

Newhaven Town Council's Response to the Core Strategy

The schedule of comments and proposed changes set out below forms the basis for the Town Council's representations on the Core Strategy.

The black text is made up of extracts from the Core Strategy to which the Council's comments and proposed changes refer. The green texts are the questions asked in the Core Strategy to help guide comments and the Town Council's responses address these questions.

The extracts are not comprehensive, but are the key ones that the Town Council considered to relate to the town and on which the Town Council should be making representations.

Reference, particularly if you wish to make your own comments, should be made to the full Emerging Core Strategy document, which is available to view on and download from the Lewes District Council website.

After each extract there is a table that sets out in blue text the general comments of the Town Council and in red text the proposed changes the Town Council will be suggesting to the District Council in order to address these comments and concerns.

EMERGING CORE STRATEGY

KEY CHARACTERISTICS - NEWHAVEN

With a population of 12,225 the town of Newhaven is located at the mouth of the River Ouse, on the English Channel coast.

The town has had a harbour for sea-faring vessels since the 16th Century. Today the main services operating from the harbour are the cross-channel ferry to Dieppe and commercial trade in aggregates and scrap metals. There is also a commercial fishing fleet and small marina.

Although there are a number of derelict and under-utilised sites that are near to, or adjoin the harbour, there has been significant recent water-front redevelopment at West Quay. There is also 12 hectares of land at Eastside, which is allocated for business development, but has yet to be implemented.

Newhaven Fort, built in the 1860s to defend the growing harbour, is a Scheduled Ancient Monument. The marine workshops on East Quay are another prominent heritage asset within the town (Grade II*).

The town has a concentration of industry and a range of facilities involved in waste management. Due to such uses currently and historically on a number of sites, including those that are derelict, there are a significant number of sites that are potentially contaminated.

Denton Island has recently seen an upsurge in economic activity with the successful establishment of the Enterprise Centre and the Newhaven campus of Sussex Downs College.

Retail offer within the town centre is declining with a number of vacant units.

The town has two railway stations offering direct train services to Lewes, Seaford and Brighton.

A high proportion of jobs in the town (37%) are in manufacturing, which is significantly higher than the regional and national averages.

Questions to consider:

Have the correct characteristics that are relevant to Lewes District been identified, or not?

Have any characteristics been misinterpreted?

NTC Comments	Proposed Revisions
<p>NTC has no specific comments on the general, environmental, social and economic characteristics which would appear to appropriately reflect the broader portrait of Lewes District.</p> <p>NTC feel that further and additional reference to the location, history, rail links, retail and development changes and opportunities in Newhaven should be made within the proposed characteristics to reflect a truer portrait of the town.</p> <p>NTC is concern that the reference to the 37% proportion of jobs in the town being in manufacturing does not reflect the recent closure of Parker Pen, Artex, and other smaller and less well known companies – if not this figure should be revised to reflect the most up to date position.</p> <p>There is also no reference to the higher levels of socio-economic deprivation factors that effect significant elements of the town's population.</p>	<p>Some bullet points are revised and new ones added to read:</p> <p>With a population of 12,225 the Town of Newhaven is located on the English Channel coast at the mouth of the Ouse valley, south of the South Downs National Park at the strategic crossing point of the river, embedded in a high quality environment with views from almost everywhere to the river, sea, or Downs.</p> <p>The historic core of the town is set on the higher land to the west of the valley, with the town now stretching through new developments across the valley floor encompassing other older settlements to the east.</p> <p>Newhaven Fort, built in the 1860's to defend the growing harbour, is a Scheduled Ancient Monument. The Marine Workshops (Grade II*) and Paint Shop on East Quay and two Conservation Areas are prominent heritage assets within the town, whilst the shoreline to the south, wetland areas to the east and Downs to the north provide valuable protected habitats and informal recreational facilities.</p> <p>Whilst there are many potential pedestrian and cycle links within the town and to these adjoining quality environments, several of the existing routes are often unattractive and obscure, poorly linked, awkward to navigate and unknown to local people.</p> <p>The town has had a harbour for sea-faring vessels since the 16th Centaury. Today the main services operating from the harbour are the cross-channel ferry to Dieppe and commercial trade in aggregates and scrap metals. There is also a commercial fishing fleet and expanded marina facilities.</p> <p>There are a number of derelict and under-utilised sites that offer significant opportunities for regeneration near to, or adjoining the harbour and there has been significant recent water-front redevelopment at West Quay. There is also 12 hectares of land at Eastside, which is allocated for business development, but has yet to be implemented.</p> <p>The town has a concentration and variety of businesses and industry with a range of facilities involved in waste management. Due to such uses currently and historically there are a number of sites that are potentially contaminated and several with other issues such as flood risk.</p> <p>Denton Island has seen an upsurge in economic activity with the successful development of the Enterprise Centre generating demand for follow on units and the establishment of the Newhaven campus of Sussex Downs College.</p> <p>The town has two railway stations offering direct train services to Seaford, Brighton and Lewes and from there to Gatwick and London.</p> <p>Since the 60's poor quality development in and a one-way ring road around the town centre has resulted in retail offer within the</p>

	town centre declining substantially with there now being a number of vacant units; however significant new retail offer has developed east of the river.
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A high proportion of jobs in the town (37%) are in manufacturing, which is significantly higher than the regional and national averages **and the town also has pockets of high levels of deprivation.**

KEY STRATEGIC ISSUES AND CHALLENGES

Accommodating and delivering growth

There is a requirement to bring forward sufficient land to meet the expected need for new homes arising from the future growth in population and households.

We need to determine the best way of ensuring that these new homes meet local needs, particularly the provision of affordable housing and housing for an ageing population.

There is a need to deliver sufficient sites and premises for business and other uses to provide employment and facilitate the growth and regeneration of the local economy.

We need to work in partnership with other agencies and organisations to deliver this growth and the necessary infrastructure improvements.

Although growth options are limited, due to significant environmental constraints, there is still a need to ensure that new development is provided in the most sustainable locations.

We need to ensure that new development is provided in a way that enables the most sustainable means of using natural resources, such as water, energy and soil, to be utilised.

There is a need, and duty, to address cross-boundary influences and links with the adjacent authorities of Brighton & Hove, Mid-Sussex and Wealden, where much higher levels of growth are planned than in Lewes District.

Improving access to housing

Improving the amount and availability of affordable housing, both rented and shared ownership, is a priority due to relatively high house prices, below average wages, and continued in-migration.

We need to be flexible in terms of housing provision in order to be able to respond effectively to changes in the housing market.

Promoting sustainable economic growth and regeneration

We need to determine the best way of addressing the pockets of socio-economic deprivation along the coast, low average wages, the impact of a declining workforce, and the high level of out-commuting which is unsustainable and undermines the local economy.

We need to address the identified lack of good quality modern business premises and smaller units in order to support the growth and retention of local businesses and the District's ability to attract inward investment.

There is a need to ensure the provision of relevant employment skills, training and support to meet the needs of existing and potential companies and the local workforce, both now and in the future.

We need to work in partnership to deliver the regeneration of vacant, underused or poor quality sites and premises and improve accessibility before allocating new green field sites for business development, particularly at Newhaven.

We need to address the inadequate access to good quality and high speed electronic/IT communications, particularly in view of its role in supporting home-working, rural employment and new start-up businesses.

We need to determine the best way of maintaining and enhancing the role of Newhaven as a regionally significant port with its associated facilities.

We need to recognise the contribution that the rural area can make to the District's economy, including the potential enhanced role of tourism in terms of providing employment opportunities, attracting investment and creating wealth. However, it does need to be recognised that tourism alone will not lead to a buoyant rural economy and that other sectors are equally as important.

Creating healthy, sustainable communities

We need to work in partnership with other organisations to ensure adequate access to health, education and other community services and facilities and to reduce inequalities across the District.

We need to determine the best way of addressing inadequacies in the provision or quality of recreational facilities and open spaces, particularly for children and teenagers.

We need to support the quality of community life through partnership working to promote social inclusion, tackle deprivation, encourage community cohesion, and reduce the fear of crime.

We need to ensure that the needs and aspirations of the growing elderly population are addressed by meeting changing housing requirements and developing the integrated provision of good quality services that will maintain people's independence and social contacts in old age.

Protecting and enhancing the distinctive quality of the environment

There is a need to continue to protect and enhance the quality of the District's environment, whilst also taking the opportunity to capitalise upon the designation of the South Downs National Park in order to improve people's understanding and appreciation of the landscape, attract new investment, and achieve economic benefits through tourism.

We need to conserve and enhance the natural beauty, wildlife and cultural heritage of the National Park, whilst promoting opportunities for the understanding and enjoyment of its special qualities by the public.

We need to determine the best way of managing change and raising the quality of new development in order to preserve and enhance the character of the District's heritage assets, including its many Conservation Areas.

We need to protect existing open spaces, create new spaces, and link these spaces together to develop a green infrastructure network that will deliver environmental and social benefits, such as enhancing biodiversity, reducing flood risk and improving community health and well-being. In view of the significant environmental constraints on the outward expansion of many of our larger settlements, we need to determine the best way of avoiding 'town cramming' and the loss of existing residential amenities.

There is a need to ensure that new development contributes to reducing flood risk and surface water run-off; protecting and restoring natural habitats; maintaining and improving air quality; and protects drinking water supplies and bathing areas.

Tackling climate change

We need to mitigate the causes and effects of climate change through the location and nature of new development and by helping to shape places that create lower carbon emissions and are resilient and adaptive to climate change.

We need to promote and encourage alternative energy sources using decentralised or low carbon technologies, and energy and water efficiency in the design, construction and use of buildings.

We need to determine the best way of encouraging people to move around the District in a sustainable manner and of ensuring maximum accessibility to new development by walking, cycling and public transport.

We need to address the risk of flooding by using the Strategic Flood Risk Assessment and the East Sussex Preliminary Flood Risk Assessment to inform planning decisions and the identification of sites for development.

We need to manage and adapt development in areas that are at risk from coastal erosion.

We need to determine the best way of maintaining and enhancing the role of Newhaven as a regionally significant port with its associated facilities.

We need to manage and adapt development in areas that are at risk from coastal erosion.

Question to consider:

Do you agree with the issues and challenges that have been identified in this section?

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NTC Comments	Proposed Revisions
<p>NTC considers the broad key strategic issues and challenges would appear to appropriately reflect those generally facing Lewes District.</p> <p>There are however some key issues and challenges related to Newhaven that could be better reflected in the wording of some bullet points:</p> <p>a) Supporting vulnerable households existing and “imported” to the town.</p> <p>b) Access to housing, even with lower house prices in the town compared to other parts of the District.</p> <p>c) Maximising the benefits of the port for the town.</p> <p>d) Making up shortfalls in the green infrastructure.</p>	<p>Some bullet points are revised to read:</p> <p>There is a need, and duty, to address not only cross-boundary influences and links with the adjacent authorities of Brighton & Hove, Mid-Sussex and Wealden, where much higher levels of growth are planned than in Lewes, but also within the District particularly where residents and businesses make demands on communities and facilities across authority boundaries.</p> <p>We need to determine the best way of addressing the pockets of socio-economic deprivation along the coast, low average wages, the impact of a declining workforce, and the high level of out commuting which is unsustainable, which undermines the vitality and viability of communities and the local economy.</p> <p>We need to be flexible in terms of housing provision in order to be able to respond effectively to changes in the housing market, community needs and individual site opportunities and constraints.</p> <p>We need to determine the best way of maintaining and enhancing the role of Newhaven as a regionally significant port with its associated facilities and how they can best benefit the local communities and economy.</p> <p>We need to determine the best way of addressing inadequacies in the access to, provision and/or quality of, recreational facilities and open spaces particularly for children and teenagers in existing urban areas and set targets for bringing the level and quality of provision to all communities up to the highest standards.</p>

VISION FOR THE FUTURE

Lewes district wide

By 2030 the district and its residents will have responded to the challenges of climate change, through a reduction in the district’s carbon footprint and by adapting to the consequences of climate change. This will have been done through a variety of means, such as sustainable construction techniques, utilising alternative travel options to the private car (including the reinstated Lewes to Uckfield railway line) and increased production of green energy. Measures to reduce risk to the district from the increased frequency and severity of flood events will have been introduced, particularly in the urban areas. Despite the risk of flooding posed by the rivers, the recreational opportunities presented by these key environmental features will have been realised.

The parts of the district within the South Downs National Park will have been conserved and enhanced under the leadership of the National Park Authority, and the area will be better understood and enjoyed by both residents and visitors. Elsewhere, the unique, distinctive and general high quality heritage, built and natural environment of the district will have been preserved, and in some instances enhanced, particularly through urban regeneration along the coastal strip. The enjoyment of the built and natural environment of the district will have been assisted through a strong sustainable tourism industry. Enhancements to the biodiversity of the district, including the further creation of a high quality network of habitats, will have been established and the relative tranquillity enjoyed by many parts of the district will have been retained.

Improved employment opportunities will have reduced the need for out commuting thereby supporting local services such as the retail centres. To enable this, businesses, including homeworking, will be supported by the provision of modern business accommodation and access to high quality and high speed e-communications.

Recent development in the District will have contributed to making existing communities more sustainable and addressing some of the previous imbalances in the standard of living across the District. The timely delivery of key infrastructure requirements, including sustainable transport options, accessible health care and education facilities, will have been key to achieving this.

Appropriate new housing will have been delivered that has contributed to meeting the significant housing need that has resulted from an increase in population and changes to the demographic profile. The provision of appropriate affordable housing, in appropriate locations, will have enabled those who wish to live in the district to do so.

Newhaven

By 2030, Newhaven will have undergone significant regeneration and developed and strengthened its economic base. Building upon the success of the Enterprise Centre the town will have become the focus for enterprise and training within the District, with links to the two universities in Brighton. Much of the economic regeneration will have centred upon port generated activities, high-tech industries and the tourism industry with the town acting as the continental gateway to the National Park. The regeneration of Newhaven will have resulted in a revitalised and more accessible town centre, with an improved public realm and a greater range of uses and activity. The improved accessibility of the town centre will have been aided by an improved highway network, greater connectivity to the towns railway stations and a high quality public transport corridor along the A259.

Questions to consider:

Do you consider the vision to be achievable, realistic and relevant to Lewes District?

Do you consider the vision to be locally distinctive to Lewes District?

Do you agree with the different character areas identified in the vision?

NTC Comments	Proposed Revisions
<p>NTC considers that the broad vision for Lewes District appears appropriate and relevant. Whether it is achievable and realistic does depend on a number of factors, many beyond the realms of the Core Strategy, notably the broad economic climate. It is however important to set a vision to aspire to and NTC supports this approach.</p> <p>NTC believes the proposed vision for Newhaven needs to be amended to better reflect the character of the town and there are several elements that also need to</p>	<p>The vision for Newhaven is revised to read:</p> <p>By 2030, Newhaven will have undergone significant regeneration and development and strengthened and diversified its economic base. All communities within the town will have access to appropriate facilities to meet their needs and a variety of quality open spaces linked by a network of footpaths and cycleways providing access to the adjoining coast and countryside. Improvements to the highway network, public transport routes and parking regimes will have eased movement within the town and access to the regional highway network and adjoining towns and cities. Building upon the success of the Enterprise Centre the town will have become the focus for enterprise and training within the District, with links to the two universities in Brighton and other educational establishments acting as a hub for developing and expanding start up businesses. Economic regeneration will also have centred on redevelopment and improvement of the area east of the river, maximising the potential of the waterfront, listed buildings and existing commercial premises, resulting in a</p>

<p>be incorporated within the vision for it to be more appropriate and reflect the local community's needs and aspirations.</p>	<p>quality environment with modern premises, improved access and greenway links, where a variety of uses, activities, businesses and industries thrive. Developing its tourism opportunities the town, with new port and accommodation facilities, integrated transport interchange and access road will act as the continental gateway to the National Park and beyond. The old town centre will be revitalised and more accessible with a new role and a greater range of uses and activities to complement those east of the river with its improved public realm linking the two areas. These links and improved accessibility of the old town centre will have been aided by the improved highway, cycle and pedestrian network, greater connectivity to the town's railway stations and integrated transport interchange and a high quality public transport corridor along the A259.</p>
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STRATEGIC OBJECTIVES

The ten strategic objectives, identified in this section, outline the direction that the Local Development Framework will take in order to achieve its vision of Lewes District in 2030. The following strategic objectives are not in any order of importance:

To deliver the homes and accommodation for the needs of the District and ensure the housing growth requirements are accommodated in the most sustainable way.

The Council and Authority will work with housing agencies and the private sector to meet the identified local housing need resulting from the changing demographics of the district, particularly an ageing population. A key element of this objective will be ensuring that a suitable mix of housing size, type, tenure and affordability is achieved.

To take advantage of the richness and diversity of the District's natural and heritage assets to promote and achieve a sustainable tourism industry in and around the District.

A key part of this objective will be strong and continued partnership working between the Council, and other agencies, and the South Downs National Park Authority. Collectively we will promote opportunities for public enjoyment and understanding of the National Park's special qualities and will also ensure that economic, environmental and social opportunities created by the new National Park are realised across the whole of Lewes District.

To work with other agencies to improve the accessibility to key community services and facilities and provide the new and upgraded infrastructure that is required to create and support sustainable communities.

The Council and Authority will work in partnership with the agencies responsible for provision of physical, social and green infrastructure. This will include the programming, funding and delivery of all infrastructure required to support new development. Where appropriate, the provision of new infrastructure should also benefit the wider community and redress current inequalities in provision. This includes education, healthcare provision, public transport, as well as recreation and open space.

To conserve and enhance the high quality of the District's towns, villages, and rural environment by ensuring that all new development is designed to a high standard and maintains and enhances the local vernacular character and 'sense of place' of individual settlements.

The Council and Authority will seek regular dialogue with builders, architects, designers and householders in order to raise standards of design and construction in the area. This will include

publication by the Council and/or National Park Authority of guidance on appropriate design, materials, construction methods and the creation of safe, legible layouts that provide inclusive access to all.

To conserve and enhance the natural beauty, wildlife and cultural heritage of the area.

The Council and the South Downs National Park Authority will work closely together to ensure that the effects of this Purpose benefit all parts of Lewes District, and not just within the National Park.

To maximise opportunities for re-using suitable previously developed land in urban areas and to plan for new development in the highly sustainable locations without adversely affecting the character of the area.

Among other development initiatives, the Council and Authority will prioritise the redevelopment of vacant and derelict sites in existing urban areas. This complements the overall aim of locating new development where it makes efficient use of suitable and available land located in sustainable locations (i.e. close to existing services and public transport).

To reduce the need for travel and to promote a sustainable system of transport and land use for people who live in, work in, and visit the District.

The Council will work with the relevant transportation agencies to promote alternative and sustainable modes of transport to the private car, including improving the provision of facilities that enable safe walking and cycling, and the connectivity, capacity, accessibility and frequency of public transport to places in the district and outlying areas, including to continental Europe through Newhaven Port. Successful achievement of this objective will also involve the delivery of high speed and high quality e-communications across the whole of Lewes District, which enables those who wish to work from home to do so, thereby reducing the need for travel. Achieving this objective should assist in tackling some of the current areas that are subject to poor air quality in the district (predominantly caused by transport) and ensure that further such areas do not become apparent.

To ensure that the District reduces locally contributing causes of climate change, including through the implementation of the highest feasible standards of sustainable construction techniques in new developments.

This objective will involve the Council and other responsible agencies seeking to reduce the current carbon emissions from the existing development stock and encourage the sustainable use of resources, as well as promoting low carbon emissions, resource efficiency measures and renewable energy in new development. Key to the achievement of this objective will be the successful achievement of the sustainable transport objective.

To reduce the District's vulnerability to the impacts of climate change, particularly by seeking to reduce the number of properties, community assets and infrastructure that are at an unacceptable risk of flooding, or coastal erosion.

The Council and National Park Authority will work closely with the Environment Agency on current and future river and sea flooding issues. An important element of this objective will be seeking to ensure that climate change impacts on biodiversity habitats and species are minimised.

To stimulate and maintain a buoyant and balanced local economy through regeneration of the coastal towns, support for the rural economy and ensuring that the economy does not become reliant on one or two sectors.

Key to this will be for the Council, National Park Authority and other organisations to take advantage of the opportunities for economic growth and prosperity that exist in the district. This includes regeneration at Newhaven associated with the existing port, creating a sustainable tourism economy that takes advantage of the District's key attractions, harnessing the

knowledge at local universities, colleges and schools and diversifying the economy of Lewes town so that it is less reliant on the public sector and tourism. This will require the creation of more modern and varied commercial premises to meet the needs of new and expanding local businesses.

Questions to consider:

Do you consider that the strategic objectives will achieve the vision?

Can the strategic objectives be achieved by 2030?

Will the objectives help achieve the vision and priorities that are set out in the Sustainable Community Strategy?

NTC Comments	Proposed Revisions
<p>NTC generally supports the proposed objectives, but considers that minor amendments are needed in some cases to take account of particular problems experienced in some urban areas like Newhaven and which may hamper its regeneration.</p> <p>a) particularly high pockets of deprivation requiring affordable housing and the need for housing development to kick start/cross subsidise regeneration and other community facilities.</p> <p>b) the need for innovative design and development solutions to sites that have major constraints or costs that are not being brought forward for regeneration.</p>	<p>The supporting text to objective 1 is revise to read:</p> <p>The Council and Authority will work with housing agencies and the private sector to meet the identified housing need resulting from the changing demographics of the district, particularly an aging population, and in special circumstances to meet the needs of a particular community and opportunities for facilitating regeneration.</p> <p>An additional sentence is added to the supporting text of objective 4 to read: Whilst recognising that in special circumstances on key sites outside the National Park more modern designs which enable innovative solutions to bring sites forward for development for the benefit of the community or economic regeneration may be appropriate.</p> <p>The supporting text to objective 9 is revise to read: Two important elements of this objective will be seeking to ensure that climate change impacts on biodiversity habitats and species are minimised and that innovative design solutions are explored in areas of potential development that are at risk of flooding, but where bringing forward appropriate development would have positive sustainable, economic and community benefits.</p>

Proposed Settlement Hierarchy

Settlement category	Function	Settlements within this category
Primary Regional Centre	A large accessible settlement by road and public transport with a centre containing a large range of retail units, including the sale of higher order goods, a range of leisure opportunities, significant levels of employment and facilities such as a hospital with A & E services. Such settlements meet all of their own needs for such higher level services.	Brighton and Eastbourne (both settlements are outside of the District, but they exert a strong influence on the District)
Secondary Regional Centre	An accessible settlement by road and public transport with a centre containing a range of retail units, including high street chains. A reasonable	Haywards Heath (this settlement is outside of the District, but it exerts a strong

	range of leisure opportunities are available and the town contains significant levels of employment. Key facilities, such as a hospital, are available. Such settlements meet the majority of their own needs.	influence on the northern part of the District)
District Centre	Accessible settlements by road and public transport containing a range of shops, employment opportunities and facilities including a secondary school. Such settlements are not reliant upon other centres to meet day to day needs, but they require support from nearby secondary or primary centres to meet the higher level needs of their residents.	Burgess Hill (this settlement is outside of the District, but it immediately borders the eastern boundary and is an influence on the north western part of the District), Uckfield (outside of the District, but is a strong influence on the north eastern part of the District), Seaford, Lewes, Newhaven, Peacehaven & Telscombe
Rural Service Centre 100+	Sustainable locations (with either a frequent bus or rail service) with a number of key services and facilities that meet many day to day needs of their residents and those from the wider rural hinterland. Some employment opportunities are available.	Newick, Ringmer
Service Village 30 - 100	Villages that have a basic level of services and facilities, public transport provision (possibly not frequent) and limited employment opportunities. Residents can have some of their day to day needs met in such locations, although higher order settlements need to be accessed to enable this to be fully achieved.	Barcombe Cross, Ditchling, Glynde, Plumpton Green, Wivelsfield Green
Local Village 10 - 30	Villages that have very few facilities and services and have poor levels of accessibility to higher order settlements. Few, if any, employment opportunities are available.	Broyleside, Cooksbridge, Chailey North, Chailey South, Falmer, Firle, Kingston, Piddinghoe, Rodmell, South Street, South Heighton
Hamlet	Settlements that generally have a population of less than 100, have an historic core (generally with a church), but are generally lacking social infrastructure and ease of accessibility to higher order settlements.	Barcombe, Bishopstone, Norton, Chailey Green, East Chilington, Hamsey, Offham, Plumpton, Iford, Streat, Southease, Tarring Neville, Telscombe Village, Wivelsfield, Westmeston

Questions to consider:

Do you agree with the settlement categories identified and the functions that have been defined?

Do you agree with how the settlements have been categorised? If not, what changes should be made to the settlement hierarchy?

Do you agree with the levels of growth that are considered appropriate to the type of settlement (appreciating that opportunities and constraints to growth are not factored into these 'theoretical' figures)?

NTC Comments	Proposed Revisions
NTC considers that the proposed settlement hierarchy appears appropriate in most circumstance and that Newhaven falls most appropriately within the definition in the hierarchy of a District Centre.	The Core Strategy should make reference to the fact that not all

<p>There is concern that the settlements on the periphery of Newhaven do not however readily fit within the definitions, particularly in terms of access to higher order settlements.</p> <p>NTC recognises that the town will have high sustainable ratings and that it would be appropriate to focus development in such locations. This is particularly so in the case of Newhaven where there are opportunities for redevelopment, but NTC are concerned that the opportunities for development on other fringe sites are finite and that some of the identified sites do have constraints on the levels of development that can be accommodated and when they could be implemented i.e. suitable highway access (see also comments on housing allocations).</p> <p>Allocations for Newhaven should not exceed the identified sites and that they should only be brought forward in association with the provision of adequate highway access and community and green infrastructure requirements. It is hoped that this will be appropriately reflected in the Infrastructure Delivery Plan.</p>	<p>settlements within the district readily fall within the categories, particularly those in close proximity/adjoining Newhaven.</p>
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The preferred approach for the level of housing and employment land

Provision of housing and employment land

In the period between 2010 and 2030, 4,150 net additional dwellings will be provided in the plan area (this is the equivalent of 208 net additional dwellings per annum).

In the period between 2010 and 2026, 50,000 to 64,000 sq. metres of employment floorspace (B1, B2 and B8) will be provided in the plan area. Between 30,000 and 40,000 sq. metres of this floorspace will be as industrial space (B1c, B2 and B8), and between 20,000 and 24,000 sq. metres will be as office space (B1a).

Other approaches to the provision of housing and employment land, in terms of quantity, which have been considered, but not recommended as the preferred approach at this stage are as follows:

Other options considered

1. To have a housing target that is consistent with the expected level of housing need over the plan period (this level of need is 300 net additional dwellings per annum and is the lower end of the range of housing need identified)
2. To have a housing target that is consistent with the expected level of housing need over the plan period (this level of need is 450 net additional dwellings per annum and is the upper end of the range of housing need identified)
3. To have a housing target that is based upon the housing target set out in the South East Plan (based upon the residual housing target from the South East Plan this would equate to 206 net additional dwellings between 2010 and 2026 and then 220 net additional dwellings for the remaining part of the plan period)
4. To plan for a higher level industrial floorspace
5. To plan for a lower level of industrial floorspace
6. To plan for a lower level of office floorspace

Proposed employment floorspace requirements

	Floorspace	Existing potential	Residual
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	requirement (sq metres)	supply (sq metres)	requirement (sq metres)
Industrial	30,000 – 40,000	167,600	0
Office	20,000 – 24,000	8,000	12,000 – 16,000
Total	50,000 – 64,000	175,600	0

Proposed housing requirements

	(A) Total requirement	(B) Already developed in the plan period	(C) Units under construction	(D) Units with extant permission (& likely to be delivered)	(E) Units that is already allocated & considered deliverable	Residual requirement to plan for (A – B, C, D & E)
Housing (within the National Park)	Plan – wide requirement: 4,150	12	78	97	0	Plan – wide requirement: 2,694
Housing (outside of the National Park)		149	87	606	427	

Options for housing distribution summarised

Settlement (NP denotes if it is in the National Park)	Commitments (as at 1 st April 2011)	Housing delivered on strategic sites	Housing to be delivered on identified small-scale sites	Housing to be delivered on broad locations for development/change	Total
Newhaven	423	Any housing on Eastside, if alternative options to the employment allocation are taken forward	275	Any housing on Eastside, if alternative options to the employment allocation are taken forward	698 + Eastside

Questions to consider:

Do you agree with the level of housing and employment growth that is proposed for the plan area?

Do you have a view on any of the options that have been considered?

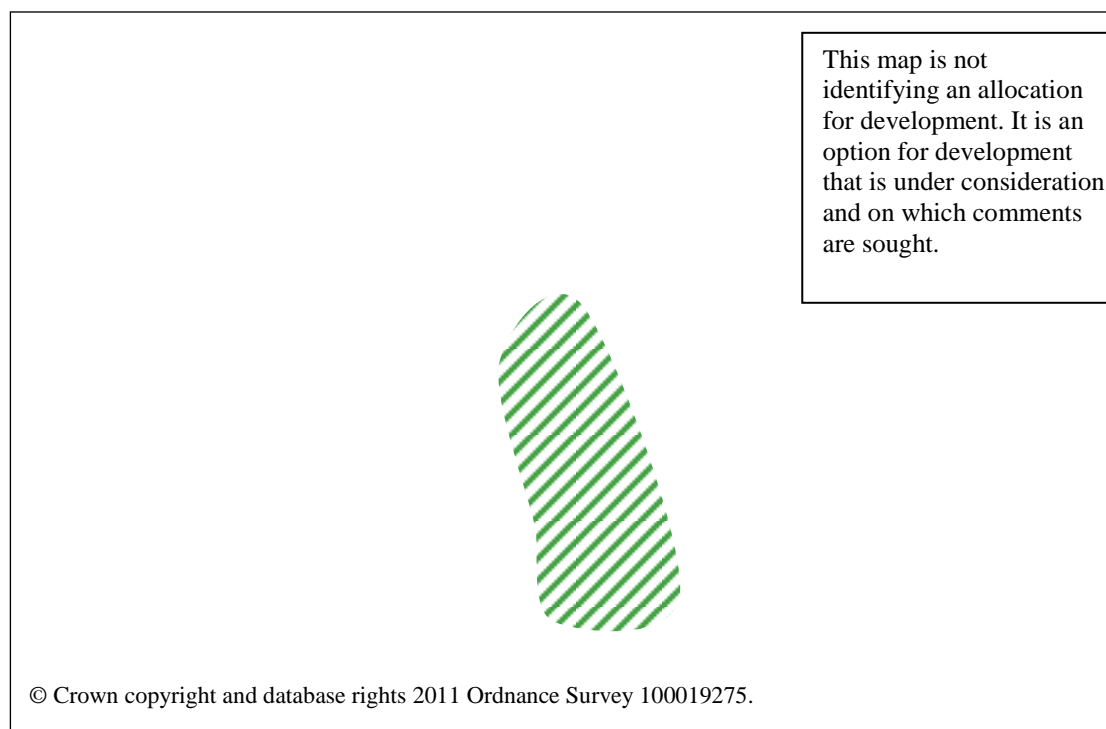
NTC Comments	Proposed Revisions
NTC are concerned that the proposed level of housing provision within the plan period is below even the lower end of the range of housing need identified in the Housing Background Paper. NTC supports the principle that housing provision should be set by identified housing	That the Core Strategy should seek to identify adequate sites to meet at least the lower end of the housing need identified for the plan period. That these should be

<p>need not market demand. Whilst recognising that the current economic climate is suppressing the housing market, NTC are concerned that long term under provision will exacerbate the demand for affordable housing.</p> <p>In terms of employment NTC are concerned that the proposed employment floorspace requirements (being already principally met by existing commitments) should not stifle opportunities for regeneration or enhancing the local economy through sustainable provision, bearing in mind the wider economic picture.</p> <p>NTC believes greater thought and reference needs to be given to the opportunities for/impact of home working and neighbourhood business centres, not only in respect of villages, but also the opportunity for recognising and establishing community villages within larger urban areas.</p> <p>NTC welcomes the reference in paragraph 6.20 that “The Core Strategy should also consider how some of the more long-standing employment land commitments, particularly in Newhaven, could eventually be delivered as well as considering how to upgrade some of the existing stock of employment premises”, but believes that greater flexibility to achieve this needs to be shown in the final document.</p>	<p>based on sustainability criteria, targeted at affordable provision, where they facilitate regeneration and/or needed community infrastructure.</p> <p>That the Core Strategy should recognise opportunities in special circumstances for the provision of additional employment opportunities provided these meet sustainability criteria.</p> <p>The Core Strategy should make reference to a wider range of ways of providing employment opportunities, with a positive approach on how these could be achieved with broad criteria for their consideration.</p> <p>The Core Strategy should set out more detail as to how these sites could be delivered and premises upgraded.</p>
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NTC Comments	Proposed Revisions
<p>NTC believes there are several other sites that could deliver in the region of 100 dwellings as well as Eastside, though some of these may be included in the “commitments”, but this is not clear. NTC believes that all of the strategic sites in Newhaven should be referred to in the Core Strategy and that the broad constraints and infrastructure requirements should be included in the supporting text of each as well as the opportunities the development offers. These could then be cross referenced with the Infrastructure Delivery Plan.</p> <p>Broad reference should also be made to redevelopment opportunities, such as the Old Shipyard, Robinson Road and in/adjoining the old town centre as part of establishing its new role.</p> <p>The allocations on the edge of Newhaven need to be</p>	<p>That the Core Strategy should seek to identify adequate sites to meet at least the lower end of the housing need identified for the plan period. That these should be based on sustainability criteria, targeted at affordable provision, where they facilitate regeneration and/or needed community infrastructure.</p> <p>That the Core Strategy should recognise opportunities in special circumstances for the provision of additional employment opportunities provided these meet sustainability criteria.</p> <p>The Core Strategy should make reference to a wider range of ways of providing employment opportunities, with a positive approach on how these could be achieved with broad criteria for their consideration.</p> <p>The Core Strategy should set out more detail as to how these sites could be delivered and premises upgraded.</p> <p>The Core Strategy should include specific reference to the following as strategic sites (over 100 dwellings) and identify their broad opportunities and constraints:</p> <ul style="list-style-type: none"> Railway Quay (as part of waterfront and port redevelopment) West Quay (as part of regeneration of riverside to West Beach) West of Meeching Road (as part of establishing western fringe)

<p>considered in relation to the comments on Policy 10 below.</p> <p>Whilst not wishing to make specific comments on the strategic allocations outside the town, NTC is concerned that the residential allocations at Peacehaven & Telscombe without complementary employment provision will lead to additional pressure on the A259 and commuting into Newhaven exacerbating the existing problems this brings.</p>	<p>South of Valley Road (as part of establishing western fringe) Eastside (as part of mixed development establishing eastern fringe)</p> <p>The Core Strategy needs to cross reference, coordinate and relate allocations to other relevant Policies such as 10 and 11.</p> <p>The Core Strategy should recognise the commuting problems developments at Peacehaven and Telscombe will bring and incorporate reference to remedial measures, such as public transport for commuters and infrastructure such as parking provision at Newhaven Railway Station as part of a transport interchange.</p> <p>Additional measures/infrastructure requirements need to be identified and incorporated as part of the Infrastructure Delivery Plan.</p>
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Eastside, Newhaven



The site that has been allocated for business development (B1 and B8) for approximately 30 years, but has never been delivered due to the cost that would be incurred in developing the site, particularly in a relatively poor commercial property market. With this in mind, one of the key considerations for the Core Strategy needs to be what happens to this strategic level site in any future strategy for the district. A number of options for this site have been developed. Based on the findings of the evidence base, particularly the EELA, the Sustainability Appraisal findings and the stakeholder engagement undertaken to date (particularly on Topic Paper 8 at the Issues and Emerging Options stage), the preferred approach for this site at this stage is as follows:

Proposed Option for Eastside, Newhaven

To identify the Eastside site for a business led (B1 and B8) mixed use scheme. If demonstrated to be necessary for economic viability, such an option would allow for higher value 'enabling development', such as housing, which therefore enables part of the required employment land need in the area to be delivered.

An Area Action Plan would be prepared for this area, which would provide the details on the development mix, how the scheme would link into the wider area, how the different uses can co-exist and the issue of the Port Access Road.

Other options for the long-term strategic planning approach for the Eastside area that have been considered, but not recommended as the preferred approach at this stage are as follows:

Other options considered

1. To de-allocate the site (hence it will no longer be included within the Planning Boundary for Newhaven).
2. To continue with the existing Local Plan allocation for business uses (B1 and B8).

There are a number of reasons why the preferred approach has been identified at this stage. The EELA recognises the Eastside site (incorporated into a slightly wider site assessment, ref: ELW3) as an important part of the potential supply of employment land in this part of the District, although at the same time appreciating the uncertainty over the delivery of the current allocation. Section 11 of the EELA suggests alternative approaches to encouraging employment development in Lewes District, including, “on appropriate sites and where a clear need is demonstrated, allowing a limited amount of higher value “enabling development” to help fund infrastructure and support provision of speculative employment premises (para 11.8 of EELA). In this instance it is considered that a need for employment development on this site is demonstrated and that the site is also appropriate (taking into account its assessment in the EELA). The current Local Plan allocation at Eastside is for B1 and B8 use. The site assessment in the EELA identifies potential uses for this site as B1, B2 and B8, hence this has been reflected in the preferred approach for this area.

The preferred approach is considered to be in conformity with the Physical Development Vision for Newhaven, which was prepared for Newhaven Strategic Network by BBP Regeneration and forms part of the evidence base for the Core Strategy. Paragraph 6.36 of this document states that Eastside “could create a mixed use environment with residential uses to the west together with employment space to the east”. Seeking a quantity of employment land on the Eastside site should also aid in the achievement of Strategic Objective 9 and the part of the District-wide vision that states “*improved employment opportunities will have reduced the need for out commuting*”.

Questions to consider:

Do you agree with the proposed strategic planning approach to the Eastside area?

Do you have a view on any of the options that have been considered?

Are there any additional options that should be considered for this area?

NTC Comments	Proposed Revisions
<p>NTC supports the proposal for Eastside to be a mixed use scheme recognising that higher value “enabling development” is likely to be required, but believes that as well as business and housing use the site provides the opportunity to help make up for shortfall in the green infrastructure of the town and help establish co-ordinated pedestrian and cycle links across the town.</p> <p>In addition to the factors referred to for the Area Action Plan, the NTC believes that the</p>	<p>The Eastside, Newhaven option reference should be reworded to read:</p> <p>To identify the Eastside site for a mixed use scheme. Such an option would allow for higher value housing development as part of a comprehensive package for the delivery of business uses (B1, B2 and B8) with community and access infrastructure.</p> <p>An Area Action Plan will be prepared for this area, which will provide the details of the</p>

<p>Plan should look at the wider area and how this development relates to the port/quayside, could contribute to wider regeneration and the establishment of a coherent community east of the river. As with the strategic housing allocations, broad reference should be made to the constraints and opportunities related to the site, but greater flexibility offered in terms of the proposed mix and level of development. Identified related site infrastructure (“port road” and open spaces) can then be cross referenced with the Infrastructure Delivery Plan.</p>	<p>development mix options, how the scheme should link into the wider area, how the different uses could co-exist and the requirements regarding infrastructure and access. Any scheme will have to demonstrate its economic viability as well as its contribution to the regeneration of the wider area and establishment of a coherent community with appropriate links to the waterside, old town and adjoining nature reserve.</p> <p>and the second to last sentence in paragraph 6.79 has the following added: , but it will be for any proposed scheme to define its layout and demonstrate how it meets the Area Action Plan and Infrastructure Delivery Plan requirements.</p>
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Core Delivery Policies

Core Policy 1 - Affordable Housing

Potential approach to Core Policy 1

Sub-area	Threshold	Percentage requirement
Coastal towns	15	30%
Lewes town	15	35%
Rural area	5	40%

For further information on this approach, see chapter 9 of the SHMA.

A key part of the approach to securing affordable housing will be retaining the current Local Plan policy (RES10) that is concerned with provision of affordable homes on exception sites (ie, outside the Planning Boundary).

Other approaches to the provision of affordable housing that have been considered, but not recommended as the preferred approach at this stage are as follows:

Other options considered

1(a) To have a continuation of the current District – wide policy (as contained within the Local Plan), which sets the threshold at 15 dwellings with a 25% affordable housing requirement.

1(b) To replicate the South East Plan policy direction – the threshold will be 15 dwellings (as per the national indicative minimum site size threshold in PPS3), with a 40% affordable housing requirement in the part of the District within the Sussex Coast sub-region and a 35% requirement in the remaining part of the District.

Questions to consider:

Do you agree with the preferred policy approach identified?

Do you have any comments on the other options that have been considered?

Are there any options that have not been identified that should be considered in developing this policy area?

NTC Comments	Proposed Revisions
<p>Whilst not wishing to overburden development NTC believes it is fairer and more appropriate if all housing developments, including conversions and subdivisions, to contribute to the provision of affordable homes, particularly because of the high demand from residents in the town. Obviously it would not be appropriate for all to provide onsite provision so it is suggested that those sites below 15 and 5 dwellings pay a proportional sum, which could then be utilised by the District Council for the provision of additional affordable housing. In addition NTC believe that the proposed percentage is too low, bearing in mind the high demand and therefore suggest that this is raised to 40% in all cases. It does however recognise that some sites may have significant costs associated with them and that in exceptional circumstances, where these sites bring forward other community benefits, this level of provision may not be achievable.</p>	<p>Policy 1 be amended to:</p> <p>i) require contributions from all residential developments, including conversions and subdivisions, with this being in the form of a proportional payment for those sites below 15 dwellings in urban areas and 5 dwellings in rural areas.</p> <p>ii) require a 40% on site contribution from sites above 15 dwellings in urban areas and above 5 dwellings in rural areas.</p> <p>and that the supportive text recognises that in exceptional circumstances, where sites bring forward other required community benefits, this full level of contribution may not be achieved and any such exception will only be as part of open book negotiations with the relevant authorities and community representatives as part of comprehensive proposals.</p>

Core Policy 2 - Housing Type, Mix and Density

Potential approach to Core Policy 2

1. Provide a range of dwelling types and sizes to meet the identified local need, based on the most up-to-date evidence (currently for accommodation for the ageing population; and smaller units for single person households and couples with no dependents), taking into account the existing character and housing mix of the vicinity, in order to deliver sustainable, mixed communities. Specific standards/targets for each type and size of dwelling are not proposed so as to ensure flexibility to 'meet the identified local need' as this may change over time and/or differ by location.
2. Support the provision of flexible and adaptable accommodation to help meet the diverse needs of the community and the changing needs of occupants over time and to encourage the Lifetime Homes standard to be met in new residential developments.
3. Set a (target) average density range (between 47 and 57 dwellings per hectare for the towns and between 20 and 30 dwellings per hectare for the villages), allowing for actual densities on individual sites to be lower or higher than this, taking into consideration the site context, including the character of the surrounding area, site accessibility, the size/type of dwellings needed in the locality. Expected densities to be achieved on allocated sites will be identified in the development principles that accompany the site allocation (either in the Core Strategy, or subsequent Site Allocations DPD).

Other approaches to housing type, mix and density that have been considered, but not recommended as the preferred approach at this stage are as follows:

Other options considered

2(a) Setting percentage standards for the proportion of housing types and sizes to be delivered across the District.

2(b) Setting various percentage standards for the proportion of housing types and sizes to be delivered in different specified parts of the District.

2(c) Setting a minimum density requirement across the District.

2(d) Reflecting the regional density target from the South East Plan in this Core Policy.

2(e) Not setting density targets.

2(f) Requiring, rather than encourage, the Lifetime Homes standard to be met in all new residential developments.

Questions to consider:

Do you agree with approach that is proposed?

Do you have any views on the policy options that have been discounted at this stage?

Do you think there are other options that should be considered in relation to housing types, mix or density?

NTC Comments	Proposed Revisions
<p>NTC generally supports the approach proposed, provided that flexibility is truly allowed depending on individual site conditions, there seems no reason why high densities should not be achieved in rural villages if the site conditions are appropriate. Similarly it is felt that a greater requirement to meet the “lifetime homes” standard should be applied to developments.</p>	<p>Policy 2 be amended to:</p> <p>Set a requirement for a % of homes on sites to meet the “lifetime homes” standard.</p>

Core Policy 3 - Gypsy and Traveller Accommodation

To help inform the process of identifying potential sites that could accommodate pitches for Gypsies and Travellers, a site assessment study has been undertaken. This study has highlighted the difficulty of finding appropriate sites to accommodate such pitches with only two of the 14 sites assessed being considered to have some potential albeit with issues that would need to be resolved if they were to come forward (flood risk, landscaping and possible land contamination). The sites in question and their potential pitch capacity are:

- Land North of Offham Filling Station, A275, Offham - 3 pitches
- Denton Depot, Newhaven – 4 pitches

Potential approach to Core Policy 3

1. Provide a total of 11 additional permanent pitches for Gypsies and Travellers in Lewes District for the period 2011 to 2018.
2. In order to meet this need, identify appropriate and deliverable sites within the Core Strategy. The sites selected will be informed by the Site Assessment Study, including any additional sites that are submitted to the District Council/National Park Authority prior to the Proposed Submission stage. Any shortfall in the planned provision will be expected to be identified and met through the Site Allocations DPD.
3. Keep the levels of need under review beyond 2018 and address any additional identified need by identifying, and where necessary, allocating additional sites in a further DPD.

4. Develop a criteria-based policy for use in selecting site allocations for Gypsy and Traveller accommodation and to assist in the consideration of planning applications for pitches on other sites if unexpected demand arises. The criteria will recognise the need for Gypsies and Travellers to be accommodated in sustainable locations, within or in close proximity to existing sustainable settlements, with good access by sustainable travel modes to essential services. Other criteria will include avoiding an adverse impact on landscape or the visual amenity of the area (having particular regard to designations such as the South Downs National Park and conservation areas); biodiversity or locally, nationally or internationally designated areas of nature conservation; heritage assets; residential amenity (including a reasonable standard of residential amenity for the site occupier); or flood risk. Sites will also be expected to have safe and convenient vehicular access to the highway network; and existing utilities infrastructure at the site, or available in reasonable proximity.

Note: no other reasonable, realistic and relevant strategic approaches to this policy area have been identified at this stage.

Questions to consider:

Do you agree with the approach that is proposed, including the level of pitches to be planned for?

Do you consider the most suitable sites identified through the Site Assessment work (Land North of Offham Filling Station, A275, Offham and Denton Depot, Newhaven) to be suitable for use for Gypsy and traveller accommodation?

Do you know of any other sites that may potentially help meet the need for additional pitches?

NTC Comments	Proposed Revisions
<p>NTC is concerned that there is not a demonstrative need for permanent pitch sites for gypsies and travellers within the town and whilst recognising that identifying suitable sites is difficult does not believe that simply because two sites have less issues than others mean that they are appropriate locations to meet the gypsy's and traveller's needs. Indeed NTC believes that with the issues and constraints, based on the criteria referred to in the policy, on the identified site at Denton Depot that it would not be suitable for permanent pitches and that the provision of 4 pitches on this site does not seem economically justifiable.</p>	<p>Policy 3 and the supporting text be amended to:</p> <p>Exclude reference to the provision of a permanent 4 pitch gypsy and traveller's site at Denton Depot site, Newhaven.</p> <p>That the Core Strategy does not identify specific sites, but establishes the criteria against which sites can be identified in Neighbourhood Plans when a specific demand for permanent gypsy and traveller accommodation is identified in that area, possibly through a continued rolling appraisal, bearing in mind the difficulties admitted in identifying long term needs.</p>

The Town Council recognises the concerns and opposition to the identification of the Denton Depot site expressed by the local community and will make detailed comments in objection to its identification and suitability for development.

Core Policy 4 - Encouraging Economic Development and Regeneration

Potential approach to Core Policy 4

1. Identify sufficient sites in sustainable locations to provide for a flexible range of employment space to meet current and future needs.

2. Safeguard existing employment sites from other competing uses unless there are demonstrated economic viability or environmental amenity reasons for not doing so (including demonstrated lack of developer interest, persistently high vacancy rates, serious adverse environmental impacts from existing operations, the site is otherwise unlikely to perform an employment role in the future, or loss of some space would facilitate further /improved employment floorspace). There will be a presumption in favour of retaining the unimplemented employment site allocations from the Local Plan (2003) for meeting part of the Districts employment land need. However, if there are clear economic viability or environmental amenity reasons for not doing so then such sites will be de-allocated or considered for alternative uses through the Site Allocations DPD (note: the Eastside allocation in Newhaven is considered separately in this document).
3. Support the appropriate intensification, upgrading and redevelopment of existing employment sites for employment uses.
4. Promote the delivery of new office space, particularly in Lewes town.
5. Promote small, flexible, start-up and serviced business units (including scope for accommodating business expansion).
6. Promote the development of sustainable tourism, including recreation, leisure, cultural and creative sectors, and having particular regard to the opportunities provided by the South Downs National Park.
7. Support the continued use of Newhaven port for freight and passengers including plans for expansion and modernisation of the port as identified in the port authority's Port Masterplan.
8. Promote modern and high speed e-communications and IT infrastructure.
9. Support sustainable working practices (eg. homeworking and live/work).
10. Increase the skills and educational attainment level of the District's labour supply.
11. Where necessary, identify Local Development Orders to support economic development and regeneration, particularly on existing employment sites.

Note: no other reasonable, realistic and relevant strategic approaches to this policy area have been identified at this stage.

Questions to consider:

Do you agree with approach that is proposed?

Do you think there are other options that should be considered that would help support economic development and regeneration in the District?

NTC Comments	Proposed Revisions
<p>NTC supports the identification of sufficient sites in sustainable locations to provide for a flexible range of employment space to meet current and future needs, but that true flexibility needs to be shown to stimulate employment and that ideally each community should have an allocation of employment land and/or appropriate policies to meet its own needs and thus potentially reduce commuting. NTC welcomes the safeguarding of existing employment areas and allocations, provided there is again the flexibility to facilitate the</p>	<p>Policy 4 should be revised to:</p> <p>Include greater reference and opportunity for flexible approaches to bring forward new and revitalise older employment areas and to enable appropriate adaptation as new types of business and working methods arise.</p> <p>Expand recognition of the need, in special cases, to adopt a mixed use approach to bring forward or revitalise employment land where this brings clear advantages to, or makes up for</p>

<p>bringing forward of new and redevelopment and regeneration of older business areas, which may involve a mix of uses. NTC also welcomes the support for the continued use, expansion and modernisation of the port at Newhaven for freight and passengers, but this must be in association with appropriate infrastructure and environmental improvements and seek to build on public transport and rail links to prevent over congestion on the highway network its associated problems; achieve greater sustainability objectives and facilitate and complement the regeneration of the adjoining areas and town. For this reason NTC would like to see a more comprehensive plan prepared for the regeneration of the wider area east of the river to complement that proposed for Eastside. See also comments above. NTC supports education and training to increase the skills of its residents and believes that Point 10 of Policy 4 needs to be further developed to reflect the importance of this and the Core Strategy should examine further how this might be achieved in spatial planning terms.</p>	<p>existing deficiencies in the local community and does not prejudice the overall long term opportunity for the provision of employment.</p> <p>More clearly state the broader aims and requirements associated with the expansion and modernisation of Newhaven port and that a comprehensive plan should be prepared to co-ordinate this with the regeneration of the wider area and town, with the opportunity taken to relate this to the Infrastructure Delivery Plan.</p> <p>The Core Strategy should examine in more depth the broader education and training needs and more clearly indicate and incorporate proposals to achieve the increased skills and educational attainment level of the District.</p>
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Core Policy 5 - The Visitor Economy

Potential approach to Core Policy 5

1. Support for the provision of new and the upgrading/enhancement of existing sustainable visitor attractions and a wide range of accommodation types supporting emerging and innovative visitor facilities and accommodation offers, and giving flexibility to adjust to changing trends.
2. Presumption in favour of the retention of existing visitor accommodation stock, including camping and caravan sites.
3. Promote sustainable tourism in rural areas, both within and outside the National Park boundary, including the promotion of opportunities for the understanding and enjoyment of the National Park while recognising the importance of conserving and enhancing the natural beauty, wildlife and cultural heritage of the area as assets that form the basis of the tourist industry here.
4. Support a year-round visitor economy and reduce seasonal restrictions wherever appropriate.
5. Support for a sustainable tourist sector, use of public transport, local attractions, and local crafts, produce and appropriate tourism development that supports farm business/diversification.
6. Provide sufficient land for the provision of new hotel accommodation (the Economic and Employment Land Assessment recommends about 1 hectare).
7. Propose the retention of saved Local Plan policies E15, E16 and E17 for Development Management purposes until such time as a Development Management DPD is adopted.

Note: no other reasonable, realistic and relevant strategic approaches to this policy area have been identified at this stage.

Questions to consider:

Do you agree with preferred approach that is proposed?

Do you think there are other options that should be considered that would help support the visitor economy in the District?

NTC Comments	Proposed Revisions
<p>NTC supports the proposed expansion of the visitor economy as an opportunity for creating additional employment opportunities, but is concerned that this may, particularly bearing in mind Newhaven port, have an adverse impact on the town in terms of the highway network unless adequate infrastructure/improvements are provided and alternative modes of transport promoted.</p> <p>NTC believes that the Core Strategy should reflect the opportunities for wider types of visitor attraction and engagement, such as study programmes for students utilising the special biological, geographical and geological assets of the area.</p> <p>Newhaven has a significant history and other visitor attraction potential and NTC believes that the Core Strategy should recognise this and the need to maximise these opportunities to retain visitors rather than act purely as a gateway to the National Park and beyond.</p>	<p>Policy 5 and the supporting text should be revised to:</p> <p>More clearly recognise the potential highway impacts of an expanding visitor economy, particularly related to the port and on key routes, stating the need for related infrastructure improvements and incorporating policies for their provision and cross referencing these with the Infrastructure Delivery Plan.</p> <p>Include references to and encourage the wider opportunities for diverse visitor attractions and engagement and establish broad criteria against which these may be considered.</p> <p>Recognise the value and need to utilise existing and potential visitor attractions in Newhaven as part of the towns regeneration and employment diversification.</p>

Core Policy 6 - Retail and Sustainable Town and Local Centres

Potential approach to Core Policy 6

1. Set out the retail and functional hierarchy of our town and local centres.
2. Set out the amount of new retail floorspace (for comparison and/or convenience goods) to be accommodated in each town centre up to 2030, if any is found to be needed by the updated retail study in Autumn 2011.
3. Promote and enhance the viability and vitality of the town and local centres, including encouraging high quality mixed use developments with active ground floor frontages, supporting appropriate enhancements to the evening economy, and supporting small and independent businesses.
4. Seek to protect local shops and facilities but where these are found to no longer be viable, take a flexible approach to the consideration of alternative uses, on their individual merits, that would be of benefit to the local community and the vitality and viability of the local centre.
5. Taking a more flexible approach to the Newhaven town centre (the area within the ring road) that would allow for alternative uses other than retail. Such an approach would allow for changes of use from unviable/long-term vacant retail units to other uses in order to support the overall vitality of the area (including residential). Such a policy approach is likely to involve removing the Primary Shopping area designation (taken from the Local Plan) that covers a significant part of the town centre.

6. Seek to reinforce and enhance the distinctive character and eclectic mix of specialist/niche retailers and service providers in Lewes town and support its role as the District's principle leisure, cultural and visitor destination town.
7. Support the role of the Meridian Centre in the provision of shops and services in Peacehaven/Telscombe. Explore the potential for further improvements and development opportunities at the Meridian Centre and its immediate surroundings. Commercial uses along South Coast Road (A259) will be appropriate to the function of a local centre and would need to complement the role of the Meridian Centre as the main district centre in Peacehaven.
8. Reinforce the Seaford town centre for retail provision, while encouraging more diverse uses in the peripheral area around the shopping core to help increase vitality beyond the central area, particularly uses that would help Seaford to exploit its potential as a visitor destination more fully (while having regard to its understated seaside character).

Other approaches to retail and sustainable town and local centres that have been considered, but not recommended as the preferred approach at this stage are as follows:

Other options considered

6(a) To maintain the current policy approach for Newhaven town centre.

6(b) To maintain the current policy approach for South Coast Road (A259) at Peacehaven.

Questions to consider:

Do you agree with the approach that is proposed?

Do you think there are other options that should be considered that would help provide sustainable, vibrant and vital town and local centres across the District?

Do you consider the approaches set out for each town are appropriate, having regard to their existing function and character?

Do you agree that Newhaven town centre should be reclassified (downwards) as having a local support function, rather than a district level town centre function, given the decline it has faced in recent decades?

Do you feel that any of the approaches are obviously out-dated, given that they are largely based on evidence from 2005, or are they still appropriate?

NTC Comments	Proposed Revisions
<p>NTC is concerned that the options are primarily based on old data considering that there have been significant changes in the nature of retailing over the last few years and awaits the results of the new retail study and subsequent functional hierarchy of town and local centres. However it is recognised that the role of the old town centre has changed significantly and in itself does not fulfil the function of a primary shopping centre, it is agreed that its declassification is therefore appropriate, particularly if this provides the opportunity for other uses to establish and facilitates regeneration of the old town centre. The town itself though still provides a primary shopping location, with the establishment of the recent additional retail provision east of the river. There are opportunities for this to be further consolidated as part of the regeneration of this area, but this has to be carefully done to ensure that any provision complements and contributes to the regeneration of the old town centre and maintains an important retail element there to meet the needs of local people west of the river. NTC see it as key that appropriate links are maintained with</p>	<p>Policy 6 and the supporting text should be revised to:</p> <p>Recognise the changing nature of retail provision within the town and that it still performs a primary shopping area function.</p> <p>Establish a flexible approach to the provision of retail floorspace outside of the old town centre as part of mixed development uses which facilitate regeneration, provided that these complement</p>

the old town centre and that any new facilities are readily accessible for those west of the river and from outlying areas. NTC believes this situation is not recognised by the proposed approach and may well jeopardise opportunities for coordinated comprehensive regeneration east of the river. NTC supports the policy to protect local shops and facilities as these are still very important to numbers of dependant residents and welcomes a flexible approach in the provision of facilities that would complement local centres and may help enhance their vitality and viability. Accessibility is seen as a key element of this and NTC believes greater reference should be made to this in terms of retaining and improving pedestrian, cycle and public transport access.

and do not conflict with role of the old town centre

Include greater reference to the need to retain and improve, pedestrian, cycle and public transport access to local centres and neighbourhood shops

Core Policy 7 - Infrastructure

National planning policy and the South East Plan require developments to make appropriate provision for the infrastructure and services that will be needed by that development, either on-site or to make an appropriate financial contribution towards off-site provision. The South East Plan also requires the scale and pace of development to depend upon sufficient infrastructure capacity being available to service the needs of the development. The timely provision of the infrastructure requirements associated with growth is recognised as an important element in the quality of life for local people. We will set out required infrastructure and how/when this will be delivered in our Infrastructure Delivery Plan that will accompany the adopted Core Strategy (and will be consulted upon at the Proposed Submission stage).

Further work into funding options will be necessary, but it is intended to establish the Community Infrastructure Levy (CIL) in Lewes District through the introduction of a CIL Charging Schedule. CIL is a new levy that local planning authorities can choose to charge on new developments in their area, in order that the burden of new infrastructure costs is shared by all development in a proportionate manner. The money raised can be used to fund local and sub-regional infrastructure provision.

Potential approach to Core Policy 7

1. Protect and where possible enhance existing physical and social infrastructure, including that which serves the elderly, unless it is evidently no longer required, occupies unsuitable land/premises and/or suitable alternative provision will be made.
2. Prepare an Infrastructure Delivery Plan to identify key infrastructure requirements and shortfalls and how these can be met in a timely manner. We will work with key delivery partners to identify the appropriate level of provision, priorities and the associated financial costs.
3. Require developer contributions towards infrastructure provision through the combination of s106 planning obligations and/or CIL as appropriate. To this end we would establish (working with key stakeholders, including infrastructure providers, local communities and developers) a CIL Charging Schedule and clearly set out what contributions would be expected in association with different types and sizes of development.

Note: no other reasonable, realistic and relevant strategic approaches to this policy area have been identified at this stage.

Questions to consider:

Do you agree with the approach that is proposed?

Do you think there are other options that should be considered that would be help to provide suitable infrastructure in the District?

Do you have views on key pieces of infrastructure that should be included in the Infrastructure Delivery Plan?

Do you consider a combination of s106 planning obligations (for on-site provisions) and CIL (for off-site provisions) to be an appropriate funding mechanism for infrastructure? Should the Council consider other mechanisms?

NTC Comments	Proposed Revisions
<p>NTC supports the establishment of a Community Infrastructure Levy as a mechanism for obtaining developer contributions for infrastructure needed offsite, in association with Section 106 Agreements for the provision by developer for on site infrastructure provision related to the development. There are concerns however as to which elements will be included and the possibilities of remedial and other contributions taking precedence over the provision of community needs.</p> <p>NTC also supports the establishment of an Infrastructure Delivery Plan to identify all the various elements that will need to be provided in respect of each site and believes this should also identify any existing deficits in provision, but the Core Strategy does not seem to address this issue or propose a clear strategy, or mechanism, by which this may be achieved.</p> <p>One infrastructure problem that NTC has identified is that of adequate parking provision in the subdivision of houses. A key component of the Community Infrastructure Levy should be a contribution to the provision of offsite parking or related parking/traffic management.</p> <p>NTC has identified the need for a multi use, flexible indoor space to provide sufficient capacity for seating between 300-500 people.</p>	<p>Policy 7 and the supporting text should be revised to:</p> <p>Examine the opportunities for provision of facilities to make up for identified infrastructure shortfalls within communities.</p> <p>Include a financial contribution to parking as part of the necessary infrastructure, particularly with regard to subdivisions of existing residential properties.</p> <p>Incorporate references and a policy to facilitate the provision of a multiuse, flexible indoor space to provide sufficient capacity for seating between 300-500 people.</p>

Core Policy 8 - Green Infrastructure

Green infrastructure refers to a multi-functional linked network of green spaces that provide opportunities for biodiversity and recreation. Green infrastructure, as defined in the South East Plan, can include:

- parks and gardens – including urban parks, country parks and formal gardens
- natural and semi-natural urban greenspaces – including woodlands, urban forestry, scrub, grasslands (e.g. downlands, commons and meadows) wetlands, open and running water, wasteland and derelict open land and rock areas (eg cliffs, quarries and pits)
- green corridors – including river and canal banks, cycleways, and rights of way
- outdoor sports facilities (with natural or artificial surfaces, either publicly or privately owned) – including tennis courts, bowling greens, sports pitches, golf courses, athletics tracks, school and other institutional playing fields, and other outdoor sports areas
- amenity greenspace (most commonly, but not exclusively, in housing areas) – including informal recreation spaces, greenspaces in and around housing, domestic gardens and village greens

- provision for children and teenagers – including play areas, skateboard parks, outdoor basketball hoops, and other more informal areas (e.g. ‘hanging out’ areas, teenage shelters)
- allotments, community gardens, and city (urban) farms
- cemeteries and churchyards
- accessible countryside in urban fringe areas
- river and canal corridors
- green roofs and walls

Potential approach to Core Policy 8

1. Identify areas where there is potential for the enhancement or restoration of existing green infrastructure and opportunities for the provision of new green space.
2. Ensure that development maintains and/or appropriately manages identified green infrastructure.
3. Require development to contribute to the creation of new green spaces and/or network linkages, as part of the infrastructure necessary to support new developments.
3. Support the creation of new green infrastructure (including new linkages between existing green infrastructure) to enhance the overall role of the green infrastructure network.
4. Resist development that adversely affects green infrastructure, undermines its functional integrity, or results in a loss of green space (unless appropriate alternative provision will be provided to a greater standard than the green infrastructure affected or lost by the development).

Note: no other reasonable, realistic and relevant strategic approaches to this policy area have been identified at this stage.

Questions to consider:

Do you agree with the approach that is proposed?

Do you think there are other options that should be considered that would help protect, enhance and provide green infrastructure in the District?

NTC Comments	Proposed Revisions
<p>NTC welcomes the green infrastructure policies, particularly the policy for the identification of areas of green space for enhancement, restoration and new provision, but none are specifically identified, nor are areas where such provision needs to be made. A significant shortfall in open space and allotments has been identified in Newhaven and the requirement and allocation of land to achieve this should be identified in the Core Strategy.</p> <p>NTC is concerned that often the provision of open space elements are left until the development is completed and its treatment and provision is considered secondary to other infrastructure provision. The Core Strategy needs to emphasise the importance of open space/green infrastructure provision and require its provision at the earliest appropriate stage in development as part of the initial comprehensive proposals. Where sites are too small to provide direct provision, financial contributions must be part of the Community Infrastructure Levy, but smaller sites must provide appropriate physical space rather than financial contributions where there is identified local need and/or a</p>	<p>Policy 8 and the supporting text should be revised to:</p> <p>Identify the need for and allocate appropriate additional green infrastructure sites in Newhaven, including land east of Lewes Road and at Eastside.</p> <p>Place greater emphasis on the importance of green infrastructure particularly within and adjoining urban areas and require its provision as a key element of any development.</p> <p>Ensure that adequate mechanisms, incorporating the Community Infrastructure Levy and Infrastructure Delivery</p>

<p>shortfall in provision. Whilst recognising that small sites can not be identified as part of the broad Core Strategy significant sites and key green infrastructure should be identified as part of the Core Strategy and Infrastructure Delivery Plan. In the case of Newhaven for example land east of Lewes Road and at Eastside.</p>	<p>Plan, are in place to provide appropriate green infrastructure on small sites and financial contributions even from individual residential units and subdivisions.</p>
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Core Policy 9 - Air Quality

In general, air quality in the District is good. However, as recognised in the characteristics section there are areas of concern, particularly with regard to nitrogen dioxide emissions. In 2005 an Air Quality Management Area (AQMA) was declared in Lewes town centre for nitrogen dioxide, the main source of which is from road traffic. There are similar concerns in the South Way area of Newhaven, which has not been declared an AQMA but where nitrogen dioxide has been recorded at levels approaching the maximum acceptable limits. Addressing these problematic areas, and ensuring that further pockets of poor air quality do not become prevalent, will be a key part in the achievement of the objective that concerns reducing the need for travel and to promote a sustainable system of transport and land use (objective number 7).

Potential approach to Core Policy 9

1. Seek improvements in air quality through implementation of the Air Quality Action Plan and having particular regard to the impacts of development on the air quality of the Lewes town centre AQMA (and any others subsequently declared).
2. Ensure that all development will have an acceptable impact on the surrounding area in terms of its effect on health, the natural environment or general amenity, taking into account cumulative impacts.
3. Promote opportunities for walking and cycling and congestion management to reduce traffic levels in areas of reduced air quality, particularly in town centre locations.
4. Require mitigation measures where development and/or associated traffic would adversely affect any declared AQMA.
5. Seek best practice methods to reduce levels of dust and other pollutants arising from the construction of development and/or from the use of the completed development.

Note: no other reasonable, realistic and relevant strategic approaches to this policy area have been identified at this stage.

Questions to consider:

Do you agree with the approach that is proposed?

Do you think there are other options that should be considered that would help improve air quality in the District?

NTC Comments	Proposed Revisions
<p>NTC is concerned at the high levels of nitrogen dioxide recorded in South Way and believes that the Core Strategy policy should identify the need to consider declaring an Air Quality Management Area, particularly with residential development proposals at Telscombe and Peacehaven, the proposed port expansion and</p>	<p>Policy 9 and the supporting text should be revised to:</p> <p>Consider the need for the declaration of an Air Quality Management Area for South Way, Newhaven.</p>

<p>other policies focusing on Newhaven. This policy needs to be cross referenced with those aimed at reducing car journeys, being identified as a possible constraint, whilst the Core Strategy also needs to examine alternative options to help reduce vehicular pollution in the town centre. The Core Strategy, Community Infrastructure Levy and Infrastructure Delivery Plan should consider the need for mitigation measures as part of offsite infrastructure contributions from other developments</p>	<p>Cross reference this policy with other relevant policies in the Core Strategy and identify other options for reducing vehicular pollution in the town centre.</p> <p>The Core Strategy, Infrastructure Delivery Plan and Community Infrastructure Levy should examine the need and opportunity to seek contributions in respect of the impact of offsite developments on the air quality at South Way, Newhaven.</p>
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Core Policy 10 - Natural Environment and Landscape Character

Potential approach to Core Policy 10

1. The highest priority will be given to the conservation and enhancement of the landscape qualities of the South Downs National Park, and the integrity of European designated sites (SAC's and SPA's) in and around Lewes District.
2. Maintaining the integrity of the European designated sites will be achieved through ensuring that development causes no significant adverse effects on the integrity of the sites, including in combination with other plans, projects and proposals. The duty to demonstrate this will be for the individual or organisation who is proposing the development.
3. The conservation and enhancement of the landscape quality of the National Park, including the setting in terms of views into and from the Park, will be achieved by ensuring that all development complies with the National Park purposes and the forthcoming Management Plan.
4. More generally, the landscape characteristics and qualities, along with the natural environment (biodiversity resources) in the plan area, will be conserved and enhanced by:
 - Not permitting new development that would harm landscape character or nature conservation interests, unless the benefits of the development outweigh the harm caused, in which case appropriate mitigation and compensation is provided.
 - Seeking to conserve and enhance the landscape qualities of the District, as informed by the County Landscape Assessment and the Landscape Capacity Study.
 - Seeking the conservation, enhancement and net gain in local biodiversity resources.
 - Seeking to maintain ecological corridors and avoiding habitat fragmentation.

Note: no other reasonable, realistic and relevant strategic approaches to this policy area have been identified at this stage.

Questions to consider:

Do you agree with the approach that is proposed?

Do you think there are other options that should be considered for this policy area?

NTC Comments	Proposed Revisions
<p>NTC supports the objective and policies to protect the natural environment and landscape character, but considers the policy as worded is very rural in outlook focusing on the countryside areas of the National Park and that it does not adequately reflect the importance of</p>	<p>Policy 10 and the supporting text should be revised to:</p> <p>Recognise the importance of landscape quality in the setting</p>

<p>landscape character, not only in the setting of an urban area, but also within it. This is particularly important where towns such as Newhaven are framed within the context of the Downs, river valley and coast and rely on green infrastructure and outward views to enhance their environment.</p> <p>In addition, particularly with the coastal towns, there is a need to maintain the remaining undeveloped, areas of coast and countryside between them to preserve their separate identities and characters. This is especially so in the case of Newhaven, for whilst there are the protected, beach, river valley, and Downs to the east separating the town from Seaford, to the west piecemeal development has significantly encroached on the countryside and coastal gap between Newhaven and Peacehaven. This remaining gap is therefore of special importance and requires additional protection as a significant part is outside the National Park. This policy should recognise these particular needs and in association with Policy 11 make reference to these aspects and provide appropriate and adequate policies to maintain and enhance the character of this area and protect it from further inappropriate development.</p>	<p>of urban areas and in those open spaces within them and incorporate appropriate policies to protect and enhance these aspects.</p> <p>Make specific reference to the importance of protecting the landscape between the coastal towns of Seaford, Newhaven and Peacehaven.</p> <p>Establish specific policies in association with Policy 11, if appropriate, to protect, maintain and enhance these gaps, with particular emphasis on the gap between Newhaven and Peacehaven.</p>
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Core Policy 11 - Built and Historic Environment and High Quality Design

Potential approach to Core Policy 11

1. Prepare generic design and built environment policy to ensure a high quality of design in all development, having in mind that the existing national and regional planning policies may have been revoked, revised or condensed when the Core Strategy is submitted or adopted, which would leave Lewes District with a policy vacuum in this respect.

Such a policy approach could include requiring development to be of a high quality design, make a positive contribution to the unique character and appearance of the surrounding area, be locally distinctive, well integrated and respond to its local context. It would also expect development to be designed so as to: reduce crime and the fear of crime; support inclusive communities; be well integrated in terms of access and functionality with the surroundings; create usable, accessible and easily understood places; reduce energy and water consumption; take opportunities for renewable energy generation and use locally sourced and sustainable materials and construction techniques; minimise flood risk; be adaptable to climate change; be visually attractive with good architecture and landscaping; take opportunities to improve the character or quality of the area; help meet the needs of the local area; make efficient/effective use of land; provide appropriate public and private amenity space; provide for appropriate car and cycle parking; create a high quality public realm with residential streets that are pedestrian, cycle and vehicle friendly; support local pride and civic identity; and provide for the retention or re-establishment of biodiversity.

2. Consider setting design standards with regard to matters such as crime reduction (eg Secured by Design principles), private outdoor space, connectivity and local distinctiveness.

3. Retain saved Local Plan policy ST3 (Design, Form and Setting of Development) for Development Management purposes until such time as a Development Management DPD is adopted.

4. Conserve and enhance the historic environment and recognise the role that nationally and locally important historic assets play in the distinctive character of the diverse settlements of the District. Propose the retention of saved Local Plan Policies H2, H3, H4, H5, H7, H12, H13 and

H14 for Development Management purposes until such time as a Development Management DPD is adopted.

Other approaches to the built and historic environment and high quality design that have been considered, but not recommended as the preferred approach at this stage are as follows:

Other options considered

11(a) Continue with existing saved Local Plan design related policy, particularly policy ST3: Design, Form and Setting of Development.

The aims of ST3 are still relevant however this alone would not allow us to seek other standards and/or respond to design related opportunities that have emerged since the Local Plan was adopted.

11(b) Prepare generic design and built environment policy to avoid a high level policy vacuum but do not retain any currently saved Local Plan policies relating to design and the built environment.

The concern with this is that not keeping Local Plan Policy ST3 and the saved Historic Environment policies in the interim would leave uncertainty for Development Management decision making.

Questions to consider:

Do you agree with the approach that is proposed?

Do you think there are other options that should be considered that would help ensure the delivery of well designed new development and contribute to high quality built environments in the District?

NTC Comments	Proposed Revisions
<p>NTC supports the retention of policies to protect the historic environment and promote high quality design, particularly in respect of its contribution to the general urban environment and public realm, but these should be made much clearer and more detailed. In association with Policy 10, this Policy also needs to protect the gaps between the coastal towns and in particular that between Newhaven and Peacehaven. (see also comments above)</p>	<p>Policy 11 and the supporting text should be revised to:</p> <p>Emphasise the requirements for high quality design in other areas and the public realm and more clearly specify how this will be achieved. Protect, in association with Policy 10, the gap between Newhaven and Peacehaven, from in appropriate development and prevent further coalescence.</p>

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

The Ouse to Seaford Head Coastal Defence Strategy will recommend (when adopted later this year) maintaining existing river embankments and coastal defences and build higher as tidal/river levels rise over time. It will also recommend that the shingle defences on the coast are maintained like they are now.

Fluvial flooding from the River Ouse and inundation from the sea are the primary flood risks in the District, however there are other more limited flood risks that nonetheless can have a significant impact on homes and businesses, such as surface water flooding, with some areas more susceptible than others. Many of these areas have been identified in the Preliminary Flood Risk Assessment. This has been prepared by East Sussex County Council, who have an

emerging role as the Lead Local Flood Authority. As part of this role, the County Council will take on the management of surface water flooding and Sustainable Drainage Systems (SuDS).

Potential approach to Core Policy 12

1. Development will be directed away from areas of flood risk when possible. Development in areas of flood risk (as identified in the latest Environment Agency and SFRA flood risk and climate change maps) will be required to meet the Sequential and Exception tests (where necessary).
2. Where site specific flood risk assessments are required, they must demonstrate that the development and its means of access will be safe from flooding without increasing the risk of flooding elsewhere. Whenever possible development should reduce overall flood risk.
3. Flood protection, resilience, resistance and mitigation measures should be appropriate to the specific requirements of the site and have regard to the character of the natural and built environment of the site and surrounding, to climate change implications, and to biodiversity.
4. Liaise closely with the Environment Agency on development and flood risk.
5. Work towards the long-term protection and re-creation of the River Ouse corridor, which will enhance biodiversity and reduce the number of properties affected by flooding from the Ouse, particularly in Lewes town.
6. Seek to reduce surface water run-off. Ensure there is no increase in surface water run-off from new developments and require development to incorporate Sustainable Drainage Systems (SuDS) unless it is demonstrated that SuDS are not technically appropriate. Liaise with ESCC as the lead local flood authority on the whole life management and maintenance of SuDS.
7. Work with partners to implement the current South Downs Shoreline Management Plan (SMP), Catchment Flood Management Plan (CFMP) and other relevant flood/coastal protection strategies and plans.
8. Ensure that development avoids undeveloped coastline unless it specifically requires a rural coastal location, meets the sequential test and does not have other adverse impacts. Prevent development on unstable areas of coastline, or areas at risk of erosion as identified in the SMP.

Note: no other reasonable, realistic and relevant strategic approaches to this policy area have been identified at this stage.

Questions to consider:

Do you agree with the approach that is proposed?

Do you think there are other options that should be considered that would help manage flood risk and coastal erosion in the District?

NTC Comments	Proposed Revisions
<p>NTC recognises the need for varying approaches and appropriate management regimes to cope with flood risk, but is concerned that the Core Strategy policy does not mention the positive ways and design solutions that can be used to facilitate development in these areas. Such solutions will be needed to achieve the redevelopment of various areas of the town adjoining the river Ouse. NTC believes that the Core Strategy should recognise these possibilities and</p>	<p>Policy 12 and the supporting text is revised to:</p> <p>Make reference to the possibility of utilising design and other solutions to facilitate the development of some areas at risk of flooding and that these will be considered in a positive light where they achieve regeneration and the provision of facilities serving the needs of the local community.</p>

opportunities and reflect that a positive approach will be taken to such proposals in order to facilitate development and achieve regeneration.	
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Core Policy 13 - Sustainable Travel

Transport issues are a major concern for many people in the District. Some areas are already suffering from congestion and other traffic-related pressures at peak periods, particularly the approaches to Lewes town centre and the A259 through Newhaven, Peacehaven and Telscombe. An Air Quality Management Area has been declared in Lewes town centre, where most of the air pollution is generated by traffic. Levels of nitrogen dioxide in Newhaven town centre are also close to the national limits. Traffic levels on the A27 trunk road is also expected to reach capacity in the near future, particularly to the west of Lewes town where the Highways Agency is forecasting 'highly stressed' road conditions by 2026.

The emerging approach for redressing the balance in favour of sustainable transport choices is to work with ESCC and the Highways Agency to improve sustainable transport infrastructure, options and usage in the District (accepting that access to all key services without some reliance on the car in rural areas cannot be achieved) is as follows:

Potential approach to Core Policy 13

1. Support development that encourages travel by public transport, cycling and walking and reduces the proportion of journeys made by car in order to help achieve a rebalancing of transport in favour of sustainable modes.
2. Ensure development is located in sustainable locations with good access to schools, shops, jobs and other key services by public transport, cycling and walking, in order to reduce the need to travel by car (unless there is an overriding need for the development in a less accessible location).
3. Ensure development has the lowest practical level of journeys by car by requiring it to minimise its impact on the road network, to incorporate appropriate mitigation measures for impacts on the road network, and to be supported by Transport Assessments and sustainable Travel Plans (mobility management measures), where appropriate (categories of development requiring Travel Plans and/or Transport Assessments will be set out in a SPD).
4. Require development to contribute to transport infrastructure improvements, particularly the provision of safe and reliable sustainable transport options (contribution requirements to be considered as part of the CIL Charging Schedule).
5. Support the expansion and improvement of public transport services throughout the District, particularly in the rural areas, including increased rail travel and improved connections and interchanges between bus and rail services.
6. Support the adopted Local Transport Plan for East Sussex and the subsequent implementation plans to be prepared.
7. Ensure development has appropriate secure and user-friendly cycle parking and car parking provided at levels that support the choice of sustainable transport usage in preference to car journeys. Support the increased and/or improved provision of secure and user-friendly cycle parking and car parking at train stations, where appropriate (parking standards will be set out in a SPD).
8. Support the design of development that prioritises the needs of pedestrians, cyclists and public transport users ahead of motorists.

Note: no other reasonable, realistic and relevant strategic approaches to this policy area have been identified at this stage.

Questions to consider:

Do you agree with the approach that is proposed?

Do you think there are other options that should be considered that would support and encourage sustainable transport use in the District?

NTC Comments	Proposed Revisions
<p>NTC generally supports the policy approach to achieve sustainable travel, particularly prioritising other access modes over use of the car, and welcomes the recognition of the problems associated with vehicular access through the town. NTC believes that more examples could be identified as to how this could be achieved and where particular problems need to be addressed (for example with the proposed developments at Telscombe and Peacehaven, public transport services coordinating times and frequency with the train services at Newhaven) and that the Core Strategy should also make reference to the problems associated with the southern end of the C7. Cross reference could also be made to other policies such as the provision of employment opportunities within settlements and ensuring these are within and served by a pedestrian, cycle and public transport network. NTC believes that the Core Strategy needs to make specific reference to the provision of a transport interchange at Newhaven as part of a comprehensive approach to integrating transport modes, developing the port and achieving sustainable transport.</p>	<p>Policy 13 and the supporting text is revised to:</p> <p>Identify how known problems may be alleviated and identify anticipated problems and how these may be addressed (i.e. associated with the allocations at Peacehaven and Telscombe). These should be related to the Infrastructure Delivery Plan and the Community Infrastructure Levy.</p> <p>Make specific reference to the provision of a comprehensive, integrated transport interchange at Newhaven</p> <p>Better cross reference the other policies within the Core Strategy that also help contribute to the sustainable travel objective.</p>

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

Potential approach to Core Policy 14

1. Renewable and low carbon energy will be encouraged in all development, with proposals responding to opportunities identified in the Energy Opportunities Map. Locations and designs of development that can take advantage of opportunities for decentralised, renewable and low carbon energy will be encouraged.
2. Applications for low carbon and renewable energy installations will be supported, subject to the following issues being satisfactorily addressed:
 - The contribution the scheme makes to meeting national and local renewable heat and energy targets.
 - Whether it meets the National Park purposes.
 - Landscape and visual impact
 - Local amenity
 - Ecology
 - Cultural heritage, including the need to preserve and enhance heritage assets.
3. Developers of any strategic site allocations and broad locations for growth will be required to undertake an Energy Strategy that will seek to incorporate decentralised and renewable or low carbon technologies into their proposals. Where a site/location is to be developed in phases, the

Energy Strategy will need to guide the development of the infrastructure to support renewable or low carbon technologies in a coordinated way.

4. To require all new dwellings to meet full Code for Sustainable Homes standards of at least Code level 3 from the point of adoption of this plan, and then at least Code level 4 once further updates to Part L of the Building Regulations come into effect (currently scheduled for 2013). All new non-residential developments over 1,000 square metres (gross floorspace) will be expected to achieve the BREEAM 'Very Good' standard.

Other approaches to this policy area which have been considered, but not recommended as the preferred approach at this stage are as follows:

Other options considered

14(a) To rely on Building Regulations to secure improvements in the sustainability of new developments.

Questions to consider:

Do you agree with the proposed approach for this policy area?

Do you have any comments on the alternative options that have been considered, but not recommended for inclusion in the Core Strategy at this stage?

Are there any additional options that should be considered?

NTC Comments

NTC supports the objective of reducing contributing causes of climate change and the broad policy of pressing for the achievement of higher standards in dwellings in advance of Building Regulation requirements. NTC believes that the Core Strategy should go further and seek to achieve the highest possible standards of energy conservation in new development and, where ever possible and appropriate, the incorporation of further energy saving and generation methods.