

Lewes District Local Plan Part 1

Joint Core Strategy Submission Document

Regulation 22 Consultation Statement Proposed Modifications Addendum

October 2015



Lewes District Council



South Downs

National Park Authority

1. Introduction

- 1.1 Lewes District Council and the South Downs National Park Authority (SDNPA), working in partnership, have prepared a plan that will, once adopted, provide the strategic planning policy framework to guide new development and change in Lewes district for the period up to 2030. This document is known as the Joint Core Strategy (JCS) and will form Part 1 of the Lewes District Local Plan.
- 1.2 This addendum report¹ provides a summary of the process of publication and consultation undertaken for the Proposed Modifications to the Submission Joint Core Strategy. For information regarding earlier consultations on the JCS, the main report should be referred to.
- 1.3 This document sets out how the consultation was carried out, including who was notified, how the consultation documents were made available and the publicity/notification that took place. It also provides a summary of the representations received for each proposed modification. The Planning Inspector examining the JCS, appointed by the Secretary of State, will consider the duly made representations when considering the proposed main modifications for any resumed hearings and in his Final Report. LDC and SDNPA will consider the merits of any representations received on additional/minor modifications for inclusion in the adoption version of the JCS in due course. The Planning Inspector can only deal with the main modifications.

2. Proposed Modifications to the Submission Joint Core Strategy

2.1 Introduction

- 2.1.1 The Joint Core Strategy was submitted for examination in September 2014. Examination hearings took place in January 2015, followed by the publication of the Inspector's Initial Findings letter in February 2015. In the spring 2015 LDC and SDNPA drafted Proposed Main and Additional Modifications in response to both the Inspector's Initial Findings and the discussions at the examination hearings. The proposed modifications were agreed for publication and consultation by both authorities in July 2015. They were then published on 7 August 2015 and the ensuing consultation ran for 8 weeks to 2 October 2015.

Who was invited to make representations?

- 2.1.2 A letter (see Appendix 1) or email alert notifying of the dates of the consultation, how comments could be submitted and where the Proposed Modifications and supporting documents could be viewed was sent to everyone on the core strategy 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 information about the consultation.

Availability of the Proposed Modifications consultation documents

¹ This report is an addendum to the Regulation 22 Consultation Statement September 2014, which was published on Submission of the JCS http://www.lewes.gov.uk/Files/plan_Consultation_Statement_Submission.pdf

2.1.3 The schedules of Proposed Modifications and supporting documents were published on the Council's examination website (www.lewes.gov.uk/corestrategyexamination) along with the Sustainability Appraisal Addendum, Representation Form, Statement of Representations Procedure and accompanying guidance notes. Details of the consultation, together with a link to the examination webpage, were also publicised on the South Downs National Park Authority website (<https://www.southdowns.gov.uk/planning/planning-policy/joint-working/lewes-district-joint-core-strategy/>). Hard copies of these documents were also placed in the Council's main 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 also remained available on the Council's examination website.

Summary of the Consultation Process

Representations received on the Proposed Modifications

2.1.4 A total of 322 representations were received on the Proposed Modifications, primarily via email, with some respondents submitting multiple representations. The majority of respondents were members of the public. The majority of representations relate to MM05 Old Malling Farm, including a number of identical cut-out-and-send objection coupons that had been printed in the local newspaper and a petition.

Use of Social Media

2.1.5 In addition to the email and letter notifications (paragraph 2.1.2) and publication on the LDC and SDNPA websites, LDC's Twitter account was used to advertise the consultation and included a link to where the consultation documents could be found on the examination webpage.

Summary of Representations Received

2.1.6 A summary of comments made on the Proposed Modifications is set out below, identifying in brief the main issues raised by respondents. Every effort has been made to categorise the representations accurately. General comments that were not specific to the proposed main or additional modifications have been included in the *Other Comments* table and this includes comments made on other supporting consultation documents. However, some general supporting arguments to representations made on the specific modifications have also been included in the Proposed Modifications table below. All representations received during this consultation have been sent to the Inspector undertaking the Joint Core Strategy examination.

Consideration of Representations

2.1.7 The Inspector will consider all duly made representations received on the proposed Main Modifications, including through any resumed examination hearings, before preparing his Final Report.

2.2 Summary of Representations on the Proposed Main Modifications (Schedule 3)

Reference No.	Respondents on this policy (reference number in brackets)	Summary of the main issues raised
MM01	<p><u>Support</u> Jess Price, Sussex Wildlife Trust (REP/473) Sarah Martin, Exigo Project Solutions (REP/497) Mike Pickup, Town and Country Planning Solutions (REP/273)</p> <p><u>Object / amendments</u> Thomas Rumble, Woolf Bond Planning (REP/328) Bob Webzell (REP/366) Andy Meader, Pegasus Group (REP/501) Sophie Jamieson, Barton Wilmore (REP/290) Sigma Planning (REP/330) Andrew Munton, Reside (REP/550) Jonathan Lieberman, Boyer (REP/560) David Lock Associates (REP/563) Julia Foster, David Lock Associates (REP/563)</p>	<p><u>Support</u></p> <ul style="list-style-type: none"> • Question whether the district’s natural capital can support the increased level of development but support the plan led system to resist the damage from inappropriate development and consider the increase in housing to be preferable to the JCS failing, subject to thorough assessment of ecological value of sites prior to planning permission being granted. • Support the increased housing target to 6,900 and in particular that this is a minimum that will not result in a cap on development. • The plan could be made ‘more sound’ by increasing the housing figure to minimum 7,500. <p><u>Object / amendments sought</u></p> <ul style="list-style-type: none"> • All proposed strategic sites should be allocated in full. • Plans fail to take commuting patterns and capacity of existing infrastructure into account. • This amendment cites the Inspector’s minimum requirement verbatim. • The increase does not go far enough to meet demand in the district. • Without identifying enough sites to meet full OAN the plan is unsound as not positively prepared and inconsistent with national policy. • More sites for housing should be identified, focusing on sustainable sites within settlement boundaries. • Newlands School site could be allocated together with council-owned sites in order to get closer to OAN and provide more than twice the number of dwellings for Seaford than the plan seeks to allocate. • While the housing target has been revised in line with the Initial Findings, the significant housing shortfall is not sufficiently justified. • Sites that area suitable, available and achievable in the SHLAA 2014 should be included, including 4 such sites at Plumpton Green, in order to increase the housing target further.

		<ul style="list-style-type: none"> • 6,900 does not meet OAN and there is no agreement from neighbouring authorities to meet the shortfall. Every opportunity to meet the shortfall should be taken. Land North of Beechwood Lane, Cooksbridge is concluded suitable, available and achievable in the SHLAA for 23 units. • The plan does not deal adequately with employment growth or affordable housing. • Council has no intention of delivering as many dwellings as it can as it has refused applications outside the settlement boundary that were suitable, available, achievable in the SHLAA. • Newick is a rural service centre and land at Mitchelswood Farm is available for up to 63 houses without the need for a SANG. • Not providing enough housing will push up house prices and make the housing crisis worse. • Cannot simply give up on meeting housing need. • Ministerial encouragement to get plans adopted is no answer to the requirements of the NPPF. • The five year target cannot be treated as a minimum if the annual requirement is not a minimum so five year supply cannot be seen as a ceiling. • The plan should acknowledge the level of OAN for housing and affordable housing in the district and commit to delivering all suitable and appropriate sites that area realistically deliverable in sustainable locations. • The plan should set out how the LPA will seek to meet OAN. • The minimum target should reflect full SHLAA capacity. • Acknowledge that this is merely an ‘interim’ solution until a detailed proposal for meeting the shortfall is agreed.
MM02	<p><u>Support</u> Peter Rose (REP/340) Jess Price, Sussex Wildlife Trust (REP/473) Sarah Martin, Exigo Project Solutions (REP/497) Mike Pickup, Town and Country Planning Solutions</p>	<p><u>Support</u></p> <ul style="list-style-type: none"> • General support for amendments. • Question whether the district’s natural capital can support the increased level of development but support the plan led system to resist the damage from inappropriate development and consider the increase in housing to be preferable to the JCS failing, subject to thorough assessment of ecological value of sites prior to planning permission being granted. • Support the increased windfall allowance but

<p>(REP/273) Craig Noel, Strutt and Parker (REP/286) Brighton and Hove City Council (REP/001)</p> <p><u>Object / amendments</u> Thomas Rumble, Woolf Bond Planning (REP/328) June Marsh (REP/335) Bob Webzell (REP/366) Andy Meader, Pegasus Group (REP/501) Erik J van Vessem (REP/504) Sophie Jamieson, Barton Wilmore (REP/290) Christine Tutt David Tutt (REP/058) Graham Beck, Luken Beck (REP/294) Sigma Planning (REP/330) Nick Sutton (REP/222) Newhaven Town Council (REP/016) Andrew Munton, Reside (REP/550) Jo Hanslip, Urbanissta (REP/327) F A Perris (REP/037) Brighton and Hove City Council (REP/001) Henry Dodson, H G Dodson (REP/314) Steven Brown, Woolf Bond (REP/561) Jonathan Lieberman, Boyer (REP/560) Julia Foster, David Lock</p>	<p>this should also be a 'minimum'.</p> <ul style="list-style-type: none"> • Agree Land at Bishops Lane should be an 'unconstrained' strategic allocation. • The plan could be made 'more sound' by increasing the housing figure to minimum 7,500. • Support the inclusion of Lower Hoddern Farm to deliver 450 at Peacehaven and Telscombe. • The increased housing target is welcomed and will lead to some reduction in the shortfall in housing provision in the wider sub-region. • The inability to meet OAN is a sub-regional issue and can only be resolved in the medium to long term through effective Duty to Co-operate at a strategic level. • BHCC, LDC [and SDNPA] are members of the Coastal West Sussex and Greater Brighton Strategic Planning Board which facilitates joint working on the strategic priorities of the area, including housing and employment. • BHCC strongly supports the requirement for a number of transport and travel related measures to promote and provide options for journeys on the A259 and other distributor roads to the west. <p><u>Object / amendments sought</u></p> <ul style="list-style-type: none"> • All proposed strategic sites should be allocated in full. • Plans fail to take commuting patterns and capacity of existing infrastructure into account. • The numbers to be allocated across the district do not add up to 6,900 (32 short). • Seaford has more capacity for allocations than 185, so could get closer to OAN. • Bishops Lane should not be designated as 'strategic' but should remain a contingency site, planning applications have twice been refused and a Secretary of State decision is awaited. • While the housing target has been revised in line with the Initial Findings, the significant housing shortfall is not sufficiently justified. • Sites that area suitable, available and achievable in the SHLAA 2014 should be included, including 4 such sites at Plumpton Green, in order to increase the housing target further. • The caveat about Ringmer Neighbourhood Plan should not be struck out. • The numbers for Ringmer have arbitrarily gone
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	<p>Associates (REP/563)</p>	<p>up much more than for Newick. Ringmer has problems for primary school places, traffic and sewerage that would be exacerbated by further early development.</p> <ul style="list-style-type: none"> • The Land at Old Malling Farm figure appears set at 200 but the SHLAA indicates 225. This should be changes to ‘approximately 225 net additional units’ or ‘a minimum of 225 net additional units’ to be consistent with the site allocation policy wording. • Land North of Beechwood Lane is suitable, available and achievable in the SHLAA so the figure for Cooksbridge should be increased. • Agree with the objections of North Ringmer Residence Group to increased development in Ringmer – Bishops Lane is totally unsuitable for housing. • Clarity is required on the number of homes for Newhaven – SP2 states minimum 400 but Table 5 identifies 424 for subsequent allocation. • The level of housing that can be achieved at North Chailey has been underestimated so the minimum target should be increased. • 5 year supply position, including completions and commitments data needs review. • The plans for Newhaven and the Coastal strip are flawed by a lack of transport infrastructure strategy. • It is essential that bus route 14 along the A259 is improved. • Some amended policy wording is suggested to include other local distributor roads, not just A259. • Capacity is not limited in Cooksbridge and more should be identified to support new community services such as a car park, enhanced rail services and school expansion. • The inclusion of MM05 indicates less weight being given to landscape issues. Cooksbridge is not affected by elevated views from the downs. • The plan fails to provide the necessary flexibility in housing supply and additional sites, such as Broyle Gate Farm, Ringmer, should be allocated. • A 20% buffer should be applied due to undersupply since 2010. • Demonstrating a 5 year supply is a matter of soundness and so building in as much flexibility as possible is essential. • Some land included in the 1 April 2015 five year
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		<p>supply position is not currently available.</p> <ul style="list-style-type: none"> • Additional sites should be allocated to provide more flexibility and sites of less than 100 units should be allocated in the JCS. • Wivelsfield Green is a sustainable ‘service village’ and could accommodate at least 100 additional houses. • The plan will fall substantially short of OAN, rely on windfall. • The minimum settlement targets actually reflect a judgement about maximum capacity. • It’s unacceptable to have a ‘floating’ 207 units for which no provision is made in the plan. • Loss or rural character is afforded too much weight and the need for homes and the needs of rural areas too little. • Mitchelswood Farm is a sustainable location to deliver more homes in Newick without the needs for SANGS and SAMMS. • The full potential for villages to accommodate growth should be included. • All suitable, available and achievable sites should be identified either through Neighbourhood Plans or the Local Plan process.
MM03	<p><u>Support</u> Peter Rose (REP/340) Mike Pickup, Town and Country Planning Solutions (REP/273) Craig Noel, Strutt and Parker (REP/286)</p> <p><u>Object / amendments</u> Thomas Rumble, Woolf Bond Planning (REP/328) Andy Meader, Pegasus Group (REP/501) Erik J van Vessem (REP/504) Graham Beck, Luken Beck (REP/294) Sigma Planning (REP/330) Andrew Munton, Reside (REP/550)</p>	<p><u>Support</u></p> <ul style="list-style-type: none"> • General support for amendments. • All proposed strategic sites should be allocated in full. • Support the modifications but the plan could be made ‘more sound’ by increasing the housing figure to minimum 7,500. • Support the inclusion of Lower Hoddern Farm to deliver 450 at Peacehaven and Telscombe • <p><u>Object / amendments sought</u></p> <ul style="list-style-type: none"> • It’s not clear why the figures in the ‘housing to be delivered through subsequent allocations’ differs marginally from the numbers in MM02, eg 184 in the table for Seaford but 185 in MM02. • More capacity is available in Seaford, including Newlands School and the Buckle. • If there is insufficient certainty on numbers to specifically allocate these sites then the windfall allowance should be significantly increased. • There is no justification to increase the houses for Ringmer to 385 as 265 is more than adequate as is clear in the Ringmer neighbourhood plan.

	<p>Jo Hanslip, Urbanissta (REP/327) Jonathan Lieberman, Boyer (REP/560) Julia Foster, David Lock Associates (REP/563)</p>	<ul style="list-style-type: none"> • The proposed modifications are contrary to the Localism Act 2011 because they impose on the local community development that should be in the hands of local people. • In the current strategy on ‘numbers’ are important yet it involves real communities and people are being ignored. • A further 216 dwellings will need to be allocated to meet the minimum figure and this could be covered by increasing Old Malling Farm to 225 dwellings. • 25 dwellings at Covers Yard, Cooksbridge has been granted so the commitments should be increased to 28. The SHLAA shows further capacity at Cooksbridge so the note at the bottom of Table 5 can be deleted. • The level of housing that can be achieved at North Chailey has been underestimated so the minimum target should be increased. • 5 year supply position, including completions and commitments data needs review. • Wivelsfield Green is a sustainable ‘service village’ and could accommodate at least 100 additional houses. • The full potential of the villages should be included. • Newick requirement should increase to at least 163 homes.
MM04	<p><u>Support</u> Historic England (REP/559)</p> <p><u>Object / amendments</u> Vanessa Newman (REP/341) Jess Price, Sussex Wildlife Trust (REP/473) Jo Hanslip, Urbanissta (REP/327)</p>	<p><u>Support</u></p> <ul style="list-style-type: none"> • Support as regards the addition of a reference to cultural heritage. <p><u>Object / amendments sought</u></p> <ul style="list-style-type: none"> • The policy does not support affordable housing. • The proposal does not promote localism. • The policy would benefit from criteria for net gains in biodiversity and green infrastructure. • 5 year supply position, including completions and commitments data needs review.

MM05	<p><u>Support</u> Christopher Nye (REP/386) Jess Price, Sussex Wildlife Trust (REP/473) Graham Beck, Luken Beck (REP/294)</p> <p><u>Object / amendments</u> Sue Fasquelle (REP/333) Dr. O. Darlington (REP/334) Celia Wenham (REP/336) Neil Merchant (REP/337) Elizabeth Banner (REP/338) Vanessa Newman (REP/341) Audrey Jarvis (REP/342) Linda Hussey (REP/343) Jane Curry (REP/344) Janette Watkins (REP/345) V. Lenihan (REP/346) James Dandridge (REP/347) Duncan Fuller Natasha Fuller (REP/348) Birgitt van der Matten (REP/349) S. Clark (REP/350) Roger van der Matten (REP/351) Liz Costigan (REP/352) Ros Soulsby (REP/353) Graham Parks (REP/354) Terry Squires (REP/355)</p>	<p><u>Support</u></p> <ul style="list-style-type: none"> • General support for the amendments. • Strongly support criteria iii, iv, and x. • Support the allocation of Old Malling Farm, request some alterations to the policy wording. <p><u>Object / amendments sought</u></p> <ul style="list-style-type: none"> • The proposal will have detrimental impact on the countryside and the purpose of the National Park. • The site was included in the National Park for good reasons. • The proposal will adversely affect land of high agricultural quality. • The proposal will adversely affect existing wildlife quality and diversity. • The proposal does not take into account flooding. • Plans fail to take commuting patterns and capacity of existing infrastructure, including roads, sewers, schools and health services) into account. • There would be a significant increase in traffic and local roads are already facing congestion due to the proposed expansion of the Sussex Police HQ. • Plans fail to make provision for supporting services (shops, surgeries, etc.) • The development would exacerbate the existing parking problem on the estate. • Plans fail to make provision for suitable amenity space. • Plans fail to make sufficient reference to provision of utilities. • Development risks decreasing value of existing dwellings. • Development could cause harm to health of existing residents. • Development risks adversely impacting a conservation area of historic importance. • Development of this site may set unwanted precedent. • Development will increase light pollution. • Development will increase noise pollution. • Development would adversely affect the setting of the Ouse Valley and iconic views including from elevated positions on the Downs • Housing should go on brownfield land not a greenfield site, which together with the Downs helps make Lewes special.
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	<p>Alex Squires (REP/356)</p> <p>Daniel Etherington (REP/357)</p> <p>C.F. Colbran S. Colbran (REP/358)</p> <p>Penelope Lower (REP/360)</p> <p>Gabriel Sullivan-Fllint (REP/361)</p> <p>B.M. O’Connell (REP362)</p> <p>Roger Hargreaves (REP/363)</p> <p>Kim Hewson (REP/364)</p> <p>P. Vinall Willie Robb (REP/367)</p> <p>Sarah Hunniset (REP/373)</p> <p>Martyn Sullivan (REP/368)</p> <p>Alexandra Cromby (REP/369)</p> <p>Phillip Rees (REP/370)</p> <p>Katie Masters (REP/371)</p> <p>Leonora Mannering Robin Mannering (REP/372)</p> <p>Rosaleen Hughes (REP/394)</p> <p>Celia Wenham (REP/336)</p> <p>Gillian New (REP/393)</p> <p>John Stockdale (REP/013)</p> <p>Hilda Heap (REP/392)</p> <p>Margarita Hanlon (REP/391)</p> <p>Michael Robins (REP/390)</p> <p>Madalene Harmer (REP/389)</p> <p>Stephanie Shepherd (REP/388)</p>	<ul style="list-style-type: none"> • Once built on the greenfield will be lost for future generations. • Contrary to NPPF 109, 112, 115 and 118. • The site has a strong rural and tranquil character that would be lost. • This site is only being considered as an easy option to meet government targets for new housing. • Scenic features and wildlife are more important to Lewes and the SDNP than new houses which could be built elsewhere. • There is a need for affordable housing in town but other areas of the town could be developed for this purpose without destroying the natural beauty of this area. • The natural environment in the area cannot support the additional walkers and dog walking that would result. • One Inspector should not put forward a site against the judgement of the Local authorities and local opinion. • Sites should be chosen through a Neighbourhood Plan so local people can input. • Housing numbers are becoming overheated in the south east. There will always be a demand for housing in Lewes no matter how much is built. • Buy to let will continue to push up prices for normal house buyers. • There is no guarantee that 50% affordable housing will be achieved. • Congestion at Earwig Corner, Church Lane and on Malling Hill is already an issue and is causing health problems to residents. • There should be a dedicated route to the site. • There is too much reliance on S106 for infrastructure provision. • There are no local facilities in the area or facilities for young people and the bus service to the town centre is only hourly except in the morning and early evening. • The building works will be disruptive to local residents. • The proposal is negatively affecting nearby house prices. • The site is disconnected from the existing Malling community. • The development would put pressure on school places. • The site is a long walk from the town centre and
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	<p>Emma Gilling (REP/387)</p> <p>Joanna and Mark Bentley (REP/385)</p> <p>Mary-Jane Wilkins (REP/384)</p> <p>Karina Pullan (REP/383)</p> <p>Anya Robins (REP/381)</p> <p>Daniel Morriss (REP/379)</p> <p>Francis Morriss (REP/378)</p> <p>Charles Brown (REP/377)</p> <p>Paul Cullen (REP/376)</p> <p>Robert Cheesman (Friends of Lewes) (REP/300)</p> <p>S Clark (REP/350)</p> <p>Steve Anker (South Downs Society) (REP/326)</p> <p>Stephanie Hirschman (REP/140)</p> <p>Victoria Short (REP/412)</p> <p>Joanne Stovold (REP/418)</p> <p>Caroline Petty (REP/419)</p> <p>Angela Courtnage (REP/420)</p> <p>Karl Brydon (REP/421)</p> <p>Joanne Barrow (REP/457)</p> <p>Mr T Cunliffe (REP/458)</p> <p>Liz and Mick Greenwood (REP/410)</p> <p>Mrs J S Gurr (REP/459)</p> <p>S Maskew (REP/460)</p> <p>D Pratley (REP/461)</p> <p>David Evans</p>	<p>so would encourage car travel.</p> <ul style="list-style-type: none"> • The first hearing about OMF was carried out without notifying local residents. If this had been a planning application local residents would have been advised. • The decision to include the site has been made without understanding of local residents views and the project has been kept deliberately low profile. • Anything over 7% affordable housing is not feasible. • Lewes is the gateway to the SDNP and by rail from the north this is through countryside, the development would result in the railway being overlooked by houses. • The Meridian field and adjacent areas are proposed as a 'sweetener'. The proposed bridges across the river and additional footpaths etc would ruin the tranquillity. • SDNPA is in the ridiculous position of being forced to include the site and not being able to argue against it. • Monks Way is impassable in ice and snow and would be the only way in/out of the development. • Development will affect the flood risk of existing housing in Monks Way and Mantell Close. • The development could affect the setting of the Malling Deanery Conservation Area and undermine its secluded village character. • The site will have been part of the original College of Benedictine Canons and was suggested as an extension to the boundary of the CA to include the Saxon remains at Malling Farmhouse. • There are other more sustainable options for development, such as Newlands School in Seaford. • The development criteria viii and ix should be strengthened to enhance overall biodiversity and the Malling Disused Railway SNCI. • The number should be raised to approximately 225 dwellings. • The 6.6ha developable area should be deleted. • 40% affordable housing is deliverable, 50% is not. • There is no evidence that development should be restricted to above the 10m contour and further than 20m from the western and
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	<p>(REP/462) V Ransome (REP/395) D G Glen (REP/396) Graham and Beverley Knight (REP/397) Mrs L Rayner (REP/398) Dr Hannah Baxter (REP/375) Mr and Mrs Champion (REP/399) JA Burke (REP/400) Steve Sorrell (REP/401) Richard Sachs (REP/402) Joyce Cecile Ord (REP/403) Karin Polden (REP/404) Oliver Callf and Sarah Hunnisett (REP/373) Stephen W. Green (REP/405) Timothy J Carrol (REP/406) Cynthia Williams (REP/080) Mrs F Fielder (REP/407) John Turner (REP/408) Paul Tucker (REP/409) Michael Greenwood (REP/410) Miss I Johnson (REP/411) Victoria Short (REP/412) B J Lopez (REP/413) Mick Murphy (REP/414) B D Atkin (REP/415) E C Wilson</p>	<p>southern field.</p> <ul style="list-style-type: none"> • Criterion iii should be changed to say that the southern field density is 'likely to be' of a lower density than other parts of the site. • Clarification is needed on criterion vi including the requirement to protect and enhance views. • No land outside the indicated site boundary has been considered directly or indirectly as part of development proposals in the JCS process. There is no public access whatsoever. • Criterion x should be deleted. • The first sentence of xiv should be deleted rather than assume trial trenching will be required. • REP/555 includes a petition against development. • Lewes is the largest town in a national park and so we don't need to make it even larger. • How does the national push for housebuilding sit with the legal purposes of the national park? If this is forced on SDNPA how can they carry out their statutory purposes? • The case has not been put strongly enough to override the inclusion of this land in the national park. • The junction of Old Malling Way and Church Lane must be dealt with. • Parking in the town must be improved. • It is outside existing edge of development i.e. it is green belt. • Lewes has considerable potential to deliver housing through office to residential conversions which haven't been identified through the SHLAA approach. • This would be the largest greenfield development ever in a national park. • At the April 2015 site visit the Inspector saw that the site was more sensitive than he had previously realised and he should not have stated in February 2015 that there was a strong case for allocating the site. • If houses are built in the floodplain the river has nowhere to go and will rise up to higher levels in the town. • 5 year supply position, including completions and commitments data needs review. • The site's sustainability credentials should be looked at more closely. Concentric development around towns does not necessarily mean sustainable as distances from
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	<p>(REP/416) Dr E M Somerville</p> <p>(REP/417) Mary and Peter Beattie</p> <p>(REP/422) Kathy Myles</p> <p>(REP/423) Paul Myles</p> <p>(REP/424) Dan Hutchings</p> <p>(REP/425) Juan Sans-Pareja</p> <p>(REP/426) Peter Bull</p> <p>(REP/427) Bryan Wille</p> <p>(REP/428) Ann Pearce</p> <p>(REP/429) Robert Fernell</p> <p>(REP/430) Marianne Fearnell</p> <p>(REP/431) Edna Johnson</p> <p>(REP/432) Lee Webster</p> <p>(REP/433) P Parrek</p> <p>(REP/434) Chris Sawyer</p> <p>(REP/435) G F Williams</p> <p>(REP/436) P E Easton</p> <p>(REP/437) Mr David Cooke</p> <p>(REP/438) P Carter</p> <p>(REP/439) Joanne Treagus</p> <p>(REP/440) K Carter</p> <p>(REP/441) R Novis</p> <p>(REP/442) Jason Bennet</p> <p>(REP/443) C Carter</p> <p>(REP/444) Mr J Bell</p> <p>(REP/445)</p>	<p>centres/services increase and less sustainable transport is used.</p>
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<p>Mrs J Bell (REP/446)</p> <p>James Barley (REP/447)</p> <p>Max Griffiths (REP/448)</p> <p>Mrs S Morgan (REP/449)</p> <p>Charles Whittaker (REP/450)</p> <p>Tanya Murrell (REP/451)</p> <p>Peter Dallaway (REP/452)</p> <p>Deborah Powell (REP/453)</p> <p>P Morgan (REP/454)</p> <p>Pamela Novis (REP/455)</p> <p>Paul Harley (REP/463)</p> <p>Mike Johnstone (REP/464)</p> <p>Mr C I Rothery and Mrs K.A Rothery (REP/465)</p> <p>Kevin Bayzluk (REP/466)</p> <p>Philip Polden (REP/467)</p> <p>F Paterson (REP/468)</p> <p>Janet Wilde (REP/503)</p> <p>Sarah & Michael Reeves (REP/505)</p> <p>Peter Harris (REP/506)</p> <p>Matthew Hilton (REP/507)</p> <p>Elizabeth Hilton (REP/508)</p> <p>D. Haddon (REP/509)</p> <p>David Rolf (REP/510)</p> <p>R Holland (REP/511)</p> <p>Terry Read (REP/512)</p>	
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<p>Louise Read (REP/513) Gavin Scott (REP/514) Amanda Scott (REP/515) Paul Venderveldt (REP/516) A Latham (REP/517) Dave Golbey (REP/518) J Crowhurst (REP/519) Ian Meade (REP/520) Andrew Bull (REP/521) T Weeden (REP/522) Kris Cathom (REP/523) Michael Owen (REP/524) J Percy (REP/525) Ian Small (REP/526) Gwen Bull (REP/527) Patricia Owen (REP/528) C Hards (REP/529) K Miller (REP/530) P Jones (REP/531) A S Dandridge (REP/532) W E Johnson (REP/533) J C Haplin (REP/534) Joyce Dent (REP/535) Janet Richards (REP/537) Michael Richards (REP/536) Rex Billingham</p>	
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<p>(REP/538) Heidi Wish (REP/539) Philip Billingham (REP/540) Alexandra Gotch (REP/541) Ben Poulton (REP/542) Ross Poulton (REP/543) Bernice Ryan (REP/485) Alex Anderson (REP/484) Lee Duffy Peter Barnes (REP/483) Alison Hawley (REP/482) Richard Chester-Nash (REP/481) Anika Pick Robin Pick (REP/480) Vicky Blackburn (REP/479) Sue Redshaw Tony Redshaw (REP/478) Andrea Ingram (REP/477) Jan Mortimer (REP/476) Jonathan Sussams (REP/475) Cllr Rosalyn St Pierre (ESCC) (REP/474) Janet Cooper (REP/472) Alison Holland (REP/471) Anna Hayman (REP/470) Serena Penman (REP/469) Sam de Stroumillo (REP/225) Gary Blaber Sandra Blaber (REP/486)</p>	
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<p>Joan Blaber (REP/487)</p> <p>Shona Burton (REP/488)</p> <p>Gabrielle Lord (REP/489)</p> <p>Duncan Morrison (REP/490)</p> <p>Harvey Banner (REP/491)</p> <p>S Pilbeam (REP/492)</p> <p>E J Pilbeam (REP/493)</p> <p>Samantha Fuller (REP/494)</p> <p>Jed Dumbrell-Fuller (REP/495)</p> <p>Richard Dumbrell (REP/496)</p> <p>Vincent Burch (REP/498)</p> <p>Adam Goodsell (REP/499)</p> <p>Valerie Jean Ishii (REP/500)</p> <p>Barbara Merchant (REP/502)</p> <p>Jess Price, Sussex Wildlife Trust (REP/473)</p> <p>Graham Beck, Luken Beck (REP/294)</p> <p>Tim Lambert (REP/562)</p> <p>Jane Boyes (REP/558)</p> <p>Sarah Buldum (REP/557)</p> <p>Michelle Garratt (REP/556)</p> <p>Cllr Daisy Cooper (LDC) (REP/555)</p> <p>Liz Penrose (REP/554)</p> <p>James Boyes (REP/551)</p> <p>David de Silva (REP/563)</p> <p>Margaret Blake-Dyke (REP/545)</p>	
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	<p>Abigail Warren (REP/544) Matthew Spencer (REP/546) Louisa de Silva (REP/547) Elizabeth Banner (REP/338) Serena Thirkell (REP/548) Jennifer Edwards (REP/549) Jo Hanslip, Urbanissta (REP/327) Henry Dodson, H G Dodson (REP/314)</p>	
MM06	<p><u>Support</u></p> <p><u>Object / amendments</u> Andy Meader, Pegasus Group (REP/501) Christine Tutt David Tutt (REP/058) Nick Sutton (REP/222) Kenneth Humm Elizabeth Humm (REP/552) Jo Hanslip, Urbanissta (REP/327)</p>	<p><u>Support</u></p> <p><u>Object / amendments sought</u></p> <ul style="list-style-type: none"> • This allocation may still be required but there are other sustainable options available, such as Newlands School, Seaford, which should be allocated or allowed for in the windfall figures. <ul style="list-style-type: none"> • The Councils should reassess additional sustainable allocations before releasing further greenfield sites. • The caveat about contingency should not be removed. Ringmer neighbourhood plan should be allowed to allocate the site. • Any SuDS system should be trialled on site before adding increased housing numbers to the site beyond those in the neighbourhood plan. • Why has Ringmer’s neighbourhood plan referendum been delayed? Is it to have less weight? • Early delivery is unachievable and the density proposed is unsuitable. • Contradicts the vision of the JCS to provide development that ‘meets the community’s needs for housing...’ • Not sustainable as housing will be bought or allocated to people that travel outside Ringmer for work or schooling. • Unless the site is developed in line with the neighbourhood plan no housing will be delivered early as Gleasons proposals will delay its delivery and they wish to sell the

		<p>site on to another developer, which will take time.</p> <ul style="list-style-type: none"> • Agree with the objections of North Ringmer Residence Group to increased development in Ringmer – Bishops Lane is totally unsuitable for housing. • Ringmer is a quiet and beautiful village and this goes against what is best for the village and common sense. • This is just about targets never mind the consequences. • Negative effects on the village of flooding, overlooking, noise, traffic and loss of house value. • There is no evidence of demand for this level of housing in Ringmer • 5 year supply position, including completions and commitments data needs review.
MM07	<p><u>Support</u> Thomas Rumble, Woolf Bond Planning (REP/328)</p> <p><u>Object / amendments</u> Jo Hanslip, Urbanissta (REP/327)</p>	<p><u>Support</u></p> <ul style="list-style-type: none"> • The proposed change is supported. <p><u>Object / amendments sought</u></p> <ul style="list-style-type: none"> • 5 year supply position, including completions and commitments data needs review.
MM08	<p><u>Support</u> Thomas Rumble, Woolf Bond Planning (REP/328)</p> <p><u>Object / amendments</u></p>	<p><u>Support</u></p> <ul style="list-style-type: none"> • The proposed change is supported. <p><u>Object / amendments sought</u></p> <ul style="list-style-type: none"> •
MM10	<p><u>Support</u> Jess Price, Sussex Wildlife Trust (REP/473) Mike Pickup, Town and Country Planning Solutions (REP/273)</p> <p><u>Object / amendments</u></p>	<p><u>Support</u></p> <ul style="list-style-type: none"> • The proposed change is supported. <p><u>Object / amendments sought</u></p> <ul style="list-style-type: none"> • This would be strengthened with the addition of a requirement for important hedgerows to be enhanced.
MM12	<p>Mike Pickup, Town and Country Planning Solutions (REP/273)</p>	<p><u>Support</u></p> <ul style="list-style-type: none"> • Gleasons support. <p><u>Object / amendments sought</u></p>

MM13	<p><u>Support</u> Jess price, Sussex Wildlife Trust (REP/473)</p> <p><u>Object / amendments</u> June Marsh (REP/335) Jess price, Sussex Wildlife Trust (REP/473) Newhaven Town Council (REP/016)</p>	<p>•</p> <p><u>Support</u></p> <ul style="list-style-type: none"> • Support the requirement for masterplan and infrastructure delivery but this could be enhanced by specifically including that this should cover green infrastructure and biodiversity enhancements. <p><u>Object / amendments sought</u></p> <ul style="list-style-type: none"> • Plans fail to take commuting patterns and capacity of existing infrastructure into account. • Criterion x should be strengthened to require biodiversity enhancement, not just mitigation of adverse impacts. • Paragraph 6.105 should include a requirement for appropriate mitigation and enhancements informed by the ecological impact assessment. • A masterplan will be required whether the site comes forward through single or multiple applications but paragraph 6.94 suggests it will only be required if multiple applications are to be made. • SP7 should set out what the masterplan should cover. • Higher density development should be expected in the quarry area. • Low density, aspirational homes in the central and western parts will rebalance the community. • Need a broad range of dwelling types. • Need to define the height, bulk and massing of building in the three discrete areas of the site. • South facing site has opportunity for sustainable energy production. • Exemplary level of sustainable construction and design are required. • Development should retain badger habitats/corridors. • Butterfly conservation is required. • The provision of open space should be future-proofed through additional allocation other than that required by iv.
MM14	<p><u>Support</u> Craig Noel, Strutt and Parker (REP/286)</p> <p><u>Object / amendments</u> Peter Rose (REP/340) Bob Webzell</p>	<p><u>Support</u></p> <ul style="list-style-type: none"> • Support the inclusion of Lower Hoddern Farm as a strategic allocation for 450 dwellings. • The site is not constrained by the national park, flood risk or its topography. <p><u>Object / amendments sought</u></p> <ul style="list-style-type: none"> • Plans fail to take commuting patterns and

	<p>(REP/366) Andy Meader, Pegasus Group (REP/501) Craig Noel, Strutt and Parker (REP/286) F A Perris (REP/037) Brighton and Hove City Council (REP/001)</p>	<p>capacity of existing infrastructure into account.</p> <ul style="list-style-type: none"> • It may transpire that this allocation is still needed but other sustainable sites should be considered first, such as Newlands School, Seaford being included as an allocation or at least allowed for in the windfall allowance. • The Councils should reassess housing capacity in sustainable locations before releasing further greenfield land. • Question the word ‘throughout’ in criterion iii as ambiguous and imprecise – change to ‘within’. • Reference to ‘the nearest point of adequate capacity’ in vii is unnecessary and burdensome it that point is on higher ground and would require costly sewage pumping infrastructure – change to ‘at a suitable point of adequate capacity’. • Lower Hoddern Farm as a strategic site is welcome in some aspects but will add to the severe transport infrastructure problem which makes its deliverability questionable. • Additional text to add that ‘the transport policies of the adjacent local highway authority, BHCC, also seek to enhance the efficiency and safety of the A259 by improving the movement and flow of people and traffic along and across the main coast road’. • Amend the text of iv to include other distributor roads, road safety and air quality. • New development in the Peacehaven area should have regard to the Rottingdean High Street AQMA. •
MM15	<p><u>Support</u></p> <p><u>Object / amendments</u> Sarah Martin, Exigo Project Solutions (REP/497) Andrew Munton, Reside (REP/550)</p>	<p><u>Support</u></p> <ul style="list-style-type: none"> • <p><u>Object / amendments sought</u></p> <ul style="list-style-type: none"> • The policy includes a target of 40% for 11+ dwellings and allows the requirement to be determined on a site by site basis where justified. This strikes the appropriate balance between affordable needs and development viability. • CP1 is not flexible enough to deal with changes in the economy. • The threshold should be changed to ‘more than 15 dwellings’. • More flexibility to make financial contributions in lieu is needed. • Lewes is not a high value area.

MM16	<u>Support</u> <u>Object / amendments</u> Sarah Martin, Exigo Project Solutions (REP/497) Jo Hanslip, Urbanissta (REP/327)	<u>Support</u> • <u>Object / amendments sought</u> • The previous wording to ‘encourage’ should be reverted back to. While Lifetime Homes is laudable it will add to development costs either affecting viability or making homes more expensive for the buyer. • This should be implemented on a case by case basis to ensure viability is considered.
MM24	<u>Support</u> Jess Price, Sussex Wildlife Trust (REP/473) <u>Object / amendments</u>	
MM25	<u>Support</u> Jess Price, Sussex Wildlife Trust (REP/473) <u>Object / amendments</u>	<u>Support</u> • This better reflects aims of NPPF 115. <u>Object / amendments sought</u> •
MM30	<u>Support</u> Jess Price, Sussex Wildlife Trust (REP/473) <u>Object / amendments</u>	<u>Support</u> • This better reflects aims of NPPF 115. <u>Object / amendments sought</u> •

2.3 Summary of Representations on Additional/minor Modifications (Schedules 1, 2 and 4)

Reference No.	Respondents on this policy (reference number in brackets)	Summary of the main issues raised
AM05	<p><u>Support</u> Mike Pickup, Town and Country Planning Solutions (REP/273)</p> <p><u>Object / amendments</u></p>	<p><u>Support</u></p> <ul style="list-style-type: none"> Gleesons support. <p><u>Object / amendments sought</u></p> <ul style="list-style-type: none">
AM21	<p><u>Support</u> Mike Pickup, Town and Country Planning Solutions (REP/273)</p> <p><u>Object / amendments</u></p>	<p><u>Support</u></p> <ul style="list-style-type: none"> Gleesons support. <p><u>Object / amendments sought</u></p> <ul style="list-style-type: none">
MOD12 (referenced as MM12 in Schedule 3)	<p><u>Support</u> Mike Pickup, Town and Country Planning Solutions (REP/273)</p> <p><u>Object / amendments</u></p>	<p><u>Support</u></p> <ul style="list-style-type: none"> Gleesons support. <p><u>Object / amendments sought</u></p> <ul style="list-style-type: none">
AM57	<p><u>Support</u></p> <p><u>Object / amendments</u> Mike Pickup, Town and Country Planning Solutions (REP/273)</p>	<p><u>Support</u></p> <ul style="list-style-type: none"> Gleesons support. <p><u>Object / amendments sought</u></p> <ul style="list-style-type: none"> No mention was made in the Initial Findings letter of the use of the Sedgefield v Liverpool approach in dealing with housing supply backlog. The Council should revert back to Sedgefield unless the Liverpool approach can be justified at a further hearing if necessary and amend AM57 accordingly.

2.4 Summary of Other Comments

Reference No.	Respondents on this policy (reference number in brackets)	Summary of the main issues raised
General	Marine Management Organisation (REP/545)	No comments to submit in relation to this consultation.
Strategic Objectives	(REP/011) Margaret Blake-Dyke	The Strategic Objectives for Lewes should include improved parking for the town. The town is dying and full of charity shops.
Lewes HRA Addendum 2015	Wealden District Council (REP/553)	There is no in-combination assessment of the Local Plan with the adopted Wealden District Core Strategy in relation to nitrogen deposition and the Ashdown Forest SAC. The HRA of the proposed modifications does not assess the impact of the plan on the A26 adjacent to the Ashdown Forest. The March 2014 HRA showed the JCS to have 190 AADT. In combination with the WDCC this would exceed the Design Manual for Roads and Bridges screening criteria. It is not clear if the additional development will exacerbate this position.
Proposed Modifications Background Paper	Mike Pickup, Town and Country Planning Solutions (REP/273)	No mention was made in the Initial Findings letter of the use of the Sedgefield v Liverpool approach in dealing with housing supply backlog. The Council should revert back to Sedgefield unless the Liverpool approach can be justified at a further hearing if necessary and amend AM57 accordingly.
HRA	Natural England (REP/005)	It would be helpful if it could be confirmed that the relatively

		small changes in the plan have not compromised the conclusions of the HRA.
SA/SEA	Natural England (REP/005)	Wording in Table 5 p56 of the SA/SEA for Old Malling Farm is not clear but appears to flag an issue of likely significant effects which needs further consideration.
Addendum SA/SEA	Natural England (REP/005)	Support the Council's approach to Ashdown Forest in the SA/SEA Addendum. A table of SAMM measures would be useful but is available elsewhere. NE was fully involved in discussions about alternatives and full and robust appraisal was assessed. Support the 7km zone approach to mitigation.

Appendix 1 - Letter sent by post or email to those listed on the JCS Consultation Database to notify them of the Proposed Modifications consultation



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

Ref: 9328.33.9.4
3 August 2015

Dear

**Lewes District Local Plan Part 1: Joint Core Strategy – Examination in Public
Post-Submission Consultation on Proposed Modifications**

Lewes District Council and South Downs National Park Authority will be consulting on schedules of proposed modifications to the Joint Core Strategy between Friday 7 August 2015 and 4pm on Friday 2 October 2015

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.

In September 2014 the Joint Core Strategy was submitted to the Secretary of State for Examination in Public. The appointed Planning Inspector held a series of public examination hearings in January 2015 and the Inspector's Initial Findings letter was received in February 2015.

We have now prepared schedules of Proposed Modifications to the Submission Joint Core Strategy to respond to the Inspector's Initial Findings. The Proposed Modifications are now being published for public consultation for a period of 8 weeks.

All comments must be made in writing, preferably using the *attached Representation Form*. We also attach *Guidance Notes* to help you in making your response to this consultation. For details of how and where to send your representation, please see the *Statement of Representations Procedure*, which also contains details of where the schedules of Proposed Modifications and accompanying documents (including the Sustainability Appraisal) may be viewed. This includes on the Council's website (www.lewes.gov.uk/corestrategyexamination) and at the Council's main office, the SDNPA South Downs Centre, and local libraries.

Important points to note:

- a) We are unable to accept representations made after the deadline of 4pm on 2 October 2015.
- b) We cannot take account of representations that are submitted to us confidentially or anonymously.
- c) We can only accept written representations (by email or letter).
- d) All comments received during the consultation period will be made public.
- e) Only comments on the Main Modifications (in schedule 3) will be considered by the Inspector in his Final Report.
- f) Comments on other Additional Modifications (consisting of minor modifications) will be considered by the Council and National Park Authority (and not the Inspector).

During this consultation period, comments are sought only on the Proposed Modifications. Comments are not invited on other (unmodified) elements of the Joint Core Strategy.

All duly made representations relating to the Main Modifications will be submitted to the examination for consideration by the Inspector before issuing his Final Report.

If you made representations during the earlier Proposed Submission consultation (published January 2013) and/or the Focussed Amendments consultation (published May 2014), then there is no need to resubmit those during this consultation period, unless you wish to alter or withdraw your representation in respect of the modifications proposed.

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



Catherine Jack
Interim Head of Planning Policy

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

Appendix 2 – Statement of Representations Procedure



Statement of Representations Procedure

Title

Lewes District Local Plan Part 1: Joint Core Strategy – Proposed Modifications

Subject

The Joint Core Strategy 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 Proposed Modifications are published in four schedules as follows:

Schedule 1 comprises both ‘main’ and ‘additional’ modifications proposed between the publication of the Joint Core Strategy Focussed Amendments Document in May 2014 and its submission to the Secretary of State in September 2014.

Schedule 2 comprises both ‘main’ and ‘additional’ modifications proposed at the Joint Core Strategy Examination Hearings in January 2015 as part of the Council’s ‘Written Matters Statements’.

Schedule 3 comprises ‘main modifications’ proposed in response to discussions at the Examination Hearings and the Inspector’s ‘Initial Findings’ letter, together with other ‘Main Modifications’ set out in Schedules 1 and 2.

Schedule 4 comprises the ‘additional modifications’ proposed in response to discussions at the Examination Hearings and to the Inspector’s Initial Findings letter. They include updated facts and figures, simple corrections and clarifications and other changes to the text that are considered by the Council to be non-material to the soundness of the Joint Core Strategy.

Period within which representations must be made

Representations can be made over an 8 week period, between **Friday 7 August 2015 and 4pm on Friday 2 October 2015**. We cannot accept any representations made after this time. Only written representations can 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 – Strategic 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 that:

- the recommendations of the planning inspector appointed to carry out an independent examination of the Joint Core Strategy have been published (the 'Final Report')
- the Joint Core Strategy has been adopted.

Availability of Documents

The Joint Core Strategy – Schedules of Proposed Modifications and supporting documents are available online at www.lewes.gov.uk/corestrategyexamination

The documents are also available for inspection at the Council's main office at Southover House, Southover Road, Lewes, BN7 1AB. Key documents are also available at the National Park Authority's main office at the South Downs Centre, North Street, Midhurst, West Sussex, GU29 9DH as well as all Lewes District libraries (Lewes, Newhaven, Ringmer, Peacehaven and Seaford) and as libraries in Haywards Heath, Burgess Hill, Saltdean and Uckfield. Opening times are:

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 9.30am – 4.30pm
Tue 9.30am – 4.30pm
Wed Closed
Thu 9.30am – 4.30pm
Fri 9.30am – 4.30pm
Sat 9.30am – 4.30pm

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 – 12 noon
Thu 1.30pm – 4.30pm

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

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

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

Mon 9.30am – 5.30pm
Tue 9.30am – 5.30pm
Wed 9.30am – 5.30pm
Thu 9.30am – 5.30pm
Fri 9.30am – 5.30pm
Sat 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 3 – Representation Form



Lewes District Local Plan Part 1: Joint Core Strategy –Proposed Modifications Modifications Stage Representation Form

Lewes District Council and South Downs National Park Authority are preparing a Joint Core Strategy, a strategic planning document that will guide development in the district for the period up until 2030. Representations are invited on the proposed modifications to the Joint Core Strategy – Submission Document submitted in September 2014.

Representations are only sought on the proposed modifications to the Joint Core Strategy - Submission Document set out in the Schedules of Modifications and changes made to the Sustainability Appraisal. The proposed modifications to the Joint Core Strategy are set out in four separate schedules. Only representations on the 'Main Modifications' set out in Schedule 3 will be formally submitted to and considered by the Planning Inspector whose role is to assess whether the Joint Core Strategy is 'sound'.

The Joint Core Strategy – Submission Document and associated schedules of proposed modifications are available on the council's website (www.lewes.gov.uk/corestrategy). Alternatively, paper copies are available at the Council's offices (Southover Rd, Lewes), local libraries, and the South Downs Centre in Midhurst. Information about public examination of the Joint Core Strategy is also available on the website. A guidance note is available to assist in completing this form.

Please note - representations must be received by 4pm Friday 2 October 2015.

Post: Lewes District Council
Strategic 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 style="width: 95%;" type="text"/>	<input style="width: 95%;" type="text"/>
Job Title (where relevant)	<input style="width: 95%;" type="text"/>	<input style="width: 95%;" type="text"/>
Organisation (where relevant)	<input style="width: 95%;" type="text"/>	<input style="width: 95%;" type="text"/>
Address	<input style="width: 95%; height: 80px;" type="text"/>	<input style="width: 95%; height: 80px;" type="text"/>
Telephone Number	<input style="width: 95%;" type="text"/>	<input style="width: 95%;" type="text"/>
Email Address	<input style="width: 95%;" type="text"/>	<input style="width: 95%;" 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) *Schedule 1: Modifications arising from the 'Focussed Amendments' consultation*
- (2) *Schedule 2: Modifications proposed in the LDC/SDNP 'Written Matters' Statements*
- (3) *Schedule 3: Main modifications proposed in response to the Examination Hearing Sessions and the Inspector's Initial Findings letter*
- (4) *Schedule 4: Additional modifications proposed in in response to the Examination Hearing Sessions and the Inspector's Initial Findings letter*
- (5) *Addendum to the Sustainability Appraisal incorporating Strategic Environmental Assessment*
- (6) *Other accompanying documents/evidence*

Please identify the reference number of the proposed modification²:

4. With respect to the matters listed in Question 3, do you consider the proposed modification that you are commenting on is **unsound** because it is **not**:

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

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

² Modification reference numbers are set out with each modification in the separate Schedules of Modifications.

5. Please give details of why you consider the proposed modification is unsound, if that is the case. Please be as precise as possible. If you wish to support the soundness of the proposed modification, please also use this box to set out your comments.

(Use separate sheet if necessary)

6. Please set out what change(s) you consider necessary to make the proposed modification sound, having regard to the test you have identified at Q5 above. You will need to say why this change will make the proposed modification 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, depending whether he identifies a need for further examination hearing sessions.**

7. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination if the Inspector decides further examination hearing sessions are necessary?

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

Yes, I wish to participate at the oral examination

8. If you wish to participate at any resumed oral examination hearings, 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 further examination hearing sessions, where necessary.

Signature:

Date:

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

(i) The publication of the recommendations of the appointed to examine the Joint Core Strategy Report'. Yes No

(ii) The adoption of the Joint Core Strategy Yes No

Thank you for taking time to respond to this consultation

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

The considerations in relation to the Joint 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>

Appendix 4 – Notice of Consultation



Lewes District Council



South Downs
National Park Authority

**Planning and Compulsory Purchase Act 2004 (as amended)
Town and Country Planning (Local Planning) (England)
Regulations 2012**

Lewes District Local Plan Part 1: Joint Core Strategy

Notice of Post-Submission Consultation on Proposed Modifications

Lewes District Council and the South Downs National Park Authority are publishing post-submission proposed modifications to the Joint Core Strategy for an 8 week public consultation.

In September 2014 the Joint Core Strategy was submitted to the Secretary of State to undergo examination by an independent Planning Inspector. The examination is a continuous process running from submission through to the Inspector's Final Report. In January 2015 the Inspector held a series of public hearing sessions. In February 2015 the Inspector set out his Initial Findings [www.lewes.gov.uk/Files/plan_ID-05 Letter to Councils 10 Feb 2015.pdf](http://www.lewes.gov.uk/Files/plan_ID-05_Letter_to_Councils_10_Feb_2015.pdf) and invited the authorities to propose modifications to address his recommendations.

The four schedules of proposed modifications (including **Schedule 3: Main Modifications**), amended Submission Joint Core Strategy (showing the proposed modifications as track-changes for information), and accompanying documents can be viewed online at www.lewes.gov.uk/corestrategyexamination.

Copies of the documents are also available for inspection between 9am and 5pm at the District Council's offices at Southover House, Lewes. Key documents are also available to view between 9am and 5pm at the South Downs National Park Authority, South Downs Centre, Midhurst, as well as at public libraries around the district.

Comments may be submitted on the proposed modifications between 7 August 2015 and 4pm on 2 October 2015. Comments relating to the Main Modifications will then be submitted to the Inspector for consideration. Comments on the Additional (minor) Modifications will be considered by the District Council and National Park Authority only.

How to comment:

Comments can only be accepted in writing. Please send them to:

Email: ldf@lewes.gov.uk

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

Edward Sheath
Head of Strategic Policy
23 July 2015

Appendix 5 – Guidance Note



Lewes District Local Plan Part 1: Joint Core Strategy – Proposed Modifications

Guidance note for making representations

1. Introduction

1.1 Modifications are proposed to the Lewes District Local Plan Part 1: Joint Core Strategy (JCS) Submission Document. The local community and other interested parties have an opportunity to consider these modifications and make representations. This guidance note is intended to assist anyone who wishes to make a representation.

1.2 ‘Main modifications’ (changes that materially affect the JCS policies) are proposed in response to issues raised at the JCS Examination in Public and by the Inspector in his ‘Initial Findings’ letter to the Council and the National Park Authority. ‘Additional modifications’ are also proposed to deal with more minor matters.

1.3 The proposed modifications are published in four schedules, reflecting the date on which they were proposed and whether or not they respond to matters that materially affect the ‘soundness’ of the JCS.

Schedule 1 comprises both ‘main’ and ‘additional’ (or minor) modifications proposed between the publication of the JCS Focussed Amendments Document in May 2014 and its submission to the Secretary of State in September 2014. These modifications have been considered by the Inspector but have not until now been subject to formal public consultation.

Schedule 2 comprises both ‘main’ and ‘additional’ modifications proposed at the JCS Examination Hearings in January 2015 as part of the Council’s ‘Written Matters Statements’. These modifications have been considered by the Inspector but have until now been subject to formal public consultation.

Schedule 3 comprises ‘main modifications’ proposed in response to discussions at the Examination Hearings and the Inspector’s ‘Initial Findings’ letter, together with other ‘Main Modifications’ set out in Schedules 1 and 2. The modifications in Schedule 3 materially affect the soundness of the JCS and are the only ones that the Inspector can consider in his final report.

Schedule 4 comprises the ‘additional modifications’ proposed in response to discussions at the Examination Hearings and to the Inspector’s Initial Findings letter. They include updated facts and figures, simple corrections and clarifications and other changes to the text that are considered by the Council to be non-material to the soundness of the JCS.

2. Making Representations

2.1 Representations are only sought on the modifications set out in Schedules 1-4.

Representations are not invited on other (unmodified) parts of the JCS, as these have been found 'essentially sound' by the Inspector on examination. All representations received within the consultation period will be considered by the Council and National Park Authority. **However, only representations on the 'main modifications' set out in Schedule 3 can be considered by the Inspector in his final report on the JCS.**

2.2 Before making a representation, please refer to the *Representation Form* and the relevant schedules (1-4), as well as any background evidence you consider is relevant. The schedules include reference numbers for the individual modifications to help you to identify which one(s) you are making representations upon. The relevant reference number should be included on the *Representations Form*. Further information is set out in the *Statement of Representations Procedure*, which is available on the Council's website.

2.3 **Representations must be received by 4pm on 2 October 2015.** As well as being sent to the Inspector, representations made on the 'main modifications' in Schedule 3 will be available to view at the main Council offices (Southover Road, Lewes) as part of the examination library and on the Council's examination website. These will be made available as soon as possible after the end of the representation period.

2.4 Please note that all respondents must complete their personal details (Part A of the *Representations Form*) as anonymous representations will not be considered. Such details will be redacted from published representations. Each individual representation should be made on a separate copy of Part B of the *Representations Form*, indicating the modification reference number as set out in the relevant schedule.

3 General Advice

3.1 In his 'Initial Findings' letter on the JCS, the Inspector concluded that the Council and the National Park Authority have essentially met all the statutory requirements, including those arising from the 'Duty to Cooperate' and those relating to legal compliance. However, in order for him to find the JCS 'sound', he invited the Council and the National Park Authority to prepare a list of main modifications in order to address a number of concerns arising from the Examination in Public.

3.2 In accordance with the National Planning Policy Framework, the JCS should meet the following tests of 'soundness':

Positively prepared - it 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 - it should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

Effective - it should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities

Consistent with national policy – it should enable the delivery of sustainable development in accordance with the Framework

3.3 If you wish to make a formal representation seeking a change to a proposed modification, you should make clear in what way the modification is not sound, having regard to the four tests set out above. It will be helpful if you also say precisely how you think the modification should be changed.

3.4 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. After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he may identify for examination.

3.5 Where there are groups who share a common view on how they wish to see a modification changed, it would be 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.

3.6 Due to the scope of the 'main modifications', the Council and National Park Authority have carried out further sustainability appraisal/ strategic environmental assessment work on the JCS. The results of this work have been published alongside the modifications as an Addendum to the JCS Proposed Submission Document Sustainability Appraisal incorporating SEA, upon which representations can also be made.

3.7 Further detailed guidance on the preparation, publication and examination of Local Plans is provided in the National Planning Policy Framework and the Planning Practice Guidance, which can be found at the following links:

www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf
<http://planningguidance.planningportal.gov.uk/blog/guidance/local-plans/publication-and-examination-of-the-draft-plan/>

Appendix 6 – 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
High Weald Lewes Havens CCG
NHS England
Eastbourne, Hailsham & Seaford 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 England
Network Rail
British Telecom
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 Local Enterprise Partnership
South East Local Enterprise Partnership

Appendix 7 – 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 Heighton 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