken Beck MDP (REP/294) HG Dodson / Baccata Trustees Ltd (REP/314) Hume Planning/Trafalgar Group (REP/307) Dr & Mrs Seccombe (REP/106) Jo Miller (REP/108) John Kay (REP/092) Martin & Andrea Gooch (REP/039) Martin Costin (REP/093) Michael and Mary Cattermole (REP/104) Anthony Turk (REP/027) Mr G & Mrs C Williams (080) B Cruttenden (REP/072) Maureen Jackson (REP/049) Newhaven Town Council (016) Newick Parish Council (REP/017) Nick Sutton (REP/222) Parker Dann / Oxbottom Lane </p>	<p> settlement housing targets. </p> <ul style="list-style-type: none"> • Transport infrastructure improvements are required to deliver the housing distribution figures set out in the policy (e.g. N. Chailey / Newick). • No consideration has been given to development in neighbouring authorities, for example Uckfield, which will place further stress on the infrastructure in Lewes District. • More focus should be on growth in unsustainable settlements, bringing them back to life, instead of overburdening the most sustainable locations. • A number of representations were received objecting to the categorising of certain towns in the settlement hierarchy (for example, Lewes which some thought should be classed as a Secondary Regional Centre). • A number of responses questioned the evidence base and the justification of the policy and settlement allocations. These related to the Rural Settlement Study, SHLAA, housing need figures etc, suggesting the evidence base was flawed. • The capacity for each rural settlement should be based on the council's evidence base, not its position in the settlement hierarchy. • A number of further strategic sites were proposed by developers at Peacehaven and Telscombe, Ringmer, Lewes, Plumpton Green, Cooksbridge, Newick, Wivelsfield Green and the edge of Burgess Hill. • A number of representations supported higher housing targets for the district's settlements, including the coastal towns (i.e. Seaford), rural service centres (i.e. Newick) and service villages (i.e. Wivelsfield green) where capacity is available and to support the local economy. Some respondents felt the 'local villages' could also accommodate housing targets in line with identified need. • Some respondents believed development should be focused in the towns in the southern part of the district where there is an identified need for affordable housing. • There is no justification/evidence to back up the relatively large housing targets set for some of the Low Weald villages • Concerns were raised as to where the 360 units at Lewes would be sited without using Greenfield land. • Some respondents suggested the housing target for Peacehaven and Telscombe was too high, in view of transport and highway constraints. • The highway constraints (A259) justification in paragraph 6.35 is not soundly based. In this regard a higher housing target was sought for Peacehaven & Telscombe • The target for Newhaven is too high considering highway network issues and a weak housing market. • The policy does not offer enough certainty and detail in relation to the 'Land at Harbour Heights' allocation. • The housing allocation for North Chailey should be removed
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<p>Neighbourhood Residents Association (REP/298) Peter and Elizabeth Brooker (REP/193) Plainview Panning / Mr and Mrs Faulke (REP/311) Portchester Planning / Croudace Ltd (REP/283) Roy and Lesley Forgham (REP/071) Ryan Hannigan (REP/098) Savills / Mr and Mrs Mundy (REP/315) St Modwen Properties (REP/287) Strutt and Parker / AJC (REP/296) Strutt and Parker / Appleton Family (REP/286) Town & Country Planning Solutions / Gleeson Developments LTD (REP/273) Teresa Sutton (REP/119) Tony Perris (REP/037) W P Field (REP/090) Lewes District Association of Local Councils (REP/297) (L)</p> <p>L - Non-duly made representation received after the deadline.</p>	<p>from the policy due to environmental constraints (Chailey Commons SSSI) and a shortfall in capacity (as identified in the SHLAA).</p> <ul style="list-style-type: none"> • It is likely that housing allocated for North Chailey would rely on services at Newick, placing further strain on the village and eroding the green gap between the settlements. • A petition was submitted with 90 signatures regarding concerns of increased traffic on rural roads as result of development at Newick/ North Chailey. • The housing target for Newick is too high considering the limited transport infrastructure, conservation areas and the detrimental impact it could have on the village and its services/facilities. • The housing target for Newick should be raised in line with the capacity identified in the SHLAA. • The higher housing target for Newick only appraised slightly more negatively than the lower figure. • The level of growth identified for Wivelsfield Green is being used to justify development on the edge of Haywards Heath (identified as a secondary regional centre in the settlement hierarchy) rather than selecting sites in Wivelsfield Green. • The housing allocation for Ringmer (220) is excessive considering the village’s proximity to the SDNP, the subsequent loss of visual amenity, lack of infrastructure and transport and highway issues. • Impact of increased traffic flows resulting from sites in Ringmer, particularly in identification of 03RG (SHLAA) North of Bishops Lane (Ringmer). • The allocation of the contingent strategic site at Ringmer was objected to – should be allocated in the policy instead.
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How have these comments influenced the Submission document?

Following further assessment, housing delivery targets have been increased at the following settlements:

- Haywards Heath (within Wivelsfield Parish)
- Burgess Hill (within Wivelsfield Parish)
- Newhaven
- Peacehaven & Telscombe
- Seaford
- Barcombe Cross

The wording of Spatial Policy 2 has also been amended to make it clear that these targets are the *minimum* number of additional dwellings to be delivered at each settlement.

Spatial Policy 3 – North Street Quarter and adjacent Eastgate area, Lewes

Number of representations submitted - 98

Spatial Policy 3 – North Street Quarter and adjacent Eastgate area, Lewes Number of representations submitted - 98	
<p>Respondents on this policy (reference number of the respondent is in brackets)</p> <p><u>Support</u></p> <p>South Downs Society (326) Cllr Sharon Davy (012)</p> <p><u>Support in principle, but propose amendments:</u></p> <p>Clifford Dann/Santon Group (REP/272) CBRE/Waitrose (REP/284) Environment Agency (REP/003) Ringmer Parish Council (REP/020) John Kay (REP/092)</p> <p><u>Object / propose amendments</u></p> <p>Felicity Mwanyolo (REP/177) WYG (REP/281) H Hockin (REP/165) David Hutchinson (REP/028) Chris Saunders (REP/224) Carlotta Luke (REP/235) Chris Smedley (REP/226) Sam de Stroumillo (REP/225) Peter Richards (REP/214) Linda Bell (REP/237) Jennifer Chibnall (REP/207) Chris Luke (REP/235) Andrew Miller (REP/221) Barbara Miller (REP/4229) Tim Katz (REP/228) Jonathan Littlewood (REP/215) Sarah Nolan (REP/181) Ann Hutchinson (REP/138) Gavin Barker (REP/186) U & S Holden (REP/156) Debby Curry (REP/184) Jim Edwards (REP/189) Sally Edwards (REP/188)</p>	<p>Summary of the issues raised</p> <p><u>Support</u></p> <p>The site is on previously developed land.</p> <ul style="list-style-type: none"> • The inclusion of this allocation would strengthen the settlement hierarchy by focussing development in the most sustainable locations. • It would also contribute to the housing and employment requirements set out in Spatial Policy 1. • The site is deliverable and will help to meet the objectively assessed development and infrastructure requirements of the town and district. • The Environment Agency support the policy, although point out that a Site Specific Flood Risk Assessment would be required for any subsequent applications on the site. • Opening up the river frontage for public use would benefit the town’s residents • In line with paragraph 21 and 182 of the NPPF. <p><u>Object / amendments sought</u></p> <ul style="list-style-type: none"> • The vast majority of respondents commenting on this policy were concerned about the potential loss of, and supported the need for, low-rent space for creative use, new businesses and community projects to be maintained. • The area is currently home to creative industries and independent traders that contribute to the local economy. • The requirement for convenience floorspace to be provided through the redevelopment or relocation of the existing foodstore is unnecessarily limiting. • In providing explicit support for the relocation of the “existing food superstore” the policy is seeking to prevent competition between different operators and so is contrary to paragraph 46 of the NPPF. • No need for more retail/office space or an additional supermarket. • Existing primary shopping area should not be extended north of the Phoenix Causeway. • The loss of allocated employment land has not been sufficiently accounted for. • Part of the evidence base (ELR 2010/2012 Update) is out of date in terms of the district’s industrial land supply. • There is a need for affordable housing, the provision of which should be specified in the policy. • This strategic site will not be able deliver enough private or affordable housing to meet current needs. • Concerns were raised about whether the current car

<p>Sarah Jelly (REP/180) E Kelpie & P Michel (REP/212) Mary Geary (REP/147) Ann Simpson (REP/150) Sarah O’Kane (REP/182) Rosemary Carter (REP/174) Martin Pepperell (REP/175) Jan Wadham (REP/176) Un-named (REP/168) Mary Soanes (REP/153) Paul Mann (REP/134) Judy Lee (REP/137) Prue Green (REP/029) Julie McGeoch (135) Victoria Buckroyd (REP/136) Paul Grivell (REP/170) Christine Collett (REP/179) Teresa Bradbury (REP/171) Martin Glover (REP/173) Pauline Smithson (REP/124) Dee O’Connell (REP/169) Elaine Miller (REP/183) D Buckton (REP/144) Hilary Buxton (REP/216) Bernard Buxton (REP/204) Ruth McNichol (REP/236) Susan Burrell (REP/220) Edmund Bewley (REP/230) Geoffrey Hall (REP/205) B Koester-Smith (REP/227) Barbel Andrews (REP/142) S Hirschman (REP/140) Andrew Wood (REP/125) Linda Calvert (REP/143) H. Adrian Briggs (REP/141) Judith Colquhoun (REP/209) Judy Gable (REP/206) Jenny Lovell (164) Esther Egerton (REP/219) Cl & G Mercer (REP/167) Colin Frost-Herbert (REP/146) Chris Gascoyne (REP/162) Alison Jolly (REP/149) Kathryn Tollervey (REP/172) Katrina Rolley (REP/160) Stephanie Evans (REP/202) Alison Jeffery (REP/194) Nick Cooper (REP/218) WS Planning/Archie Mills (REP/310) Ioni Sullivan (REP/161)</p>	<p>parking provision on the site would be replaced as well as parking provision in the town in general.</p> <ul style="list-style-type: none"> • Concerns were raised over the increase in traffic the development would likely bring to the town and the impact on air quality. • Concerns were raised about flood risk of the site and the reliance on flood defences to address this. • The policy should require the development to provide a connection to the sewerage and water supply systems at the nearest point of adequate capacity and to ensure future access to the existing sewerage and water supply infrastructure for future maintenance and upsizing purposes • Contrary to paragraph 23 of NPPF (ensuring the vitality of town centres) • Concerns were raised about the requirement for a detailed masterplan to be prepared in advance of a planning application, which may delay delivery. Another respondent felt it should have been prepared in advance of allocation in the Core Strategy. • The option of part of the site being developed, for example if a holistic scheme did not materialise, should be considered in the policy. • Doubts over the deliverability of 350 residential units on the site, particularly due to the need to provide flood defences, which as yet are not approved by the Environment Agency. • There are also potential land assembly challenges which may affect how many units can be delivered, as well as the type and mix of housing which may be limited by virtue of the physical constraints of the site.
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<p>Karen Scott (REP/233) I & M McKay (REP/166) Guy Roberts-Holmes (REP/200) E Montlake & J Sullivan (REP/185) Janet O’Riordan (REP/157) Angela Davies (REP/223) Val Davies (REP/191) Ben Baldwin (REP/201) Sally Miller (REP/198) Clare Barrett (REP/187) Hazel Collinson (REP/238) James Saunders (REP/234) HG Dodson/Baccata Trustees (REP/314) Friends of Lewes (REP/300) Luken Beck MDP (REP/294) WS Planning/Hatch Homes (REP/312) Lewes Community Land Trust (REP/282) Southern Water (REP/006) Tony Perris (REP/037) Katherine Souch (REP/334)</p>	
<p>How have these comments influenced the Submission document? No amendments were identified as necessary in the light of these comments.</p>	

<p align="center">Spatial Policy 4 – Greenhill Way/Ridge Way, Haywards Heath Number of representations submitted – 62</p>	
<p>Respondents on this policy (reference number of the respondent is in brackets)</p> <p><u>Support</u></p> <p>Environment Agency (REP/003) Woolf Bond / Taylor Wimpey Ltd (REP/328)</p> <p><u>Object / amendments</u></p>	<p>Summary of the issues raised</p> <p><u>Support</u></p> <ul style="list-style-type: none"> • A number of comments were made by Woolf Bond to support the Greenhill Way allocation. These related to the housing target set by LDC, meeting the district’s objectively assessed need for market and affordable housing, compliance with the Duty to Cooperate, the revocation of the SE Plan among other issues. These issues have been considered in more detail in the Spatial Policy 2 summary. Other comments made by Woolf Bond in support of the strategic allocation were: • The site is sustainably located with a good range of

<p>Philip and Deborah Cornford (REP/100) Anthony Padfield/ Bluemark Properties (REP/308) Greenhill Way Residents Association (REP/299) Southern Water (REP/006) Mid Sussex DC (REP/002) Wivelsfield Parish Council (REP/024) Cllr Sharon Davy (REP/012) John Sage (REP/032) Christopher and Sally Jones (REP/041) Denzil and Jacqueline Gill (REP/043) Bill and Jennifer Lea (REP/045) Robert and Charlotte Harwood-Matthews (REP/051) David and Linda Rothwell (REP/052) Jill Sharp (REP/053) Jean Whitworth (REP/054) Diana Wright (REP/055) Richard Wright (REP/056) Alan Sparks (REP/061) David Hitchings (REP/062) Jonathan Forrest (REP/063) Mr & Mrs Cox (REP/064) Josephine Hartless (REP/066) Roger Hartless (REP/067) Anthony Sharp (REP/068) Nicola Sage (REP/069) Richard Teague (REP/070) David Pidgeon (REP/074) Mr and Mrs Batsford (076) D.Bell & T.Loweryt (REP/077) Mr and Mrs Holder (REP/078) John Astrop (REP/079) Dorothy Tracey (REP/081) Robert Harrison (REP/085) Janet Harrison (REP/086) Philip Drouin (REP/088) Mrs D M Field (REP/089) WP Field (REP/090) Judy Browne REP/ 0(97) K & G Durnford (REP/333) Robin Forster (REP/102) Russell Gaylard (REP/103) Malcolm Winspur (REP/105)</p>	<p>transport links, key services and employment opportunities.</p> <ul style="list-style-type: none"> • The site is assessed in the SHLAA as suitable, available and achievable. • Site has few constraints to development - located outside designations such as the National Park and SAC's. <p><u>Object / amendments sought</u></p> <ul style="list-style-type: none"> • The policy should be amended to remove requirement to complete HHRR prior to completion of housing units on site (Core Policy 7 covers timely infrastructure provision) • Propose change to include additional 2.5ha of land for total dwellings up to 180 • Transport and access issues not fully assessed. Access is inadequate and “dual access” is misleading – may lead to creation of a large cul de sac. • Site does not promote sustainable transport, will encourage and increase car use and congestion • Concerns were raised about the public transport options proposed by the developer, i.e. the subsidisation and suitability of the dial-a-ride bus. • Lack of cooperation and joint working with Mid Sussex District Council and Haywards Heath Town Council • Under-considered burden on Mid Sussex DC local services while Council Tax is collected by Lewes DC. • Uncertainty around provision of new services and distance to/capacity of existing local services • The policy should require the development to provide a connection to the sewerage and water supply systems at the nearest point of adequate capacity and to ensure future access to the existing sewerage and water supply infrastructure for future maintenance and upsizing purposes • The policy should reflect the requirement for SuDs to be agreed with ESCC as the Lead Local Flood Authority. • Outside settlement boundary for Wivelsfield Green, more related to Haywards Heath • The Core Strategy has no vision for Haywards Heath so it is not clear how it contributes to sustainable development in Lewes District. • Plan and Sustainability Appraisal fail to evidence how environmental, social and economic characteristics and needs of Haywards Heath have been considered. • Site is located on high grade agricultural land (3a). • Concern was raised regarding the proximity to ancient woodland and the conservation area. • A number of points were raised concerning the findings of the Sustainability Appraisal and the selection of the site. These mainly concerned inconsistent scoring for appraisals and discrepancies in how data gathered was used in the two submission documents (Core Strategy and Sustainability Appraisal).
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<p>Katie McNeil (REP/107) Alan Colgate (REP/110) Garry Hook (REP/112) Michael Searle (REP/116) Mr & Mrs Greeley (REP/036) Linda Searle (REP/128) Diane Hall (REP/131) Ian Browne (REP/139) Jacqueline Jones (REP/158) Owen Jones (REP/159) Amanda Bradbury (163) Simon Gould (REP/195) Tim Fletcher (REP/199) Kathryn McEwen (REP/210) William McEwen (REP/211) The Ditchling Society (REP/270) Lewes District Association of Local Councils (REP/297) (L)</p> <p>L – Non-duly made representation received after the deadline</p>	<ul style="list-style-type: none"> • Sustainability Appraisal did not assess if site is best option for growth for Haywards Heath
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How have these comments influenced the Submission document?

The area of the allocated site has been extended and target capacity increased to 175 dwellings.

The wording of Spatial Policy 4 has been amended to delete the requirement for any dwelling completions to be phased with the construction of the Haywards Heath Relief Road.

<p align="center">Spatial Policy 5 – Land North of Bishop’s Lane, Ringmer Number of representations submitted – 36</p>	
<p>Respondents on this policy (reference number of the respondent is in brackets)</p> <p><u>Support in principle, but propose amendments:</u></p> <p>Environment Agency (REP/003) Town & Country Planning Solutions/Gleesons REP/ (273)</p> <p><u>Object / amendments</u></p>	<p>Summary of the issues raised</p> <p><u>Support</u></p> <ul style="list-style-type: none"> • Support given to the role of the Core Strategy to identify strategic sites in Ringmer due to rural service centre status. • Additional housing at Ringmer will assist in maintaining and enhancing the village’s community services and facilities, as well as meeting a housing need for the area. • The land is immediately available. • The site is deemed a ‘suitable’ housing site in the SHLAA and is in the control of a single housing developer. • The site is well located in terms of services and facilities (for example shops, schools etc)

<p>Strutt and Parker/AJC (REP/296) M & M Cattermole (REP/104) Nicholas Sutton (REP/222) HG Dodson/Bacca Trustees (REP/314) Mike Howell (REP/109) Dave Moore (REP/231) Jen Morse-Brown (REP/217) Southern Water (REP/006) Mrs Maureen Jackson (REP/049) Teresa Sutton (REP/119) Christine Tutt (058) Ringmer Parish Council (REP/020) John Kay (REP/092) Colin Mitchell (REP/190) David Bush (REP/196) Janet Vanderhook (REP/192) Jo Miller (REP/108) Will Hannam (REP/197) Roy and Lesley Forgham (REP/071) Ryan Hannigan (REP/098) Martin and Andrea Gooch (REP/039) Peter and Elizabeth Brooker (REP/193) Mr & Mrs Mawas (REP/091) Portchester Planning /Croudace (REP/283) Francis Lang (REP/203) Chris Gebbie (REP/178) Gill and Graham Stapley (REP/101) Mr I McClelland (REP/034) CPRE/Sussex Countryside Trust (REP/292) Robert Ramsay (REP/120) Trevor Franklin (REP/042) Kevin O'Sullivan (REP/117) Town & Country Planning Solutions/Gleesons (REP/273)</p>	<p><u>Object / amendments sought</u></p> <ul style="list-style-type: none"> • No evidence to suggest this is the most sustainable or best site for development • A number of objections were raised as to the impact an allocation of this scale would have on the village, in terms of traffic (both through the village and at key junctions), aesthetic (i.e. loss of village identity), infrastructure (i.e. the sewage system which is near capacity) and services (for example schools which are also struggling to cope with demand). • Development of 120 houses on one site contradicts Core Policy paragraph 6.74 which refers to the importance of ensuring that the character of the village and areas of the countryside are not compromised. • Development would be a considerable distance from local services and facilities. • Strong objections were raised on the principle of allocating sites in Ringmer, which it was felt should be left to the Parish Council / Neighbourhood Plan. • It was felt that the developer could compromise the timely adoption of the Core Strategy which will impact on the deliverability of the neighbourhood plan. • Allocation of a 'strategic' site in a rural village is not justified. Allocations should be left to the Site Allocation DPD or Neighbourhood Plan. • Due consideration should be given to other sites without specific allocation to Bishops Lane through the Neighbourhood Plan. For example, Broyle Gate Farm, Lewes Road and Rangers Farm which are more suitable sites for development. • Due to the uncertainty of Ringmer Neighbourhood Plan, the contingency reference (see Spatial Policy 2) should be deleted. • The contingent date makes no allowance to changes or delays to the Core Strategy so the policy should be expressed relative to the adoption date of the Core Strategy, while the second date should be set with reference to the actual dates at which critical infrastructure requirements are met. • The contingency element does not coordinate with infrastructure, sustainability or transport requirements. • The allocation of the site circumvents the requirements of the Localism Act. • The site floods easily and a site-specific flood risk assessment will need to be completed for this site. Also due to low permeability soil, infiltration SuDs are unlikely to be suitable. • The policy should require the development to provide a connection to the sewerage system at the nearest point of adequate capacity
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How have these comments influenced the Submission document?

No amendments were identified as necessary in the light of these comments.

Spatial Policy 6 – Land at Harbour Heights, Newhaven

Number of representations submitted – 9

Respondents on this policy
(reference number of the respondent is in brackets)

Support

Ringmer Parish Council
(REP/020)

Support in principle, but
propose amendments

John Kay (REP/092)
Environment Agency
(REP/008)
Tony Perris (REP/037)
Hume Planning / Trafalgar
Group (REP/307)

Object / amendments

Southern Water (REP/006)
Marcus Herron (REP/123)
Vera Brunskill (REP/047)
HG Hodgson / Baccata
Trustees (REP/314)

Summary of the issues raised

Support

- The development supports the regeneration of Newhaven town which has reasonable transport links and affordability.
- Other general comments supporting this policy, such as meeting the district’s housing need and Newhaven being a sustainable locations with fewer environmental constraints in comparison to other growth options.

Object / amendments sought

- The policy wording should make reference to the need for a flood risk assessment.
- The policy does not provide certainty as to the level of development.
- The delivery of the site should not be delayed due to commitments.
- The development should be enlarged, creating a substantial centre, to relieve pressure on Lewes Town.
- General comments were raised concerning infrastructure capacity in Newhaven to support development and the planned level of growth.
- The policy should require the development to provide a connection to the sewerage system at the nearest point of adequate capacity
- The ESCC transport evidence, with regards to housing numbers at Newhaven, is overly pessimistic in terms of highway capacity.

How have these comments influenced the Submission document?

No amendments were identified as necessary

Core Policy 1 – Affordable Housing
Number of representations submitted – 21

Respondents on this policy (reference number of the respondent is in brackets)	Summary of the issues raised
<p><u>Support</u></p> <p>Clifford Dann / Santon Group (REP/272) David Lock Associates / Barratt Homes (REP/277) Parker Dann / John Lewin (REP/304) Portchester Planning / Croudace Strategic Ltd (REP/283)</p> <p><u>Support in principle, but propose amendments:</u></p> <p>Plumpton Parish Council (REP/019) Newhaven Town Council (REP/016) CPRE Sussex (REP/292) Ringmer Parish Council (REP/020) Plumpton Residents Opposed to Unnecessary Development (REP/318) (L)</p> <p>L – Non-duly made representation received after the deadline.</p> <p><u>Object / amendments</u></p> <p>Newick Parish Council (REP/017) Woolf Bond Planning / Taylor Wimpey (REP/271) Boyer Planning / Thakeham Homes (REP/317) Colin Mitchell (REP/190) Collins Planning Services / Mr Cooper (REP/280)</p>	<p><u>Support</u></p> <ul style="list-style-type: none"> • The flexible approach to affordable housing requirements recognises the diversity of sites to be developed and varying development costs. • The recognition of financial viability evidence on a site-specific basis and the consideration of exceptional circumstances when justified by market and/or site conditions are supported. • The option of in lieu off-site contributions towards affordable housing in exceptional circumstances was supported. • The policy is consistent with the NPPF. <p><u>Object / amendments sought</u></p> <ul style="list-style-type: none"> • The majority of new build should be affordable. • The 40% target is not justified by supporting evidence. • The target of 40% is too high and will deter small-scale development on smaller sites and future windfall sites. • A number of existing commitments are failing to be delivered at the current 25% affordable housing rate and so it is unlikely they will be delivered at 40% - this is especially relevant to Newhaven where a 25% rate should remain. • An objection was raised to the downgrading of the affordable housing percentage from a 'requirement' to a 'target' which is too flexible. • Onerous affordable housing provision and developer contribution requirements could make schemes unviable. • A 'blanket' affordable housing percentage is not appropriate as residential sales values vary so much across the district. • As the proposed CIL rate is not specified in any supporting evidence it is an unreliable basis for assessing the viability of the affordable housing rate. • The evidence base for this policy fails to take into account the mandatory changes to Building Regulations, which along with affordable housing provision, will impact on the viability of schemes. • The supporting evidence (Affordable Housing and CIL Viability Study) does not make an allowance for CIL/S106 contributions when calculating the Residual Land Value and it is unclear whether they have been factored in to section 6 (viability analysis). • A 40% requirement would considerably change the social

<p>Home Builders Federation (REP/268) Hume Planning / Trafalgar Group (REP/307) John Jackson (REP/048) John Kay (REP/092) Laurence Keeley (REP/035) Cllr Sharon Davy (REP/012) Lewes District Association of Local Councils (REP/297) (L)</p> <p>L – Non-duly made representation received after the deadline.</p>	<p>mix of the villages.</p> <ul style="list-style-type: none"> • Accepting in lieu off-site contributions does not ensure delivery of affordable housing in rural areas and where there is an identified need. • Some smaller settlements are given no housing target and so are unlikely to deliver any affordable housing. • The stepped approach to the affordable housing target/threshold will lead to developers taking advantage of the approach. • There is no overall target to monitor the provision of affordable housing. • Some respondents proposed alternative suggestions for delivering affordable housing, such as supporting the establishment of community land trusts.
<p>How have these comments influenced the Submission document?</p> <p>No amendments were identified as necessary in the light of these comments.</p>	

Core Policy 2 – Housing Type, Mix and Density
Number of representations submitted – 11

Respondents on this policy
(reference number of the respondent is in brackets)

Support

Gregory Gray Assoc's / Lewes Garden Centre (REP/293)
Tanner and Tilley / Retirement Housing Group (REP/301)

Support in principle, but propose amendments:

Clifford Dann / Santon Group (REP/272)
Newhaven Town Council (REP/016)
Ringmer Parish Council (REP/020)
Friends of Lewes (REP/300)
CPRE Sussex (REP/292)

Object / propose amendments

David Lock Assoc's / Barratt Homes (REP/277)
Mr Laurence Keeley (REP/035)
Mr Colin Mitchell (REP/190)
Cllr Sharon Davy (REP/012)

Summary of the issues raised

Support

- Support proposed approach, providing flexibility is truly allowed.
- Accords with NPPF, including the requirement to use evidence base.
- Agree high densities are appropriate for Lewes Town Centre and suggest buildings of up to 5 stories could be provided in appropriate places.

Object / amendments sought

- Housing densities are set too high.
- The policy is not strong enough to deliver a mix of smaller accommodation required by an ageing population and the formation of smaller households.
- A stronger commitment to lifetime homes and provision of extra-care apartments is essential.
- A percentage of lifetime homes should be a requirement.
- The policy only refers to making the best use of previously developed land in urban areas only – it should refer to all previously developed/brownfield sites and premises.
- Amendments to the policy wording were suggested, with one respondent suggesting an emphasis on tall buildings and higher housing densities to meet housing need.

How have these comments influenced the Submission document?

No amendments were identified as necessary in the light of these comments.

Core Policy 3 – Gypsy and Traveller Accommodation

Number of representations made on this policy – 4

Respondents on this policy
(reference number of the respondent is in brackets)

Support

N/A

Support in principle, but propose amendments:

N/A

Object / propose amendments

Newhaven Town Council
(REP/016)
Traveller Law Reform
(REP/302)
Baroness Whitaker (REP/059)
Lawrence Keeley (REP/035)

Summary of the issues raised

Object / amendments sought

- The joint local authority work to establish local pitch requirements referred to in the policy wording is not publicly available.
- Additional Policy wording was suggested which stresses collaborative working to satisfy the Duty to Co-operate and NPPF requirements.
- The number of net additional pitches should be increased.
- Sites to deliver the required number of pitches should be identified.

How have these comments influenced the Submission document?

No amendments were identified as necessary in the light of these comments.

Core Policy 4 – Encouraging Economic Development and Regeneration

Number of representations submitted – 6

<p>Respondents on this policy (reference number of the respondent is in brackets)</p> <p><u>Support</u></p> <p>East Sussex County Council (REP/007) David Lock Assoc's / Barratt Homes (REP/277) Gregory Gray Assoc's / Lewes Garden Centre (REP/293)</p> <p><u>Support in principle, but propose amendments:</u></p> <p>Clifford Dann / Farrington Property Developments Ltd (REP/305) Newhaven Town Council (REP/016)</p> <p><u>Object / propose amendments</u></p> <p>Friends of Lewes (REP/300)</p>	<p>Summary of the issues raised</p> <p><u>Support</u></p> <ul style="list-style-type: none"> • General support for much of the policy, particularly the flexible approach to existing employment sites (point 2); the support for small, flexible start-up business units (point 5); promotion of the sustainable tourism sector (point 6); and the rural economy (point 10). • The policy is in line with the NPPF. • The policy's flexible and supportive approach to economic development will help address key challenges identified in the East Sussex Local Economic Assessment. • Focus of policy on improving existing sites is consistent with East Sussex Development Strategy Objectives. • A number of comments were received praising the policy support for the regeneration of Newhaven and the expansion of the port. <p><u>Object / amendments sought</u></p> <ul style="list-style-type: none"> • There is no need for more office space as there are currently a number of empty office premises in the district. Also the move to more home working is likely to reduce future demand. • Expand on recognition of need to adopt a mixed use approach in special cases. • De-allocation/alternative use process should not preclude merit-worthy schemes being approved beforehand.
<p>How have these comments influenced the Submission document?</p> <p>No amendments were identified as necessary in the light of these comments.</p>	

<p align="center">Core Policy 5 – The Visitor Economy Number of representations submitted – 4</p>	
<p>Respondents on this policy (reference number of the respondent is in brackets)</p> <p><u>Support</u></p> <p>DMH Stallard / The Community Stadium Limited</p>	<p>Summary of the issues raised</p> <p><u>Support</u></p> <ul style="list-style-type: none"> • The expansion of the visitor economy is welcomed providing it is underpinned by adequate highway infrastructure improvements and sustainable modes of transport.

<p>(REP/316) Gregory Gray Assoc's / Lewes Garden Centre (REP/293)</p> <p><u>Support in principle, but propose amendments:</u></p> <p>Newhaven Town Council (REP/016)</p> <p><u>Object / propose amendments</u></p> <p>Friends of Lewes (REP/300)</p>	<ul style="list-style-type: none"> • Support for new high quality visitor accommodation is welcomed. • The policy is positive and compliant with NPPF requirement for sustainable rural tourism and leisure development. • Support was given to points 1, 3 and 5 of the policy by one consultee promoting a potential hotel development. <p><u>Object / amendments sought</u></p> <ul style="list-style-type: none"> • Minor amendments to the policy were raised in relation to acknowledging the importance of Lewes and Newhaven to the visitor economy. • The Core Strategy should recognise the significant history and other visitor attraction potential not purely act as gateway to the National Park.
<p>How have these comments influenced the Submission document?</p> <p>No amendments were identified as necessary in the light of these comments.</p>	

<p style="text-align: center;">Core Policy 6 – Retail and Sustainable Town and Local Centres Number of representations submitted – 8</p>	
<p>Respondents on this policy (reference number of the respondent is in brackets)</p> <p><u>Support</u></p> <p>The Theatres Trust (REP/278) Barton Willmore / Cooperative (REP/288)</p> <p><u>Support in principle, but propose amendments:</u></p> <p>CBRE/ Waitrose (REP/284) Newhaven Town Council (REP/016)</p> <p><u>Object / propose amendments</u></p> <p>John Kay (REP/092) Friends of Lewes (REP/300) David Hutchinson (REP/028) Gregory Gray Associates /</p>	<p>Summary of the issues raised</p> <p><u>Support</u></p> <ul style="list-style-type: none"> • General support for the policy and, in particular, the protection it offers for local services and facilities. • Promotes and enhances the viability and vitality of retail and town centres in the district. • The lower threshold set for Retail Impact Assessments is supported and considered justified due to the modest scale of the existing centres of the district and the impact that the 'default' criteria set in the NPPF could potentially have. • The policy is in accordance with the NPPF <p><u>Object / amendments sought</u></p> <ul style="list-style-type: none"> • The requirement for local and rural shops/community facilities to demonstrate that the use is unviable is overly onerous, and the requisite that a community use should be sought as an alternative use is unjustified by national policy. • Some respondents had concerns over the ranking of the district's towns in the retail hierarchy. For example, one respondent raised concerns that Newhaven was ranked in the same class (local centre) as Ditchling and Ringmer,

<p>Lewes Garden Centre (REP/293) Planning Potential / Quora (REP/306)</p>	<p>whereas it actually rivals Lewes in its retail offer.</p> <ul style="list-style-type: none"> • Some respondents proposed amendments (or objected to amendments by LDC/SDNPA) to Town Centre boundaries and primary/secondary shopping frontages. • Newhaven Town Council re-submitted a representation from the previous consultation stage (Emerging Core Strategy) which was summarised in the corresponding summary document and has informed the Proposed Submission Core Strategy.
<p>How have these comments influenced the Submission document?</p> <p>No amendments were identified as necessary in the light of these comments.</p>	

<p align="center">Core Policy 7 – Infrastructure Number of representations submitted – 22</p>	
<p>Respondents on this policy (reference number of the respondent is in brackets)</p> <p><u>Support</u></p> <p>East Sussex County Council (REP/007) The Theatres Trust (REP/278) Portchester Planning / Croudace (REP/283)</p> <p><u>Support in principle, but propose amendments:</u></p> <p>Newhaven Town Council (REP/016)</p> <p><u>Object / propose amendments:</u></p> <p>M & M Cattermole (REP/104) Alan Griffith (REP/111) Nicholas Sutton (REP/222) Teresa Sutton (REP/119) Laurence Keeley (REP/035) John Jackson (REP/048) G & C Williams (REP/080) Ringmer Parish Council (REP/020) John Kay (REP/ 092)</p>	<p>Summary of the issues raised</p> <p><u>Support</u></p> <ul style="list-style-type: none"> • Provides a robust approach to infrastructure provision. • The commitment to regularly update the Infrastructure Delivery Plan (IDP) and to introduce a CIL Charging schedule is supported. • The retention of existing and encouragement of new facilities and services is supported. <p><u>Object / amendments sought</u></p> <ul style="list-style-type: none"> • The policy is not strong enough to be effective and is thus unsound. • The completion of necessary infrastructure should be a pre-condition to the implementation of any planning consents. • Many of those commenting upon the policy did so in terms of the stretched infrastructure capacity at Ringmer and highway constraints at Ringmer/Lewes. • Some of the spatial policy allocations are not in conformity with point 4 of this policy as there are already unresolved infrastructure capacity issues. • Some respondents felt the wording of the policy was not strong enough to ensure infrastructure is funded, delivered and in time for new development. • The IDP does not identify the critical infrastructure necessary to deliver the spatial policies. CP7 is therefore ineffective and unsound. • The policy does not address the impact of the Greenhill Way development (SP4) on the services and facilities that lie outside of Lewes District.

<p>Colin Mitchell (REP/190) Martin Gooch (REP/039) Martin Costin (REP/093) David Bush (REP/196) Maureen Jackson (REP/049) Christine Tutt (REP/058) W P Field (REP/090) South East Water (REP/009) CPRE Sussex (REP/292)</p>	<ul style="list-style-type: none"> • Concerns were raised about the issue of infrastructure contributions for windfall developments and other non-strategic site allocations. • It is not legally enforceable to propose that site-specific infrastructure mitigation costs are charged on one specific development. • The policy/IDP does not include clear policy support for the necessary new water supply infrastructure to meet future demand and the infrastructure improvements identified in the SE Water Water Resources Management Plan. • Following the revocation of the SE Plan, key elements of the SE plan should be incorporated into this policy to meet the duty to cooperate. This should include reference to joint working with other agencies and the allocation of sites to meet strategic infrastructure needs.
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How have these comments influenced the Submission document?

The supporting text to Core Policy 7 has been amended by the addition of a new paragraph (7.78) that sets out the commitment of the District Council and the National Park Authority to helping to meet regional infrastructure requirements, including the supply of water, through the Lewes District Site Allocations and Development Management Policies DPD or the South Downs National Park Local Plan.

<p align="center">Core Policy 8 – Green Infrastructure Number of representations submitted – 7</p>	
<p>Respondents on this policy (reference number of the respondent is in brackets)</p> <p><u>Support</u></p> <p>Environment Agency (REP/003) Newick Village Society (REP/269) Portchester Planning / Croudace (REP/283)</p> <p><u>Support in principle, but propose amendments:</u></p> <p>Newhaven Town Council (REP/016) Natural England (REP/005)</p>	<p>Summary of the issues raised</p> <p><u>Support</u></p> <ul style="list-style-type: none"> • General support for the policy. • The Environment Agency supported; the recognition of the multi-functional role Green Infrastructure (GI) can play; the protection, enhancement of sites, and creation of new habitats and green spaces; and the policy’s contribution to meeting the requirements of the Water Framework Directive. <p><u>Object / amendments sought</u></p> <ul style="list-style-type: none"> • The policy should stress the importance of GI and require its provision at the earliest appropriate stage of developments, including on small sites/developments. • Key GI should be identified within the Core Strategy. • The policy should require the provision of green corridors for Greenfield site development. • The policy should prohibit any measures that are

<p>Ringmer Parish Council (REP/020)</p> <p><u>Object / propose amendments</u></p> <p>Christine Tutt (REP/058)</p>	<p>detrimental to the environment before planning permission is granted.</p> <ul style="list-style-type: none"> • The spatial policies are not in conformity with the policy, and so it is therefore ineffective. • The policy could be strengthened to reflect the role GI plays as an ecosystem service. • The policy could refer to the range of spaces considered as GI in paragraph 7.78 of the policy justification and make reference to the NPPF.
<p>How have these comments influenced the Submission document?</p> <p>No amendments were identified as necessary in the light of these comments.</p>	

<p style="text-align: center;">Core Policy 9 – Air Quality Number of representations submitted – 4</p>	
<p>Respondents on this policy (reference number of the respondent is in brackets)</p> <p><u>Support</u></p> <p>Hume Planning / Trafalgar (REP/307)</p> <p><u>Support in principle, but propose amendments:</u></p> <p>Ringmer Parish Council (REP/020) Clifford Dann / Santon Group (REP/272)</p> <p><u>Object / amendments</u></p> <p>Newhaven Town Council (REP/016)</p>	<p>Summary of the issues raised</p> <p><u>Sound/In support</u></p> <ul style="list-style-type: none"> • General support for the principles of the policy. <p><u>Object / amendments sought</u></p> <ul style="list-style-type: none"> • Parts 4 and 6 of the policy are unclear and should be reworded. • There are no provisions in related spatial policies to ensure its delivery. Thus, the policy is unsound as it would be ineffective. • The policy should cross reference other policies in the Core Strategy and identify other ways to reduce vehicular pollution in Newhaven Town Centre. • An AQMA should be designated in Newhaven and the Core Strategy should seek contributions based on the effect of developments on air quality at South Way, Newhaven.
<p>How have these comments influenced the Submission document?</p> <p>No amendments were identified as necessary in the light of these comments.</p>	

Core Policy 10 – Natural Environment and Landscape Character

Number of representations submitted – 12

Core Policy 10 – Natural Environment and Landscape Character	Number of representations submitted – 12
<p>Respondents on this policy (reference number of the respondent is in brackets)</p> <p><u>Support</u></p> <p>Environment Agency (REP/003) Ringmer Parish Council (REP/020) RSPB (REP/267)</p> <p><u>Support in principle, but propose amendments</u></p> <p>Natural England (REP/005) Ringmer Parish Council (REP/020) Newhaven Town Council (REP/016)</p> <p><u>Object / amendments</u></p> <p>David Lock Assoc's / Barratt Homes(REP/277) South East Water (009) Christine Tutt (REP/058) CPRE/Sussex Countryside Trust (REP/292) Mr I Seccombe (REP/106) Sussex Ouse Restoration Trust (REP/274) Chailey Parish Council (014)</p>	<p>Summary of the issues raised</p> <p><u>Support</u></p> <ul style="list-style-type: none"> • General support for the policy including reference to the protection of the Ashdown Forest and the joint working with Wealden and other councils to develop a strategy for the provision of Suitable Alternative Natural Green Space (SANGS). • Reference to the South East River Basin Management Plan is supported. • The policy is helping to reduce the impact of climate change • The policy complies with the Conservation of Habitats and Species Regulations, 2010, as well as the Duty to Cooperate. <p><u>Object/amendments sought</u></p> <ul style="list-style-type: none"> • The policy does not comply with chapter 11 (Conserving and enhancing the natural environment) of the NPPF. • The resisting of development within the 7km zone surrounding the Ashdown Forest (until appropriate SANGS are provided) is opposed to on the grounds that it will bring development in the area to halt and will prevent the Council from meeting objectively assessed housing needs. • A level of flexibility should be added to the policy if developers are able to provide their own mitigation with on-site SANGS. • Comments were received regarding the potential impact of disturbance and pollution on Chailey Common and that a similar SANGS obligation or alternative visitor management mitigation should be a requirement. • An assessment into the impact of proposed spatial housing allocations on traffic and subsequent nitrogen dioxide flows should be carried out for Chailey Common SSSI. • More explicit reference and protection should be given to the Lewes Downs SAC. • Reference should be made to the South East Water Resources Management Plan. • Concern was raised about the unreasonably limited protection for designations such as ancient woodland, hedgerows and wetlands. • More emphasis should be placed on the importance of landscape quality in an urban setting as well as protecting the gaps between the coastal towns. • An amendment to point 4 of the policy was proposed by the Sussex Ouse Restoration Trust. This included an additional clause to ensure no historic or socially valuable structures are lost.

How have these comments influenced the Submission document?

The wording of Criterion 3 of Core Policy 10 has been amended to offer developers the flexibility to provide alternative mitigation solutions to Suitable Alternative Natural Greenspaces (or SANGs) in order to bring forward residential development.

Core Policy 11 – Built and Historic Environment and High Quality Design

Number of representations submitted – 5

Respondents on this policy
(reference number of the respondent is in brackets)

Support

Support in principle, but propose amendments:

Clifford Dann / Santon Group (REP/272)
Newhaven Town Council (REP/016)
Ringmer Parish Council (REP/020)

Object / propose amendments

Newick Village Society (REP/269)
John Foxley (REP/026)

Summary of the issues raised

Support

- General support from most respondents on the direction of the policy.

Object / amendments sought

- Point 5 needs rewording as it is impossible to ensure everyone’s differing needs, in terms of safety and accessibility, are met.
- Some of the wording of the policy is incomprehensible.
- The policy needs to be strengthened to meet Strategic Objective 6 and ensure the ‘vernacular’ and ‘sense of place’ of the district’s settlements are maintained.
- The gap between the coastal towns should be protected.
- Reference should be made to the Chyngton Farm area of archaeological interest.

How have these comments influenced the Submission document?

No amendments were identified as necessary in the light of these comments.

Core Policy 12 – Flood Risk, Coastal Erosion and Sustainable Drainage

Number of representations submitted – 3

Respondents on this policy

Summary of the issues raised

<p>(reference number of the respondent is in brackets)</p> <p><u>Support</u></p> <p>Environment Agency (REP/003) East Sussex County Council (REP/007)</p> <p><u>Object / amendments</u></p> <p>Newhaven Town Council (REP/016)</p>	<p><u>Support</u></p> <ul style="list-style-type: none"> • General support for the approach as it seeks to reduce the risk of flooding and coastal erosion. • The policy is consistent with the NPPF. • The policy provides a robust framework for flood risk and introduces appropriate measures. • The policy recognises the role of the County Council as the Lead Local Flood Authority, albeit it assumes that ESCC will become the drainage approval body which is not yet the case as the Commencement Order has not been published. <p><u>Object / amendments sought</u></p> <ul style="list-style-type: none"> • The policy does not identify mitigation and facilitation measures to allow development in areas of flood risk.
<p>How have these comments influenced the Submission document?</p> <p>No amendments were identified as necessary in the light of these comments.</p>	

<p>Core Policy 13 – Sustainable Travel Number of representations submitted – 4</p>	
<p>Respondents on this policy (reference number of the respondent is in brackets)</p> <p><u>Support</u></p> <p>East Sussex County Council (REP/007)</p> <p><u>Support in principle, but propose amendments:</u></p> <p>Newhaven Town Council (REP/016)</p> <p><u>Object / propose amendments</u></p> <p>Ringmer Parish Council (REP/020) Friends of Lewes (REP/300)</p>	<p>Summary of the issues raised</p> <p><u>Support</u></p> <ul style="list-style-type: none"> • General support for policy approach • Policy aligns with the East Sussex Local Transport Plan 2011-2026. • The promotion of sustainable travel across other policies (such as CP5, CP8 and CP9) is supported. • Reference made to working with other relevant agencies is supported. <p><u>Object / amendments sought</u></p> <ul style="list-style-type: none"> • Reference could be made to specific examples where particular problems exist and how they may be addressed. • Better cross-referencing to other policies in the Core Strategy which may help to achieve this policy.

How have these comments influenced the Submission document?

No amendments were identified as necessary in the light of these comments.

Core Policy 14 – Renewable and Low Carbon Energy and Sustainable Use of Resources

Number of representations submitted – 7

Respondents on this policy

(reference number of the respondent is in brackets)

Support

SE Water (REP/009)

Support in principle, but propose amendments:

Clifford Dann / Santon Group (REP/272)

Newhaven Town Council (REP/016)

Object / propose amendments

Dundas & Wilson / SE Water (REP/313)

Transition Town Lewes (REP/335)

John Jackson (REP/048)

Ringmer Parish Council (REP/020)

Summary of the issues raised

Support

- General support for the policy and the requirement for higher sustainability standards in existing and new housing stock – although one respondent suggested the policy could go even further in supporting even higher standards.
- General support but some amendments to points 3 and 4. This included reference being made to other site specific sustainability toolkits that are used for certain developments.

Object / amendments sought

- The policy should be clearer, more detailed and positive in encouraging renewable development in the areas identified on the Energy Opportunities Map.
- The policy ignores the carbon release associated with the travel of the occupiers of any new housing development.
- No clear carbon reduction targets.

How have these comments influenced the Submission document?

No amendments were identified as necessary in the light of these comments.

Number of representations submitted – 1	
<p>Respondents on this policy (reference number of the respondent is in brackets)</p> <p>Ringmer Parish Council (REP/020)</p>	<p>Summary of the issues raised</p> <p><u>Support</u> Support for the retention of ‘saved’ Local Plan policies RG1 and RG3</p> <p><u>Object / amendments</u> Object to the proposed retention of ‘saved’ Local Plan policy RG4</p>
<p>How have these comments influenced the Submission document?</p> <p>No amendments were identified as necessary in the light of these comments.</p>	

Comments relating to other development sites not identified in the Core Strategy

A number of representations were made that were seeking the identification of alternative/additional housing allocations (or in some cases other types of development) in the Core Strategy. The following part of this summary document identifies the sites in question and the reasoning provided by the respondents as to why they should be included within the Core Strategy. In promoting these sites, the representations often commented upon and/or objected to other parts of the Core Strategy. Such comments are summarised within the relevant policy summaries previously set out in this document and are therefore not repeated here. This section also identifies objections to the potential allocation of these additional/alternative sites.

The non-identification of the following sites as allocations

Number of representations submitted– 39

Respondents on this site

(reference number of the respondent is in brackets)

Mr Lionel Harwood (REP/040)
 Tony Perris (REP/037)
 Mr and Mrs Philp (REP/033)
 Peter Gosling (REP/087)
 Denise DeNoon (REP/114)
 G & K McKellar (REP/084)
 Pat Mosher (REP/094)
 St Modwen Properties (REP/287)

Support (allocation of the site in the Core Strategy)

Portchester
 Planning/Croudace (REP/283)
 G & G Stapely (REP/101)
 Mary Marriot (REP/132)
 R & D Swan (REP/057)
 K McCarthy (REP/083)
 Mrs L Atkinson (REP/075)
 Robert Ramsey (REP/120)
 Ian McClelland (REP/034)

Valley Road, Peacehaven (8 representations)

All respondents sought the identification of this site as a strategic housing allocation in the Core Strategy. The following reasoning was provided:

- The site is scrub land while prime agricultural land has been developed.
- The site was allocated in the late 1970s and the Government found in favour of developing the site at two previous Public Enquiries (1985 and 1997).
- The site could come forward as part of a comprehensive development.
- Highways issues only occur during the rush hours and there isn't a problem outside these hours and during school holidays.
- Sewerage, schooling and access/transport issues that previously would have prevented development at the site have now been resolved.
- There has been no joined up thinking between authorities (LDC, NPA, ESCC and B&HCC) to solve issues that stifle growth.
- The ESCC Transport Advice Note (2012) lacks credibility and should not prevent development coming forward in Peacehaven, which is needed to meet the identified housing need.
- There is a need for affordable housing to meet Brighton & Hove's overspill.
- Peacehaven is not constrained by the National Park.

Broyle Gate Farm, Ringmer (12 representations)

The following comments were received seeking the identification of the site as a strategic allocation for housing:

- Support reference that Broyle Gate could provide mixed use scheme and that site would offer extension to adjacent school and additional sports facilities.
- Accessibility to the Lewes Road makes this site more suitable than the Bishops Lane site.
- Site fits in well with the growth of the village.
- Site will have little impact on the appearance of the existing settlement unlike Bishops Lane which will create more fragmented development and change the rural setting into a suburban one.
- The site is adjacent to Ringmer Community College and

<p><u>Object to the possible identification of Broyle Gate Farm as a strategic allocation</u></p> <p>Mr D Sands-Smith (REP/044) Mr Hamilton (REP/127) Lydia Macdonald (REP/118) Philip Matthews (REP/126)</p> <p>Savills / Mr & Mrs Mundy (REP/315)</p> <p>Wendy Mortimer (REP/122)</p> <p>Sharon Davy (REP/012) Strutt & Parker on behalf of</p>	<p>close to the primary school and other village amenities.</p> <ul style="list-style-type: none"> • Benefit of one single site such as clear evaluation of associated infrastructure rather than effects of piecemeal development. • Development of this site will have negligible impact on other residential properties. • Ringmer has been identified as having the potential to accommodate housing development above that required to meet local needs and so another strategic site could be justified. <p>The following comments were received objecting to the potential identification of the site as a strategic housing allocation:</p> <ul style="list-style-type: none"> • There are already unacceptable levels of traffic at peak hours. • Services will not be able to cope with additional housing in Ringmer. This includes doctor's surgeries, dentists and schools, which are already at capacity. <p>Valebridge Road, Burgess Hill (within Wivelsfield Parish) (2 representations)</p> <p>The following comments were in support of allocating the site in the Core Strategy for housing:</p> <ul style="list-style-type: none"> • Sustainably located adjoining Burgess Hill which provides a comprehensive range of services and facilities. • Could provide 200 dwellings towards meeting the district's objectively assessed housing needs. • The site is not constrained by environmental designations like other strategic allocations that have been considered. • The individual sites which make up the broad area are identified in the 2011 SHLAA as suitable for development. <p>The comment below objected to the identification of the site as a strategic housing allocation:</p> <ul style="list-style-type: none"> • The respondent pointed out a number of constraints to any potential development on the site, including mature Oak trees, underground drainage and Tunbridge Wells sand running through the site. <p>Lower Hoddern Farm, Peacehaven (2 representations)</p> <p>Both respondents sought the identification of this site as a strategic housing allocation in the Core Strategy. The following</p>
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<p>the Appleton family (REP/286)</p>	<p>reasoning was provided:</p> <ul style="list-style-type: none"> • Lower Hoddern Farm is a sustainable location for a mixed use development that would help to meet the strategic housing and employment needs of the district. • The site can accommodate 450 dwellings and is assessed as 'suitable, achievable and available' in the SHLAA.
<p>CLlr Sharon Davy (REP/012) Luken Beck Ltd (REP/294)</p>	<p style="text-align: center;">Old Malling Farm, Lewes (2 representations)</p> <p>Both respondents sought the identification of this site as a strategic housing allocation in the Core Strategy. The following reasoning was provided:</p> <ul style="list-style-type: none"> • Support for the inclusion of Old Malling Farm as a sustainable site within easy walking distance of essential services. • The site could provide much needed housing to meet the needs of Lewes Town. • Site is suitable, developable, deliverable and available for development immediately. • Site is not constrained by flood risk. • Landscape and transport reports (Luken Beck) are submitted to the Inspector for consideration to demonstrate suitability of the site. • An appropriate development, in terms of scale, density, landscaping and building materials, could complement the existing neighbouring housing.
<p>WS Planning / Hatch Homes (REP/312)</p>	<p style="text-align: center;">Land West of Winterbourne Hollow, West of the Gallops, Lewes (1 representation seeking the allocation of this site for housing)</p> <ul style="list-style-type: none"> • The allocation of the site would deliver a significant amount of housing (150-200 units) to help meet the district's objectively assessed housing needs. • The mixed use site would also provide tourism facilities for the South Downs National Park.
<p>Gregory Gray Associates / Lewes Garden Centre (REP/293)</p>	<p style="text-align: center;">Lewes Garden Centre, Kingston (1 representation seeking the allocation of this site for housing)</p> <ul style="list-style-type: none"> • Rural brownfield site already occupied by buildings of a significant scale, and so development may reduce the impact on the surrounding landscape. • Located in a sustainable location
<p>Collins Planning Services / Mr</p>	<p style="text-align: center;">South of Lewes Road and East of Chamberlains Lane, Ringmer (1 representation seeking the allocation of this site for housing)</p>

<p>A Cooper (REP/280)</p>	<ul style="list-style-type: none"> • The site could contribute 40 dwellings to the Ringmer housing target, including 30 affordable units. • The site is sustainably located <p style="text-align: center;">Little Inholmes Farm, Plumpton Green (1 representation seeking the allocation of this site for housing)</p>
<p>Barton Willmore / Glenbeigh (REP/290)</p>	<ul style="list-style-type: none"> • The site is an edge of settlement site and considered developable, suitable and available in the 2012 SHLAA. • It is not located in the National Park and would not impact upon the surrounding landscape character. • The site could provide 40 dwellings, including affordable. <p style="text-align: center;">Mitchelswood Farm, Newick (1 representation seeking the allocation of this site for housing)</p>
<p>David Lock Associates / Barratt Homes (REP/277)</p>	<ul style="list-style-type: none"> • The site would provide at least 45 dwellings as well as community facilities. <p style="text-align: center;">Bennet’s Field, Village Way, Falmer (1 representation promoting this site for a hotel use)</p>
<p>DMH Stallard / TCSL (316)</p>	<ul style="list-style-type: none"> • The site could help to meet the aims of Core Policy 5 and the recognised need for visitor (hotel) accommodation within the district. • The site is a sustainable site, surrounded by existing development and located next to public transport links. <p style="text-align: center;">Land East of Station Road, Plumpton Green (1 representation seeking the allocation of this site for housing)</p>
<p>David Evison for Diocese of Chichester (REP/291)</p>	<ul style="list-style-type: none"> • The site is capable of providing 50 dwellings, including affordable units. <p style="text-align: center;">‘New’ Cooksbridge, Hamsey Parish (1 representation seeking the allocation of this site for housing)</p>
<p>HG Dodson / Baccata Trustees (REP/314)</p>	<ul style="list-style-type: none"> • The site could accommodate approximately 255 dwellings. • The site is sustainably located near to Cooksbridge train station, a primary school and local shops. <p style="text-align: center;">Land East of the Telephone Exchange, Newick (1 representation)</p>
<p>Parker Dann / Mr J Lewin (REP/304)</p>	<ul style="list-style-type: none"> • The representation was specifically in reference to Strategic Policies 1 and 2, however, the site proponent was making the comments in relation to the above site and promoting its suitability for housing. <p style="text-align: center;">Land at Newick / North Chailey (1 representation seeking the allocation of this site for housing)</p>

<p>Plainview Planning / Mr & Mrs Faulke (REP/311)</p> <p>Planning Potential / Quora (REP/306)</p> <p>TCPS / Gleasons (REP/273)</p> <p>WS Planning / Mr Millis (REP/310)</p>	<ul style="list-style-type: none"> • The sites could accommodate 30 dwellings • The site is sustainably located, adjoining urban development on two sides and in close proximity to public transport links. <p style="text-align: center;">Former Magistrates Court, Lewes (1 representation)</p> <ul style="list-style-type: none"> • Promoting a mixed-use development including retail, leisure and hotel development. • Sustainably located in the town centre and near to a range of public transport facilities. <p style="text-align: center;">Land at North Common Road, Wivelsfield Green (1 representation seeking the allocation of this site for housing)</p> <ul style="list-style-type: none"> • The site is sustainably located adjacent to the settlement of Wivelsfield Green and in close proximity to a primary school, shops and local services. • The site is identified as suitable, available and achievable in the 2010 SHLAA. • The site could accommodate up to 135 dwellings and could contribute towards the village’s housing need. It could also be brought forward in the early part of the plan period. • ESCC have confirmed that development of 80 units would not adversely impact on the village of Ditchling through traffic movement, as was previously feared. • The SHMAA confirms that there would be advantages of locating housing in Wivelsfield Green. <p style="text-align: center;">Kingston Ridge, Kingston (1 representation)</p> <ul style="list-style-type: none"> • The site could deliver 10 dwellings
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How have these comments been taken into consideration?

None of the above sites were considered appropriate as additional strategic housing allocations, i.e. allocations capable of delivering more than 100 dwellings. However, all the sites will be considered further as part of the preparation of the Local Plan Part 2 (Site Allocations and Development Management Policies DPD) or the South Downs National Park Local Plan.

SHLAA
Number of representations submitted – 31

<p>Respondents on this policy (reference number of the respondent is in brackets)</p> <p><u>Support document or site identified in / propose new site for the SHLAA</u></p> <p>Plainview / Mr and Mrs Faulke (REP/311) WS Planning / Hatch Homes (REP/312) Parker Dann / John Lewin (REP/304) Barton Willmore / Glenbeigh (REP/290) HG Dodson / Baccata Trustees (REP/314) Savills / Mr and Mrs Mundy (REP/315) G & G Stapley (REP/101) David Lock Associates / Barratt Homes (REP/277)</p> <p><u>Objected to sites identified in the SHLAA / considered the document unsound</u></p> <p>Newick Parish Council (REP/017) Denis Black (REP/095) Janice Black (O REP/96) Richard Thomas (REP/145) Ian McClelland (REP/034) Peter Clark (REP/082) David Barnes (REP/031) Janet Barnes (REP/152) Parker Dann / Oxbottom Lane Neighbourhood Residents Group (REP/298) R & M McNiven (REP/155) Chailey Parish Council (REP/014) Jill Bristow (REP/129) David Conway (REP/148) Sharon Davy (REP/012) Hugh Thwaites (REP/208) Mr & Mrs Hobbs (REP/213) John Jackson (REP/048) Maureen Jackson (REP/049)</p>	<p>Summary of the issues raised</p> <p><u>Sound/In support</u></p> <ul style="list-style-type: none"> • SHLAA identifies an appropriate level of deliverable sites for Newick. • Supports recognition of development potential at Plumpton, specifically 16PL. • Supports recognition of development potential at edge of Burgess Hill (04WV, 08WV, 10WV, 12WV and 18WV). • Site promoted in SHLAA (11HY) should be taken forward. • Site promoted in SHLAA (03NW/16NW) should be taken forward. <p><u>Unsound/ objection</u></p> <ul style="list-style-type: none"> • SHLAA trajectory not consistent with housing land supply. • The document is not consistent in its approach. • A number of comments raised objections and disagreed on the SHLAA findings on sites identified at Lower Station Road (16CH,12CH and 20CH) due to such issues as local surface flooding, access, increased traffic on local roads, distance from nearest facilities, and loss of undeveloped gap between Newick and North Chailey. • SHLAA overestimates the housing capacity at Newick. • Some respondents were opposed to development at Allington Road / Oxbottom Lane (Newick) due to insufficient infrastructure. • Land at Plumpton Green (16PL) should be considered 'unavailable' due to an extant section 52 agreement precluding residential development. • Site 13PL, Plumpton Green, not considered suitable for development. • Ringmer SHLAA site 20RG is prone to flooding. • Sites 01RG, 04RG and 26RG (Ringmer) better suited to development due to direct access to Lewes Road. • The potential development of sites 19RG, 23RG, 25RG and 28RG does not support paragraph 6.24 of the Core Strategy. • Reassess potential housing sites at Peacehaven in the SHLAA (42PT) as it is considered to have scope for an increased capacity. • General comments concerning potential housing sites on edge of settlement locations losing their rural nature.
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<p>Christine Tutt (REP/058) Town and Country Planning Solutions / Gleasons (REP/273) HG Dodson / Baccata Trustees (REP/314) Barton Willmore / Glenbeigh (REP/290) Lewes District Association of Local Councils (REP/297) (L)</p> <p>L – Non-duly made representation received after the deadline</p> <p><u>Other</u></p> <p>Friends of Seaford Head (REP/295)</p>	<p><u>Other/ general comment</u></p> <ul style="list-style-type: none"> Joint Core Strategy recognises the importance of retaining land such as Chyngton Way from development.
<p>How have these comments been taken into consideration?</p> <p>All comments will be considered as part of the annual SLHAA review and update.</p>	

<p style="text-align: center;">Infrastructure Delivery Plan Number of representations submitted – 8</p>	
<p>Respondents on the IDP (reference number of the respondent is in brackets)</p> <p><u>Support</u></p> <p>Environment Agency (REP/003) East Sussex County Council (REP/007) Highways Agency (REP/008) Clifford Dann/Santon Group (REP/272)</p> <p><u>Object / propose amendments</u></p> <p>W A Griffith (REP/111) Newick Parish Council</p>	<p>Summary of the issues raised</p> <p><u>Support</u></p> <ul style="list-style-type: none"> General support was expressed for the Infrastructure Delivery Plan (IDP). Provides a robust approach to infrastructure provision. The commitment to regularly update the IDP is supported. <p><u>Object / amendments sought</u></p> <ul style="list-style-type: none"> Some respondents requested minor textual/updating amendments. The IDP fails to adequately address the provision of new and improved highway, education and water supply infrastructure to meet future demands. The Environment Agency requests an additional section on new flood defence infrastructure in the District. More consideration should be given to the impacts of potential development on surface water flood risk. A new reservoir should be built before any new

(REP/017) SE Water (REP/009) John Kay (REP/092)	development is brought forward to ease the district's water supply constraints and prevent future restrictions being imposed throughout the district as was done in 2012.
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How have these comments been taken into consideration?

The Infrastructure Position Statement has been updated to reference the latest Water Resources Management Plans published by South East Water and Southern Water in 2013 (page 48 of the Draft IDP)

Proposals for new or improved flood defences in Lewes town and Newhaven are now included in the Infrastructure Delivery Schedule (page 79 of the Draft IDP).

Sustainability Appraisal
Number of representations submitted – 8

Respondents on the Sustainability Appraisal (reference number of the respondent is in brackets)	Summary of the issues raised
<p><u>Support in principle, but comment</u></p> <p>Parker Dann / John Lewin (REP/304)</p> <p><u>Object / propose amendments</u></p> <p>CPRE Sussex Countryside Trust (REP/292) Newick Parish Council (17) John Kay (REP/092) Ringmer Parish Council (REP/020) Greenhill Way Residents Association (REP/299) Mid Sussex District Council (REP/002) Prospective Planning / Village Development (REP/289)</p>	<p><u>Support</u></p> <ul style="list-style-type: none"> • Agree that the SA should not consider lower district-wide and Newick Parish housing targets as it would not be consistent with national planning policy. • An appropriate range of housing targets have been assessed through the SA. • The most appropriate housing target, when considered against reasonable alternatives, has been identified through the SA. <p><u>Object / amendments sought</u></p> <ul style="list-style-type: none"> • The scoring system used in the SA is not clear. • The Option carried forward for the housing target appraisals (Option A) scored lower in a number of objectives in comparison to other options. • The SA does not fully justify why the housing option carried forward was chosen, which is contrary to the SEA Directive. • There is only a small difference when assessing housing options for Newick, and the higher target should have been chosen in light of the Government's aim to deliver growth and homes. • The SA has not considered completions in Newick since 2010. • The views of stakeholders have been allowed to influence the Sustainability Appraisal. • The SA does not take into proper account the Lewes Downs SAC. • It appears that more weight has been given to the

	<p>conservation of the environment than the social and economic criteria.</p> <ul style="list-style-type: none"> • Some of the assessments made refer to scenarios different to that proposed. • The assessment for Old Malling Farm should be more favourable than North of Bishops Lane in respect of the travel indicator. • The assessment of the Bishops Lane site is not accurate in terms of biodiversity, economy and community indicators. • The level of housing desired by Ringmer residents is not considered. • The assessment for Greenhill Way contains flaws and changes to the assessment in line with scores received for other sites would make it a less sustainable option. • The assessment of the Greenhill Way site has been considered in isolation and has not considered growth elsewhere around Haywards Heath. • The assessment did not consider a range of options for provision of housing at Haywards Heath.
<p>How have these comments been taken into consideration?</p> <p>No amendments were considered necessary in the light of these comments.</p>	

<p style="text-align: center;">Transport evidence Number of representations submitted – 4</p>	
<p>Respondents on this policy (reference number of the respondent is in brackets)</p> <p><u>Support</u></p> <p>Highways Agency (REP/008)</p> <p><u>Object / propose Amendments</u></p> <p>Newick Parish Council (REP/017) Tony Perris (REP/037) St Modwen Properties plc (REP/287)</p>	<p>Summary of the issues raised</p> <p><u>Support</u></p> <ul style="list-style-type: none"> • The Highways Agency confirms that its earlier comments have been broadly addressed by the submission Core Strategy and that the transport evidence is sufficient to assess the impact of development on the strategic road network, subject to more detailed work at the Site Allocations stage. <p><u>Object / amendments sought</u></p> <ul style="list-style-type: none"> • The promoters of alternative development sites in Peacehaven argue that the transport evidence in relation to the capacity of the A259 is flawed. • No regard is given to the level of congestion experienced on the A272 at peak times when assessing the housing targets for Newick and North Chailey.

Strutt & Parker/Appleton Family (REP/286)	
<p>How have these comments been taken into consideration?</p> <p>East Sussex County Council, as the local transport authority, is in discussions with transport consultants commissioned by the promoters of potential housing sites in Newhaven and Peacehaven to investigate measures that could address the capacity constraints on parts of the A259 coast road.</p>	

No comments/objections
Number of representations submitted – 5

<p>Respondents who had no comments/ no objections to the plan (reference number of the respondent is in brackets)</p> <p>Office of Rail Regulation (REP/010) Marine Management Organisation (REP/011) Civil Aviation Authority (REP/276) Canal and River Trust London (REP/275) Brighton & Hove City Council (REP/001)</p>	<p>N/A</p>
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Non-Duly Made Representations
Number of representations – 4

<p>Respondents (reference number of the respondent is in brackets):</p> <p>Plumpton Residents Opposed to Unnecessary Development (L) (REP/318) Ditchling Parish Council (L) (REP/015) Lewes District Association of Local Councils (L) (REP/297)</p>	<p>Summary of the issues raised and the policies referred to:</p> <ul style="list-style-type: none"> • It is important to maintain the strategic gap between settlements (3.4 – Relating to Spatial Policy 2 and Core Policies 8 and 10). • The majority of new build should be affordable dwellings (5.352 – Core Policy 1). • Greenfield development should only be considered once all brownfield alternatives have been exhausted (5.352 – Spatial Policies 1 and 2). • High levels of commuting also bring wealth to the district
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<p>(L) – Non-duly made representation received after the deadline.</p>	<p>(5.352 – Core Policy 13).</p> <ul style="list-style-type: none">• The SDNP should not be used as an excuse for disproportionate peripheralization of ‘available’ housing land within the district (5.352 – Spatial Policies 1 and 2 and SHLAA).• Redundant farm buildings should be brought back into use to support rural economies (5.352 – Core Policy 5).• The rapidly growing elderly population presents a problem (5.352 – Core Policy 2).
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5.3 List of Statutory Consultees who responded to the consultation

Brighton and Hove City Council	REP/001
Mid Sussex District Council	REP/002
Environment Agency	REP/003
Natural England	REP/005
Southern Water	REP/006
East Sussex County Council	REP/007
Highways Agency	REP/008
South East Water	REP/009
Office of Rail Regulation	REP/010
Marine Management Organisation	REP/011

5.4 List of Town and Parish Councils who responded to the consultation

Chailey Parish Council	REP/014
Ditchling Parish Council	REP/015
Newhaven Town Council	REP/016
Newick Parish Council	REP/017
Plumpton Parish Council	REP/019
Ringmer Parish Council	REP/020
Rodmell Parish Council	REP/021
Seaford Town Council	REP/022
Wivelsfield Parish Council	REP/024

6. Proposed Submission Core Strategy Focused Amendments

6.1 Introduction

6.1.1 Since the publication of the Proposed Submission Core Strategy, a number of focussed amendments were made to the Core Strategy to reflect changes to national planning policy, the revocation of the South East Plan and to address matters raised in the previous consultation. These amendments were presented in a Schedule of Focussed Amendments¹ and a Schedule of Minor Amendments². The schedules were consulted on, along with a track changed Proposed Submission Core Strategy and Sustainability Appraisal. The consultation took place between 16th May and 11th July 2014.

Who was invited to make representations?

6.1.2 A letter (see Appendix 3) or email alert notifying of the dates of the consultation, how comments could be submitted and where the Core Strategy 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. At the same time, the District Council's website displayed front page information about the consultation.

Availability of the Proposed Submission Core Strategy Focused Amendments

6.1.3 The schedules of amendments and the Core Strategy Focused Amendments document were published on the Council's website (www.lewes.gov.uk/corestrategy) along with the track changed Sustainability Appraisal, Representation Form, Statement of Representations Procedure and accompanying guidance notes. Hard copies of these documents were also placed in the Council's Planning Offices in Lewes and the South Downs National Park Authority's offices in Midhurst. Hard copies were also sent to the libraries in and around the district, as well as the mobile libraries that cover the district. The background and evidence base documents to the Core Strategy were also made available on the Council website.

Summary of the Consultation Process

Representations received on the Proposed Submission Core Strategy Focused Amendments

6.1.4 A total of 94 individuals and organisations submitted representations on the Proposed Submission Core Strategy Focused Amendments, primarily via email. This resulted in approximately 170 individual comments, with some respondents submitting multiple representations. The majority of respondents were members of the public.

Publicity of Consultation

6.1.5 In addition to the email notifications and letters sent out to the contacts on the Consultation Database, a press release was issued and an article was placed in the District News Magazine, which is the Council's quarterly publication produced for every household in Lewes District. The press release and article publicised the consultation and explained where the document could be found and how people could submit comments.

¹ http://www.lewes.gov.uk/Files/plan_schedule_of_focussed_amendments.pdf

² http://www.lewes.gov.uk/Files/plan_Schedule_of_Minor_Amendments.pdf

Use of Social Media

- 6.1.6 The Council's Twitter account was used to advertise the consultation and included links to where the Core Strategy and supporting documents could be found.
- 6.1.7 A summary of comments made on the Proposed Submission Core Strategy Focussed Amendments is set out below, picking out the main issues raised by respondents. The consultation invited comments on the amendments made to the Core Strategy, as set out in the Schedule of Focussed Amendments and the Schedule of Minor Amendments. Every effort has been made to categorise the representations accurately. General comments that were not specific to the focussed or minor amendments have been included in the *Other Comments* table as an opportunity to comment had been given during the Proposed Submission consultation in January 2013. However, some general supporting arguments to representations made on the specific amendments have also been included in the Focussed and Minor Amendments table below. All comments received during this consultation will be sent to, and considered by, the Inspector undertaking the Core Strategy examination.

Consideration of Representations

- 6.1.8 Following consideration of the representations, the focussed amendments which were consulted upon were incorporated into the Core Strategy Submission Document. A small number of modifications were proposed in addition to the focussed amendments which have been set out in a Schedule of Modifications to accompany the Core Strategy Submission Document. This schedule consisted mainly of minor errors identified during the consultation and can be found at the link below.

<http://www.lewes.gov.uk/corestrategy/index.asp>

6.2 Summary of Representations on the Core Strategy Focused Amendments

Reference No.	Respondents on this policy (reference number in brackets)	Summary of the main issues raised
FA1	<u>Object</u> Porchester Planning for Croudace Strategic (REP/283)	<u>Support</u> <u>Object / amendments sought</u> <ul style="list-style-type: none"> Statement of intent to work with other Local Authorities to try and meet housing needs across the wider area is not justification for not meeting the AON. Suggests that the paragraph is reworded to: explain which other LA's will be included, include a timetable for the work, set out a clear set of objectives and include evidence that the other LA's involved have agreed to participate.
FA2	<u>Support</u> South Downs Society (REP/326) CPRE Lewes (REP/292) <u>Object / amendments</u> Gregory Gray Associates for The Garden Centre Group (REP/293) South Downs Society (REP/326)	<u>Support</u> <ul style="list-style-type: none"> The proposed change is supported <u>Object / amendments sought</u> <ul style="list-style-type: none"> The proposed amendment may have a detrimental impact in the countryside and specific wording applicable to the National Park is required.
FA3	<u>Support</u> South Downs Society (REP/326) CPRE Lewes (REP/292) <u>Object / amendments</u> Mr Peter Clark (REP/082) Mr Tony Perris (REP/037) Porchester Planning for Croudace Strategic (REP/283) Sigma Planning for Rydon Homes Ltd (REP/330) Boyer Planning for Thakeham homes (REP/317) Urbanissta on Behalf of Persimmon Homes	<u>Support</u> <ul style="list-style-type: none"> General support for amendments General support for amendment made in paragraph 6.16 <u>Object / amendments sought</u> A number of objections were received relating to the failure to meet the identified objectively assessed need (OAN). <ul style="list-style-type: none"> The identified OAN range for the district (9,200-10,400) is not appropriate or based on relevant evidence. Failure to meet the OAN is contrary to guidance in the NPPF and renders the Core Strategy unsound The justification for not meeting the OAN is not robust. It appears to have been predetermined that the OAN cannot be met, with a weak justification for not meeting OAN. As the housing shortfall for LDC (against the OAN) cannot be met elsewhere in the Sussex Coast Housing Market Area then LDC should put a greater emphasis on providing these homes, even if this means developing less desirable sites. Some objections were received suggesting the district's

	<p>(REP/327) Gleeson Strategic (REP/309) Ringmer Parish Council (REP/020) Luken Beck (REP/294) Barton Wilmore for Thakeham Homes (REP/322) Porta Planning for Eton College (REP/319) Home Builders Federation (REP/268) Town and Country Planning Solutions for M J Gleeson Group (REP/273) CPRE Lewes (REP/292) Dijksman Planning (REP/285)</p>	<p>OAN was too high</p> <ul style="list-style-type: none"> • The district’s OAN figure is too high and based on unsubstantiated evidence regarding commuting patterns and fails to take into account the account the capacity of the district’s existing infrastructure. <p>Duty to Cooperate and cross-boundary work to explore long-term solutions to meeting housing need</p> <ul style="list-style-type: none"> • The duty to co-operate has not been met • Collaboration with other LA’s with the intention of addressing long term housing needs does not justify the failure to meet the OAN. • More immediate action is required (by LDC and ESCC) to solve transport constraints along the A259 between Brighton and Newhaven to prevent the situation for exacerbating and leading to further housing supply issues • There is no information on how this collaboration will take shape and no background document supporting it. • Reference is made to a Memorandum of Understanding but this is not available on the council website and so cannot be commented upon. • Paragraph 6.21 and 6.22 do not provide any hard evidence as to how cross boundary planning will be undertaken. • The core strategy should not have been progressed until the outcome of the sub-regional study is known; submitting the core strategy before knowing the outcome demonstrates a failure to comply with the duty to co-operate. • Possible new settlement proposed in paragraph 6.22 does not alleviate the need to provide the OAN houses over the plan period. • The Core Strategy should plan for today, not pursuing long term options and mitigation measures <p>A number of comments were received objecting to the justification for the district’s housing strategy</p> <ul style="list-style-type: none"> • Paragraph 6.16 is unnecessarily negative and seeks only to justify the Council’s under-provision of houses –more balanced and accurate representation of issues is needed. • Paragraph 6.17 fails to acknowledge the financial and other contributions developers can make to resolve infrastructure issues • Council needs to show it has met paragraph 47 of the NPPF by going through a 3 stage process, this should be included in paragraph 6.14. • The risk of flooding needs to be given due prominence in para 6.17 and the word “significant” needs to be re-introduced as a minimum.
FA5	<p><u>Support</u> South Downs Society</p>	<p><u>Support</u></p> <ul style="list-style-type: none"> • General support for the increased housing target due to

	<p>(REP/326)</p> <p><u>Object</u> Plumpton Parish Council (REP/019) Iceni Projects on behalf of EA Strategic Land (REP/323) Porchester Planning for Croudace Strategic (REP/283) Woolf Bond Planning on behalf of Taylor Wimpey (REP/328) David Lock Associates (REP/277) Gladman Development Ltd (REP/321) David Gibbs (REP/252) Sigma Planning for Rydon Homes Ltd (REP/330) Boyer Planning for Thakeham homes (REP/317) Gleeson Strategic (REP/309) Ringmer Parish Council (REP/020) Luken Beck (REP/294) Barton Wilmore for Thakeham Homes (REP/322) Home Builders Federation (REP/268) Barton Willmore for Hallam Land Management Ltd (REP/331) Town and Country Planning Solutions for M J Gleeson Group (REP/273) CPRE Lewes (REP/292) Dijksman Planning (REP/285) Plainview Planning Ltd on behalf of Mr and Mrs Faulke (REP/311)</p>	<p>the housing need across the district.</p> <p><u>Object / amendments sought</u></p> <p>A number of comments were received suggesting the proposed increase to the housing target was not high enough as it does not meet the identified OAN and highlighted some of the repercussions</p> <ul style="list-style-type: none"> • Proposed number of houses 5,600, although an increase is still far too low to be found sound. • Some respondents felt that the housing target should be increased to at least 7,000 homes to reflect the deliverable supply of sites in the SHLAA, completions and windfall allowance. Some felt a target of at least 9,800 (the mid-range of the OAN) should be planned for. Some felt that an even higher housing target of between 12,200 and 12,720 should be planned for. • The unmet housing need is likely to be greater than that calculated using the objectively assessed housing needs range. • The increased housing target is still not sufficient to allow for homes from the overspill of London. • The housing requirement is unjustified and the plan has been insufficiently positively prepared. • Not meeting the OAN will have a detrimental impact on the housing market and affordability • The <i>minimum</i> level of housing growth appears to be taken as the maximum and many areas/villages that could support more housing than that allocated are not providing for it. • Background documents do not fully justify why the OAN are not being met. • The ability of neighbouring districts, such as Mid Sussex, to accommodate some of the shortfall has not been adequately investigated. • More emphasis of re-use of former employment brownfield sites could be a solution to meeting OAN. • Local designations that restrict housing growth should be reviewed to see if they are necessary or if they can be amended to be less restrictive. <p>Objections were received relating to the ‘review of Spatial Policies 1 and 2’</p> <ul style="list-style-type: none"> • The suggestion that an element of the housing requirement could be met through subsequent reviews of the plan or ‘longer term options for strategic development’ is not a good practice approach and contrary to the NPPF. • More research should be undertaken into strategic urban extensions to Haywards Heath and Burgess Hill. • Old Malling Farm, Lewes is a highly sustainable site that
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		<p>could help to meet the housing needs of the district.</p> <p>A number of consultees the proposed increase of the housing target was too high</p> <ul style="list-style-type: none"> • Transport and service infrastructure will not be able to accommodate an increased housing target. • The district will not be able to cope with increased housing target and is in danger of being overdeveloped • The increase in the district’s housing target is not within the capacity of the district’s current or planned infrastructure.
FA7	<p><u>Object</u> Porchester Planning for Croudace Strategic (REP/283) Gleeson Strategic (REP/309) Town and Country Planning Solutions for M J Gleeson Group (REP/273)</p>	<p><u>Object / amendments sought</u></p> <ul style="list-style-type: none"> • Figures do not meet the full OAN • The table should be amended to reflect a higher housing target
FA9	<p><u>Support</u> Savills on behalf of Mr and Mrs Mundy (REP/315) CPRE Lewes (REP/292)</p> <p><u>Object</u> Mr Peter Clark (REP/082) Plumpton Parish Council (REP/019) Mr Hugh Thwaites (REP/208) Porchester Planning for Croudace Strategic (REP/283) Mrs Margaret Elson (REP/241) Mr Michael Farmer (REP/242) Mr Nick and Mrs Sarah Beaumont (REP/038) Mr Adrian and Jayne Pratt (REP/243) Enis Guryel (REP/244) Dr Nicola Collins (REP/246) Mr Keith and Mrs Audrey Hicks</p>	<p><u>Support</u></p> <ul style="list-style-type: none"> • The allocation for land at the edge of Burgess Hill is supported as it is sustainably located and individual sites are considered available and suitable in the SHLAA. • Support for the inclusion of realistic windfall allowance. <p><u>Object / amendments sought</u></p> <ul style="list-style-type: none"> • The targets do not meet the full objectively assessed housing need targets for the district - the reasoning put forward by the Council is not sufficient to justify the shortfall. The Plan is therefore, still considered unsound. • Not all options for maximising housing delivery have been explored. As an example, Plumpton Green has a higher identified capacity including sites that are suitable, available and achievable. • The windfall allowance should be removed or justified by compelling evidence in compliance with the NPPF and NPPG. <p>A number of representations were received objecting to modifications to the target for individual settlements</p> <ul style="list-style-type: none"> • Concerns were raised about the addition of ‘minimum’ after the settlement allocation, with some respondents suggesting that it should be deleted. • Some respondents felt that a higher target could be considered on the edges of Haywards Heath and Burgess Hill. • Wivesfield parish Council objected to the lack of consultation prior to the publication of the focussed

	<p>(REP/247) Barton Willmore on behalf of Glenbeigh Developments (REP/290) Patrick Collins (REP/248) Mr James and Mrs Sally Bugden (REP/249) Bryony Sinclair (REP/251) Mrs M Holmes (REP/264) David Lock Associates (REP/277) Newick Parish Council (REP/017) Gladman Development Ltd (REP/321) Alan Janes (REP/253) Rhonda Janes (REP/254) Sheila Blair (REP/255) Sigma Planning for Rydon Homes Ltd (REP/330) Boyer Planning for Thakeham homes (REP/317) Urbanissta on Behalf of Persimmon Homes (REP/327) Newhaven Town Council (REP/016) Labour Party Meridian Branch (REP/324) Mr and Mrs Neale (REP/256) Janet Slater (REP/257) Ringmer Parish Council (REP/020) Telscombe Town Council (REP/023) Peacehaven Town Council (REP/018) Luken Beck (REP/294) Barton Wilmore for Thakeham Homes (REP/322)</p>	<p>amendments.</p> <ul style="list-style-type: none"> • This allocation was made at late notice and will impact on the development of the Wivelsfield Neighbourhood Plan. • Objection to the Wivelsfield/East of Burgess Hill allocation • The amended housing target in Wivelsfield/East of Burgess Hill is too high and will have a negative impact on the environment, drainage, local infrastructure (including highways and open space), congestion on the surrounding road network and local services (i.e. public transport and school provision). • The amended allocation at Burgess Hill fails to recognise the pressure that development of this scale would put on Mid Sussex services and infrastructure. • Covenants on the land to the East of Burgess Hill prevent development of this density. • The increase in the housing target for Peacehaven and Telscombe is not appropriate and not deliverable due to capacity constraints on the A259, unsuitable public transport provision, capacity constraints in education and health facilities and the possible impacts of cliff erosion on the A259 within the next thirty years. • The increase in the housing target for Peacehaven and Telscombe is contrary to East Sussex County Council’s advice. • There is uncertainty as to whether there are deliverable sites in broad locations such as Peacehaven and Telscombe. • The justification for the increased target for Peacehaven and Telscombe is not viable and based on out of date evidence. A new study needs to be carried out to support development on this scale. • The amended wording for the Peacehaven and Telscombe allocation is not effective and “to the satisfaction of the local highway authority” should be removed as the final decision should be with LDC not ESCC. • Transport mitigation measures, such as the extension of bus lanes, are not achievable along the A259. • The allocation for Newhaven should remain at 780. A target of 830 would place too much pressure on the Harbour Heights allocation which is not suitable for this cliff top location. • Housing targets for many villages (Ringmer and Newick specifically) are too low and should be reassessed. • Objection raised to the new trigger proposed for the release of the Ringmer contingent strategic site. • The allocation for North of Bishops Lane in Ringmer should be amended to “a minimum of 110 net additional units” • The reduced figure for Lewes town falls short of meeting the town’s housing needs.
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	<p>Strutt and Parker for the Appleton Family (REP/286) Mrs Kathryn Jepson (REP/259) Olaf Petersen (REP/260) Bernice Petersen (REP/261) Town and Country Planning Solutions for M J Gleeson Group (REP/273) Wivelsfield Parish Council (REP/024) Telscombe Residents Association (REP/240) Mr Peter Seed (REP/121) Councillor Graham Knight (REP/263) Strutt and Parker for the Appleton Family (REP/286) Peacehaven and District Residents' Association (REP/239) M Gittings (REP/266) Mr A Turk (REP/027) Newick Village Society (REP/269) Mrs J Jones (REP/265)</p>	
FA11	<p><u>Support</u> CPRE Lewes (REP/292)</p> <p><u>Object</u> Porchester Planning for Croudace Strategic (REP/283) Sigma Planning for Rydon Homes Ltd (REP/330) Ringmer Parish Council (REP/020)</p>	<p><u>Support</u></p> <ul style="list-style-type: none"> • Support for the inclusion of a realistic windfall allowance. <p><u>Object/ amendments sought</u></p> <ul style="list-style-type: none"> • Table 5 fails to make provision to meet the full objectively assessed housing needs for the District. • Particular concern about the Ringmer and Broyleside provision of only 220 dwellings when it should be 592. • The table needs to be amended to take into account the changes put forward by one consultee proposing an increase to the targets at Cooksbridge and Ringmer and Broyle Side. • Objection raised to the proposal to reduce the housing target for Lewes town as it is a sustainable location. • There is an inadequate allowance for windfall development • An objection was raised to the amendment of the 'commitments' figure for Ringmer and Broyle Side.

FA13	<p><u>Support</u> South Downs Society (REP/326)</p> <p><u>Object</u> Urbanissta on Behalf of Persimmon Homes (REP/327)</p>	<p><u>Support</u></p> <ul style="list-style-type: none"> • Support for the recognition that increased use of public transport is vital to unlocking development but that it will be hard to achieve. <p><u>Object/ amendments sought</u></p> <ul style="list-style-type: none"> • Work has not been undertaken to assess how highway impacts of future development can be mitigated. This work needs to be undertaken in order to truly assess whether the OAN can be met or not.
FA15	<p><u>Object</u> Southern Water (REP/006)</p>	<p><u>Object/ amendments sought</u></p> <ul style="list-style-type: none"> • Existing capacity for wastewater in the North Street Quarter is insufficient to meet anticipated demand • Suggest criterion should be added to the site allocation policy to support the delivery of necessary infrastructure (example provided in rep) • Existing capacity for wastewater in the North Street Quarter is insufficient to meet anticipated demand
FA16 Spatial Policy 4 (Greenhill Way/Ridge Way)	<p><u>Support</u> Woolf Bond Planning on behalf of Taylor Wimpey (REP/328)</p> <p><u>Object</u> Mr Kevin Greeley (REP/036) WP Field (REP/090) Enis Guryel (REP/244) Bryony Sinclair (REP/251) Southern Water (REP/006)</p>	<p><u>Support</u></p> <ul style="list-style-type: none"> • The proposed amendment to extend the allocation to include the full 8.5ha is supported. • The deletion of the final sentence, “Any housing units will be phased for completion once the full Haywards Heath Relief Road has been completed” is supported – Paragraph 6.74 is incorrect and needs to reflect this however. • The site would help to meet the district’s OAN, is located in a sustainable location and is ready to be delivered in the next 5 years <p><u>Object / amendments sought</u></p> <ul style="list-style-type: none"> • The increase in dwellings from 140 to 175 is opposed due to the steep gradient of the additional land and the density on the extension of the site would be too high • Development of the extension to the allocation would adversely impact on local wildlife, habitats and adjacent woodland • The additional development will have a negative impact on the local highways infrastructure, congestion on the surrounding road network and local services (i.e. school provision). • Suggest criterion should be added to the site allocation policy to support the delivery of necessary infrastructure (example provided in representation)
FA17	<p><u>Support</u> Woolf Bond Planning on behalf of Taylor Wimpey (REP/328)</p>	<p><u>Support</u></p> <ul style="list-style-type: none"> • The amendment is supported

FA18	<u>Object</u> Porchester Planning for Croudace Strategic (REP/283) Southern Water (REP/006) Ringmer Parish Council (REP/020) Town and Country Planning Solutions for M J Gleeson Group (REP/273) CPRE Lewes (REP/292)	<u>Object/ amendments sought</u> <ul style="list-style-type: none"> • Suggest criterion should be added to the site allocation policy to support the delivery of necessary infrastructure (example provided in rep) • Objection raised to the new trigger proposed for the release of the Ringmer contingent strategic site • The allocation for North of Bishops Lane in Ringmer should be amended to “a minimum of 110 net additional units” • The amendments to the release of the contingency site could frustrate the Ringmer Neighbourhood Plan. • Existing capacity for wastewater in the area is insufficient to meet anticipated demand
FA20	<u>Object</u> Southern Water (REP/006)	<u>Object/ amendments sought</u> <ul style="list-style-type: none"> • Existing capacity for wastewater in the area is insufficient to meet anticipated demand • Suggest criterion should be added to the site allocation policy to support the delivery of necessary infrastructure (example provided in rep)
FA22	<u>Support</u> South Downs Society (REP/326) <u>Object</u> Ringmer Parish Council (REP/020) Hobbs Parker Property Consultants (REP/279) CPRE Lewes (REP/292)	<u>Support</u> <ul style="list-style-type: none"> • General support for amendment <u>Object</u> <ul style="list-style-type: none"> • It is unsound to propose meeting the various different categories of housing need by a single overall target. • The viability study referred to in paragraphs 7.1 to 7.20 are out of date and does not reflect national planning policy guidance in considering competitive returns to landowners and developers. • With regard to conversions, there is a strong case for raising the threshold to a minimum of 10 dwellings. • The general principle of lowering the threshold for affordable dwellings should be reviewed. • The assessment of the need for affordable housing over the plan period is unsound.
FA28	<u>Object</u> Southern Water (REP/006)	<u>Object/ amendments sought</u> <ul style="list-style-type: none"> • Neglects to protect the amenity of the occupants of Gypsy and Traveller accommodation – this amendment proposes to remove the protection that would have been afforded by the earlier wording.
FA32	<u>Support</u> South Downs Society (REP/326)	<u>Support</u> <ul style="list-style-type: none"> • General support for amendment
FA33	<u>Support</u> DTZ for Royal Mail Group (REP/325) Gregory Gray Associates for The Garden Centre Group (REP/293)	<u>Support</u> <ul style="list-style-type: none"> • General support for amendments • The addition of “in the first instance” is supported <u>Object / amendments sought</u>

	South Downs Society (REP/326)	
FA34	<u>Object</u> Ringmer Parish Council (REP/020)	<u>Object</u> <ul style="list-style-type: none"> The amended wording is not compliant with the NPPF as it does not ensure that new infrastructure required by new development is delivered so as to be available by the time it is ready for occupation
FA35	DTZ for Royal Mail Group (REP/325)	<u>Support</u> <ul style="list-style-type: none"> General support for amendments
FA39	<u>Object</u> David Lock Associates (REP/277)	<u>Object</u> <ul style="list-style-type: none"> One developer expressed concern at the addition to paragraph 7.100 and the reference made to the Habitats Regulations Assessment (HRA) and the content of that document in general.
FA40	Boyer Planning for Thakeham homes (REP/317)	<u>Support</u> <ul style="list-style-type: none"> Supports that other mitigation solutions than SANGs may be used.
FA43	<u>Object</u> Ringmer Parish Council (REP/020)	<u>Object</u> <ul style="list-style-type: none"> The amended wording fails to recognise that local car parking provision, based on local evidence of needs, is a legitimate matter for Neighbourhood Planning.
FA44	<u>Object</u> Ringmer Parish Council (REP/020) <u>Support</u> DTZ for Royal Mail Group (REP/325)	<u>Support</u> <ul style="list-style-type: none"> General support for amendments <u>Object</u> <ul style="list-style-type: none"> The amended wording fails to recognise that local car parking provision, based on local evidence of needs, is a legitimate matter for Neighbourhood Planning.
FA48	Julia Waterlow of Transition Town Lewes (REP/030)	<u>Support</u> <ul style="list-style-type: none"> Objection to this amendment as there is no evidence to support change <u>Object / amendments sought</u>
FA50	Sigma Planning for Rydon Homes Ltd (REP/330)	<u>Object / amendments sought</u> <ul style="list-style-type: none"> It is inappropriate to seek to introduce a review of the plan through the monitoring framework.
FA51	Sigma Planning for Rydon Homes Ltd (REP/330)	<u>Object / amendments sought</u> <ul style="list-style-type: none"> Changes need to be made to the housing trajectory in light of amendments and sites proposed by various consultees.
General support / objection to focussed	Mid Sussex District Council (REP/002) DTZ for Royal Mail Group (REP/325)	<u>Support</u> <ul style="list-style-type: none"> General support for Joint Core Strategy Proposed Submission Document and amendments made No objections to proposed increase in housing target

amendments	Highways Agency (REP/008) South East Water (REP/009)	<ul style="list-style-type: none">• South East Water support Focussed Amendments and able to confirm that our published planned programme will be fully able to satisfy the growth in demands in the zones, assuming the required new resources and demand management measures are delivered as planned.
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6.3 Summary of Representations on the Core Strategy Minor Amendments

Reference No.	Respondents on this policy (reference number in brackets)	Summary of the issues raised
MA17	<u>Object</u> Boyer Planning for Thakeham homes (REP/317) Home Builders Federation (REP/268)	<u>Object / amendments sought</u> <ul style="list-style-type: none"> • Duty to Cooperate has not been effectively met. Also the information regarding how the duty to cooperate is to be met is too vague and doesn't provide timescales or suggestions. • The plan is unsound because it not the product of effective collaborative working that provides a solution to the problem of Lewes's unmet housing need.
MA34	<u>Object</u> Porchester Planning for Croudace Strategic (REP/283)	<u>Object / amendments sought</u> <ul style="list-style-type: none"> • Seeks to dilute paragraph 47 of the NPPF by stating that there is a requirement to seek to bring forward sufficient housing. • Suggested amendment to reflect importance of meeting OAN as stated in NPPF para 47.
MA35	<u>Object</u> Porchester Planning for Croudace Strategic (REP/283)	<u>Object / amendments sought</u> <ul style="list-style-type: none"> • Full OAN should be met. It is not sufficient to conclude that they cannot be met due to environmental harm as this does not conform to paragraph 47 of the NPPF. • Propose to add the following words at the end of the sentence in MA35 – '<i>having regard to the requirements of paragraph 47 of the National Planning Policy Framework.</i>'
MA40	<u>Object</u> Porchester Planning for Croudace Strategic (REP/283)	<u>Object / amendments sought</u> <ul style="list-style-type: none"> • Should note that after the main urban areas the Rural Service Centre of Ringmer is the next largest and most sustainable settlement in the District.
MA53	<u>Support</u> Woolf Bond Planning on behalf of Taylor Wimpey (REP/328)	<u>Support</u> <ul style="list-style-type: none"> • The amendment is supported
MA77	<u>Object</u> Town and Country Planning Solutions for M J Gleeson Group (REP/273)	<u>Object / amendments sought</u> <ul style="list-style-type: none"> • The monitoring framework should be amended to reflect a higher housing target

6.4 Summary of Other Comments

Policy / section	Respondents on this policy (reference number in brackets)	Summary of the issues raised
Chapter 2 – A Portrait of Lewes	<u>Object</u> Seaford Town Council (REP/022)	<u>Object / amendments sought</u> <ul style="list-style-type: none"> A number of minor amendments to the Seaford section were proposed by Seaford Town Council
Chapter 3 – Key Strategic Issues and Challenges	<u>Object</u> Seaford Town Council (REP/022) David Lock Associates (REP/277) Natural England (REP/005)	<u>Object / amendments sought</u> <ul style="list-style-type: none"> A number of minor amendments were proposed to the ‘Improving Access to Housing’ and ‘Promoting Sustainable Economic Growth and Regeneration’ sections. Reference should be made to the Ashdown Forest Special Protection Area (SPA) – this should be added under paragraph 3.2. No reference made in the “protecting and enhancing...” chapter in regards to the need to conserve and enhance biodiversity.
Chapter 4 – A Vision for Lewes District	<u>Support</u> Planning Potential on behalf of Mr Temmerman (REP/320) <u>Object</u> Seaford Town Council (REP/022)	<u>Support</u> <ul style="list-style-type: none"> Support for the vision for Newhaven <u>Object / amendments sought</u> <ul style="list-style-type: none"> A number of minor amendments were proposed to the Seaford section of this chapter
Strategic Objective 6	Cllr John Stockdale (REP/013)	<u>Object / amendments sought</u> <ul style="list-style-type: none"> Objective should be strengthened to reflect higher design standards in line with best practice in the relevant settlement.
Spatial Policies 1 and 2	<u>Support in principle</u> Planning Potential on behalf of Mr Temmerman (REP/320) <u>Object</u> Mr David Barnes (REP/031) & Mrs Janet Barnes (REP/152) Mr Nigel and Mrs Sara Gourlay (REP/073) Iceni Projects on behalf of EA Strategic Land (REP/323) Mr High Thwaites (REP/208) Mr Andrew Sharpe (REP/245)	<u>Support</u> <ul style="list-style-type: none"> General support for the policy whilst highlighting that there are a number of key development sites in Newhaven that are key in ensuring that the Core Strategy meets the requirements of the NPPF. <u>Object / amendments sought</u> General <ul style="list-style-type: none"> The Policy is overly restrictive in only identifying targets in certain locations The housing target should be increased in line with the housing capacity in the 2014 SHLAA which shows a potential capacity of over 5,600 units. The recent designation of the UNESCO Biosphere of Brighton and Lewes Downs reduces the capacity A number of sites were put forward to demonstrate the housing capacity that the district has and to emphasise that a higher target could be met through such sites.

	<p>John Gould (REP/060) David Lock Associates (REP/277) Gladman Development Ltd (REP/321) Sigma Planning for Rydon Homes Ltd (REP/330) Mr Ian and Mrs Rachel Seccombe (REP/106) Home Builders Federation (REP/268) Barton Willmore for Hallam Land Management Ltd (REP/331) Town and Country Planning Solutions for M J Gleeson Group (REP/273) Dijksman Planning (REP/285) Mr David Barnes (REP/031) & Mrs Janet Barnes (REP/152) Mr Nigel and Mrs Sara Gourlay (REP/073) Plainview Planning Ltd on behalf of Mr and Mrs Faulke (REP/311) Plainview Planning Ltd for Mr and Mrs Cadle and Mr and Mrs Smith (REP/332) Plumpton Parish Council (REP/019) Porchester Planning for Croudace Strategic (REP/283)</p>	<ul style="list-style-type: none"> • Further consideration should be given to the potential of a new settlement to solve the district’s housing problems. <p>Justification and conformity with national policy</p> <ul style="list-style-type: none"> • The Core Strategy is not consistent with national policy i.e. the NPPF and does not meet the test of soundness • The Core Strategy has not been positively prepared as it is not planning to meet the objectively assessed housing needs of the district. • The Core Strategy is not justified as constraints which restrict the housing targets have not been thoroughly evidenced. • The Core Strategy is not effective as there is a need to plan for further deliverable sites to meet housing needs • Historically low levels of housing delivery have resulted in detrimental impacts to the district’s workforce, school population levels and resulted in an unsustainable population profile. • In relying principally upon the demographic modelling the assessment gives less weight to the market signals elements of the NPPG • The starting point for the district’s objectively assessed housing needs should be 600 dwellings per annum • The plan is unsound because it not the product of effective collaborative working that provides a solution to the problem of Lewes’s unmet housing need. <p>Policy wording</p> <ul style="list-style-type: none"> • In the penultimate paragraph of Spatial Policy 2, the term “appropriate timeframe” should be defined. • A new criterion should be introduced to Spatial Policy 1 that allows new windfall housing sites to come forward outside of the settlement boundaries. • The policy should indicate that previously developed sites will be considered preferentially when identifying potential windfall sites. • Wording should be amended in a way that doesn’t restrict windfall to “small scale” • The restriction on only affordable housing to be delivered in settlements not mentioned in Section 3 of Spatial Policy 2 should be removed. <p>Seaford settlement target</p> <ul style="list-style-type: none"> • Seaford should have a minimum target of 170 net additional units. <p>North Chailey settlement target</p> <ul style="list-style-type: none"> • Should have a housing target of 10 net additional units • The housing target for the village (‘local village’ in settlement hierarchy) is the same as two of the ‘service
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		<p>villages’.</p> <ul style="list-style-type: none"> • Has a higher housing target than South Chailey despite being ranked lower in the sustainability matrix accompanying the Rural Settlement Study. • Should have higher housing targets in line with the identified capacity in the SHLAA. • North Chailey should be reassessed to see if it can accommodate a larger amount of growth given its lack of constraints to development in relation to other villages within the District. <p>Newick settlement target</p> <ul style="list-style-type: none"> • The housing target should be increased to 150 to reflect the village’s housing capacity • Should have higher housing targets in line with the identified capacity in the SHLAA. • The housing target for Newick should not exceed 100. <p>Ringmer settlement target</p> <ul style="list-style-type: none"> • The net additional allocation for Ringmer and Broyle Side should be increased to at least 320 dwellings and a strategic allocation at Fingerpost Farm should be included in the plan. • Ringmer, which has limited development constraints, has not been given sufficient consideration in helping to meet future housing needs. • A strategic allocation at Broyle Gate farm was also put proposed. It was suggested that the green gap between the settlements of Ringmer and Broyleside could be retained even with development of the Land at Broyle Gate Farm. <p>Cooksbridge settlement target</p> <ul style="list-style-type: none"> • The net additional housing allocation at Cooksbridge should be increased to a minimum of 65 dwellings • Support allocation of 255 new homes to site North of Cooksbridge, east and west of A275 <p>Wivelsfield Green settlement target</p> <ul style="list-style-type: none"> • A higher target of 75 units should be planned for at Wivelsfield Green. <p>Plumpton Green</p> <ul style="list-style-type: none"> • 50 dwellings should be the maximum for Plumpton Green.
Spatial Policy 3	<p><u>Object</u> Lewes Phoenix Rising Ltd (REP/329) Natural England (REP/005)</p>	<p><u>Object / amendments sought</u></p> <ul style="list-style-type: none"> • A number of modifications were proposed to the policy by one respondent, in particular a change to the amount and type of employment floorspace provided on the site • Green Infrastructure opportunities have not been

		considered.
Spatial Policy 4	<p><u>Support</u> Woolf Bond Planning on behalf of Taylor Wimpey (REP/328) Natural England (REP/005)</p> <p><u>Object</u> WP Field (REP/090) Woolf Bond Planning on behalf of Taylor Wimpey (REP/328) Natural England (REP/005)</p>	<p><u>Support</u></p> <ul style="list-style-type: none"> • General support for the allocation <p><u>Object / amendments sought</u></p> <ul style="list-style-type: none"> • A number of objections to the allocation previously made at the Proposed Submission consultation were repeated. These included objections relating to access to the site, traffic impact, local amenity, wildlife, impact on the built environment, sustainability and local infrastructure • A factual error was pointed out. The first paragraph of the policy should read “land amounting to 8.5 hectares” which reflects the amended site area. • SP4 point i) should be revised as follows: “Access including provision for pedestrians and cyclists to be provided from Ridge Way and/or Greenhill Way”
Spatial Policy 5	<p><u>Object</u> Natural England (REP/005) Porchester Planning for Croudace Strategic (REP/283)</p>	<p><u>Object / amendments sought</u></p> <ul style="list-style-type: none"> • No reference is made to a landscape and visual impact assessment which would be required. • Land North of Bishops Lane is not ‘justified’ as it is not the most suitable site; Land at Broyle Gate Farm is more suitable for development being better located and more sustainable.
Spatial Policy 6	<p><u>Object</u> Jan Gouveia (REP/258)</p>	<p><u>Object / amendments sought</u></p> <ul style="list-style-type: none"> • Spatial Policy 6 contradicts the aims of Core Policy 8 as it is a cliff top location which currently provides valuable amenity space.
Core Policy 1	<p><u>Object</u> Plumpton Parish Council (REP/019) Home Builders Federation (REP/268)</p>	<p><u>Object</u></p> <ul style="list-style-type: none"> • The affordable housing target of 40% should be a requirement to ensure housing remains accessible. • The policy is unsound because it is unjustified as the rate of 40% proposed is not underpinned by a reliable viability assessment.
Core Policy 2	<p><u>Object</u> Home Builders Federation (REP/268)</p>	<p><u>Object / amendments sought</u></p> <ul style="list-style-type: none"> • Policy should be amended to remove “urban areas” from the key strategic objectives box. • Part 2 of the policy relating to Lifetime Homes standards – not justified or effective in the way it is expressed and is contrary to national planning policy. • Part 4 of the policy is unsound because it is unjustified.
Paragraph 7.34 / 7.35 (CP3)	<p><u>Object</u> Plumpton Parish Council (REP/019)</p>	<p><u>Object / amendments sought</u></p> <ul style="list-style-type: none"> • Provision for traveller sites needs to be in place soon before impromptu sites are established.
Paragraph 7.70 (CP6) / Appendix 5	<p><u>Object</u> Cllr John Stockdale (REP/013)</p>	<p><u>Object / amendments sought</u></p> <ul style="list-style-type: none"> • The downgrading of the north side of Cliffe High Street (Lewes) to secondary shopping frontage is not justified and the map in Appendix 5 should be amended retaining the area as primary.

Core Policy 6	<u>Object</u> Gregory Gray Associates for The Garden Centre Group (REP/293)	<u>Object / amendments sought</u> <ul style="list-style-type: none"> Point 4 should be amended to the following “Support and retain local and rural shops <i>which constitute an important amenity to local residents</i> and community facilities in locations not identified in the retail hierarchy”
Core Policy 7	<u>Object</u> Home Builders Federation (REP/268)	<u>Object / amendments sought</u> <ul style="list-style-type: none"> Part 4 of the policy is unsound because it is unjustified.
Core Policy 8	<u>Object</u> Natural England (REP/005)	<u>Object / amendments sought</u> <ul style="list-style-type: none"> Natural England suggested amendments to this policy.
Core Policy 10	<u>Object</u> David Lock Associates (REP/277) Natural England (REP/005)	<u>Object / amendments sought</u> <ul style="list-style-type: none"> Further detail should be added to the lead-in-text to the policy in relation to the consideration of mitigation solutions other than SANGS. An amendment to point 2 of the policy was put forward by Natural England. No specific policy protection is given to SSSIs
Core Policy 11	<u>Object</u> Home Builders Federation (REP/268)	<u>Object / amendments sought</u> <ul style="list-style-type: none"> Part iii of the policy is unsound because it is contrary to national policy.
Core Policy 14	<u>Support</u> South East Water (REP/009) <u>Object</u> Home Builders Federation (REP/268)	<u>Support</u> <ul style="list-style-type: none"> General support for policy <u>Object / amendments sought</u> <ul style="list-style-type: none"> The policy is unsound because it is unclear hence ineffective and unjustified and contrary to national policy.
Appendices	<u>Support</u> Friends of Seaford Head (REP/295)	<u>Support</u> <ul style="list-style-type: none"> Retention of 2003 Local Plan policy CT1 is supported
Sustainability Appraisal	<u>Object</u> Mr David Barnes (REP/031) & Mrs Janet Barnes (REP/152) Mr Nigel and Mrs Sara Gourlay (REP/073) Mr Hugh Thwaites (REP/208) Sigma Planning for Rydon Homes Ltd (REP/330) Ringmer Parish Council (REP/020) Gleeson Strategic (REP/309) H G Dodson on behalf of Baccata Trustees (REP/314)	<u>Object / amendments sought</u> <ul style="list-style-type: none"> Consideration of development at North Chailey – a further option assessing planned growth towards the lower end of the settlement hierarchy should be appraised. The assessment of the consideration of options at Cooksbridge is flawed. Further options and housing targets should have been appraised at Ringmer. Objection was raised as to the appraisal for Fingerpost Farm, Ringmer and the decision not to take it forward as a strategic allocation. The approach to the assessment of Spatial Strategy / housing target options is flawed. Some comments suggested the appraisal process was flawed, the sustainability framework criteria are not applied logically or consistently and that the wrong option had been taken forward in some cases.

	Luken Beck (REP/294)	<ul style="list-style-type: none"> • SA doesn't take into account the fact that LDC only has a 1.8 year housing supply • The Sustainability Appraisal does not comparatively assess the effect of new developments on river pollution • Further options should have been considered for Lewes town.
General	Marine Management Organisation (REP/011) Lindfield Parish Council (REP/025)	<ul style="list-style-type: none"> • No specific comments on the amendments.
Other	Friends of Seaford Head (REP/295) Newick Parish Council (REP/017) Natural England (REP/005) Home Builders Federation (REP/268) Mr A Turk (REP/027) Newick Village Society (REP/269)	<ul style="list-style-type: none"> • Chyngton Field should be safeguarded from development for its role of meeting the objectives of the SDNPA. • Natural England suggested the Core Strategy should place more of an emphasis on easing pressure on water resources. • Further consideration should be given to alleviating constraints preventing 11PL of Policy Constraints Report from coming forward.
Non duly made	Helen Smith (REP/262)	<ul style="list-style-type: none"> • An objection was made to the Burgess Hill allocation of 100 units

7. Appendices

Appendix 1 - Letter sent to consultees to publicise the Emerging Core Strategy



Working in Partnership



direct dial 01273 484449

my ref 9328.33-6

your ref

date September 2011

Dear

Lewes District Local Development Framework – Emerging Core Strategy

Lewes District Council, in conjunction with the South Downs National Park Authority, is preparing a Core Strategy. This is the key part of the Local Development Framework for Lewes District, which will eventually replace the existing Local Plan. It will set out the strategic planning policies for Lewes District until 2030 and is the document that will set the context for all future planning documents forming part of the Local Development Framework.

As part of the process of preparing the Core Strategy, we have published the Emerging Core Strategy for public consultation. **The consultation commences on 30 September 2011 and will run for a six week period up to 11 November 2011.**

The document is available to view on the Council's website at www.lewes.gov.uk/corestrategy and has been influenced responses received from last year's consultation on our Issues and Emerging Options Topic Papers, which can be found on the same webpage.

It is accompanied by the Sustainability Appraisal (incorporating a Strategic Environmental Assessment)

The document has also been informed by background documents that can be found at www.lewes.gov.uk/planning/backgroundreps.asp

Any difficulties in getting your responses in, please get in touch with us.

If you have any queries about the preparation of the Core Strategy, do not hesitate to contact us, either by emailing us at ldf@lewes.gov.uk or by telephoning (01273) 484417.

Yours Faithfully,

Appendix 2 - Consultation Documents for the Proposed Submission Core Strategy



direct dial 01273 484 417

my ref 9328.33-7/ Core Strategy

your ref

date 10th January 2013

Dear

Lewes District Joint Core Strategy – Proposed Submission Document

Lewes District Council in partnership with the South Downs National Park Authority has prepared a plan that will, once adopted, set out the strategic policies to guide new development and change in the district for the period up to 2030.

Under regulation 19 of The Town and Country Planning (Local Planning) (England) Regulations 2012, the plan has now been approved by both authorities for publication, a public representation period and subsequent submission to the Secretary of State. Representations will be invited on the Core Strategy between:

Friday 11th January 2013 and 16.00 on Friday 22nd March 2013

Any representations received after this date and time will not be accepted. Further information and guidance on this representation period and how to submit comments can be found in the attached *Guidance Notes for making representations*.

All comments must be made in writing, preferably via the *Representation Form*. For details on how and where to send your representation, please see the attached *Statement of Representations Procedure*. This statement also contains details on where the Core Strategy and accompanying documents (including the Sustainability Appraisal) can be viewed. This includes on the Council's website (www.lewes.gov.uk/corestrategy) and at the Council offices and libraries across the district. Please note that we cannot take account of representations that are submitted to us confidentially and that all comments received during the representation period will be made public.

Unlike previous consultation periods representations will not be considered by Lewes District Council, or the South Downs National Park Authority. Instead they will be considered by the Planning Inspector appointed to conduct the examination in public.

If you have any queries please do not hesitate to contact us, either by emailing us at ldf@lewes.gov.uk or by telephoning (01273) 484417.

Yours Faithfully

Lewes District Local Plan Part 1: Joint Core Strategy – Proposed Submission Document Publication Stage Representation Form

The District Council and National Park Authority are seeking representations on the Proposed Submission Core Strategy, a strategic planning document that will guide development in the district for the period up until 2030. Representations will be considered by a Planning Inspector, appointed by the Secretary of State, at a public examination to determine whether the plan is sound. The Core Strategy is available to view on the council website (www.lewes.gov.uk) and paper copies are available to view at the Council offices (see address below) and your local library. The background reports informing the Core Strategy can also be found on the website which we are also welcoming representations on.

Please return to Lewes District Council by 16.00 on Friday 22nd March 2013

How can I respond to this consultation?

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

E-mail: ldf@lewes.gov.uk

Note: A guidance note accompanies this form and can be used to help fill this form in.

Part A

1. Personal Details

2. Agent's Details (if applicable)

Title	<input type="text"/>	<input type="text"/>
First Name	<input type="text"/>	<input type="text"/>
Last 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 Line 1	<input type="text"/>	<input type="text"/>
Line 2	<input type="text"/>	<input type="text"/>
Line 3	<input type="text"/>	<input type="text"/>
Line 4	<input type="text"/>	<input type="text"/>
Post Code	<input type="text"/>	<input type="text"/>
Telephone Number	<input type="text"/>	<input type="text"/>
E-mail Address (where relevant)	<input type="text"/>	<input type="text"/>

Part B – Please use a separate sheet for each representation

Name or Organisation:

3. To which part of the DPD does this representation relate?

Paragraph Policy Proposals Map

4. Do you consider the DPD is in accordance with/whether it is:

4.(1) The Duty to Cooperate Yes No

4.(2) Legal and procedural requirements Yes No

4.(3) Sound* Yes No

* For an explanation please refer to the accompanying Guidance Notes which can be found on the Lewes District Council website.

If you have entered 'No' to 4.(3), please continue to Q5. In all other circumstances, please go to Q6.

5. Do you consider the DPD is unsound because it is not:

(1) Positively prepared

(2) Justified

(2) Effective

(4) Consistent with national policy

6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

(Continue on a separate sheet/expand box if necessary)

7. Please set out what change(s) you consider necessary to make the DPD 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 DPD 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.

(Continue on a separate sheet/expand box if necessary)

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 for independent examination | <input type="checkbox"/> | Yes | <input type="checkbox"/> | No |
| (ii) The publication of the recommendations of the person appointed to carry out an examination of the local plan | <input type="checkbox"/> | Yes | <input type="checkbox"/> | No |
| (iii) The adoption of the Local Plan | <input type="checkbox"/> | Yes | <input type="checkbox"/> | 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.

The considerations in relation to the DPD being 'Sound' are explained in the National Planning Policy Framework (NPPF) Paragraph 182. The NPPF can be found at:

<https://www.gov.uk/government/publications/national-planning-policy-framework--2>

Guidance notes for making representation on the Lewes District Council and South Downs National Park Authority Joint Core Strategy – Proposed Submission Document

1. Introduction

1.1 These guidance notes have been produced to assist anyone who wishes to make a formal representation on the Proposed Submission Core Strategy. When making a representation you will need to refer to the representation form, this guidance and the Plan, as well as any background evidence you think is relevant to your representation. Further details on making a representation are included in the *Statement of Representations Procedure*, which can be found on the Lewes District Council website. The Core Strategy is subject to a 10 week period of representation between:

Friday 11th January and 16.00 on Friday 22nd March 2013.

1.2 The Core Strategy is published in order for representations to be made prior to submission. The representations will be considered alongside the submitted document which will be examined by a Planning Inspector. Please be aware that representations cannot be treated as confidential. As well as being sent to the Secretary of State, copies of all representations made to the Council will be available to view at the main Council offices (Southover Road) and the SDNPA offices (Rosemary's Parlour, Midhurst). These copies will be made available as soon as possible after the 10 week period of representation is finished.

1.3 The Planning and Compulsory Purchase Act 2004³ (the 2004 Act) states that the purpose of the examination is to consider whether the Core Strategy complies with legal requirements and is 'sound'.

- 1) If you are seeking to make representations on the way in which the Local Planning Authority (LPA) has prepared the Core Strategy it is likely that your comments or objections will relate to a matter of legal compliance.
- 2) If it is the actual content on which you wish to comment on or object to, it is likely it will relate to whether the Core Strategy is positively prepared, justified, effective or consistent with national policy. The Core Strategy needs to meet all these tests for it to be considered 'sound'.

1.4 Please note that all respondents must complete their personal details as it is not possible for representations to be considered anonymously. Each separate representation you wish to make should be made on a separate copy of Part B of the response form. This consultation is not an invitation to make general comments; representations should only relate to 'legal compliance' or 'soundness' as detailed below in sections 2 and 3.

³ View the Planning Act online at <http://www.legislation.gov.uk/ukpga/2004/5/contents>

2. Legal Compliance

2.1 The Inspector will first check that the Core Strategy meets the legal requirements under s20(5)(a) of the 2004 Act before moving on to test for soundness. You should consider the following before making a representation on legal compliance:

2.2 The Core Strategy should be within the current Local Development Scheme (LDS) and the key stages should have been followed. The LDS is effectively a programme of work prepared by the Local Planning Authority (LPA), setting out the Local Development Documents it proposes to produce over a 3 year period. It will set out the key stages in the production of any DPDs which the LPA propose to bring forward for independent examination. If the Core Strategy is not in the current LDS it should not have been published for representations. The LDS is available at the Council's main offices (Southover Road) and on the website at the following link:

http://www.lewes.gov.uk/Files/plan_Revised_LDS_February_2012.pdf

2.3 The process of community involvement for the Core Strategy should be in general accordance with the Council's Statement of Community Involvement (SCI) and the National Park Authority's SCI. The SCI is a document that sets out a strategy for involving the community in the preparation and revision of Local Development Documents and the consideration of planning applications. The SCI can be viewed at the Council's main offices (Southover Road) and via the following link:

http://www.lewes.gov.uk/Files/plan_AdoptedSCI.pdf

2.4 The Core Strategy should be consistent with national policy and conform generally to the Regional Spatial Strategy (RSS), although this is soon to be revoked. Please note that national policy has recently changed. The Department for Communities and Local Government has recently published the National Planning Policy Framework (NPPF) and the Localism Act received royal assent in late 2011. Both of these matters will mean that elements of the plan preparation process have changed. A new plan making provision was introduced by Section 110 of the Localism Act which requires local authorities and other bodies to 'co-operate' with each other when preparing Plans.

2.5 The Core Strategy should comply with the Town and Country Planning (Local Planning) (England) Regulations 2012. On publication, the LPA must publish the documents prescribed in the regulations, make them available at their principal offices (and anywhere else considered appropriate), and published on the Council's website. The LPA must also notify various consultees (as set out in the regulations) and any persons who have requested to be notified.

2.6 The LPA is required to provide a Sustainability Appraisal Report when a DPD is published. This should identify the process by which the Sustainability Appraisal has been carried out, and the baseline information used to inform the process and the outcomes of that process. Sustainability Appraisal is a tool for appraising policies to ensure they reflect social, environmental, and economic factors.

3. Soundness

3.1 In accordance with the National Planning Policy Framework 2012, to be considered 'sound' the Core Strategy should be:

Positively prepared

3.2 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

3.3 The plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence. These alternatives should be realistic and the subject of a sustainability appraisal and consultation. The Core Strategy should show how the policies and proposals help to ensure that the social, environmental, economic and resource use objectives will be achieved.

Effective

3.4 This means the Core Strategy should be deliverable over its period, embracing elements such as:

- Sound infrastructure delivery planning;
- Having no regulatory or national planning barriers to delivery;
- Delivery partners who agree that the Plan is realistic and achievable; and
- Based on effective joint working on cross-boundary strategic priorities

3.5 The Core Strategy should also be flexible and able to be monitored. The Core Strategy should indicate who is to be responsible for making sure that the policies and proposals happen and when they will happen. The plan should be flexible to deal with changing circumstances, which may involve minor changes to respond to the outcome of the monitoring process or more significant changes to respond to problems such as lack of funding for major infrastructure proposals. Although it is important that policies are flexible, the Core Strategy should make clear that major changes may require a formal review including public consultation.

3.6 Any measures that the Council has included to make sure that targets are met should be clearly linked to an Authority Monitoring Report. This report must be produced each year by all local authorities and will show whether the Core Strategy needs amendment.

4. Consistent with national policy

4.1 Where there is a departure from national policy, LPAs must provide clear and convincing reasoning to justify their approach. Conversely, you may feel the LPA should include a policy or policies which would depart from national or regional policy to some degree in order to meet a clearly identified and fully justified local need, but they have not done so. In this instance it will be important for you to say in your representations what the local circumstances are that justify a different policy approach to that in national or regional policy and support your assertion with evidence.

4.2 If you think the content of the Core Strategy is not sound because it does not include a policy where it should do, you should go through the following steps before making representations:

1. Is the issue with which you are concerned already covered specifically by national planning policy? If so it does not need to be included.
2. Is what you are concerned with covered by any other policies in the Core Strategy on which you are seeking to make representations or in any other DPDs in the LPA's Local Plan. There is no need for repetition between documents in the Local Plan.
3. If the policy is not covered elsewhere, in what way is the Core Strategy unsound without the policy?
4. If the Core Strategy is unsound without the policy, what should the policy say?

5. General advice

5.1 If you wish to make a representation seeking a change to all/part of the Core Strategy you should make clear in what way all/part of the Core Strategy is not sound having regard to the legal compliance check and the four tests set out above. You should try to support your representation by evidence showing why the Core Strategy should be changed. It will be helpful if you also say precisely how you think the Core Strategy should be changed. Representations 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 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.

5.2 Where there are groups who share a common view on how they wish to see the Core Strategy changed, it would be very helpful for that group to send a single representation which represents the view, rather than for a large number of individuals to send in separate representations which repeat the same points. In such cases the group should indicate how many people it is representing and how the representation has been authorised.

5.3 Further detailed guidance on the preparation, publication and examination of Local Plans is provided in the National Planning Policy Framework and in the CLG Plan making manual, which can be found at the following links.

NPPF -

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

CLG Plan Making Manual - <http://www.pas.gov.uk/pas/core/page.do?pagelid=109798>

Statement of Representations Procedure

Title

Lewes District Local Plan Part 1: Joint Core Strategy – Proposed Submission Document.

Subject

The document will set out the strategic-level planning policies which will guide development in Lewes District (including the part of the district within the South Downs National Park) until 2030.

Period within which representations must be made

Representations can be made over a 10 week period, between **Friday 11th January and Friday 22nd March 2013**. Representations must be made by 4pm on the 22nd March. Please note that representations received after this date and time will not be accepted.

Representations can be made using the Representation Form available on the Lewes District Council website and can be sent via:

Email – ldf@lewes.gov.uk

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

Note: Although the Joint Core Strategy has been prepared in partnership with the South Downs National Park Association, the representations period is being administered by Lewes District Council and hence all representation need to be sent to the above address.

Request to be notified

Representations may be accompanied by a request to be notified at a specified address of any of the following:

- That the Joint Core Strategy has been submitted for independent examination
- That the recommendations of any person appointed to carry out an independent examination of the plan has been published
- That the Joint Core Strategy has been adopted.

Availability of Documents

The Joint Core Strategy – Proposed Submission Document and its supporting documents has been made available online at www.lewes.gov.uk/corestrategy.

The documents are also available for inspection at the Council's office at Southover House, Southover Road, Lewes, BN7 1AB and the National Park's office at Rosemary's Parlour, North Street, Midhurst, West Sussex, GU29 9SB. They have been made available in all of the libraries in Lewes District (Lewes, Newhaven, Ringmer, Peacehaven and Seaford) as well as libraries on the outskirts of the district in Haywards Heath, Burgess Hill, Saltdean and Uckfield. Opening times can be found below:

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

Mon	9.30am – 7pm
Tue	10.30am – 5pm
Wed	9.30am – 1pm
Thu	9.30am – 7pm
Fri	9.30am – 5pm
Sat	9.30am – 5pm

Newhaven Library, 16 High Street, Newhaven BN9 9PD

Mon		1.30pm – 5pm
Tue	9.30am – 12.30pm	1.30pm – 5pm
Wed	9.30am – 1pm	
Thu	10.30am – 12.30pm	1.30pm – 5pm
Fri		1.30pm – 5pm

Sat 9.30am – 4pm

Peacehaven Library, Meridian Centre, Peacehaven, BN10 8BB

Mon 9.30am – 1pm
Tue 9.30am – 5pm
Wed 9.30am – 1pm
Thu 9.30am – 7pm
Fri 10.30am – 5pm
Sat 9.30am - 4.30pm

Ringmer Library, Cecil Gates Room, Village Hall, Lewes Road, Ringmer, BN8 5QH

Tue 3pm – 6pm
Wed 9am – 12pm
Thu 1.30pm – 4.30pm

Temporary Seaford Library, Elm Court, Blatchington Road, Seaford, BN25 2AD

Mon 9.30am – 6pm
Tue 9.30am – 6pm
Wed 9.30am – 1pm
Thu 9.30am – 6pm
Fri 10.30am – 6pm
Sat 9.30am – 5pm

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

Mon 9.30am – 7pm
Tue 9.30am – 7pm
Wed 9.30am – 7pm
Thu 9.30am – 7pm
Fri 9.30am – 7pm
Sat 9.30am – 5.00pm

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

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

Saltdean Library, Saltdean Lido, Saltdean BN2 8SP

Tue 10am – 1pm 2pm – 7pm
Fri 10am – 1pm 2pm – 5pm
Sat 10am – 1pm 2pm – 4pm

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

Mon 9.30am – 1pm
Tue 9.30am – 5.30pm
Wed 9.30am – 7pm
Thu 9.30am – 5.30pm
Fri 10am – 7pm
Sat 9.30am – 4pm

Please note that we cannot take account of responses which are submitted to us confidentially as the public have the right to examine representations made. Only those representations made in writing or by e-mail, which arrive at the address specified within the specified consultation period will have a right to be considered.

Appendix 3 - Consultation Documents for the Core Strategy Focussed Amendment Consultation



Southover House
Southover Road
Lewes BN7 1AB
01273 471600
01273 484488 minicom
www.lewes.gov.uk

Dear Sir/ Madam

16 May 2014
Ref: 9328.33.7.24

Lewes District Planning Policy Consultations

Lewes District Council will be consulting on the following two planning documents between Friday 16th May and 16.00 Friday 11th July 2014.

1) Lewes District Local Plan Part 1: Joint Core Strategy Proposed Submission Document – Focussed Amendments

Lewes District Council, in partnership with the South Downs National Park Authority, has been preparing a plan that will, when adopted, set out the strategic policies to guide new development and change in the district for the period up to 2030. This plan will form Part 1 of the Lewes District Local Plan and is known as the Joint Core Strategy.

Between 11th January and 22nd March, 2013, a Proposed Submission version of the Core Strategy was published and representations were invited. It was expected that the Core Strategy would be submitted shortly afterwards for Examination in Public.

However, subsequent changes to the planning system led the two planning authorities to undertake further evidence work, which has resulted in some changes being made to the Proposed Submission Core Strategy. These changes are set out in full as tracked changes in the Joint Core Strategy - Proposed Submission Document: Focussed Amendments. For ease of reference the amendments are also highlighted in a separate *Schedule of Focussed Amendments* (including changes to policy wording and the more significant alterations) and a *Schedule of Minor Amendments* (including updated facts and figures, simple corrections/clarifications and other changes considered to be non-material).

Under regulation 19 of the Town and Country Planning Regulations, comments are now invited on the amendments contained in the Joint Core Strategy - Proposed Submission Document: Focussed Amendments.

Please note that we are unable to accept representations made after the deadline of 4pm on 11 July 2014.

All comments must be made in writing, preferably via the *Representation Form*. For details of how and where to send your representation, please see the attached *Statement of Representations Procedure*. This statement also contains details on where the Proposed Submission Document: Focussed Amendments and accompanying documents (including the Sustainability Appraisal) can be viewed. This includes on the Council's website (www.lewes.gov.uk/corestrategy) and at the Council offices, SDNPA South Downs Centre, and local libraries.

Please note that we cannot take account of representations that are submitted to us confidentially or anonymously and that all comments received during the representation period will be made public.

During this publication period, comments are only sought on the amendments that have been made to the Proposed Submission Document. Comments made during both the current representation period and the previous representation period will be submitted to and considered by a Government-appointed Planning Inspector during the Examination of the Joint Core Strategy. If you made representations on the original Proposed Submission document, which was published in January 2013, then there is no need to resubmit them during this representation period, unless you wish to alter or withdraw your representation in light of the amendments made.

2) Community Infrastructure Levy (CIL) Draft Charging Schedule

Lewes District Council intends to submit a Draft Charging Schedule for public examination, under Section 212 of the Planning Act 2008. In accordance with Regulation 16 of the Community Infrastructure Levy Regulations 2010 (as amended), Lewes District Council is inviting representations on its Draft Charging Schedule, which takes into account the comments received during previous consultations and sets out the proposed charging rates for liable development in the areas of the district outside of the National Park. Further details can be found on the Council's website (www.lewes.gov.uk/planning/20838.asp). **Please note, a specific representation form has been produced for the CIL consultation and can be found at the above link.**

If you have any queries please do not hesitate to contact us, either by emailing us at ldf@lewes.gov.uk or by telephoning (01273) 484417.

Yours sincerely

Lewes District Local Plan Part 1: Joint Core Strategy – Proposed Submission Document: Focussed Amendments Publication Stage Representation Form

Lewes District Council and South Downs National Park Authority are preparing a Core Strategy, a strategic planning document that will guide development in the district for the period up until 2030. Representations are invited on the Focussed Amendments document, a document that details changes that have occurred to the Proposed Submission version of the Core Strategy, which was consulted on between January and March, 2013.

Representations are only sought on the changes contained in the Focussed Amendments document and changes made to the Sustainability Appraisal. The changes to the Joint Core Strategy are referenced in the Schedule of Focussed Amendments and Schedule of Minor Amendments. Such representations will be sent to and considered by a Government-appointed Planning Inspector who will determine whether the Core Strategy is sound at an examination. Previous comments on the original Proposed Submission Document will also be forwarded to the Planning Inspector to be considered at the Examination.

The document and the associated schedules are available to view on the council's website (www.lewes.gov.uk/corestrategy) and paper copies are available to view at the Council's offices (Southover Rd, Lewes), local libraries, or at the South Downs Centre in Midhurst. The background reports informing the Core Strategy can also be found on the website. A guidance note has been produced to assist in completing this form.

Please note - representations must be received by 16.00 Friday 11 July 2014.

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

E-mail: ldf@lewes.gov.uk

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"/>
Telephone Number	<input type="text"/>	<input type="text"/>
Email Address	<input type="text"/>	<input type="text"/>

Part B – Please use a separate sheet for each representation

3. Please identify which of the following matters your comment relates to:

- (1) The Council's *Joint Core Strategy Focussed Amendments Document* and the accompanying *Schedule of Focussed Amendments and Schedule of Minor Amendments*
- (2) The Sustainability Appraisal (Incorporating a Strategic Environmental Assessment) Focussed Amendments
- (3) Other

Please identify the reference/paragraph number of the proposed change⁴:

4. Does your representation relate to a previous comment submitted for the Proposed Submission Core Strategy Consultation or previous consultation stages? If so has the Council satisfied your objection through the proposed changes?

Yes the Proposed Change meets a previous objection which I would now like to withdraw

No, the proposed change does not meet a previous objection

I did not submit any comments on the previous stage

5. With respect to the matters listed in Question 3, do you consider the consultation material you are commenting on is in accordance with/ is:

5.(1) The Duty to Cooperate Yes No

5.(2) Legal and procedural requirements Yes No

5.(3) Sound* Yes No

* For an explanation please refer to the accompanying Guidance Notes which can be found on the Lewes District Council website.

If you have entered 'No' to 5.(3), please continue to Q6. In all other circumstances, please go to Q7.

6. Do you consider the consultation material you are commenting on is unsound because it is not:

(1) Positively prepared

(2) Justified

(3) Effective

(4) Consistent with national policy

⁴ Amendment reference numbers are set out with each amendment in the *Schedule of Focussed Amendments* and *Schedule of Minor Amendments*.

7. Please give details of why you consider the consultation material not legally compliant or unsound, if that is the case. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Core Strategy, please also use this box to set out your comments.

(Use separate sheet if necessary)

8. Please set out what change(s) you consider necessary to make the consultation material legally compliant or sound, having regard to the test you have identified at Q6 above where this relates to soundness. You will need to say why this change will make the consultation material 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.

(Use separate sheet if necessary)

Please note: your representation should succinctly cover 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. **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.**

9. 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

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

(Use separate sheet if 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 Core Strategy for independent examination | <input type="checkbox"/> | Yes | <input type="checkbox"/> | No |
| (ii) The publication of the recommendations of the person appointed to carry out an examination of the Core Strategy | <input type="checkbox"/> | Yes | <input type="checkbox"/> | No |
| (iii) The adoption of the Core Strategy | <input type="checkbox"/> | Yes | <input type="checkbox"/> | 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.

The considerations in relation to the Core Strategy being 'Sound' are explained in the National Planning Policy Framework (NPPF) Paragraph 182. The NPPF can be found at:

<https://www.gov.uk/government/publications/national-planning-policy-framework--2>



Lewes District Local Plan Part 1: Joint Core Strategy – Proposed Submission Document: Focussed Amendments

Guidance note for making representations

1. Introduction

- 1.1 The Focussed Amendments Document contains a set of changes to the original Proposed Submission version of the Joint Core Strategy, which itself was published for a period of representation in January 2013. These guidance notes have been produced to assist anyone who wishes to make a formal representation on the Joint Core Strategy – Proposed Submission Document: Focussed Amendments.
- 1.2 When making a representation you will need to refer to the *Representation Form*, this guidance and the Proposed Submission Document: Focussed Amendments, as well as any background evidence you think is relevant to your representation. Further details on making a representation are included in the *Statement of Representations Procedure*, which can be found on the Lewes District Council website.
- 1.3 For ease of use, the amendments have also been set out in a *Schedule of Focussed Amendments* (including changes to policy wording and the more significant alterations) and a *Schedule of Minor Amendments* (including updated facts and figures, simple corrections and clarifications and other changes considered to be non-material). Both Schedules include reference numbers for the amendments to help you to clearly identify which amendment(s) you are making representations upon. The reference number should be included on the *Representations Form*.
- 1.4 **Representations are only sought on the changes introduced by the Proposed Submission Document: Focussed Amendments (identified in as tracked changes in the full document and set out for clarity in the accompanying *Schedule of Focussed Amendments* and *Schedule of Minor Amendments*).** Representations received within the representation period will be sent to and considered by a Government-appointed Planning Inspector who will determine whether the Core Strategy is sound at an Examination in Public.
- 1.5 **Please note** that all representations received on the Proposed Submission document (during the January – March 2013 consultation) will also be forwarded to the Planning Inspector to be considered at the Examination. As such, there is no need to resubmit representations made during the previous representation period, unless you wish to alter or withdraw your representation in the light of the amendments made.
- 1.6 Representations must be made between **16 May 2014 and 4pm on 11 July, 2014**. As well as being sent to the Planning Inspector, copies of all representations made on the Focussed Amendments will be available to view at the main Council offices (Southover Road, Lewes) and the SDNPA offices (South Downs Centre, Midhurst). These copies will be made available as soon as possible after the end of the representation period.
- 1.7 The Planning and Compulsory Purchase Act 2004⁵ (the 2004 Act) states that the purpose of the Examination is to consider whether the Core Strategy complies with legal requirements and is 'sound'. Therefore:
 - 3) If you are seeking to make representations on the way in which the District Council and National Park Authority have prepared the Core Strategy it is likely that your comments or objections will relate to a matter of legal compliance;

⁵ View the Planning Act online at <http://www.legislation.gov.uk/ukpga/2004/5/contents>

- 4) If it is the actual content on which you wish to comment on or object to, it is likely it will relate to whether the Core Strategy is positively prepared, justified, effective or consistent with national policy. The Core Strategy will need to meet all these tests for it to be considered 'sound'.

1.6 **Please note** that all respondents must complete their personal details (Part A of the *Representations Form*) as anonymous representations cannot be considered. Each separate representation respondents wish to make should be made on a separate copy of Part B of the *Representations Form*, indicating the amendment reference as set out in the *Schedule of Focussed Amendments* or *Schedule of Minor Amendments*. Representations should only concern 'legal compliance' or 'soundness' matters relating to the Joint Core Strategy – Proposed Submission Document: Focussed Amendments.

2. Legal Compliance

2.1 The Inspector will first check that the Core Strategy meets the legal requirements under s20(5)(a) of the 2004 Act, before moving on to test for soundness. You should consider the following before making a representation on legal compliance:

2.2 The Core Strategy should be in the current Local Development Scheme (LDS) and the key stages should have been followed. The LDS is effectively a programme of work prepared by the Local Planning Authority (LPA), setting out the Development Plan Documents it proposes to produce over a 3 year period. It will set out the key stages in the production of any DPDs which the LPA proposes to bring forward for independent examination. If the Core Strategy is not in the current LDS it should not have been published for representations. The LDS is available online at the following link:

www.lewes.gov.uk/Files/plan_Revised_LDS_February_2012.pdf

2.3 The process of community involvement for the Core Strategy should be in general accordance with the Council's and National Park Authority's Statements of Community Involvement (SCI). The SCI is a document that sets out a strategy for involving the community in the preparation and revision of Local Development Documents and the consideration of planning applications. The respective SCIs can be viewed via the following links:

www.lewes.gov.uk/Files/plan_AdoptedSCI.pdf

www.southdowns.gov.uk/_data/assets/pdf_file/0004/418963/Statement-of-Community-Involvement-first-revision-Jan-2014.pdf

2.4 The District Council and National Park Authority has a 'duty to cooperate' to work with neighbouring authorities and bodies when preparing land use planning documents such as the Core Strategy.

2.5 The Core Strategy should comply with the Town and Country Planning (Local Planning) (England) Regulations 2012. On publication, the LPA must publish the documents prescribed in the regulations, make them available at their principal offices (and anywhere else considered appropriate), and published on the Council's website. The LPA must also notify various consultees (as set out in the regulations) and any persons who have requested to be notified.

2.6 The LPA is required to provide a Sustainability Appraisal Report when a DPD is published. This should identify the process by which the Sustainability Appraisal has been carried out, and the baseline information used to inform the process and the outcomes of that process. Sustainability Appraisal is a tool for appraising policies to ensure they reflect social, environmental, and economic factors.

3. Soundness

3.1 In accordance with the National Planning Policy Framework 2012, to be considered 'sound' the Core Strategy should be:

Positively prepared

3.2 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

3.3 The plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence. These alternatives should be realistic and the subject of sustainability appraisal and consultation. The Core Strategy should show how the policies and proposals help to ensure that the social, environmental, economic and resource use objectives will be achieved.

Effective

3.4 This means the Core Strategy should be deliverable over its period, embracing elements such as:

- Sound infrastructure delivery planning;
- Having no regulatory or national planning barriers to delivery;
- Delivery partners in agreement that the Plan is realistic and achievable; and
- Based on effective joint working on cross-boundary strategic priorities.

3.5 The Core Strategy should also be flexible and able to be monitored. The Core Strategy should indicate who will be responsible for making sure that the policies and proposals happen and when they will happen. The plan should be flexible to deal with changing circumstances, which may involve minor changes to respond to the outcome of the monitoring process or more significant changes to respond to problems such as lack of funding for major infrastructure proposals. Although it is important that policies are flexible, the Core Strategy should make clear that major changes may require a formal review including public consultation.

3.6 Any measures that the Council has included to make sure that targets are met should be clearly linked to an Authority Monitoring Report. This report must be produced each year by all local authorities and will show whether the Core Strategy needs amendment.

Consistent with national policy

3.7 Where there is a departure from national policy, LPAs must provide clear and convincing reasoning to justify their approach. Conversely, you may feel the LPA should include a policy or policies which would depart from national or regional policy to some degree in order to meet a clearly identified and fully justified local need, but they have not done so. In this instance it will be important for you identify what local circumstances you consider would justify a different policy approach to that in national policy and to support your assertion with evidence.

3.8 If you think the content of the Core Strategy is not sound because it does not include a policy where it should do, you should go through the following steps before making representations:

5. Is the issue with which you are concerned already covered specifically by national planning policy? If so it does not need to be included.
6. Is what you are concerned with covered by any other policies in the Core Strategy on which you are seeking to make representations or in any other DPDs in the LPA's Local Plan. There is no need for repetition between documents in the Local Plan.

7. If the policy is not covered elsewhere, in what way is the Core Strategy unsound without the policy?
8. If the Core Strategy is unsound without the policy, what should the policy say?

4. General advice

4.1 If you wish to make a representation seeking a change to all/part of the Core Strategy you should make clear in what way all/part of the Core Strategy is not sound, having regard to the legal compliance check and the four tests set out above. You should try to support your representation by evidence showing why the Core Strategy should be changed. It will be helpful if you also say precisely how you think the Core Strategy should be changed.

4.2 Representations 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 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.

4.3 Where there are groups who share a common view on how they wish to see the Core Strategy changed, it would be very helpful for that group to send a single representation which represents the view, rather than for a large number of individuals to send in separate representations which repeat the same points. In such cases the group should indicate how many people it is representing and how the representation has been authorised.

4.4 Further detailed guidance on the preparation, publication and examination of Local Plans is provided in the National Planning Policy Framework, which can be found at the following link: www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

Statement of Representations Procedure

Title

Lewes District Local Plan Part 1: Joint Core Strategy – Proposed Submission Document: Focussed Amendments.

Subject

The document will set out the strategic-level planning policies which will guide development in Lewes District (including the part of the district within the South Downs National Park) until 2030. The Focussed Amendments Document contains modifications made to the original Proposed Submission Document since it was subject to a period of representation in January – March 2013.

Period within which representations must be made

Representations can be made over an 8 week period, between **Friday 16 May 2014 and 16.00 on Friday 11 July 2014**. We cannot accept any representations made after this time.

Representations can be made using the Representation Form available on the Lewes District Council website and can be sent via:

Email – ldf@lewes.gov.uk

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

Request to be notified

Representations may be accompanied by a request to be notified at a specified address of any of the following:

- That the Joint Core Strategy has been submitted for independent examination
- That the recommendations of any person appointed to carry out an independent examination of the plan has been published
- That the Joint Core Strategy has been adopted.

Availability of Documents

The Joint Core Strategy – Proposed Submission Document: Focussed Amendments and its supporting documents is available online at www.lewes.gov.uk/corestrategy.

The documents are also available for inspection at the Council's office at Southover House, Southover Road, Lewes, BN7 1AB and the National Park's office at the South Downs Centre, North Street, Midhurst, West Sussex, GU29 9DH. They have been made available in all of the libraries in Lewes District (Lewes, Newhaven, Ringmer, Peacehaven and Seaford) as well as libraries on the outskirts of the district in Haywards Heath, Burgess Hill, Saltdean and Uckfield. Opening times can be found below:

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

Mon	9.30am – 7pm
Tue	10.30am – 5pm
Wed	9.30am – 1pm
Thu	9.30am – 7pm
Fri	9.30am – 5pm
Sat	9.30am – 5pm

Newhaven Library, 16 High Street, Newhaven BN9 9PD

Mon		1.30pm – 5pm
Tue	9.30am – 12.30pm	1.30pm – 5pm
Wed	9.30am – 1pm	
Thu	10.30am – 12.30pm	1.30pm – 5pm
Fri		1.30pm – 5pm

Sat 9.30am – 4pm

Peacehaven Library, Meridian Centre, Peacehaven, BN10 8BB

Mon 9.30am – 1pm
Tue 9.30am – 5pm
Wed 9.30am – 1pm
Thu 9.30am – 7pm
Fri 10.30am – 5pm
Sat 9.30am – 4.30pm

Ringmer Library, Cecil Gates Room, Village Hall, Lewes Road, Ringmer, BN8 5QH

Tue 3pm – 6pm
Wed 9am – 12pm
Thu 1.30pm – 4.30pm

Temporary Seaford Library, Elm Court, Blatchington Road, Seaford, BN25 2AD

Mon 9.30am – 6pm
Tue 9.30am – 6pm
Wed 9.30am – 1pm
Thu 9.30am – 6pm
Fri 10.30am – 6pm
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 10am – 4pm

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

Saltdean Library, Saltdean Lido, Saltdean BN2 8SP

Tue 10am – 1pm 2pm – 7pm
Fri 10am – 1pm 2pm – 5pm
Sat 10am – 1pm 2pm – 4pm

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

Mon 9.30am – 1pm
Tue 9.30am – 5.30pm
Wed 9.30am – 7pm
Thu 9.30am – 5.30pm
Fri 10am – 7pm
Sat 9.30am – 4pm

Appendix 4 – List of Statutory Consultees on the Consultation Database

East Sussex County Council
Brighton and Hove City Council
Wealden District Council
Mid Sussex District Council
West Sussex County Council
The Coal Authority
Environment Agency
Sussex Police
Natural England
Department of Transport
NHS High Weald Lewes Havens CCG
Southern Water
Southern Electric
UK Power Networks
Southern Gas Networks
South Downs National Park Authority
AMEC (on behalf of the National Grid)
Historic Buildings and Monuments Commission (English Heritage)
British Telecom
Cable and Wireless
Hutchinson G3 UK Ltd
Mobile Operators Association
02 UK Ltd
Orange Personal Communications Ltd
T-Mobile
Virgin Media
Vodafone Ltd
Home and Communities Agency
East Sussex County Council
Highways Agency
Network Rail
British Telecom
South East Water
South East Water
The Mayor of London
The Civil Aviation Authority
Office of Rail Regulation
Transport for London
Marine Management Organisation
NHS Property Services
Local Nature Partnership

Coast 2 Capital
South East Local Enterprise Partnership
NHS England
High Weald Lewes Havens CCG
Eastbourne, Hailsham & Seaford CCG

Appendix 5 – List of Town and Parish Councils within and neighbouring Lewes District on the Consultation Database

Lewes District

Barcombe Parish Council
Chailey Parish Council
Ditchling Parish Council
East Chiltington Parish Council
Falmer Parish Council
Firle Parish Council
Glynde And Beddingham Parish Council
Hamsey Parish Council
Iford Parish Meeting
Kingston Parish Council
Lewes Town Council
Newhaven Town Council
Newick Parish Council
Peacehaven Town Council
Piddinghoe Parish Council
Plumpton Parish Council
Ringmer Parish Council
Rodmell Parish Council
Seaford Town Council
South Highton Parish Council
Southeast Parish Meeting
St Ann (Without) Parish Meeting
St John (Without) Parish Meeting
Streat Parish Meeting
Tarring Neville Parish Meeting
Telscombe Town Council
Westmeston Parish Council
Wivelsfield Parish Council

Wealden District

Alciston Parish Meeting
Little Horsted Parish Council
Laughton Parish Council
Selmeston Parish Meeting
Alfriston Parish Council
Fletchling Parish Council
Chalvington with Ripe Parish Council
Cuckmere Valley Parish Council

Mid Sussex District

Pycombe Parish Council

Hassocks Parish Council

Burgess Hill Town Council

Ansty and Staplefield Parish Council

Haywards Heath Town Council

Lindfield Rural Parish Council

Horsted Keynes Parish Council

Isfield Parish Council

Rottingdean Parish Council