



LEWES DISTRICT COUNCIL AND SOUTH DOWNS NATIONAL PARK AUTHORITY
Peacehaven and Telscombe Neighbourhood Plan Regulation 16 Consultation
March 2026

The following pages present a summary, written by the Policy Planning Officer at Lewes District Council, of the comments made during the Regulation 16 consultation on the Peacehaven and Telscombe Neighbourhood Plan, which took place between 12 October to 24 November 2023. The summary is written to provide assistance to the Examiner and to allow anyone who wishes to see some of the issues raised. It does not contain every point a consultee has made. The Examiner will read the comments of each consultee in full.

Reference	Statutory Consultees - Name/Organisation	Date	Method	Summary of representation
R1	Southern Water	24 Nov 2023	Consultation Portal	<ul style="list-style-type: none"> • Supports the Neighbourhood Plan's overall intention to protect biodiversity and habitats. The organisation is broadly supportive of Policy PT17 but raises concerns about the clarity of its current wording. • Referred to NPPF paragraph 16(d), noting that policies must be clearly written and unambiguous. In their view, the present drafting implying that an ecologist must remain onsite throughout the main construction phases which would be difficult for a decision-maker to interpret and does not reflect proportionate ecological risk management. • Emphasise that continuous on-site ecological presence is not always justified. Southern Water already employ qualified ecologists, submit ecological assessments where appropriate, and implement mitigation strategies proportionate to the likelihood of ecological harm. • Highlighted the potential need for additional wastewater infrastructure to support development, noting that such infrastructure often has limited location flexibility due to the need to connect to existing networks. • Cited National Planning Guidance, which requires planning policies to support the provision of adequate water and wastewater infrastructure to enable sustainable development. • Requested an amendment to Policy PT17. Proposed alternative wording requiring an ecological assessment and a clear, deliverable mitigation strategy, with ecological monitoring undertaken at an appropriate, risk-based level by a suitably experienced ecologist.

R2	South Downs National Park	23 Nov 2023	Email	<ul style="list-style-type: none"> • Welcomes the overall quality and comprehensiveness of the Neighbourhood Development Plan (NDP), recognising the joint work by Peacehaven and Telscombe Town Councils. Their representation identifies multiple areas where amendments would enhance clarity, ensure conformity with the South Downs Local Plan (SDLP), and align the document with national planning policy and best practice. <p>General</p> <ul style="list-style-type: none"> • Ensure consistent terminology throughout the Plan (e.g., use “Neighbourhood Development Plan (NDP)” to avoid confusion with “National Park (NP)”). • Include the Adopted SDLP (2019) within the Basic Conditions Statement and cross-referenced within the Introduction. • Add paragraph numbers, figure numbers, and clear headings for improved readability. • Display the plan period on the front cover. • Clarification that SDNPA is the Local Planning Authority for parts of both parishes. • Add references and hyperlinks to the South Downs Local Plan (SDLP) alongside Lewes Local Plan parts 1 and 2. • Strengthen wording on: <ul style="list-style-type: none"> ○ Aim 7: include reference to recreation for health and wellbeing. ○ Objective 6: embed sustainable and low-carbon design principles • Harmonise the term “20-minute neighbourhood” throughout. <p>Area-Wide Policies and Definitions</p> <ul style="list-style-type: none"> • Amend the definition of “major development” to reflect the NPPF. • Clarify that within the National Park, SDNPA determines what constitutes major development under NPPF paragraphs 176–177. • Update Policy PT1 (High Quality Design) to strengthen references to SDNP landscape setting, add references to design codes, and ensure conformity with emerging NPPF changes.
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				<p>SDNP-Specific Environmental Considerations</p> <ul style="list-style-type: none"> • Policy PT4 should incorporate: • The statutory Purposes and Duty of the National Park (Environment Act 1995). • The NPPF requirement for the highest level of landscape protection. • Stronger wording is recommended to ensure development within or affecting the setting of the SDNP: <ul style="list-style-type: none"> ○ Is landscape-led. ○ Protects tranquillity, dark skies, biodiversity, and visual amenity. <p>Climate, Sustainable Design and Heritage</p> <ul style="list-style-type: none"> • Page 24: Text should explicitly reference the Climate Change Act 2008 (as amended) and set Net Zero expectations. • Policy PT5 (Sustainable Design) should: • Include clearer requirements on energy efficiency, SuDS, water efficiency, adaptation measures, and heritage building retrofits (PAS 2035). • Possibly be moved earlier in the document to improve flow. <p>Housing and Design Code Areas</p> <ul style="list-style-type: none"> • Replace references to “brownfield sites” with “previously developed land (PDL)”. • Update text to reference both LPAs (LDC and SDNPA) for housing matters and 5-year land supply. • Insert a map showing the 8 design code areas, with clarity on which fall within the SDNP. • Policy PT6 (Housing Design) • Strengthen landscape-led development requirements. • Add cycling/e-mobility storage and composting.
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			<ul style="list-style-type: none"> • Ensure conformity with Peacehaven & Telscombe Design Codes. • Encourage water re-use measures. <p>Policies on Housing Mix, Reuse, and Employment</p> <ul style="list-style-type: none"> • PT8–PT9: Recommend defining housing types and tenures required rather than site-specific references due to ongoing LPA plan reviews. • PT10: Replace “brownfield” with PDL and extend policy to all building types. • PT24: Refocus employment, retail, tourism and community uses to appropriate, sustainable locations. <p>Movement, Active Travel, SDNP Access</p> <ul style="list-style-type: none"> • Define ESCC and LCWIP correctly. • Emphasise SDNP partnership in active travel projects (Project 3). • Policy PT12 is supported; no major changes required. <p>Green Spaces, Biodiversity, SuDS</p> <ul style="list-style-type: none"> • PT14: Correct wording, ensure replacement provision is accessible, and include a map of designated spaces. • Clarify whether areas listed are proposed Local Green Spaces (LGS) or simply open spaces. • PT17: Strengthen requirement that development must protect and enhance protected habitats; require an ecological assessment and ongoing ecologist involvement. • PT18: Align wording with the Environment Act 2021 (10% BNG for 30 years); remove reference to bird/bat boxes. • Define “green assets” in PT19. • PT20 should refer to multi-functional SuDS.
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				<p>Net Zero and Renewable Policies</p> <ul style="list-style-type: none"> • Consider relocating PT21–PT23 earlier in the Plan. • Potentially merge PT5 and PT22 into a single Net Zero and Sustainable Design policy. <p>Community Facilities, Future Growth, CIL</p> <ul style="list-style-type: none"> • Include a map of community facilities (PT31). • Amend PT36 wording around PDL and measurable targets. • Clarify that LDC and SDNPA are separate CIL charging authorities, each negotiating s106 in their respective areas. <p>Glossary</p> <ul style="list-style-type: none"> • Update several glossary definitions, particularly: • LPAs for each parish area. • National Park Purposes and Duty. • PDL definition (NPPF glossary).
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R3	East Sussex County Council	Nov 2023	Email	<p>Welcomed several updates but notes a number of outstanding recommendations required to ensure alignment with national policy (NPPF), Local Transport Plan (LTP), Local Cycling & Walking Infrastructure Plan (LCWIP), and Active Travel England guidance.</p> <p>General</p> <ul style="list-style-type: none"> • “Walking and cycling” should be replaced with “walking, wheeling and cycling” throughout to reflect Government/Active Travel England terminology. <p>Electric Vehicle (EV) Policies</p> <ul style="list-style-type: none"> • EV charging is only addressed for individual dwellings (Policy PT6). • ESCC requests additional references to communal/public EV charging in Policies PT2 and PT5. <p>Corrections & Updates to Movement Section (Page 40)</p> <ul style="list-style-type: none"> • Update text on the A259 corridor to reflect: <ul style="list-style-type: none"> ◦ Its MRN (Major Route Network) status. ◦ The completed A259 study and submission of the Strategic Outline Business Case to DfT (Oct 2023). • List ESCC proposed improvements for Peacehaven/Telscombe: <ul style="list-style-type: none"> ◦ Longridge Avenue junction management. ◦ Activated message signs for speed reduction. • Update references to the LCWIP (adopted 2020, now a live document). • Remove/adjust wording suggesting “good” active travel potential; use recommended ESCC wording. • Add reference to the development of LTP4 (consultation Nov 2023; LCWIP update from Jan 2024). • Add reference to feasibility work on LCWIP scheme N15 – Peacehaven Loop (funded by ATE; completion Feb 2024). • Note ongoing active travel behaviour-change programmes delivered via Peacehaven Cycle Hub. • Update references to A259 bus priority measures to include 2023 consultation. <p>Policy PT11 – Travel Planning</p>
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			<p>ESCC requests significant strengthening to align with NPPF, LTP, and LCWIP requirements:</p> <ul style="list-style-type: none"> • Prioritise safe and secure active travel routes and parking. • Strengthen requirement to enable, not “encourage”, walking, wheeling and cycling. • Require active travel links to key services and education. • Require cycle parking in new development. • Clarify (5) refers to existing car parks. • Add requirements for <ul style="list-style-type: none"> ○ Transport Assessments for both major sites and smaller sites ○ Travel Plans for major proposals. ○ EV charging in all new developments. <p>Public Transport Section & Policy PT13</p> <ul style="list-style-type: none"> • Text incorrectly states Telscombe Village has “no access” to public transport; bus services are accessible on the A259. • PT13 should state contributions are required where appropriate and proportionate. • Add reference to Real Time Passenger Information (RTPI). • Use “trip chain journeys”. • Clarify and separate priorities in Council Project 3. • Update walking 20-minute radius to reflect realistic distances and include additional destinations such as schools, football ground. <p>Culture & Tourism</p> <p>Policy PT30 – Community Facilities</p> <ul style="list-style-type: none"> • Replace narrow list like theatres and galleries with broader wording: “cultural activities requiring indoor space” to ensure inclusion of music, dance, crafts, etc. <p>Policy PT31 – Community Facilities</p> <p>sure of community facilities should not rely on viability alone.</p>
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				<p>ties rely on grants, fundraising and volunteers, and current wording risks valued assets.</p> <p>Public Health</p> <ul style="list-style-type: none"> • No further comments. • ESCC recognises most Reg 14 and previous Reg 16 recommendations have been incorporated; remaining issues are not significant enough to require objection. <p>Rights of Way</p> <p>Policy PT12 – Enhancing Accessibility</p> <ul style="list-style-type: none"> • ESCC welcomes the policy but requests the inclusion of their previously submitted text to ensure alignment with NPPF paragraphs 100 & 174. • Proposed additions include: <ul style="list-style-type: none"> ○ New links for pedestrians, cyclists and horse-riders. ○ Integration with the wider active travel network. ○ Active frontages for safety and natural surveillance. ○ Improved signage/legibility. ○ Inclusive access for people of all abilities. ○ Removal of barriers on public access routes. ○ Clear reference to National Trails (King Charles III England Coast Path).
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R4	Environment Agency	27 Nov 2023	Email	<ul style="list-style-type: none"> • Notes that the Neighbourhood Plan does not allocate sites and, due to resource constraints, their comments focus only on the main Plan document. Their key points are: • Supported of the Plan’s environmental focus, including climate change, water efficiency, biodiversity, and net zero policies. <p>Comments</p> <p>Policy PT1 – High Quality Design</p> <ul style="list-style-type: none"> • Welcomed references to addressing climate change within design. <p>Policy PT5 – Sustainable Design</p> <ul style="list-style-type: none"> • Support for water-efficiency requirements. • Recommends clarifying that 110 litres/person/day applies to residential use. • Suggests adding BREEAM Excellent standards for non-residential buildings in water-stressed areas. <p>Policy PT15 – Amenity, Green and Blue Spaces</p> <ul style="list-style-type: none"> • Supports inclusion of requirements contributing to biodiversity net gain. <p>Policy PT17 – Protection of Biodiversity & Habitats</p> <ul style="list-style-type: none"> • Reiterates earlier advice: policy should explicitly follow the mitigation hierarchy: • Avoid harm first. • Only where avoidance is not possible should mitigation be considered. <p>Policy PT18 – Biodiversity Net Gain</p> <ul style="list-style-type: none"> • Current focus on nesting boxes is too narrow. • Recommends broadening the policy to support wider BNG measures. • Suggests referencing the emerging Local Nature Recovery Strategy.
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				<p>Page 60 – Hardstanding</p> <ul style="list-style-type: none">• Queries whether the text should refer to permeable (not non-permeable) hard surfaces. <p>Coastal Erosion & Shoreline Management</p> <ul style="list-style-type: none">• Reiterates earlier advice regarding the uncertainty around climate change impacts on cliff erosion.• Notes that future coastal defence work depends on:• Technical, environmental and economic viability.• Necessary permissions.• Suggests referencing the Beachy Head to Selsey Bill Shoreline Management Plan for accurate policy context.• Highlights that some coastline sections are intended to allow natural erosion to continue. <p>Net Zero (Page 62)</p> <ul style="list-style-type: none">• Supports inclusion of net-zero policies. <p>A Centre for Peacehaven / Policy PT37</p> <ul style="list-style-type: none">• Notes presence of a historic landfill site within / adjacent to the area.• Recommends referencing this constraint in the policy wording.• Advises consultation with appropriate Lewes District Council teams to ensure development does not adversely affect the water environment.
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R5	Historic England	20 Nov 2023	Email	<ul style="list-style-type: none">• Confirmed that they do not consider it necessary to provide further detailed input on the submission version.• Referred the Examiner to any previous comments submitted at Regulation 14.• Referred to their published guidance on incorporating the historic environment into neighbourhood plans.• Clarify that this representation does not prevent them from offering future advice or objecting to development proposals if these would adversely affect the historic environment.
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R6	British Horse Society	16 Nov 2023	Email	<ul style="list-style-type: none"> • Emphasised the importance of equestrian access within the Neighbourhood Plan. • Highlighted NPPF paragraphs 98 and 100: <ul style="list-style-type: none"> ○ The value of high-quality open spaces and opportunities for physical activity, including for equestrians. ○ The requirement for planning policies to protect and enhance public rights of way, and to provide improved facilities such as links to National Trails. <p>East Sussex Rights of Way Improvement Plan (ROWIP)</p> <ul style="list-style-type: none"> • Noted the significant economic benefit of equestrian activity and existing ROWIP objectives to: <ul style="list-style-type: none"> ○ Improve roadside verge safety for horse riders. ○ Enhance accessible routes for disabled users. ○ Provide multi-user off-road routes where possible. • Suggests the Neighbourhood Plan is well placed to support and help deliver these objectives. <p>Neighbourhood Plan Objectives</p> <ul style="list-style-type: none"> • Welcomed the Plan's aim to create well-connected active travel routes. • Emphasised that equestrians must be included in both new active travel routes and improvements to existing cycling/walking routes. • Stated that improvements should not come at the detriment of horse riders. <p>Health and Well-being</p> <ul style="list-style-type: none"> • Cited district-level inactivity rates and argues for protecting and enhancing safe off-road provision for all users, including equestrians, due to recognised health and wellbeing benefits. <p>Council Project 3</p> <ul style="list-style-type: none"> • Supports the creation of a high-quality active travel network but insists equestrian needs be explicitly included, particularly for leisure routes. <p>Policy PT36 – Design & Placemaking</p> <ul style="list-style-type: none"> • Welcomed principles promoting accessible routes and active movement. • Recommended ensuring equestrians are recognised as part of this movement hierarchy.
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R7	National Highways	14 Nov 2023	Email	<ul style="list-style-type: none"> • National Highways is the statutory authority responsible for the safe and efficient operation of the SRN. Their interest relates to potential impacts from development within Peacehaven and Telscombe on the A26 and A27 corridors. • The Plan correctly identifies: <ul style="list-style-type: none"> ○ Poor pedestrian and cycling infrastructure. ○ Limited public transport connectivity. ○ Resulting high car dependency. • Welcomed the Plan's intention for new developments to create well-connected walking and cycling routes aligned with the 20-minute neighbourhood approach. • Noted that: <ul style="list-style-type: none"> ○ The Plan does not specify dwelling numbers, development quantum, or locations. ○ No employment land allocations are identified. ○ This limits the ability to fully assess transport implications at this stage. • Once development quantum and locations are identified, the Town Councils should re-consult National Highways. • Larger proposals may require assessment of cumulative traffic impacts on the SRN. • Suggested that all planning applications should be accompanied by: <ul style="list-style-type: none"> ○ Transport Statements, or ○ Transport Assessments, depending on scale.
R8	West Sussex County Council	23 Oct 2023	Email	Confirmed that no comments on the draft Plan.
Reference	Non-Statutory Consultees - Name/Organisation	Date	Method	Summary of representation

R9	Dr Julia Winckler	06 Nov 2023	Consultation Portal	<ul style="list-style-type: none"> • Showed opposition to further development on Greenfield sites, citing their importance and the inadequacy of existing infrastructure. • Emphasised that there is a need for greater investment in local infrastructure before any further development is considered. • Connecting Peacehaven & Telscombe Cliffs by train to Newhaven/Southeast would greatly ease the “notoriously bad traffic issues”. • A railway station had been part of the original vision for Peacehaven/Telscombe Cliffs in the early 1920s and would make a “substantial difference to the quality of people’s lives”.
R10	Jacqueline Anderson	15 Nov 2023	Consultation Portal	<ul style="list-style-type: none"> • Raised concerns regarding Site Ref 06PT and 20PT (Valley Road, Peacehaven), arguing that the proposals would not constitute sustainable development due to significant environmental and infrastructure constraints. <p>Key issues raised:</p> <ul style="list-style-type: none"> • The development would require extensive infrastructure works—road building on steep gradients, installation of utilities (gas, electricity, water) and wastewater pumping—resulting in considerable depletion of natural resources. • An ecological survey should be undertaken before any land disturbance, to avoid obscuring the current ecological baseline. • A flood risk assessment/modelling is needed, as the valley’s gradient and increased impermeable surfaces would cause runoff to accumulate at the lowest point (Valley Road), increasing flood risk. • Local services, particularly GPs and dentists, are already under significant pressure, with no identified proposals to expand capacity for additional households. • Public transport is limited, with no railway station and bus services focused on the A259. • The A259 is frequently gridlocked, and further development at Valley Road would worsen congestion..
R11	Mr D Goggin	20 Nov 2023	Consultation Portal	<ul style="list-style-type: none"> • Mentioned the Plan is detailed. • Argued that it fails to address key local infrastructure problems.

				<p>Key issues raised:</p> <ul style="list-style-type: none"> • Traffic issues are not adequately recognised. • Lack of essential services such as schools, doctors, dentists and the failure to deliver improvements previously promised as part of the Chalker's Rise development. • Complaints about potholes, illegal parking, dangerous driving, and the absence of enforcement officers in Peacehaven. • Perception that service levels differ compared with Lewes, despite residents paying the same Council Tax. • Lengthy documents that do not focus on tangible improvements for Peacehaven.
R12	Mr David Seabrook	24 Nov 2023	Consultation Portal	<ul style="list-style-type: none"> • Raised significant concerns about both the content of the Neighbourhood Plan and the process by which it was progressed, arguing that the plan is not ready for submission. • Expressed that the NDP is a missed opportunity to properly identify the town's infrastructure needs. • Claimed that infrastructure requirements have been deliberately ignored, despite residents supporting development if adequate infrastructure is provided. • Noted that The Hub, a Peacehaven Town Council asset, was included as a potential site for development without the Council's approval. • Stated that the Green Infrastructure Plan, intended to support and protect limited green spaces, has not been completed and no draft is available. • The section on the Peacehaven Shopping Centre is said to be irrelevant, as plans have been superseded by a Morrisons scheme approved by Lewes District Council. • The proposed clifftop cycle routes are considered unrealistic due to space constraints and likely to damage the SSSI through erosion and runoff. • Views from those with relevant technical knowledge were allegedly ignored.

R13	Mr Don Neave	22 Nov 2023	Consultation Portal	<ul style="list-style-type: none"> • Raised concerns that the Neighbourhood Plan does not address the serious traffic congestion problems affecting Peacehaven and the wider area. Key points include: • A lack of recognition of the need for a bypass or alternative road solution to relieve congestion around Newhaven and Peacehaven. • Previous initiatives linked to new development such as car-share schemes, public transport improvements, cycle subsidies are seen as having failed. • The Plan does not adequately address the shortage of safe cycle lanes/tracks, making it dangerous to cycle between Peacehaven, Newhaven and Saltdean. • Ongoing conversion of detached bungalows into flats or HMOs is contributing to increased congestion in narrow residential roads.
R14	Ian Alexander	19 Nov 2023	Consultation Portal	<p>A. The plan appears to satisfy the basic conditions. B. The plan appears to comply with the provisions C. I don't think there is a need to extend the referendum area D. The plan appears to satisfy the ECHR.</p>
R15	Mark Hollis	15 Nov 2023	Consultation Portal	<ul style="list-style-type: none"> • Raised objections to development at Site Ref 06PT and 20PT (Valley Road), arguing that the Neighbourhood Plan would fail to achieve sustainable development and would cause significant, irreversible environmental harm in the Valley Road area. <p>Key issues raised:</p> <ul style="list-style-type: none"> • Major infrastructure requirements (gas, electricity, water, wastewater infrastructure, and pumping systems due to land levels) would result in extensive environmental damage. • The road network required to support new development would further damage the natural landscape. • A thorough environmental and ecological review is needed to assess impacts on wildlife and natural habitats before any development proceeds. • The valley's topography means that with increased impermeable surfaces, flooding is inevitable ("it will flood without question"). • Existing infrastructure and transport systems are already very weak, and further development would exacerbate pressures.

				<ul style="list-style-type: none"> Local GP and dental capacity is already limited and would be further strained. Additional housing would increase light pollution and CO₂ emissions, contributing to wider environmental impacts.
R16	Mr Mike Lucraft	03 Nov 2023	Consultation Portal	<p>Policy PT6 – Housing Design</p> <ul style="list-style-type: none"> Questioned how housing design can “provide access to hi-speed wi-fi” when broadband and mobile provision is outside the control of planners and developers. Noted that the area suffers from poor mobile and broadband coverage, which can only be improved by external providers, not through housing design requirements. <p>Movement / Active Travel (Pages 40–41)</p> <ul style="list-style-type: none"> Challenges the realism of statements suggesting improvements to road infrastructure, given geographical constraints (cliffs, sea, and National Park). Stated that the neighbourhood plan should recognise these physical limitations. Queries raised for the meaning of “improving public transport”, arguing that local bus services are already extremely good, frequent, and well connected. <p>Policy PT13 – Public Transport</p> <ul style="list-style-type: none"> Disagreed with the plan’s claim of poor public transport connectivity. Highlights that Peacehaven benefits from excellent bus services with wide regional connections and regular frequency. Suggested that the focus should be on whether such services can be maintained in future. Additional electronic display boards would improve user experience.

				<p>Policy PT26 – Tourism</p> <ul style="list-style-type: none"> • Expressed scepticism about aspirations to grow tourism, given strong neighbouring destinations (Brighton, Eastbourne). • Noted lack of hotels or tourist accommodation locally. • Mentioned that expanding tourism may reduce available housing, as properties could become holiday lets or second homes. <p>Policy PT28 – Digital Infrastructure</p> <ul style="list-style-type: none"> • Supported the inclusion of digital infrastructure policy. <p>Recommends</p> <ul style="list-style-type: none"> • Providing evidence/data on broadband speeds and reliability. • Highlighting differences between providers. • Addressing mobile mast coverage gaps causing outages. • Being clearer on how improvements could be delivered, including engagement with providers and whether the area will benefit from the Shared Rural Network programme.
R17	Mr Paul Whitney	19 Nov 2023	Consultation Portal	<ul style="list-style-type: none"> • Mentioned that developments of any kind must be accompanied by improvements in basic infrastructure. • Raised concerns against the medical centre in Peacehaven which is overstretched, transport links which are inadequate and a perception that decisions made in Lewes do not benefit the smaller towns on the coast.
R18	Mr Peter Gurr	19 Oct 2023	Consultation Portal	<ul style="list-style-type: none"> • Raised concerns about traffic impacts arising from recent highway changes at the junction of Telscombe Cliffs Way and the A259. <p>Key issues raised:</p> <ul style="list-style-type: none"> • Following the removal of a roundabout and installation of traffic lights at the bottom of Telscombe Cliffs Way, drivers are now diverting through residential roads (Highview Road, Springfield Avenue, Broomfield Avenue, Grassmere Avenue) to avoid queues on the A259.

				<ul style="list-style-type: none"> • These roads form part of a national cycle route and are used by pupils of Telscombe Cliffs Primary School, making the new rat-run particularly dangerous for cyclists and children. • Traffic using these residential roads is reportedly travelling at high speeds (around 30 mph or more), creating safety risks. • The respondent proposes installing a bicycle gate which is similar to the one at Arundel Road/Sutton Avenue to discourage through-traffic while maintaining access for residents and cyclists. • The gate would lengthen vehicle journeys slightly, making the rat-run less attractive, while protecting users of the national cycle route.
R19	Mrs Kate Baker-Bassett	12 Oct 2023	Consultation Portal	<ul style="list-style-type: none"> • Supportive of new housing in principle, but strongly opposes any development that would infringe on existing green spaces within Peacehaven and Telscombe. <p>Key issues raised:</p> <ul style="list-style-type: none"> • Telscombe is small, and its roads are not suitable for high levels of traffic. • Residential back roads are already being used as cut-throughs to avoid the A259. • The football pitch and access to the Tye are described as essential for the health and wellbeing of young people and should be protected. • Argues that, given declining wildlife numbers, the area needs more green spaces with native planting, not fewer. • Strongly urges that no development should take place on green spaces.
R20	Mrs Linda McKellar	22 Nov 2023	Consultation Portal	<ul style="list-style-type: none"> • Expressed strong concern about the effects of overdevelopment on the town. <p>Key issues raised:</p> <ul style="list-style-type: none"> • Local infrastructure is struggling poor roads, no town centre, and over-subscribed GPs, dentists, and schools. • Raised concern against the development “continues at a pace,” with green spaces disappearing quickly. • Questioned what happens to CIL payments, noting that residents see no visible reinvestment.

				<ul style="list-style-type: none"> • Believed there has been little thought for the environment or biodiversity, describing the situation as “a total mess.” • Concluded that the current Neighbourhood Plan fails to address or resolve these longstanding issues.
R21	Ms Sue Griffiths	24 Nov 2023	Consultation Portal	<ul style="list-style-type: none"> • PT16 (Call for Sites): The inclusion of The Hub a Peacehaven Town Council–owned building and sitemwas never approved by the Town Council. • PT37 (Peacehaven Centre): The AECOM masterplan referenced in the NDP has been superseded by the Morrisons scheme, which has planning approval, and therefore should be removed from the Plan. • The Peacehaven Community Orchard, a Priority Habitat protected by a Deed of Dedication, should have been included but requests to add it were ignored.
R22	Nikki Fabry	15 Oct 2023	Consultation Portal	<ul style="list-style-type: none"> • Expressed that the Neighbourhood Plan is sorely needed In P & T and will help us move on to focus on future developments for the area.
R23	Rupert Hakim	27 Nov 2023	Email	<ul style="list-style-type: none"> • Objected to any further house building in this area, citing insufficient infrastructure and the need for major investment before any additional development is considered. • Local services including doctors, dentists, schools and transport—are already overstretched. The respondent argues that new surgeries, schools, and a direct road link to the A27 should be delivered before further housing is contemplated. • The respondent refers to the Council's declaration of a climate emergency and its alignment with the UN Sustainable Development Goals, expressing concern about future restrictions on travel, increased pressure on the electricity grid from EVs, and the potential emergence of “15-minute cities.” • The countryside between Telscombe Road, Valley Road, The Lookout, and the South Downs National Park is described as an invaluable resource that should be protected and managed for residents' mental wellbeing. The respondent notes that use of these areas increased dramatically during the Covid-19 lockdowns.

				<ul style="list-style-type: none"> • Opposition to development near Valley Road, the area is considered unsuitable for further house building due to limited infrastructure, traffic pressures, and the importance of the surrounding landscape.
R24	Jonathan Hammond	19 Oct 2023	Email	<ul style="list-style-type: none"> • Opposed to the inclusion of green space as building land, with particular reference to the Harbour Heights proposal. He describes this site as one of the last remaining ultra-rare green spaces, emphasising its importance for both migratory birds, including skylarks and cuckoos, which rely on the area when making landfall, and local residents' quality of life and equilibrium • Raised concerns that enabling development on this land would be at the peril of both residents and wildlife, and urges that it should be protected from any form of development
R25	Steve Parker	16 Oct 2023	Email	<ul style="list-style-type: none"> • Raised concerns about local safety and enforcement, emphasising that more policing and traffic-calming measures are needed before any further housing development is approved. <p>Key Issues include:</p> <ul style="list-style-type: none"> • Peacehaven is described as a hotspot for motorcycle theft, requiring a stronger police presence. • Arundel Road is identified as a problem area, with calls for more speed bumps, better traffic enforcement and action against speeding vehicles and "boy racers." • Mentioned that speeding cars fail to stop at mini-roundabouts, contributing to the deaths of pets (notably cats). • Argued that more must be done to improve local safety prior to agreeing to additional development.
R26	Tony Perris	N/A	Email	<ul style="list-style-type: none"> • Highlighted the difficulty for residents in identifying changes between the earlier and revised versions of the Neighbourhood Plan. They note that the document is substantial, and detecting amendments that may affect them is challenging without clear guidance. • Requested that the Town Councils provide a summary or résumé of key changes that led to the re-issue of the Plan and a list of chapters or section numbers where changes have been made with clear indication of where

				readers should focus their attention to understand what is different from previous drafts.
R27	Mr A Keys	N/A	Email	<ul style="list-style-type: none"> • Argued that cycling and pedestrian routes should be separated wherever possible to avoid accidents. • Noted that on the Telscombe Cliffs shared path, cyclists often travel too fast, causing safety issues particularly for elderly and disabled pedestrians. • Reduced hedge and grass-cutting have left brambles and vegetation overgrown, forcing cyclists and pedestrians into close proximity and restricting accessibility for wheelchairs, walking aids and prams. • Grass verges are often untended and overgrown, detracting from the area's appearance. • Suggests removing some verges to create: • Additional parking on feeder roads (e.g., Telscombe Cliffs Way, Central Avenue, Sutton Avenue) • Proposed removing verges along the A259 to create bus lanes and cycle lanes, improving traffic flow and reducing pollution from slow-moving vehicles. • Raises concerns that PT11 places too much emphasis on walking and cycling, without acknowledging the needs of an elderly population who rely on cars to access essential services. • Suggested the Plan does not adequately address issues such as: <ul style="list-style-type: none"> ○ Restricted parking ○ Vehicle access limitations (e.g., ULEZ/No-Go zones) ○ Practical transport needs of older residents
R28	Mary Campbell	N/A	Email	<p>Argued that the PTNDP does not meet:</p> <ul style="list-style-type: none"> • Basic Condition (a): Not in general conformity with national policy; reverses an existing statutory national policy objective. • Basic Condition (d): Does not support sustainable development and, in some areas, reduces it.

				<ul style="list-style-type: none"> • Basic Condition (e): Not in general conformity with Lewes District Local Plan, its emerging Local Plan (Reg 18), or East Sussex County Council strategic planning/transport policies. <p>PT1 – High Quality Design</p> <ul style="list-style-type: none"> • PT1(1): “Accessible and safe for all ages” is too absolute; would force refusal of beneficial development and contradicts national C2/C3 housing distinctions. • PT1(2): Incorrect use of “landscaping” instead of “landscape”. Failure to reference trees, hedges, woodland risks unintended loss of natural features and conflicts with Lewes strategic policies. • PT3(1): “Landscaping” again used incorrectly. Wording offers no meaningful protection to mature trees/hedges; needs stronger requirement for retention except in exceptional circumstances. • PT3(2): Incorrect reference to “cliff-top location”; should be site-appropriate. <p>PT5 – Sustainable Design</p> <ul style="list-style-type: none"> • Largely changed from previous drafts; implications not assessed (e.g. cost, feasibility). <p>PT6 – Housing Design</p> <ul style="list-style-type: none"> • PT6(5): Should refer to important views to and from the SDNP, not only into it. • Repeated incorrect use of “landscaping” instead of “landscape”. <p>PT8 & PT9 – Housing Need / Housing Mix</p> <ul style="list-style-type: none"> • Reliance on out-of-date Housing Needs Assessment deemed unsound; should reference updated assessments. • PT9(2): Financial viability clause allows developers to bypass policy; should be amended to prevent exploitation. <p>PT11 – Travel Planning</p>
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				<ul style="list-style-type: none"> • Missing explicit reference to pedestrian crossings, despite being a major local transport need. <p>PT16 – Call for Sites</p> <ul style="list-style-type: none"> • Inclusion of The Hub (PTC-owned site) unjustified and not approved by Peacehaven Town Council; policy wording tied to outdated AECOM document. <p>PT17 – Biodiversity</p> <ul style="list-style-type: none"> • Does not require biodiversity net gain, nor protection of wider ecological assets. • Wording interpreted as facilitating development rather than preventing harm. • “Protected habitat” definition inadequate for local context. <p>PT37 – Peacehaven Centre</p> <ul style="list-style-type: none"> • Outdated: superseded by the approved Morrisons development; creates misinformation unless revised. <p>Area-Based Design Codes – Policy Issues</p> <ul style="list-style-type: none"> • Lack of Map for Design Code Areas • Missing map makes the policy ineffective and contrary to communication requirements. <p>Area 3 – South Downs Fringe / Valley Road</p> <ul style="list-style-type: none"> • PTNDP text not in conformity with Lewes Local Plan (current or emerging) which continues to classify Area 3 as countryside, not suitable for housing. • Wording could enable development contrary to strategic policies protecting this area. <p>Area 6 – Peacehaven Centre</p>
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				<ul style="list-style-type: none"> Entire section outdated due to Morrison's planning permission; PTNDP text contradicts current strategic policy. <p>Movement & Route Map Policies</p> <p>Cycle Route Map (p.50)</p> <ul style="list-style-type: none"> New cycling proposals (especially along the clifftop/SSSI) conflict with: Marine & Coastal Access Act 2009 (England Coast Path intended for walkers) ESCC LCWIP (omits key strategic cycle routes: N4 & N2) Lewes DC cliff preservation and drainage policies Map differs substantially from the 2021 Reg 14 version. <p>Flooding & Coastal Protection</p> <ul style="list-style-type: none"> PTNDP under-reports flood risk in Valley Road area; fails to warn developers about known surface water issues, contrary to strategic policy requirements. <p>Additional Policy Issues</p> <ul style="list-style-type: none"> Policy conflicts between PTNDP and: Saved 2003 Lewes policies LDC Local Plans 1 & 2 ESCC Highways/transport strategy Outdated evidence base, including reliance on 2011 census data for 2024 decision-making.
R29	David Judd	12 Oct 2023	Consultation Portal	No Comments