

George Dyson
Town Clerk

☎ (01273) 585493
✉ TownClerk@peacehaventowncouncil.gov.uk



Community House,
Meridian Way,
Peacehaven,
East Sussex,
BN10 8BB.

6th February 2026

Members of Peacehaven Town Council are summoned to an EXTRAORDINARY Council meeting to be held in Community House, Peacehaven, on Thursday 12th February 2026 at 7.30pm.

A handwritten signature in black ink, appearing to read "G Dyson", written over a horizontal line.

George Dyson
Town Clerk

A G E N D A

C1486 MAYOR/CHAIR'S ANNOUNCEMENTS

C1487 PUBLIC SESSION. *Members of the public may ask questions on any relevant Council matter.*

a. Public Questions

C1488 TO APPROVE APOLOGIES FOR ABSENCE

C1489 TO RECEIVE DECLARATIONS OF INTERESTS

C1490 TO ADOPT THE MINUTES OF THE COUNCIL MEETING OF THE 16TH DECEMBER 2025

C1491 TO NOTE THE AMENDED PEACEHAVEN AND TELSCOMBE NEIGHBOURHOOD DEVELOPMENT PLAN FOLLOWING EXAMINATION

C1492 TO CONSIDER A MOTION TO AGREE TO BEGIN WORK TO PREPARE AMENDMENTS TO THE PEACEHAVEN AND TELSCOMBE NEIGHBOURHOOD DEVELOPMENT PLAN

C1493 DATE OF NEXT MEETING - TUESDAY 17TH FEBRUARY 2026 AT 7.30PM.

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Minutes of the meeting of the Council meeting held in the Anzac Room, Community House on Tuesday 16th December 2025 at 7.30pm

Present: Cllr Debbie Donovan (Chair), Cllr Aimee Harman (Vice Chair), Cllr Nikki Fabry, Cllr Mary Campbell, Cllr Sue Griffiths, Cllr Cathy Gallagher, Cllr Paul Davies, Cllr Max Rosser, Cllr Simon Studd, Cllr Philip Mills, Cllr Kiera Gordon-Garrett, Cllr Sherral Wood, Cllr Ian Alexander, Cllr Claude Cheta, Cllr Wendy Veck, Youth Mayor & Deputy.

Officers: George Dyson (Town Clerk), Zoe Malone (Responsible Financial Officer), Kevin Bray (Parks Officer), Zoe Polydorou (Meetings & Projects Officer), Jessa Chapman (Civic & Events Officer).

4 members of the public were in attendance.

C1468 MAYOR/CHAIR'S ANNOUNCEMENTS

The Chair opened the meeting at 19:30, welcomed everyone, made a statement on Civility & Respect and the application of this, briefly ran through the building fire procedures, asked that phones be put onto silent, advised that the meeting was being recorded, informed everyone of how the public session works, and reminded Councillors of obligations under section 106 of the Local Government Finance Act 1992.

The Chair also advised that Bingo is tomorrow (17th December 2025) at 2pm, and any volunteers would be welcome.

C1469 PUBLIC SESSION. *Members of the public may ask questions on any relevant Council matter.*

a. Public Questions

There were no public questions.

b. Reports from District and/or County Councillors

Cllr Fabry updated that a motion at Lewes District Council has been passed to support community cohesion across the District.

Cllr Gallagher spoke about the strong financial position of Lewes District Council, and that Council Tax relief for those who most need it has been agreed to continue. Consultation for the Lewes District Local Plan is also due to start imminently.

C1470 TO APPROVE APOLOGIES FOR ABSENCE

Apologies were received from Cllr Sharkey.

C1471 TO RECEIVE DECLARATIONS OF INTERESTS

There were no declarations of interest.

C1472 TO ADOPT THE MINUTES OF THE COUNCIL MEETING HELD ON THE 21st OCTOBER 2025

Proposed by: Cllr Gordon-Garrett

Seconded by: Cllr Mills

The minutes of 21st October 2025 were **agreed** and **adopted**.

C1473 TO CO-OPT A COUNCILLOR TO FILL THE CASUAL VACANCY IN WEST WARD

The Chair advised that the candidate who had applied has withdrawn, so advertising the co-option opportunity will continue.

C1474 TO RECEIVE THE 2025-2026 YOUTH MAYOR AND DEPUTY YOUTH MAYOR

The Chair explained that 3 candidates were interviewed by Cllrs Donovan, Veck, Studd, and Rosser, and that they were all such good candidates, that it was decided to offer all 3 the opportunity to be Youth Mayor/ Deputy Youth Mayor.

The Civic & Events Officer added that all 3 candidates will be a great asset to the Council.

Ruby Papanicolou introduced herself, who will take the first 4 months of the year as Youth Mayor. Daniel Gill who is starting as a Deputy Youth Mayor for the year then introduced himself, followed by Jacob Lord who will also be starting as a Deputy Youth Mayor.

The Chair of Council thanked the outgoing Youth Mayor & Deputy Youth Mayor for their hard work over the past year and presented them with a gift of thanks.

The Chair then presented Ruby with the Youth Mayor's Chain of Office.

C1475 TO RECEIVE MINUTES, RATIFY ACTIONS & RECEIVE REPORTS ON URGENT MATTERS:-

a. Planning Committee:-

- i. To receive the meeting minutes of the 7th October 2025
- ii. To receive the meeting minutes of the 28th October 2025
- iii. To receive the meeting minutes of the 18th November 2025

Proposed by: Cllr Gordon-Garrett

Seconded by: Cllr Wood

The minutes were **agreed** and **adopted**.

iv. To note the draft meeting minutes of the 9th December 2025

Cllr Gordon-Garrett offered an invite to any members of Council to join a TFG for the Lewes District Local Plan which was set up at this meeting.

Council **noted** the draft meeting minutes.

b. Policy & Finance Committee:-

- i. To receive the financial report, authorise payments and signing of Bank Reconciliation statements

Proposed by: Cllr Alexander

Seconded by: Cllr Campbell

Council **resolved** to **agree** to authorise payments and signing of bank reconciliation statements.

ii. To receive the meeting minutes of the 7th October 2025

Proposed by: Cllr Alexander **Seconded by:** Cllr Gordon-Garrett
The minutes were **agreed** and **adopted**.

iii. To note the draft meeting minutes of the 25th November 2025

Council **noted** the draft meeting minutes.

c. Personnel Committee:-

i. To note the draft meeting minutes of 30th September 2025

Council **noted** the draft meeting minutes.

d. Leisure & Amenities Committee:-

i. To receive the meeting minutes of the 23rd September 2025

Proposed by: Cllr Studd **Seconded by:** Cllr Rosser
The minutes were **agreed** and **adopted**.

ii. To note the draft meeting minutes of the 2nd December 2025

Council **noted** the draft meeting minutes.

iii. To agree funding for the Centenary Park car park line painting.

Proposed by: Cllr Studd **Seconded by:** Cllr Campbell
Council **resolved** to **agree** to this proposal.

e. Community Engagement Committee:-

i. To receive the meeting minutes of the 9th September 2025

Proposed by: Cllr Veck **Seconded by:** Cllr Wood
The minutes were **agreed** and **adopted**.

ii. To note the draft meeting minutes of the 4th November 2025

Council **noted** the draft meeting minutes.

iii. To adopt a revised Youth Mayor's Handbook

It was proposed that this be referred back to the Community Engagement Committee to be looked at.

Proposed by: Cllr Veck **Seconded by:** Cllr Wood
Council **resolved** to **agree** to this proposal.

Cllr Cheta added the importance of involving the newly elected Youth Mayor/ Deputy Youth Mayors in this review.

f. Environment & Sustainability Committee:-

i. To note the draft meeting minutes of the 18th November 2025

Council **noted** the draft meeting minutes.

The Civic & Events Officer left at this point (19:58)

C1476 TO RECEIVE AN UPDATE FROM CLLR GALLAGHER, CHAIR OF THE NEIGHBOURHOOD DEVELOPMENT PLAN STEERING GROUP

Cllr Gallagher informed Council that the Examiners report has now been received, and the required changes are updates due to changes to the National framework and District Local Plan, and that these changes are now being worked on. We are now in a period of very prescriptive timelines, which will involve a referendum hopefully in April or May, after the plan has been noted at Council.

Cllr Campbell asked about whether there's any reason why the Examiners Report and associated documents haven't been shared with all Councillors, whether there will be an opportunity for PTC to fully debate the plan or whether it will be simply to note, and to request that the Clerk seeks legal advice on several points, including whether the Local Planning authority spatial policies count as strategic in relation to Neighbourhood planning, whether it will only be the formal specified policies in the NHDP that will carry weight at the Local Planning Authority and appeal inspectors, and finally if it is just the policies that carry weight, will the rest of the text carry any weight at all with the planning officers and appeal inspectors.

The Town Clerk clarified that the Examiners report and associated documents are being reviewed by the Steering Group and will be shared in due course, and that as Cllr Gallagher mentioned in her update, the Plan will come before Council and we will take guidance from the District Council on how this happens.

C1477 TO AGREE THE 2026/27 BUDGET AND PRECEPT DEMAND

The Chair introduced the item and summarised the process that has been followed so far.

Cllr Griffiths put forward a suggestion that the 40% cut to the small grants budget is removed, and requested a recorded vote on this agenda item. Cllr Griffiths read out some of the wording from the PTC Grants Policy, and that this only makes a 76p per year difference to Council Tax, also citing the very small underspend this year in the small grants budget, and highlighting the amount that comes back to us in room hire charges. Cllr Griffiths gave some examples of the organisations that receive support from the small grants budget.

Cllr Alexander highlighted that the increases to the service level grants balance out the £4000 reduction from the small grants, highlighting that the room hire grants could be reassessed.

Cllr Gallagher spoke about there being a lot of compromising in the budgetary discussions this year, which led to some very difficult decisions.

The Clerk spoke about how the administration of room hire could be looked at in the future, but that this would need to be a separate matter.

Cllr Wood spoke about some of the grant applications being from outside of Peacehaven, which don't benefit the town.

Cllr Campbell spoke about agreeing that room hire grants should be looked at, that the precept is now coming in slightly lower than initially anticipated, and would support keeping the small grants budget at the current level.

Cllr Fabry highlighted that she does sit on the Grants Committee, that the Committee is very generous, and does not feel many organisations would lose out by reducing this budget.

Cllr Rosser and Cllr Veck spoke in support of keeping the small grants budget at its current level.

An amendment to the draft budget was proposed to keep the small grants budget at £10,000, and that a TFG is formed within the next year look at how grants for room hire are administered.

Proposed by: Cllr Griffiths **Seconded by:** Cllr Campbell

In favour: Cllr Veck, Gordon-Garrett, Rosser, Mills, Griffiths, Campbell, Studd, Harman.

Against: Cllr Davies, Gallagher, Cheta, Alexander, Wood, Fabry, and Donovan.

The Council **resolved** to **agree** to this proposal by majority vote.

The RFO updated the Council on the impact on the budget of this decision.

It was proposed that Council agree the amended budget, resulting in a precept demand of £1,031,538.

Proposed by: Cllr Griffiths **Seconded by:** Cllr Mills

Council **resolved** to **agree** to this proposal by majority of 11 in favour, 3 against, and 1 abstention.

C1478 TO AGREE A RESPONSE TO THE PROPOSALS FOR LOCAL GOVERNMENT REORGANISATION CONSULTATION

The Clerk introduced the item and explained that Council had previously agreed an outline response to this consultation, which can be used as a basis for a response, as well as reinforcing the importance of Councillors and members of the public responding.

Cllr Gallagher spoke in support of the one East Sussex proposal, using the already agreed response as a basis for a response, Cllr Campbell also spoke in support of this.

Proposed by: Cllr Gallagher **Seconded by:** Cllr Campbell

Council **resolved** to **agree** to continue to support the One East Sussex proposal.

C1479 TO AGREE PROPOSED WORKS TO THE COMMUNITY HOUSE MAIN HALL IN JANUARY 2026

The Clerk introduced the report and summarised the works. Cllr Alexander questioned about whether any other groups could benefit from the use of the scissor lift which was briefly discussed.

It was proposed that Council agree to proceed with the works, as outlined in the report.

Proposed by: Cllr Gallagher **Seconded by:** Cllr Mills

Council **resolved** to **agree** to this proposal.

C1480 TO REVIEW COMMITTEE MEMBERSHIP AND AGREE ANY CHANGES

The Clerk spoke about a couple of requested changes, that Cllr Wood would like to come off the Leisure and Amenities, and Environment and Sustainability Committees, that there is also a vacancy on the Personnel Committee, which Cllr Davies had expressed an interest in.

Cllr Veck spoke about supporting Cllr Rosser going onto the Personnel Committee.

Cllr Cheta offered to step down from the Personnel Committee.

The above changes were proposed.

Proposed by: Cllr Campbell **Seconded by:** Cllr Mills
Council **resolved** to **agree** to this proposal.

C1481 TO RECEIVE REPORTS FROM OUTSIDE BODY REPRESENTATIVES AND REVIEW OUTSIDE BODY REPRESENTATION

Cllr Gallagher put herself forward as the representative for the SCDA, which would be added as an additional Outside body to the SCDA Community Supermarket. Cllr Griffiths will become the representative for the SCDA Community Supermarket.

Cllr Griffiths asked about arranging the CEO of the SCDA to come to speak to Council.

Cllr Harman will become a representative for the Peacehaven Players.

It was proposed that Council agree the above changes.

Proposed by: Cllr Donovan **Seconded by:** Cllr Rosser
Council **resolved** to **agree** to this proposal

Council **noted** the Outside body reports

C1482 TO NOTE OVERVIEW OF COMPLAINTS RECEIVED

Council **noted** the overview of complaints received.

C1483 TO NOTE THE COUNCILLOR ATTENDANCE RECORD

Council **noted** the Councillor attendance record.

C1484 TO RECEIVE VERBAL UPDATES FROM THE FOLLOWING TASK AND FINISH GROUPS (TFGs):

a. Meridian Centre Liaison

The Clerk advised that Morrisons are in active discussion again and information should be shared publicly soon.

b. Public Rights of Way

Cllr Gordon-Garrett advised that the group is still running and is close to putting an application forward.

c. Meridian Walk

Cllr Donovan shared that the walk is set and the leaflet underway, and that this TFG can now close, although that there may be more in the future if additional funding becomes available.

d. Town Flower

Cllr Mills spoke that he and Cllr Rosser have been looking into this and making good work, that a report should be coming forward soon.

C1485 DATE OF NEXT MEETING – TUESDAY 17TH FEBRUARY 2026 AT 7.30PM.

The next meeting was confirmed as Tuesday 17th February 2026 at 7.30pm.

There being no further business, the meeting was closed at 21:07

The Peacehaven and Telscombe Neighbourhood Development Plan 2022-2030



Neighbourhood Plan Steering Group



Contents

Section 1	
Introduction to the Neighbourhood Development Plan	2
Aspirations	5
Who prepared the plan	6
What is the plan?	6
What’s not in the plan	7
The Neighbourhood Development Plan process	8
Section 2	
Peacehaven & Telscombe Area	10
The area today	10
Overview and concerns	12
The vision for tomorrow	14
Aims and objectives	15
The 20-Minute neighbourhood	16
Section 3	
Area Wide Policies	18
High Quality Design	19
PT1 High quality design	20
PT2 Innovation & good management	21
PT3 Landscaping	22
PT4 South Downs National Park	23
PT5 Sustainable design	25
Council Project 1	
Promoting sustainability	25
Housing Policies	27
PT6 Housing design	33
PT7 Adaptable housing	35
PT8 Low-cost housing	36
PT9 Housing mix	38
PT10 Reusing the existing	39
Council Project 2	
Housing	39
Movement Policies	40
PT11 Travel planning	43
PT12 Enhancing accessibility to the National Park and coastal areas	45
PT13 Enhancing public transport	47
Council Project 3	
Travel Planning	48
Open Space & Amenity Policies	52
PT14 Protection of greenspaces	53
PT15 Amenity and greenspace	56
Council Project 4	
Greenspace infrastructure plan	57
PT16 Enhancement of sports areas and playspace equipment	58
Council Project 5	
Sports facilities	58
PT17 Biodiversity protection	60
PT18 Urban Greening	60
Council Project 6	
Encourage urban greening	61
Coastal Protection & Flooding	62
PT19 Drainage management	63
Reaching Net Zero	64
PT20 Renewables	65
Council Project 7	
Renewable energy	65
PT21 Net zero	66
PT22 Air quality	66
Employment Space	67
PT23 Providing a mix of employment opportunities	67
PT24 Open workspace	68
PT25 Tourism	68
PT26 Digital infrastructure	70
Historical Character	71
PT27 Heritage assessments	72
Community Facilities	73
PT28 Community facilities	73
PT29 Loss of community facilities	74
SA1 Site allocation - The Hub	74
Advertisements	76
Council Project 8	
A259 Feasibility study	76
PT30 Shutters	77
PT31 Signage	77
Section 4	
Shaping Growth	78
PT32 Masterplanning	80
PT33 Design and placemaking	82
Section 5	
A Centre for Peacehaven	83
PT34 Peacehaven centre	86
PT35 Community facilities in Peacehaven centre	87
PT36 Market place & outdoor events	87
Section 6	
Community Infrastructure Levy	88
Section 7	
Glossary	90



Foreword

Since 2018, The Neighbourhood Development Plan Steering Group have been working hard with residents, businesses and community groups to identify the towns issues and needs in light of recent growth.

Growth of urban areas is inevitable as we need to cater for increasing population sizes and longer life expectancy rates, but it doesn't mean that growth is negative. Growth can be influenced and used as a vehicle to improve the area as a whole. The Town Councils have taken the pragmatic approach that growth in Peacehaven and Telscombe should be positive; that increased Community Infrastructure Levy can be invested back into the local community to enhance facilities, and that this Neighbourhood Development Plan can be used to improve the quality of the local built environment and the well-being of their residents.

The production of the plan has involved a lot of commitment from many people; from those that answered surveys or attended events to provide ideas and views, to those that gave their time and expertise freely to research evidence and bring all the information together. This plan could not have been achieved without their contributions, and the Steering Group would like to take this opportunity to thank you all. A special thank you goes to the Chair Cllr. Cathy Gallagher, Vice Chair Cllr. Laurence O'Connor, Cllr. Neil Watts and Cllr. David Judd who have supported the project from the beginning.

Peacehaven and Telscombe Town Councils

PS. Some maps within the NDP do not show the recent developments as they were created as evidence prior to their completion. They will be include in the next revision. In light of recent growth at Chalkers Rise, the urban edge areas have adjusted.

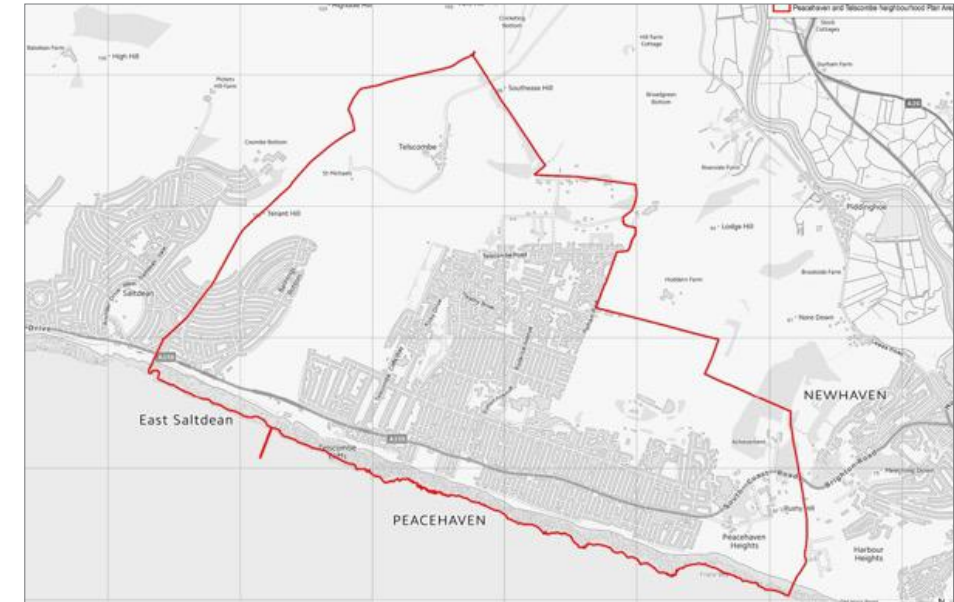
A Long-Term plan for Peacehaven and Telscombe

This is the Regulation 15 Neighbourhood Development Plan. It covers the towns of Peacehaven and Telscombe, as illustrated in Diagram 1.

Our daily routines of where we work, how we travel, where we live, where our children go to school are all shaped by the development of our built environment. New development is adjudicated by the District Council in accordance with planning policies set out within the Local Development Plan and since 2012, local areas have been able to shape some of the detail of those planning policies via a Neighbourhood Development Plan.

The purpose of a Neighbourhood Development Plan is to allow residents, community groups and businesses within the area to express ideas for how they see their local area evolving over time. It allows them to bring forward their thoughts on what should be included in the area for future generations.

The journey of this Neighbourhood Development Plan has been ongoing since 2018 and has allowed many people from all aspects of the community to come together and have a say on what they would like their local area to look like and include over the coming decade. The Neighbourhood Development Area covers the towns of both Peacehaven and Telscombe, as set out in diagram 1.



Neighbourhood Development Plan Area

Diagram 1



Structure of the Plan

Following this introduction, the Plan comprises further sections:

Section 1 - Introduction

Background to the Neighbourhood Development Plan, its structure, content, process and objectives.

Section 2 - Peacehaven & Telscombe Area

'Peacehaven and Telscombe Area' presents an overview of the area covered by the Neighbourhood Development Plan, highlighting some of the current issues and barriers faced by the Towns. The chapter also sets out the vision, aims and objectives for the development of the towns for the future.

Section 3 - Area Wide Policies

Sets out the design and planning policies for the towns.

Section 4 - Future Growth Policies

Sets out how larger planning applications for growth should be managed and encourage participation of the local community.

Section 5 - A Centre for Peacehaven

Sets out the towns aspirations for a vibrant and mixed centre for Peacehaven that encourages employment and provides homes. A place where people can live, shop, work and come together for social and cultural activities.

Section 6 - Community Infrastructure Levy

Explains the Community Infrastructure Levy and how an enhanced amount of levy will benefit the towns.

Section 7 - Glossary

Helps to explain planning jargon and phraseology.

Future opportunities

"Within our dreams
and aspirations, we find
our opportunities"

Sugar Ray Leonard

On the journey of developing the Neighbourhood Development Plan, local people were asked to bring forward what they thought the future of the area should look like. To describe what could be done to help the local people live better and healthier lives. Obviously not everyone's vision is the same, and therefore it is important that the Neighbourhood Development Plan looks at providing as much of those aspirations as is possible. Therefore, not only does the plan set out traditional style policies but also highlights possible projects that the local town councils can take forward and develop.

It is important that this plan is read alongside the accompanying Design Codes and Strategic Environmental Assessment that have been produced with this plan so that a full picture of the community vision can be gained.

Who's been Involved?

Peacehaven Town Council and Telscombe Town Council have come together to develop this plan. They established a Steering Group which consisted of Councillors, residents, business representatives and community leaders to work through the main planning issues and to use their combined networks for information sharing and gathering.

The Town Councils would like to take this opportunity to thank all those steering group members that helped develop this Plan.

The benefits of having a Neighbourhood Development Plan

Residents of Peacehaven and Telscombe often express via social media how they have been forgotten. How other nearby towns such as Lewes or Seaford get better developments, or more facilities.

Following on from the Pelham Rise development, the Town Council felt that they needed to promote opportunities for the area, to influence better quality spaces and building design and most of all, to seek additional social infrastructure which would benefit the well-being of residents. This Neighbourhood Development Plan has therefore taken time to develop supporting policies that will help influence changes for the better.



The Scope of the Plan

It has been important for the Neighbourhood Development Plan to be developed in such a way as not to repeat planning policies that have already been set by the District Council in the Lewes District Local Plan Part 1¹ and Part 2², and South Downs National Park Authority plans, but to add local information that can help shape future development and growth of the area.

Growth of the local area isn't unwanted, it is viewed by the Town Councils as an opportunity to provide much needed facilities for future generations. However, it must be done in a sympathetic and sustainable way. This plan is seen as a tool for enabling growth to occur, so that the benefits of growth can be shared throughout the whole area.

¹ [Adopted Joint Core Strategy](#)
² [Local Plan Part 2 2020](#)
[Neighbourhood planning - GOV.UK](#)

The Neighbourhood Development Plan Journey

The starting point for the Neighbourhood Development Plan journey was to engage with the community and discuss the main planning issues that were likely to be faced during the next decade. Issues such as traffic generation and lack of social infrastructure and services featured highly.

Once the main issues were identified, evidence was then collected from a variety of different sources and technical professionals to scope out policies that would help manage those issues for the future. These policies were set out in a draft plan which went out to resident's consultation (Regulation 14) in 2021.

From the feedback gained, a further draft plan has been prepared. This is known as the Regulation 15 document. This Regulation 15 document has been submitted to Lewes District Council who have undertaken a period of consultation with statutory consultees. The Neighbourhood Development Plan and all the comments were then examined by a Government appointed Inspector, and the recommended modifications have been included in this document. If all is acceptable, then the plan will be put to a local referendum where residents can vote to adopt the plan.

If adopted, additional funding can be gained through the Community Infrastructure Levy towards local community projects. This Neighbourhood Development Plan should remain up to date and relevant and this includes a commitment to reviewing the Neighbourhood Development Plan when a new Lewes Local Plan is made.

For more information about the stages of the Neighbourhood Development Plan then go to the Government's website:
www.gov.uk/guidance/neighbourhood-planning--2#evidence-to-support-a-neighbourhood-plan

or contact Peacehaven Town Council or Telscombe Town Council:
www.telscombetowncouncil.gov.uk
www.peacehaventowncouncil.gov.uk



Peacehaven and Telscombe Plan Area

The Neighbourhood Development Plan area comprises of two coastal towns between Brighton and Newhaven. In 2021 the Neighbourhood Plan Area had a total of 22 834 residents occupying 9963 dwelling units. Census information shows that there is an approximate growth rate of 130 people per annum since 2011. Peacehaven and Telscombe are formed from geographically separate areas that each have an individual history.

Telscombe contains three distinct settlements, separated by the Telscombe Tye. The village of Telscombe is a small village within the South Downs National Park, consisting of approximately 30 houses (of which 50% are listed) and a Saxon church. It is a rural village within a conservation area, where the only employment locally is via farming or livery and a small amount of tourism generated by the amazing South Downs National Park scenery.

The area of East Saltdean was mainly developed during the 1920's and 30's as an extension to the Saltdean Seaside resort with Butlins Hotel. The area of East Saltdean always remained within the parish boundary of Telscombe and even though various debates have occurred to examine the separation of East Saltdean from Telscombe and inclusion within Brighton boundary, this has never occurred.

Peacehaven and Telscombe were developed from the first quarter of the twentieth century, from speculative resort development schemes. Peacehaven in particular relates to the later inter-war years of plotland developments, where people were encouraged to buy (or won via raffles) individual plots to build homes for themselves. The grid like street pattern throughout the Neighbourhood Development Plan area typifies these developments.

Peacehaven, Telscombe and East Saltdean extend above the chalk cliffs to the open downland of the South Downs National Park and within Lewes District in East Sussex. Though separated areas, the South Downs National Park and the sea provide a common link throughout, and one that can be used to provide cohesion for the future.



Overview of the Neighbourhood Development Plan Area

Large amounts of development over the last 20 years has done little to improve local infrastructure and has taken place in a piecemeal fashion. There have been approximately 700 new homes delivered in Peacehaven and Telscombe since 2009 and much of this has been through windfall sites.

Although there is a reasonable offer of facilities and services, there continues to be a lack of good quality social infrastructure in the area and increased growth has led to high demand for services, in particular health services. In addition, housing growth and commuting patterns have over recent years placed severe pressure on the A259 South Coast Road. The Neighbourhood Development Plan consultation exercises have raised the following concerns:

- Poor quality development that has used poor quality materials, given the coastal location.
- Poor cycling or pedestrian infrastructure linking main points of town, creating greater dependency on car travel.
- Poor public transport connectivity with the area and to neighbouring areas, making local journeys time consuming and costly.
- Poor provision of good quality commercial space to meet the needs of local businesses, meaning that more people commute to place of employment.
- Lack of managed recreational open spaces and sports pitches.
- High demand for health services and poor access to NHS dentists and doctors. According to 2011 census Peacehaven has some of the worst health outcomes of the entire district.
- Meeting the needs of a growing ageing population while providing facilities for young people in the area, is problematic.

Peacehaven and Telscombe, a Snapshot

The entire coastline and cliff top between East Saltdean to Newhaven is a Marine Conservation Area and lies within the Living Coast UNESCO world biosphere area.



Telscombe Village has 16 listed buildings including Grade 1 church. St. Laurence. There are also 3 scheduled ancient monuments on the Tye.

South Downs National Park encloses the Neighbourhood Plan area to the north and west, while the Channel encloses the NDP area to the South.

Population 22,834 increase of 6% since 2011.

Main shopping area Meridian site subject of current major redevelopment proposal.



Property is generally unaffordable for lower quartile. Average flat price is 8 times average salary. Rent for one bed property 40% of average salary.

Shortage of formal play spaces and sports facilities.

Nearest train station is over 6km away at Newhaven.

Lack of cycle and walking routes. Reliance on cars.

Only one road A259 that leads in and out of towns. Road is full capacity during peak hours.



Main bus route only serves southern part of towns. Poor or no bus service throughout rest of town areas.

Significant proportion of people travel outside the area for work. Significantly higher than elsewhere in the District.

Peacehaven and Telscombe of the Future

The Vision

Peacehaven and Telscombe Towns aim to be sustainable, with clean air and a healthy environment providing a good quality of life for all inhabitants and visitors.

Aims of the Neighbourhood Development Plan

- ✓ By 2030, the area will incorporate active movement for all ages by creating better accessibility to public transport, better cycle routes and walkways. Thus, improving air quality and people's well-being.
- ✓ There will be better designed buildings contributing to the character of the area.
- ✓ There will be improvements to the public realm, encouraging more outside events and social gatherings.
- ✓ Better quality (both physical and technological) employment spaces, encouraging more people to work locally.
- ✓ A wider and more diverse range of retail and leisure outlets that will support the needs of the local community, encourage a more vibrant centre and discourage travel to neighbouring towns for essential goods and services.
- ✓ Improvements to community facilities such as libraries, food growing spaces, and meeting spaces, to enable more community interaction and knowledge sharing.
- ✓ Improvement to the accessibility of the South Downs National Park, Telscombe Village and the cliff top/beach areas which will attract visitors and develop a tourism market.

The timeframe of the plan, is aligned to the existing Lewes Local Plan (Part 1: Joint Core Strategy 2010-2030 and Part 2: Site Allocations and Development Managements Policies 2020)³ and will regularly undergo reviews to ensure that the vision is progressing in accordance with emerging new policies set by Lewes District Council and future changes to the wider planning system.

³ [Lewes District Local Plan Part 2: Site allocations and development management policies - Lewes and Eastbourne Councils](#)

Objectives

The objectives following from the vision are:

- All new development will be designed to deliver a better-quality environment for the area.
- Access to and through the South Downs National Park and along the Coastal Path will be improved as multifunctional routes for tourism, travel and recreation, further linking the areas within Peacehaven and Telscombe to surrounding areas.
- New developments will create well connected, attractive cycling and pedestrian routes, providing seamless integration with the existing towns facilities and public green spaces to encourage a reduction in car-based travel.
- Improvements to existing walking and cycling routes will be undertaken to encourage more active travel modes.
- Existing habitats and green infrastructure networks are protected and enhanced through sensitive development, to encourage local habitat and biodiversity improvements.
- Improve local air quality and provide reductions in carbon emissions by supporting local renewable energy generation.
- Encourage the appropriate re-development of previously developed land to help meet housing need and encourage housing development to cater for all ages and abilities within the community. In particular, creating innovative and affordable housing opportunities.
- Protect and encourage the development of retail and leisure spaces which meet identified local need and encourage an evening/nighttime economy for all ages and abilities to use.
- Encourage flexible and high technological working spaces to attract new business development and expansion within the local area.

The Neighbourhood Development Plan is looking to provide sustainable development for future generations that will allow residents to feel proud of the identity of their area. To increase access to local services, local employment and local housing and in doing so, improve inclusivity of its community.

Meeting the Vision The 20-Minute Neighbourhood

Peacehaven and Telscombe are neighbouring urban areas that geographically are quite flat. However, one of the largest subjects of concern raised by local residents, was poor accessibility to local services, such as doctors, dentists and nursery care. Through adopting the concept of a '20-Minute Neighbourhood', the Town Councils are hoping to raise awareness of the current closeness of local service provision and work towards increasing the amount of local service provision so that accessibility becomes easier for all.



The 20-Minute Neighbourhood is about creating attractive, interesting, safe, walkable environments in which people of all ages and levels of fitness are happy to travel actively for short distances from home, to the destinations that they visit and the services they need to use day to day. Destinations and services such as shopping, school, community and healthcare facilities, places of work, green spaces, and more. These places need to be easily accessible on foot, by cycle or by public transport as well as car, and accessible to everyone, whatever their budget or physical ability, so that people can make an informed choice about their journeys and not be solely reliant on a car. The 20-Minute Neighbourhood idea is also about strengthening local economies by keeping jobs and money local and facilitating local food production to create jobs and supply affordable, healthy food for all; about empowering communities to have a direct say in how their neighbourhoods change; and about doing all this in ways that create places that meet the needs of the least healthy and the least well-off.

The importance of creating better connected communities, is supported by Sport England's "Uniting the Movement Strategy"⁴ as well as draft National Model Design Code (updated January 2021)⁵, which contains useful guidance on delivering 20-Minute Neighbourhoods.

⁴ Sport England - Uniting the Movement
⁵ National Model Design Code - GOV.UK

Section 3

Neighbourhood Development Plan - Area Wide Policies

This section of the Neighbourhood Development Plan presents policies that apply across the towns as a whole. They relate to:

- Design
- Housing
- Movement
- Open Space and biodiversity
- Drainage Management
- Air quality Management
- Employment Spaces
- Tourism
- Community facilities
- Renewables
- Advertisements

A major application consists of . . .

- Housing development where ten or more homes will be provided, or the site has an area of 0.5 hectares or more.
- Non-residential development consisting of additional floorspace of 1000 square metres or more or a site of 1 hectare or more.
- As otherwise provided in the Town and Country Planning (Development Management Procedure) (England) Order 2015.

Within the National Park, whether a proposal is 'major development' is a matter for the decision maker, taking into account its nature, scale and setting and whether it could have a significant adverse impact on the purposes of the National Park.

High Quality Design and Local Distinctiveness

The achievement of high-quality design is a core principle of the National Planning Policy Framework (NPPF)⁶, which is the Governments' key planning document. It states, at paragraph 131, that "the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities".

The NPPF goes on to note that 'Design policies should be developed with local communities so they reflect local aspirations and are grounded in an understanding and evaluation of each area's defining characteristics. Neighbourhood planning groups can play an important role in identifying the special qualities of each area and explaining how this should be reflected in development, both through their own plans and by engaging in the production of design policy, guidance and codes by local planning authorities and developers.' (Paragraph 132 NPPF).

The Neighbourhood Development Plan Steering Group with AECOM have produced a set of design codes to inform all development across the towns. All development should conform to the design codes and reflect the principles contained within.

⁶ [National Planning Policy Framework](#)

⁷ [peacehaven-and-telscombe-neighbourhood-plan-steering-group.co.uk/_files/ugd/6d59de_56ff5741e0d742ff885b5f5d832cdf51.pdf](#)



Policy PT1: High Quality Design

- (1) All proposals for developments and public spaces should be designed to be accessible and safe to use by people of all ages and for those whose mobility may be reduced. The only exemptions to this is development providing specialist accommodation for a group of people with specific needs (such as purpose-built accommodation for older people or students) or where the specific requirements will depend on the nature of the accommodation or development provided.
- (2) Proposals should demonstrate through the submission of a proportionate statement to accompany the planning application how they will have a positive impact by considering the local landscape, the setting of and longer views to and from the South Downs National Park, coastal areas and other local environmental assets including trees and woodland.
- (3) Proposals should incorporate opportunities to address climate change including enhancing biodiversity, green roofs and walls, green technologies, water saving and SUDs in accordance with the development plans, supplementary plans and guidance adopted by Lewes District Council and the South Downs National Park Authority as appropriate.
- (4) Proposals should demonstrate through the submission of a proportionate statement to accompany the planning application how they have considered, and been informed by, the Peacehaven and Telscombe Design Code(s)⁸ (and any other relevant design codes and guidance) for the Neighbourhood Development Plan area.

8 [Peacehaven and Telscombe Design Code](#)

Innovative Design

Innovative design, that raises the standard and quality of buildings in Peacehaven and Telscombe, promotes local distinctiveness, as well as addresses the needs of climate change are welcomed. New buildings should be designed so that they can respond to changing social, environmental and technological needs. Contemporary design approaches may be acceptable where it responds positively to the surrounding landscape.

Good management of buildings and public spaces also contributes to resilience, attractiveness and beauty of a place. Good management provides clearly defined spaces that are well maintained and cared for.

Policy PT2: Innovation and Good Management

- (1) Development proposals that incorporate new methods of sustainable design and digital infrastructure are welcomed, (where they comply with other planning policies).
- (2) Proposals for new developments should seek to provide flexible and adaptable spaces that have high speed digital connectivity in order to provide options and information to help education, social interaction, business and home working.
- (3) Major application proposals should set out management and maintenance systems for areas of public car-parking, waste management and shared outside spaces over the long term to ensure that they are well maintained.



Landscaping

Landscaping and the public realm can contribute significantly to the local character of an area, green infrastructure, wildlife and biodiversity, as well as to the local amenity and well-being of residents. Poorly designed landscaping has the potential to impact negatively on the character and residential amenity.

Landscaping also helps mitigate the impact of new developments and can be used to complement the design of new buildings.

Policy PT3: Landscaping

All new development schemes should:

- (1) Protect and enhance natural features by respecting and incorporating existing landscape features into the design. In particular, proposals should retain mature or otherwise important trees and hedges.
- (2) Use appropriate high-quality materials and native species that are suitable for the site.
- (3) Contribute to the urban greening of the street scene.
- (4) Landscaping on major applications should seek to include outdoor community spaces such as food growing areas, communal allotments, community gardens or pocket parks.

South Downs National Park

Peacehaven and Telscombe are enveloped by the South Downs National Park and as such, the towns benefit from the wonderful landscapes, the wildlife and cultural heritage the South Downs National Park brings. It is therefore important that any future growth protects those benefits as well as protecting the South Downs National Park itself.

The South Downs was established as a National Park in 2010. The South Downs National Park Authority became the local planning authority for the National Park in 2011⁹. The National Park contains over 1,600 km2 of England’s most iconic lowland landscapes stretching from Winchester in the west to Eastbourne in the east.

The purposes and duty of the National Park Authority are set out in Section 5 (1) of the National Parks and Access to the Countryside Act 1949, as amended by Section 62 of the Environment Act 1995.

9 [South Downs Local Plan - South Downs National Park Authority](#)

The National Park purposes are to conserve and enhance the natural beauty, wildlife and cultural heritage of the area and to promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public. The National Park Authority also has a duty to seek to foster the economic and social well-being of the local communities within the National Park when carrying out its purposes.

The 2023 Levelling Up and Regeneration Act (s245) and subsequent 2024 Government guidance, places a duty on those bodies preparing Neighbourhood Development Plan to seek to further the purposes of the National Park.

Paragraph 189 of the NPPF states that great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks which have the highest status of protection in relation to these issues. It continues that the scale and extent of development should be limited, while development within its setting should be sensitively located and designed to avoid or minimise adverse impacts on the National Park. This is particularly important as many areas outside of the National Park are still considered to be within the setting of the National Park¹⁰.

Policy PT4: Impacts on the South Downs National Park

- (1) Development in, or within the setting of, the South Downs National Park (SDNP) should have a landscape led approach which seeks to further the purposes of, and makes a positive contribution to, the landscape character, visual amenity and special qualities of the South Downs National Park.
- (2) Development proposals must not detract from, or cause detriment to, biodiversity, dark night skies¹¹, geology, tranquility, and other essential characteristics of the South Downs National Park.
- (3) Proposals should not adversely affect transitional landscape character in the setting of the National Park, including the views, outlook and aspect, into and out of, the National Park by virtue of its location, scale, form and/or design.”

10 [Supplementary Planning Documents and TANs - South Downs National Park Authority](#)
11 <https://www.southdowns.gov.uk/planning-policy/supplementary-planning-documents>
[South Downs National Park Dark Skies Technical Advice Note. Version 2. May 2021](#)

Sustainable Design

Peacehaven Town Council declared a climate emergency in 2021 and have undertaken a commitment to be carbon neutral by 2030. Planning applications seeking to reduce carbon dioxide emissions and other air pollutants will contribute to these objectives and will help tackle the effects of man-made climate change.

In addition, Peacehaven and Telscombe are classified as a “water stressed area”¹² by the Government and as such this resource needs to be managed effectively, particularly given the complexities of the towns location on eroding cliff tops and chalk strata levels.

All new developments should aim to be net zero in accordance with the legally binding target in the Climate Change Act 2008 (2050 Target Amendment) Order 2019. This commits the UK to reducing greenhouse gas emission to Net Zero by 2050.

All new development proposals in the Plan area need to show how thought has been given to being climate friendly and should seek to demonstrate that the sourcing of materials, facilities and water-drainage strategies and other actions are contributing to this target. Both Lewes District Council and South Downs National Park Authority have a range of technical guidance available on how development can meet these challenges.

Older traditional buildings seeking to renovate as part of a refurbishment programme should seek to undertake a whole building holistic approach in accordance with PAS 2035 (PAS 2035:2019 Specification for the energy retrofit of domestic buildings¹³)

¹² <https://www.gov.uk/government/publications/water-stressed-areas-2021-classification>

¹³ [PAS 2035 Guide - Retrofit Academy](#)

Policy PT5: Sustainable Design

All development within the Neighbourhood Development Plan area should seek to achieve high standards of sustainable development and where appropriate demonstrate in proposals how design, construction and operation has sought to:

- (1) Promote the use of natural resources and the reuse of or recycle existing resources.
- (2) Support the use of sustainable drainage systems (SUDS) to conserve and enhance the landscape and wildlife, reduce the effects of storm water runoff, reduce the effects of summer heatwaves, and reduce the effects of summer droughts.
- (3) Meet the Building Regulations water efficiency standard of a maximum of 110 litres per person per day for residential use (or subsequent standards).
- (4) Show how the proposals seek to be resilient to the impacts of climate change by including adaption measures in terms of, but not limited to heat and water stresses.
- (5) Use a holistic building approach in accordance with the principles set out in PAS 2035 (or its successor) in the renovation of traditional buildings or heritage assets to help improve the sustainability of the structure whilst preserving or enhancing its architectural and/or historic interest, appearance, character, setting, significance and long-term preservation.

Council Project 1. Promoting Sustainability

The Town Councils will investigate, with partners, creating a Local Eco annual Conference and Open House weekend. To draw on existing buildings and operations within the towns, to demonstrate Passive Haus design principles, good residential landscape design for cliff top areas, water saving, and carbon reducing technologies.



Housing - Creating high quality housing for all

The Neighbourhood Development Plan seeks to encourage the appropriate re-development of brownfield sites to help meet housing needs and encourage housing development to cater for all ages and abilities within the community. In particular, the Neighbourhood Development Plan seeks to bring forward innovative affordable housing options to meet the defined need, as established by the Housing Needs Assessment for Peacehaven and Telscombe 2022¹⁴.

It is important to acknowledge that this version of the Neighbourhood Development Plan does not allocate housing sites for new development. Nevertheless, the Neighbourhood Development Plan is supportive in principle of proposals which would (amongst other considerations):

- Retrofit existing buildings rather than demolish and rebuild.
- Prioritise the development on brownfield sites.
- Meet the identified local area needs.
- Maximise the development of sites in accordance with other planning policies.
- Facilitate a mix of housing (i.e. type, tenure, and affordability) which is accessible and adaptable for all users.

Whilst the Lewes District Local Plan Part 1 sets out the housing figure for the Neighbourhood Development Plan Area and is the local planning authority for the areas of the Parishes outside the National Park, the South Downs National Park Authority is the local planning authority for the areas of the Parishes inside the National Park. Both local planning authorities set out in their respective local plans, how they wish to improve the quality and amount of affordable housing in their plan areas, including the need for a mix of housing type, mix and density.

Other Core Strategy housing policies look at how new housing will be distributed across the district, the housing type, mix and density of proposed housing developments and the amount of affordable housing needed.

In terms of the areas outside of the National Park, Lewes District Council have not been able to demonstrate (at the time of writing) a five year housing land supply. Therefore some of the housing policies within the Lewes Core Strategy will be weighted in favour of the sustainable development aims set out in the National Planning Policy Framework.

The Neighbourhood Development Plan Steering Group, Lewes District Council and AeCOM (Strategic Environmental Report¹⁵) have therefore collaborated in bringing forward the relevant housing policies for this plan.

As mentioned, the plan is not allocating sites for housing following advice from Lewes District Council. However, the Steering Group (and community) are keen to consider the potential constraints and opportunities for development within broad locations for development within the Neighbourhood Development Plan area. It was determined that the character areas identified within the Peacehaven, and Telscombe Design Code and Strategic Environmental Assessments (2021) would provide a good basis for identifying sub-areas to explore the potential constraints and opportunities associated for development. The Design Codes identify a total of ten areas, and it was appropriate that some of these were combined for the purposes of housing.



¹⁴ [Report \[Housing Assessment\] 2021-07-19](#)

¹⁵ [Peacehaven and Telscombe NP SEA Environmental Report_v2.0_040222](#)

Design Code Character Areas

For each of the eight areas, a narrative is provided below to identify any potential constraints as well as opportunities for development.

A summary of the key findings is provided, within the detailed appraisals for each area provided within Chapter 4 in the main body of the Strategic Environmental Report.

Area 1: East Saltdean

While there are a number of constraints within and surrounding this area, any development would have good accessibility to the services and facilities within the local area.

Area 2: Telscombe Village

There are a number of significant constraints to development within this area as a result of landscape and historic environment sensitivity. These constraints and the scale of the existing settlement mean that only small-scale growth could be accommodated.

Area 3: South Downs Fringe

Development in this area would be set away from the facilities and services on offer in the existing settlement. Further to this, existing development within this area is at a much lower density compared to the rest of the settlement. The lower density of housing and the presence of the South Downs National Park may restrict potential opportunities for development.

Area 4: Telscombe & North Peacehaven

While there are a number of constraints within and surrounding this area, any development would have relatively good accessibility to the services and facilities within the existing settlement.

Area 5: Plotlands

While there are a number of constraints within and surrounding this area, any development would have good accessibility to the services and facilities within the existing settlement.

Area 6: Peacehaven Centre

The area contains a number of important community assets, including the Peacehaven Community School, Leisure Centre and Meridian Surgery. There is also a number of existing employment areas. The Meridian Centre is an out-of-date, low-rise building surrounded by large car parks. As the area is designed for vehicles, it is not very pedestrian friendly and therefore does not support active transport.

Development could present an opportunity to provide a mix use scheme that would improve the pedestrian environment and connectivity to surrounding areas (including the strategic site allocation at Chalker's Rise, Peacehaven, which is located immediately to the north of the Meridian Centre)

Area 7: Coastal Plotlands and Coastal Road

While there are a number of constraints within and surrounding this area, any development would have good accessibility to the services and facilities within the existing settlement.

Area 8: East Peacehaven and Mobile Homes

The area contains and is in close proximity to a number of constraints, including the South Downs National Park and a range of designated natural assets. Development in the west of this area is likely to have reasonable access to the services and facilities in Peacehaven, although if development is delivered in the east of the area, then accessibility would be reduced.

Neighbourhood Development Plan - Character Areas Map



Area 1: East Saltdean

Area 2: Telscombe Village

Area 3: South Downs Fringe

Area 4: Telscombe & North Peacehaven

Area 5: Plotlands

Area 6: Peacehaven Centre

Area 7: Coastal Plotlands and Coast Road

Area 8: East Peacehaven and Mobile Homes

The issue of affordability of both market and rental accommodation affects all Neighbourhood Development Plan areas. Not having a good supply of affordable housing in the towns is leading to those on the lowest earnings, such as public sector workers, essential local workers, or young people starting their careers, being unable to live in the area they work in.

This also means that it will be harder for local employers to find a labour supply in the local area and the area will find it difficult to recruit key posts, such as nurses, teaching assistants, nursery staff etc. Traffic generation and overcrowding is an offshoot of this issue as more people need to commute out of the area for employment or to visit family.

Average prices in Peacehaven and Telscombe have increased substantially since 2011. Median average prices have increased by 48% over the period 2011-2020. Lower quartile prices (the cheapest 25% of properties) have increased at a similar rate- just below 50%. In absolute terms, the median average house price is almost £100k more in 2020 than in 2011 with the lower quartile price £87.5k higher than in 2011 (AECOM Housing Needs Assessment 2022).

A key objective of the Neighbourhood Development Plan is to support a better balance between jobs and homes in Peacehaven & Telscombe.

The Housing Needs Assessment shows that the number of older households has not grown as significantly as expected, but there has been a significant growth in the proportion of households with non-dependent children. This has suppressed the formation of single and couple households largely driven by affordability for young people to move out and those providing care of an elderly relative.

In addition to affordability, the housing mix in the town does not meet current demographic needs. The towns have historically built detached houses or bungalows of two or three bedrooms, small family homes, many now owned by elderly couples whose adult children have moved out of the area.

Freeing up these detached houses and bungalows by encouraging more elderly housing in the area doesn't address the affordability problem. It just means there are more family dwellings on the market and those wanting smaller units for young adult starter homes, will still have to move further afield due to lack of appropriate affordable stock. Adapting existing housing stock to meet needs will be required.

In addition, a lot of the housing stock within the area is out of date and doesn't meet modern building regulations standards, meaning that a lot of housing is inefficient, costly and will require much refurbishment to meet the aspiration of being carbon neutral or achieving zero emission ratings. The costs of housing are a large contributing factor to mental well-being. Achieving affordable, well insulated homes that are cheaper to heat and reduce carbon emissions is essential for a healthy, sustainable community.

As outlined by the National Planning Policy Framework (NPPF), it is important that the design and quality of new housing stock is well-designed and adaptable to provide good living conditions for future occupants. It is also important that development should address the character and appearance of its surroundings in relation to the immediate vicinity and the broad locality within which the site is located.

Schemes taking account of local topography and accessibility, innovation and originality in design will be supported. Our accompanying design codes and guides set out the general characteristics of each of the ten neighbourhood character areas, and these should be used as a tool to guide the design of all planning applications.

The introduction of a design code at a local level is thought to be justified to ensure that moving forward, all new homes provide suitable and adequate space for day-to-day living, irrespective of type and numbers of bedrooms.

Advances in technology are an important element in reducing the climate impact. Technology can help cut emissions through reducing energy and water consumption and can help reduce vehicle trip generation through working and studying from home.

In light of the recent changes to the Permitted Development Order, these policies apply to conversions of non-residential buildings to residential uses as well as new build developments. In flatted developments, provision of secure storage facilities for bulkier items such as prams/powerful chairs and e-bikes, whether communal or private will be encouraged.





Policy PT6: Housing Design

All new residential development (including conversions) must:

- (1) Meet the nationally described¹⁶ internal space standards for each individual unit.
- (2) Be arranged to ensure that primary habitable rooms have an acceptable level of daylight and where possible will receive direct sunlight.
- (3) Be designed to minimise disturbance to occupants from other land uses and from sources of noise and pollution.
- (4) Provide an efficient layout, including internal storage areas, areas for working from home and good quality outdoor amenity space.
- (5) Adopt a landscape-led approach to ensure development positively contributes to the overall appearance and landscape/townscape character of the area taking account of street layout, density, plot size, scale and roofscapes whilst avoiding or minimising any adverse impacts on the South Downs National Park, its setting and views to and from the National Park and views to the sea.
- (6) Create a safe environment, incorporating measures to reduce opportunities for crime and incorporating opportunities for natural surveillance of public places and include the principles of Secured by Design¹⁷.
- (7) Provide for accessible and well-designed secure bicycle storage areas, e-bikes and electric car charging points, and waste recycling areas.
- (8) Provide access to hi-speed wi-fi infrastructure
- (9) Where possible, include smart technology for protection and safety, such as water leakage notification, fire-safety and security systems
- (10) Where possible incorporate smart demand energy systems to reduce energy and water usage.
- (11) Be in conformity with the Peacehaven and Telscombe Design Codes and any other adopted design codes and guidance for the Neighbourhood Development Plan area.

¹⁶ [Technical housing standards – nationally described space standard - GOV.UK](#)

¹⁷ [Secure by Design 2019_update_May.pdf](#)

Adaptable Housing

The plan aims to provide a range of housing types that support the varying needs of a diverse population. This is important for inclusion and community development. The design of housing is especially important to the health and well-being of residents.

The NHS Sussex Partnership produced a document in July 2020 – A strategic plan for integrating housing and mental health across Sussex¹⁸.

“The homes that we live in are a key determinant of positive physical and mental well-being. In the past few months, our partnership and our communities have been dealing with the Covid-19 Coronavirus Pandemic. We have all spent much more time in our homes than ever imagined, and our home environment has become even more critical in keeping us safe and well. It is therefore appropriate that as we move forward, housing is recognised as an even more critical factor that enables us to live well. In driving forward our plans and transformation priorities, we have identified the need for a more integrated and strategic approach with housing. What is critical is that both the home environment and the care and support that is available, promotes the greatest levels of independence and recovery possible for the individual, their carers and families.”
Para 1.4 p.3

18 [Integrating-Mental-Health-and-Housing-Services-for-Better-and-More-Fulfilling-Lives-4.pdf](#)



Policy PT7: Adaptable Housing

Support will be given for the adaption of existing buildings as well as new development that creates high-quality sustainable accommodation suitable for people of differing levels of physical and mental abilities. Housing should seek to be:

- (1) Easily accessible to shops, public transport, medical facilities, community facilities and services appropriate to the needs of the intended occupiers..
- (2) Where appropriate, provide suitable facilities for care/medical staff and visitors, such as day rooms, dedicated parking, additional washrooms and overnight accommodation.
- (3) Developments should seek to include adaptations for those with differing physical and mental abilities to reside, such as wheelchair accessible rooms, wet rooms, one touch taps, talking appliances, smart technology, and high levels of security etc.

Affordable Housing

The National Planning Policy Framework sets out at paragraph 65 that a proportion of affordable housing can only be sought on sites of 10 or more homes. Larger sites are therefore key to delivering significant levels of affordable housing. However, it is recognised that the term “affordable housing” in planning policy usage is unlikely to provide enough homes for those on low to average incomes. Many people, including the young, or those with specific needs cannot access the local housing market, as it stands.

It has been a concern at both district and local levels that many applications seeking housing development do not provide enough robust information to determine the levels of affordable housing needed and, therefore, often only minimal limits are achieved. The housing needs assessment highlights that the number of affordable houses provided in the area has been lower than expected.

Policy PT8: Low Cost Housing

- (1) Support will be given (subject to other development plan policies) to well-designed schemes within Areas 1, 4, 5 & 6 developed through community land trusts, housing associations or co-operative housing schemes which demonstrate that they help meet the needs of the local area.
- (2) Support will be given (subject to other development plan policies) for well-designed schemes within Areas, 1, 4, 5 & 6 which involve the provision of land for self-build projects which demonstrate that they help meet the needs of the local area.
- (3) Support will be given to (subject to other development plan policies) for well-designed Build to Rent or live-work schemes within Areas 1,4,5 & 6 where a reasonable percentage of the units are provided (and maintained in perpetuity) for affordable private rent.
- (4) All schemes involving affordable housing will be considered on the basis of site-by-site circumstances, considering the needs outlined in the Peacehaven and Telscombe Housing Needs Assessment or any successor document or the most up to date housing needs assessment.

For major development applications, applicants should provide a robust "open book" appraisal to demonstrate the proposed levels of affordable housing, taking into consideration the Peacehaven and Telscombe Housing Needs Assessment. Appraisals should be undertaken in accordance with the Assessing Viability in Planning under National Planning Policy Framework 2019 – RICS March 2021¹⁹ and should be based on Benchmark Land Values as undertaken by a qualified RICS Assessor.

¹⁹ [RICS guidance note on the National Planning Policy Framework 2019 \(for England\). RICS Professional Standard, 1st edition.](#)



Housing Mix

It is acknowledged that the type and size of housing in Peacehaven and Telscombe, which is mainly medium sized family units, presents a barrier to those who need or can only afford smaller properties or are seeking to downsize. However, the delivery of smaller units needs to be part of a larger housing strategy that provides the Neighbourhood Plan Area with a balanced mix of housing stock. This needs to meet the needs, across all ages, abilities and income levels, including providing larger types of housing for extended families. (Housing Needs Assessment).

Robust “open-book” assessments should be undertaken in accordance with the Assessing Viability in Planning under National Planning Policy Framework 2019 – RICS March 2020 and should be based on Benchmark Land Values as undertaken by a qualified RICS Assessor.

Policy PT9: Housing Mix

- (1) All new residential developments should seek to provide homes of an appropriate type and size to meet the needs of the local community. The proposed housing mix should respond appropriately to the relevant evidence set out in Peacehaven and Telscombe’s Housing Needs Assessment or any successor document or the most up to date housing needs assessment and address any site-specific requirements contained in this or other relevant local plan documents and guidance.
- (2) Proposals should seek to meet these requirements, unless it can be demonstrated that it is not financially viable or technically feasible to do so based on specific site characteristics, that there would be no need or market demand for a particular size of homes (as may be the case for certain types of specialist accommodation), or that doing so would have an adverse impact on the character of the surrounding area.

Policy PT10: Reusing the Existing

- (1) Support will be given (subject to other development plan policies) to proposals efficiently using existing suitable brownfield land and buildings within the built-up boundaries and/or seek to retrofit existing buildings in accordance with PAS 2035 (PAS 2035:2019 Specification for the energy retrofit of domestic buildings)

Council Project 2 - Housing

The Towns Councils would welcome an opportunity to work with the District Authority to bring forward a longer-term housing strategy for the plan area, based on the recent Housing Needs Assessment and to explore whether Neighbourhood Development Orders could be used to meet those needs identified. In particular, the Council would like to assess the opportunity of creating a Neighbourhood Development Order for the Old Motel Site on the South Coast Road to bring forward an affordable housing scheme.

The Town Councils will also seek to work with community-led groups, housing associations, housing trusts and other partners to facilitate the provision of truly affordable housing in the area, through innovative schemes that will help subsidize or lower costs.



Movement: Promoting active, smarter and more sustainable modes of travel

The A259 (South Coast Road) is the only road link to and from the Neighbourhood Development Plan area.

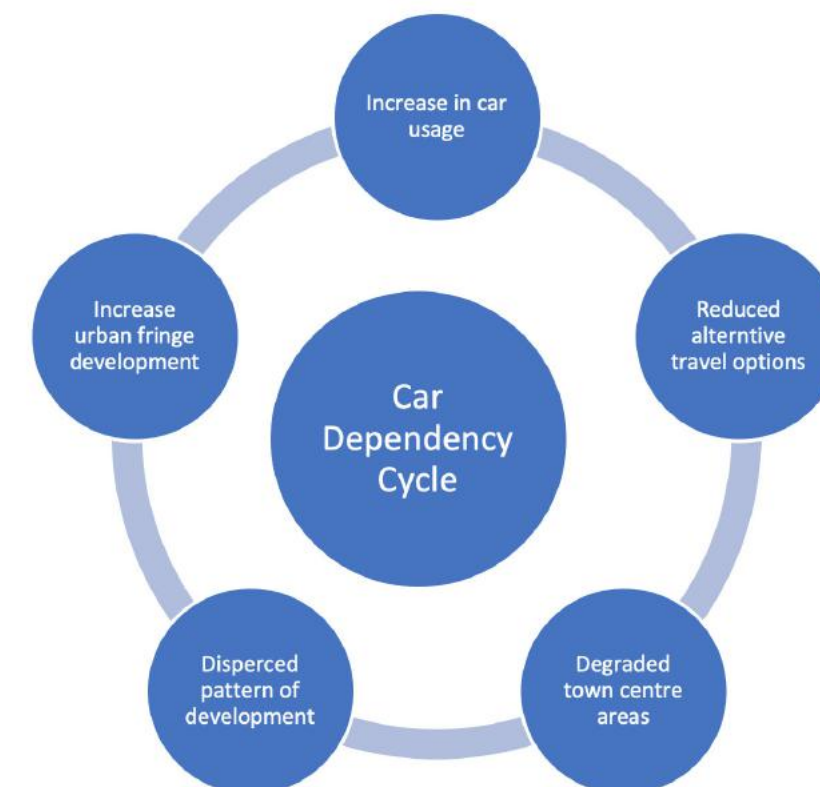
The A259 corridor is a key part of the Major Route Network (MRN) due to the high level of mixed-use traffic that uses it (e.g. pedestrians, cyclists, buses, cars/vans etc.) and its economic importance to the area in terms of providing inter-urban connectivity from Peacehaven & Telscombe with Brighton to the west, and east to Newhaven. At the time of writing the Neighbourhood Development Plan, a study of the A259 has been undertaken by East Sussex County Council. This identifies a package of transport schemes along the A259 from east of Brighton to east of Eastbourne, including the section through Peacehaven and Telscombe. The outcomes of the study have been used to inform the development of a Strategic Outline Business Case which was submitted to the Department for Transport in October 2023.

The proposed schemes for the Peacehaven/Telscombe section of the A259 comprise:

- **Longridge Avenue – Traffic management**
Minor widening of A259 / Longridge Avenue junction approaches aiming to reduce blocking back on A259 and improve journey time reliability for public transport and general traffic.
- **Rottingdean-Peacehaven – activated message signs 5.**
Introduction of markings / activated message signs along route aiming to reduce excessive speeding.

These will meet with the five objectives of the MRN which include reducing congestion, supporting economic growth and rebalancing, supporting housing delivery, supporting all road users, and supporting the Strategic Route Network.

ESCC has published the East Sussex Local Walking and Cycling Infrastructure Plan²⁰. This identifies that Peacehaven and Telscombe have the potential to increase active travel (walking, wheeling and cycling) through improved walking and cycling infrastructure. This includes linking active travel route to public transport. ESCC is also producing Local Transport Plan 4 and will update the Local Walking and Cycling Infrastructure Plan as part of their work



Active Movement

Peacehaven and Telscombe are relatively well laid out towns, with grid-like streets and level topography. Most everyday services are within a 15–20-minute walk, cycle or bus journey, but connectivity is not easy. Road surfacing is of a poor quality and car parking is widely available for free. This discourages people from making healthier and sustainable travel choices.

Health indicators show that Lewes District residents are generally more inactive than other districts in the South-East²¹. The 2018 survey by East Sussex County Council shows that approximately 9% of residents within the Lewes District were inactive (less than 30 mins activity per day) compared to 6% for Brighton and Hove and 8% in Eastbourne (Public Health England, Physical Activity)

The Town Councils would like to start the process of improving travel choices with the aim of getting to the point where walking or cycling are the most convenient choice for short journeys of less than 15-20 minutes. This would be good for the environment, for health and social well-being and for saving money²².

On longer distances people should be given an option of good quality and affordable travel modes so that they can make informed decisions as to how they travel. To enable this to happen public transport and road infrastructure has to be improved, in frequency, quality and accessibility. If traffic congestion on the A259 Coast Road is to get better, the Neighbourhood Development Plan must look at ways of how new developments can help in reduce car dependency.



²⁰ [East Sussex Local Cycling & Walking Infrastructure Plan Public Consultation 2020 - East Sussex - Citizen Space](#)
²¹ [healthy-eating-physical-activity-data-briefing-apr-2018.pdf](#)
²² [Building-Car-Dependency-2022.pdf](#)



Policy PT11: Travel Planning

- (1) All planning applications should set out the site's connectivity to nearby key services, education facilities and community spaces. These statements should be proportionate to the size of the proposed development and be tailored to address local circumstances strengthening existing links to such facilities and services.
- (2) Statements should positively support higher levels of walking, cycling and public transport use by demonstrating how the proposed scheme links to existing walking, cycling and public transport infrastructure.
- (3) Statements should promote the role of local shared transport alternatives by setting out links to local cycle hire schemes and local car clubs.
- (4) For larger proposals where new development is proposing new pathways and vehicle highways, documents should set out the time frames of infrastructure development, any planned changes to existing infrastructure and a long-term management strategy for their care and maintenance.
- (5) Where off road parking provision is not available or suitable, statements should reflect the important role existing nearby parking facilities can play when seeking to promote sustainable forms of travel. These existing parking facilities can seek to include new provisions of cycle parking (incorporating e-bike charging points), cycle/electric cycle hire schemes, changing facilities and lockers where appropriate²³.
- (6) Where new parking facilities are incorporated into the development proposals these should include opportunities to promote sustainable travel, through park and cycle, park and walk schemes and inclusion of electric vehicle charging infrastructure.
- (7) New parking facility layouts should seek to include covered cycle storage and ensure that disabled access and dementia friendly parking spaces are catered for.

Encouragement is given for developers to set out new parking areas in the Neighbourhood Development Plan area in accordance with the South Downs National Park Authority's Guidance on Parking for Residential and Non-Residential Development Supplementary Planning Document April 2021 that follows a landscape led approach to designing parking facilities.



Policy PT12: Enhancing Accessibility to the South Downs National Park and Coastal Areas

Proposals for development that enhance the quality and accessibility of the South Downs National Park, Coastal Path or undercliff walkways are welcomed.

Improvements may include:

- (1) Incorporating new links and junctions for pedestrians, cyclists, and horse-riders.
- (2) Integrating with an enhanced walking, cycling and horse-riding network across the Neighbourhood Plan area.
- (3) Creation of new active frontages along routes which enhance safety and security through natural, appropriately designed and located surveillance.
- (4) Provision of appropriately designed and located signs and notices that improve the legibility of routes for users.
- (5) Development that encourages people of all abilities to enjoy walking, cycling or horse-riding in these areas.

All development should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for all users.



Public Transport

A good public transport system helps reduce congestion, improves air quality and can save people money.

Current public transport provision in the area is focused along the A259 corridor providing travel from Brighton to Seaford. The majority of the town's residents are not within easy reach of this bus service and the current local bus route to the north and east of the Neighbourhood Development Plan area is both inadequate and infrequent, and has significant gaps in the provision of service. While this is to be partially improved as part of the East Sussex Bus Service Improvement Programme (BSIP)²⁴ with proposed increase service provision to the route no. 14 between North Peacehaven and Newhaven, there still remains connectivity issues between East Saltdean and the Meridian Centre, North Peacehaven and the South Coast Road.

Telscombe Village has no access to any public transport, thus residents of the village are totally reliant on car use.

Policy PT13: Enhancing Public Transport in the Neighbourhood Development Plan Area

All major developments of ten houses or more and commercial spaces (major) where appropriate to the development's type and scale should seek to:

- (1) Help to deliver and facilitate a better public transport connection between East Saltdean, East Peacehaven, North Peacehaven and the Meridian Centre and South Coast Road.
- (2) Deliver a better public transport connection between East Saltdean, East Peacehaven, North Peacehaven and the Meridian Centre.
- (3) Provide bus shelters that are well designed and located in front of cycle lanes. Bus shelters should contain live departure information and journey details.
- (4) Link secure cycle parking to bus routes enabling greater trip chain journeys to be undertaken.
- (5) Should seek to extend times of existing services in poorly served areas.
- (6) Design walkways to bus stops so that they are well lit, easily viewed and feel safe and secure, particularly after dark.

²⁴ [east-sussex-county-council-bus-service-improvement-plan-2021.pdf](#)

Council Project 3 – Travel Planning

Through the work on the Neighbourhood Development Plan, a series of possible projects have been identified which the Town Councils will continue to lobby for. With regards to public transport improvements, there are three main priorities.

- (1) The delivery of a frequent, direct, and high-quality transport connection from all parts of the towns to the Meridian site and nearby health facilities.
- (2) The delivery of a frequent and direct public transport route from North Peacehaven to the South Coast Road.
- (3) The upgrade of bus shelter infrastructure to provide comfortable waiting areas with real time travel information.
- (4) With regards to walking and cycling routes, the Town Councils will work closely with East Sussex County Council, South Downs National Park Authority, Lewes District Council and Sustrans to bring forward a high-quality route network (as set out below) that links education, health, retail, leisure and employment facilities across the towns.

The quality of surface infrastructure, as well as new routes and services should be enhanced. For example, better pedestrian crossing facilities, improved public realm designs, dedicated local cycle and walking lanes, better junction crossings for pedestrians and cyclists. These projects are also an opportunity for direction of funds payable to the Town Councils through CIL.



Indicative 20 minute walking radius



Map areas illustrate relevant locations and not the entire neighbourhood development plan area.

Open Space and Amenity

Peacehaven and Telscombe benefit from lots of open spaces of various sizes within and bordering the Neighbourhood Development Plan area. During the Covid pandemic, these spaces became sanctuaries to the local community and continue to serve the area by being spaces that help improve health and well-being. There is generally a good provision of young children’s play spaces across the towns. They are well maintained and where possible, improved by the local Town Councils.

The Town Council’s also provide some football pitches within the local area which are free to use, but there is a shortage of supply of courts, non-football pitches, and indoor sports venues.

Accessibility to larger areas of open space is limited and parts of the South Downs National Park and coastal undercliff areas are poorly signposted, so often, people don’t know how to access them.

As well as poor legibility, many of the neighbourhood’s green spaces are poorly managed and offer little biodiversity gain, often comprising overly mown grass areas that are used for dog walking but little else.

The policies within this plan therefore seek to protect existing areas of open space, while seeking to improve green spaces and their contribution towards combating climate change.

The Neighbourhood Development Plan seeks that new open space provision should aim to link with existing areas, providing new green corridors that will enhance habitats and improve accessibility and legibility to wider landscapes.

Policy PT14: Green Spaces for Protection

- (1) All development proposals should take every opportunity to contribute to a connected recreational green network and provision of new open spaces, playing fields and urban greening.
- (2) Development which would result in the loss of existing areas of formal and informal recreational space such as playing fields, amenity spaces and allotments as listed below should clearly demonstrate that the facility is surplus to requirements or that the loss is replaced by alternative provision in a suitably accessible location elsewhere in the Neighbourhood Development Plan area that is equivalent or better in terms of size, quality, and amount of facilities offered or would result in a net improvement in the quality and type of facilities available



Green Spaces for Protection within the NDP



Map areas illustrate relevant locations and not the entire neighbourhood plan area.



Greenspace, such as parks, woodlands, fields and allotments as well as natural elements including green walls, roofs and incidental vegetation, are increasingly being recognised as an important asset for supporting health and well being. "This natural capital can help local authorities address local issues that they face, including improving health and well being, managing health and social care costs, reducing health inequalities, improving social cohesion and taking positive action to address climate change." p.19 A Green Future²⁵: Our 25 year plan to improve the environment (Government 2018)

The provision of better, more accessible water features and green infrastructure within the Neighbourhood Development Plan area will result in a more attractive place to live and work and bring about long-term improvements in people’s health.

Policy PT15: Amenity, Green and Blue Spaces

The Neighbourhood Development Plan area is situated between the sea and the South Downs, both of which consist of protected habitats that are of benefit to the health and well being of the residents living in the neighbourhood area.

Applications will therefore be encouraged to:

- (1) Explore ways of connecting these spaces, through enhancing and strengthening the landscapes along the connecting routes and creating public realm improvements.
- (2) Improve accessibility to all open spaces and improving opportunities for residents and visitors to experience the nature they offer.
- (3) Increase the number of native trees and hedgerow planting within the neighbourhood area.
- (4) Provide long term management plans of all green infrastructure contained on the sites.
- (5) Contribute to net gains in biodiversity by incorporating features such as green roofs and walls, soft landscaping, bird and bat boxes, habitat restoration and expansion and improved green links.

25 [25-year-environment-plan.pdf](#)

Council Project 4 – The development of Green Spaces Infrastructure

The Councils long-term vision is that the water features and green spaces are used, enjoyed and maintained as public health assets for the whole of the local community, regardless of age, gender, race or mobility.

The Town Councils will seek to work with the South Downs National Park Authority, East Sussex County Council and Lewes District Council to examine ways to increase the accessibility of areas, so they have a central role in

- Increasing physical activity levels
- Improving mental health
- Increasing social inclusion and reducing loneliness

Sports

The availability of formal sports recreation facilities in Peacehaven and Telscombe is a topic of concern, where demand is already outpacing provision. Lewes District Council’s Infrastructure Delivery Plan 2020²⁶, which sets out the key strategic infrastructure needed to meet the demands of new development, and recognises the need for additional outdoor sports facilities in the Neighbourhood Area.

This is supported by the Lewes District Council’s playing pitch strategy July 2020²⁷ which shows that there is a general deficit in pitch provision and the existing pitch provision needs improvement as many pitches have become overplayed in response to larger demand.

26 [Lewes District Council Infrastructure Delivery Plan](#)
27 [LDC Playing Pitch Strategy Needs Assessment - 2020.pdf](#)



Policy PT16: Enhancement of Formal Sports Areas and Children's Equipped Play Spaces

- (1) The provision of new equipped play areas will be encouraged, particularly those which provide for all-inclusive use.
- (2) Proposals for new formal sports facilities and/or upgrading the existing sports infrastructure will be supported.

Swimming and water safety have been a statutory element of the national curriculum for PE in England since 1994. All primary schools must provide swimming and water safety lessons in either key stage 1 or 2 and every pupil is required to be able to perform safe self-rescue in different water-based situations.

The impact of lockdowns on school swimming and the closure of the local swimming pool means that many children no longer have the opportunity to swim, and many schools cannot afford the transport to swimming pools in neighbouring areas.

Council Project 5 – to provide local sports facilities

The Town Councils will work together with Lewes District Council, sports clubs and schools to review existing sport provision and assess what future provision / improvements may be required to meet increasing demand.

The Town Councils will also look at the potential for all-inclusive sports provision, swimming provision and the use of CIL funding to bring forward such facilities as identified in a feasibility strategy.

Biodiversity

There are a variety of Biodiversity Action Plan (BAP) Priority Habitats located within or within close proximity to the Neighbourhood Development Plan area, predominantly areas of good quality semi-improved grassland, areas of deciduous woodland, and areas of maritime cliff and slope.

The Sussex Biodiversity Records Centre contains records of protected or notable species within the Neighbourhood Development Plan area. This includes records of several species of birds, mammals, bats, insects, grasses, trees, amphibians and reptiles; many of which are protected under the Wildlife and Countryside Act 1981 (as amended) and under Section 41 of the Natural Environment and Rural Communities Act 2006. In this respect, the BAP Priority Habitats (2016) ecological designations within and surrounding area are likely to support populations of protected species.

To the north-eastern edge of the Neighbourhood Development Plan area is the Bollens Bush Nature Reserve which is partly a Site of Nature Conservation Importance (SNCI) and contains woodland and ancient woodland indicator species. The whole Neighbourhood Plan area lies within the Living Coast UNESCO²⁸ world biosphere area, the Brighton to Newhaven Cliffs Site of Special Scientific Interest (SSSI) (including Priority Habitat Inventory Maritime Cliffs and Slopes), and Marine Conservation Zone. The Neighbourhood Development Plan area is a priority area for Countryside Stewardship measures addressing Redshank habitat issues and is within the People and Nature Network (PANN)²⁹ area as set out by the South Downs National Park Authority.

An objective of the plan is to encourage the clothing of buildings with living green walls and roofs to help urban cooling, sustain wildlife and habitats and encourage green corridors to be developed.

²⁸ [Map - The Living Coast](#)

²⁹ [People And Nature Network \(PANN\) - South Downs National Park Authority](#)



Policy PT17: Protection of Biodiversity and Habitats

- (1) All development proposals which are likely to affect a protected habitat or species must protect and, where possible, enhance the protected habitats and species. Planning applications must be accompanied by an appropriate and proportionate Ecological Assessment which sets out a clear and deliverable conservation (and enhancement) strategy. Amongst other measures includes any necessary mitigation and ensures that there is a satisfactory level of monitoring by a suitably qualified ecologist, to ensure the risk to protected habitats or species is managed effectively. This may include the need for the ecologist to be onsite throughout the main construction phases.
- (1) All development must achieve at least 10% biodiversity net gain (BNG) using the appropriate DEFRA metric, and any gain must be secured for at least 30 years, as per the Environment Act 2021 (as amended). In doing so, proposals should be delivered in accordance with the local policies and supplementary guidance adopted by Lewes District Council and the South Downs National Park Authority as appropriate

Policy PT18: Urban Greening

- (1) In order to ensure that green assets are technically feasible and commercially viable and can thrive over the long term, all development proposals are encouraged to:
 - (a) provide the maximum practicable coverage.
 - (b) Keep and maintain existing mature landscaping where possible.
 - (c) Include a clear planting plan demonstrating resilience to disease, pests and climate.
- (2) Major applications should also include a watering system, particularly utilising rainwater harvesting techniques to minimise water usage and incorporate a management plan for long term management of growth, disease control and plant failure to ensure that plants that die are replaced and any failure does not harm the fabric of the building or its setting.
- (3) Schemes should be designed to ensure maximum visibility from the public realm and capture associated well-being benefits for the whole community.



Council Project 6 – to encourage urban greening.

Urban Greening is an important element of the Neighbourhood Development Plan and, as such, the Town Councils could use CIL funding to bring forward a programme of public realm improvements, and council building/land improvements such as street trees, community allotments, living walls or green roofs on Council properties.

The Town Councils will work with partners to explore how underused green spaces and roadside verges might be better used to increase biodiversity value, provide new wildlife habitats and space for local food production. Use of such space for pocket parks and community gardens is encouraged.

Coastal Protection & Flooding

Along the currently undefended sections of the frontage of the Neighbourhood Development Plan area, the cliffs are currently experiencing an average rate of coastal erosion between 0.28m - 0.48m per year. Along the protected parts, this is lessened but is reliant on defences being maintained and reinforced.

During this plan’s lifespan, coastal defence strategies will need to be progressed by Lewes District Council to help slow the erosion rates in accordance with the Brighton Marina to Newhaven Western Arm Plan 2016³⁰. It should also be noted that these works are dependent on the economic, environmental and technical viability of the proposals, and the necessary permissions being granted. Any improvements to coastal protection would be subject to the assessment of environmental impact on the Site of Special Scientific Interest and the Marine Conservation Zone and will require consultation with and approval from the relevant organisations.

Sea defences, where available, only protect the base of the cliff, and do not protect the erosion on the top of the cliff which is caused by weathering, poor surface water drainage and natural cliff changes. There are various ways in which climate change could affect the weathering and erosion of the cliff top. In addition, there are areas of Peacehaven and Telscombe that have a medium-high surface water flood risk, primarily impacting the local road network. This includes sections of South Coast Road, Telscombe Cliffs, Saltdean’s Banning’s Bottom, Buckhurst Road, Cliff Gardens, Ashington Gardens, The Oval, View Road, Firle Road, and at Peacehaven Sewage Treatment Works.



Implementation of sustainable urban drainage systems (SUDS) could help reduce the risk from surface water runoff, both for the purposes of flooding and coastal erosion. However it will continue to be important that new development has permeable hardstanding rather than traditional forms of hardstandings to ensure that surface water run-off is managed effectively.

30 Brighton Marina to Newhaven Coastal Management Implementation Plan Local Community Summary

Policy PT19: Drainage Management

- (1) All development proposals within the Neighbourhood Development Plan area should demonstrate clearly how developments will provide for the drainage of surface water and sewerage systems.
- (2) Proposals should ensure that surface water run-off is managed as close to its source as possible, in line with the following drainage hierarchy:
 - 1. Store rainwater for later use.
 - 2. Use infiltration techniques, such as porous surfaces away from cliff edge.
 - 3. Attenuate rainwater in ponds or open water features for gradual release.
 - 4. Attenuate rainwater by storing in tanks or sealed water features for gradual release.
 - 5. Discharge rainwater direct to a watercourse.
 - 6. Discharge rainwater to a surface water sewer/drain.
 - 7. Discharge rainwater to the combined sewer.
- (3) Where possible all developments should seek to utilise sustainable urban drainage systems (SUDS).



Reaching Net Zero

The De-carbonisation agenda set by Government to reach “net zero”³¹ by 2050 means that planning policies must seek to help the transition from fossil fuels and encourage greater use of other modes of energy and movement.

Residents and visitors to the area should be exploring ways to undertake fewer car journeys, particularly for shorter trips as this helps us tackle some of the most challenging issues we face as a society, not just climate change, but improving air quality, health and well being, addressing inequalities, and tackling congestion and noise pollution on our roads. Increased levels of active travel can improve everyday life for us all.

Existing buildings will need to be made more energy efficient, primarily by ensuring they are well insulated and draught free. White goods should be of a high energy efficiency rating and taps, showers and toilets should be water saving.

New buildings will need to install low carbon heating, whether this be via ground source heat pumps, dual ready heating systems that can use both electric and hydrogen sources, or on larger schemes implementing a heating network that can mean several properties benefit from one heating source.

All buildings should be looking towards including renewable energy sources, whether from solar or wind gain, and the Town Council would welcome the opportunity to explore, with partners, the development of local community energy schemes.

31 [net-zero-strategy-beis.pdf](#)

Policy PT20: Renewables and Energy Efficiency

Applications are encouraged to support the provision of renewable energy, energy efficiency and promote sustainable development generally by:

- (1) Optimising design, layout and orientation of development to minimise energy use,
- (2) Including measures to provide high quality and low emissivity fenestration systems and doors, insulation to roof and walls, low water usage fixtures and fittings, and high energy efficient white goods.
- (3) Encouraging the installation of renewable energy equipment and low carbon usage heating,
- (4) Encouraging appropriate free-standing renewable energy schemes,
- (5) Encouraging high standards of sustainable construction including the use of recycled construction materials.
- (6) Encouraging developments to attain high energy efficiency ratings with minimum impact on the landscape and biodiversity.

Council Project 7 – Renewable energy

The Town Council will seek to work with other stakeholders and partners to look at potential sites for battery storage. This could then either be sold back to the grid or used at a local level to provide local initiatives such as a community electrical charging scheme for the towns.



Policy PT21: Net Zero

Proposals should seek to include the:

- (1) Installation of rapid electric vehicle charging points, wireless, induction pads, public e-bike charging stations or other such technologies.
- (2) The inclusion of electric car/bike/Motorbike sharing schemes.
- (3) The use of low pollution/electric freight vehicles during construction phases.

The 2019 (pre Covid) Air Quality Annual Status Report for Lewes District³² confirms that there are three diffusion tubes within Peacehaven which monitor air quality, including: South Coast Road (Cornwall Avenue o/s 223), Steyning Avenue, and South Coast Road (o/s 53).

South Coast Road (part of the A259) is the main route into and out of Peacehaven, and the air quality monitoring is kerbside (approximately 3m from the road). Reflecting the results of the air quality monitoring, all three sites did not exceed the national objective of 40µg/m³ for the annual mean concentrations of NO₂ throughout 2017 or 2018. The average concentration was 24.6µg/m³ across the three sites. Any future growth of the area should seek to maintain good air quality.

Policy PT22: Air Quality

- (1) Development should not damage the health of the air by increasing emissions of harmful pollutants to it. Such pollutants include: greenhouse gases; those considered by the United Nations to cause adverse impacts to the natural environment; and particles and gases considered by the World Health Organisation (WHO) to be harmful to human health. Any proposal that results in a significant increase in air pollution (in particular, NO₂ levels) will only be justified in exceptional circumstances.
- (2) Development should comply at least with all minimum UK environmental requirements in relation to air pollutants.
- (3) On major developments including construction stages, the proposals should aim to be at least 'air quality neutral' and not cause or contribute to worsening air quality. This should be demonstrated where necessary by an air quality assessment, setting out the impact of the development on the Neighbourhood Development Plan area and proposed mitigation measures.

Employment Space

Peacehaven and Telscombe have relatively small amounts of employment space, providing only 3.2% of the district's employment land (Lewes Employment & Economic Land Assessment 2010). This means that many of the residents of the NDP area travel to work outside the area, principally to Brighton and Hove.

Research undertaken by the University of Brighton for the Neighbourhood Development Plan (Diversifying the Local Economy Report 2020)³³, suggests that employment expansion could be towards the tourism market, expanding a night-time economy and, where possible, creating flexible workspaces with good quality digital infrastructure.

Peacehaven has a higher level of self-employed people (12.4%) compared to the national average (9.9%), East Sussex average (10.7%)³⁴. Providing more flexible business space could be a good opportunity to stimulate economic growth and to harness local entrepreneurial spirit. Provision of such uses, including opportunities for home working, can support the future sustainability of development, reduce commuting and car usage, and encourage business development.

Policy PT23: Providing for a mix of employment opportunities

- (1) Support will be given for the sustainable economic development and regeneration of Peacehaven and Telscombe, with a particular focus on improving local skills and increasing skilled employment opportunities within the towns.
- (2) Support will be given for applications for new employment uses, including the temporary use of vacant spaces with the use of "meanwhile leases".
- (3) Support will be given to applications that provide for sustainable growth through the allocation of accessible land for employment and employment generating uses (including retail, leisure, culture and tourism and education).

Given that a large proportion of employment in Peacehaven is based around sole traders and the skilled manual sector, there is a need for high quality serviced offices and meeting spaces that can be used flexibly. The South-East Creative Economy Network uses the term "open workspace" to refer to employment spaces that seek to bring together professionals to flexibly share high quality workspace and allow the reduction of costs. Such spaces include incubators, accelerators, co-working spaces and artist studios.

³² [Sussex-air - Promoting better Air Quality in Sussex](#)

³³ [Brighton University Employment Report](#)

³⁴ [Labour Market Profile - Nomis - Official Census and Labour Market Statistics](#)

Policy PT24: Open Workspace

- (1) Proposals for high quality “open workspace” will be supported (subject to other policies in the development plan) to provide flexible working spaces for SME’s in the local area.

The Neighbourhood Development Plan area has lots of potential to encourage a greater tourism industry in the area and help widen the local economy. This was particularly noticeable during the Covid pandemic when lots of people used the open spaces which, in turn, encouraged more mobile cafes and food vans to open.

Applications that seek to support or strengthen the role of tourism within the neighbourhood area will be supported. This will include opportunities to capitalise on the presence of the South Downs National Park, the cliff tops open space, the National Coastal Path and Greenwich Meridian line. Applications will also be welcomed that promote and expand local leisure and cultural uses, as will applications that seek to improve the public realm as part of the overall visitor experience to the area.

The Town Councils would welcome the opportunity to work with partners to bring forward open space events, such as markets, conferences and festivals that help support local businesses within the area.

Policy PT25: Tourism

- (1) Support will be given to applications that improve the quality and diversity of tourist facilities, attractions, accommodation and infrastructure, including cultural infrastructure. Applicants for new build tourist facilities should seek to create a strong sense of place by connecting to existing assets in the neighbourhood plan area.

The Index of Multiple Deprivation

The Index of Multiple Deprivation (IMD) 2019 has seven domains, these are income, employment, health and disability, education, training and skills, barriers to housing and services, living environment and crime. People may be counted in more than one domain.

The IMD scores are recorded by Super Output Areas (SOA's) which are then ranked from 1 most deprived to 34,844 least deprived. Three SOA's within Peacehaven are ranked within the higher deprived areas in England.

SOA

Lewes 007d ranked 6771
Lewes 010d ranked 6876
Lewes 010c ranked 9796

IMD

Reports for education, training and skills, place the vast majority of Peacehaven and Telscombe Cliffs in the higher deprived areas in England.

SOA

Lewes 010c ranked 4059
Lewes 010d ranked 4064
Lewes 006e ranked 5642
Lewes 007d ranked 5770

Full year reporting for apprenticeships across all sectors in 2018/2019 for Lewes District Authority returned a total of 440 starts. Reporting for quarter 1 and 2 ending January 2020 returns 220 starts of which only 20 were for construction, planning and the built environment sector.

South East LEP, with the Construction Industry Training Board (CITB) commissioned Whole Life Consultants to undertake a construction labour and skills analysis for Kent and East Sussex in 2018³⁵. One of the recommendations of the report was to improve the construction industry outreach. “Build a more positive image of construction with young people and adults. Increase recruitment through new entrance points, career changes and re-skilling. Emphasize that construction offers a high rewarding value career for all”.

In a recent survey conducted by Lewes District Council (2018), 75% of SME’s said that they would welcome faster and stronger digital networks across the district to help their businesses. Peacehaven and Telscombe suffer from poor mobile network coverage and from slow speed broadband provision, particularly in Telscombe Village, North Peacehaven and East Saltdean, where signal coverage is poor and inconsistent.

To help business growth in the Neighbourhood Development Plan Area the digital services provided must be improved.

Policy PT26: Digital Infrastructure

- (1) Development that facilitates improved digital infrastructure and better communication coverage such as high-speed broadband access for businesses and homeworkers will be welcomed as long as it accords to other policies within the plan and design codes.

Historical Character

The Neighbourhood Development Plan area is a gateway to the South Downs National Park and its protected flora and fauna and range of nature. The area also benefits from proximity to coast and cliff tops (part of the protected UNESCO’s Biosphere Reserve) and hosts the point where the Greenwich Meridian Line leaves the country.

This area is also rich in history, with the Telscombe Tye having three scheduled ancient monuments, a Saxon funeral path leading to Telscombe Village and the Church of St. Laurence (Grade 1 listed 11th Century nave and chancel), as well as Telscombe Village having several Grade 2 and Grade 2* listed buildings.

East Sussex Heritage Environment Record shows that over the years there have been some significant historical finds locally, such as axe heads and scrapes from the Neolithic and Bronze Age, that now reside at the Brighton Museum. East Sussex County Council’s website also shows that large parts of Peacehaven and Telscombe are within Archaeological Priority Notification Areas.

To a lesser degree, but just as interesting, are the buildings and structures within the Neighbourhood Plan Area that are currently not recorded or protected but would deserve their heritage assessed as part of any forthcoming development. For example, the former Gracie Fields Home and Orphanage on Telscombe Cliffs Way, The Coach House on Bannings Vale, Coastguard Cottages and Smugglers Rest on the A259, to name a few.





Policy PT27: Heritage Assessment

- (1) It is encouraged that all applications for developments undertake a proportionate heritage assessment of the site. Recording whether the development is within an Area of Archaeological Notification, nearby listed buildings, Conservation Areas, the buildings age, design, quality and features. The assessment should identify historical characteristics within the building and surrounding area. All impacts to features and historic characteristics should be recorded, and where required, an appropriate mitigation strategy included as part of the planning application.

Community facilities

Local community facilities provide a range of social care, education and welfare services that, once lost, are not easily replaced. Having such facilities locally is important socially and economically and also reduces the need for longer travel distances. It is therefore important that these services and facilities are protected over the longer term. Such facilities and services include (but not exclusively) schools, nurseries and places of learning such as libraries places of worship, healthcare provision, community centres, local theatres and galleries/exhibition halls and Post offices and banks.

In particular, the following community facilities should be safeguarded:

Peacehaven Library, Tyedean Hall, Telscombe Village Hall, The Scouts Hut in Arundel Road, East Brighton Masonic Centre (Seaview Road), Community House, Telscombe Civic Centre, Community Centre for Peace and Mosque, Kempton House Day Centre, The Joff Youth Centre, Central Avenue Post Office.

Policy PT28: Community Facilities

All major applications are encouraged to contribute towards the provision of local community facilities, both commercial and not for profit.

New provision of community facilities are encouraged to facilitate shared uses, and, where possible, to encourage existing buildings to expand service provision close to the district centre (Meridian Centre) where public transport networks are available.

New facilities outside of the district centre should provide an appropriate level of parking, including different types of parking such as cycle parking, dementia friendly parking and safe drop off zones, to encourage greater accessibility and social inclusion.

Delivery of new community services and facilities should be introduced at an early stage of the development, to encourage greater integration and social cohesion.

Policy PT29: Loss of Community Facilities

Proposals that include the loss or change of the following community facilities; Peacehaven Library, Tyedean Hall, Telscombe Village Hall, The Scouts Hut in Arundel Road, the Scouts Hut in Longridge Avenue, East Brighton Masonic Centre (Seaview Road), Community House, Telscombe Civic Centre, Community Centre for Peace and Mosque, Kempton House Day Centre, The Joff Youth Centre, Central Avenue & Longridge Avenue Post Offices will only be supported where:

- (1) adequate alternative provision exists or will be provided in an equally accessible or more accessible location within 800 metres walking distance; and
- (2) all reasonable efforts have been made to preserve the facility, but it has been satisfactorily demonstrated that it would not be economically viable, feasible or practicable to retain the facility or provide any other type of community service within the site/building.

The local community must be fully involved to gain a proper understanding of the importance of any community facility and the implications of any proposal which may affect it. Applicants proposing to redevelop or convert facilities which are of established community value, will be expected to engage with local communities at an early stage in the planning process about the relative importance of the facility to its users.

Neighbourhood Development Plans are able to identify and help bring forward potential sites for future development if the sites have been fully assessed. As part of the work undertaken on this Neighbourhood Development Plan, AECOM were asked to assess a few site options. The Hub building at the Peacehaven Sports Park was identified as a site that could have wider benefits to the local community. Site reference PTNP5 identified in the AECOM site assessment report, set out that the site had the opportunity to develop additional leisure or community facilities and services.

Policy SA1: Site allocation The Hub

- (1) Planning applications for the refurbishment or redevelopment of The Hub building to a height of three storeys will be supported.
- (2) The replacement facilities should not equate to any net loss of leisure or community facilities.

The Hub site SA1 was identified as PTNP55 in the AECOM Site Options and Assessment report as a site with opportunity to develop for leisure and community facilities. It is identified as number 11 on page 75 'Protection of Community Facilities Map'.

[AECOM site assessment report](#)

Protection of Community Facilities Map



- | | |
|---------------------------------|----------------------------|
| 1. Post Office Longridge Avenue | 7. Community House |
| 2. Tyedean Hall | 8. Scout Hut Peacehaven |
| 3. Telscombe Civic Centre | 9. Scout Hut Saltdean |
| 4. Post Office Central Avenue | 10. Telscombe Village Hall |
| 5. The Joff Youth Centre | 11. The Hub |
| 6. Peacehaven Library | PW. Place of Worship |

Map areas illustrate relevant locations and not the entire neighbourhood plan area.

Advertisements

There are a wide range of commercial business premises operating in the local shopping areas. These include shops and offices, bars, cafes and restaurants and clubs. Inevitably, the quality of design of their frontages and associated signage varies considerably.

The quality of the shop fronts along the A259 and Longridge Avenue and within the town centre, has an influence on the appearance and attractiveness of the NDP area. During consultation, the poor visual quality of buildings was raised: many people thought that the upkeep and maintenance of the buildings in local retail and employment areas could be improved, and that a consistent approach to signage and shopfronts would make an improvement to the experience of using commercial areas.

Poor quality signs and materials undermine the visual quality of the Neighbourhood Development Plan area and do not help attract visitors to the towns. It is thus considered important that shopfronts respond better to local character and bring a consistency of style to the commercial areas. Equally, the use of shop signage on pavements should be limited to reduce clutter. Any new signage on pavements that is associated with the business of the individual premises should have due consideration for the character and design of street furniture in the wider area and should seek to enhance the public realm.

Council Project 8

The Town Councils will in collaboration with other relevant stakeholders and public bodies explore the possibility of producing a feasibility study for the A259 to look at the quality of the public realm and signage.



Policy PT30: Shutters

- (1) Applications for external roller shutter or removeable grills will generally not be supported, unless they are concealed or incorporated into the fabric of the building.

Policy PT31: Signage

- (1) Applications for retail and commercial frontages will be supported where the depth of the fascia is in scale with the building and is set below the first-floor windows. The use of large areas of acrylic or other shiny materials should be avoided.
- (2) The use of box fascia's should be sympathetic to the scale of the building and should not project too far from the building. Lighting should be by a small number of uplighters or LED trough/halo lighting behind individual letters.
- (3) Projecting signs should only be allowed where they are in proportion to the building.
- (4) Free-standing monolith and totem pole signs should be in keeping with the scale and size of the building and, where possible, should use uplighters for illumination.

Section 4

Shaping Growth

Peacehaven and Telscombe do offer some limited opportunities for urban growth. Where these developments are sought, there need to be policies that can help deliver a sustainable approach which enables the wider community to engage, and a balance between existing and new to be achieved. It will therefore be encouraged that those applications for major sized developments be informed by a masterplanning process which will encompass a landscape led approach to design.

Masterplanning

Masterplanning is a method by which developers can set out a clear and coherent route map to the delivery of a development. It helps applicants to demonstrate and communicate an understanding of the site's constraints and connectivity to the surrounding area. It shows that a coherent approach has been undertaken in analysing information and provides a design that is bespoke to that location.

The Neighbourhood Development Plan area is enveloped by designated protected open space, and as such, a landscape design approach to masterplanning should be undertaken. A landscape design approach will require developers to sensitively design in terms of scale to the landscape context of being between clifftops and the South Downs National Park. The approach will also be required to deliver on the wider challenges such as the effects of climate change and health and well-being and how it can contribute to the wider area by supporting community benefits, local economies and promoting sustainability, culture, biodiversity and heritage.

Masterplans should be subject to a programme of community consultations and supported by a statement referencing the AECOM Design Codes and corresponding Consultation Statement to build on and learn from previous planning schemes within the area.



Policy PT32: Masterplanning

All masterplans should incorporate the following:

- (1) Consideration of the unique characteristics of the site and surrounding area, in particular analysing how the landscape will deliver local community and economic benefits and supports health and well-being.
- (2) Set up a cooperative structure that will involve all landowners in and around the site to form a coherent approach to development delivery.
- (3) Set out clear aims and objectives of the development and what the long-term landscape design success will look like. Undertake early consultation on these with the local community.
- (4) Establish a context appraisal for the site which will include the landscape design criteria.
- (5) Create a land use plan, which will also look at plot sizes, heights, points of connectivity.
- (6) Develop a movement framework that will set out the street hierarchy and public realm improvements.
- (7) Establish a green infrastructure plan which will set out the landscape design and open space network. The plan should include green corridors and habitat links to the wider area. The Green Infrastructure plan should contain a long-term management plan for the landscaping and how these areas are set out to be for the long-term resilience to the local effects of climate change, including being within a defined water stressed area.

A placemaking approach.

Placemaking is an approach to growth which focuses on how people interact with the built environment and spaces around them. It seeks to set a context of how areas are used for living, working and spending leisure time.

Successful placemaking helps rejuvenate community areas by uplifting the public realm and reconnecting people to the architecture that surrounds them. It is not completely design led and involves a more collaborative approach where landowners and users of public space come together to look at how new spaces can be created that will encourage greater public interaction, social cohesion and improve health and well-being. This approach also helps rejuvenate local economies as more people use an area.

Placemaking is not separate from masterplanning. The two can be combined to provide for a greener, more landscaped approach for the creation of new public realm within larger growth areas.

For a successful placemaking approach to be undertaken, flexibility and responsive design needs to be incorporated as trends often change and people look to find new experiences. Long term management and maintenance of these areas also has to be incorporated to ensure that they remain safe and well used.



Policy PT33: Design and placemaking principles

Major applications should seek to encompass a placemaking approach by including the following:

- (1) Putting people first – create a hierarchy of open spaces, from parks to grass verges and ensure that all are easily accessible for all ages and abilities. Create good wayfinding with safe and legible routes to from and within the site. Encourage active and sustainable movement, especially walking and cycling between open spaces.
- (2) Make it good for people and the planet – encourage community food growing and allotments, farmers markets and places where people can buy local wholesome produce. Prioritise the development of brownfield sites and develop these to the maximum density that the local context will allow, before developing greenfield sites. **Don't waste space.** Resource efficiency through using recycled materials, rainwater harvesting, and smart technology such as metres and lighting.
- (3) Future proofing and resilience – take a long term look at the life cycle of the development. Make it flexible and adaptable to changes in the economic market and the environment. Undertake a risk and resilience plan which looks at the effect of increased heating on buildings and spaces, impacts of extreme weather events, climate related health impacts, fluvial and surface water risk and water scarcity.
- (4) Measure the success – set targets for the long- term gains of the development, mode of transport usage and modal changes. Set energy consumption targets measuring the ongoing demand reductions and renewable percentages? Biodiversity net gain targets. Social indicators such as improvements in health and well- being and people's happiness levels. Economic indicators such as affordability and commercial viability.

Section 5

A Centre for Peacehaven

The policies in this section relate to the central retail district known as the Meridian Centre and surrounding area.

This area has been the subject of a full masterplanning and consultation exercises undertaken by the Neighbourhood Development Plan Steering Group during 2020-2021. As such, these policies set out to meet the aspirations of the residents of the towns as well as the Neighbourhood Plan Steering Group³⁵.

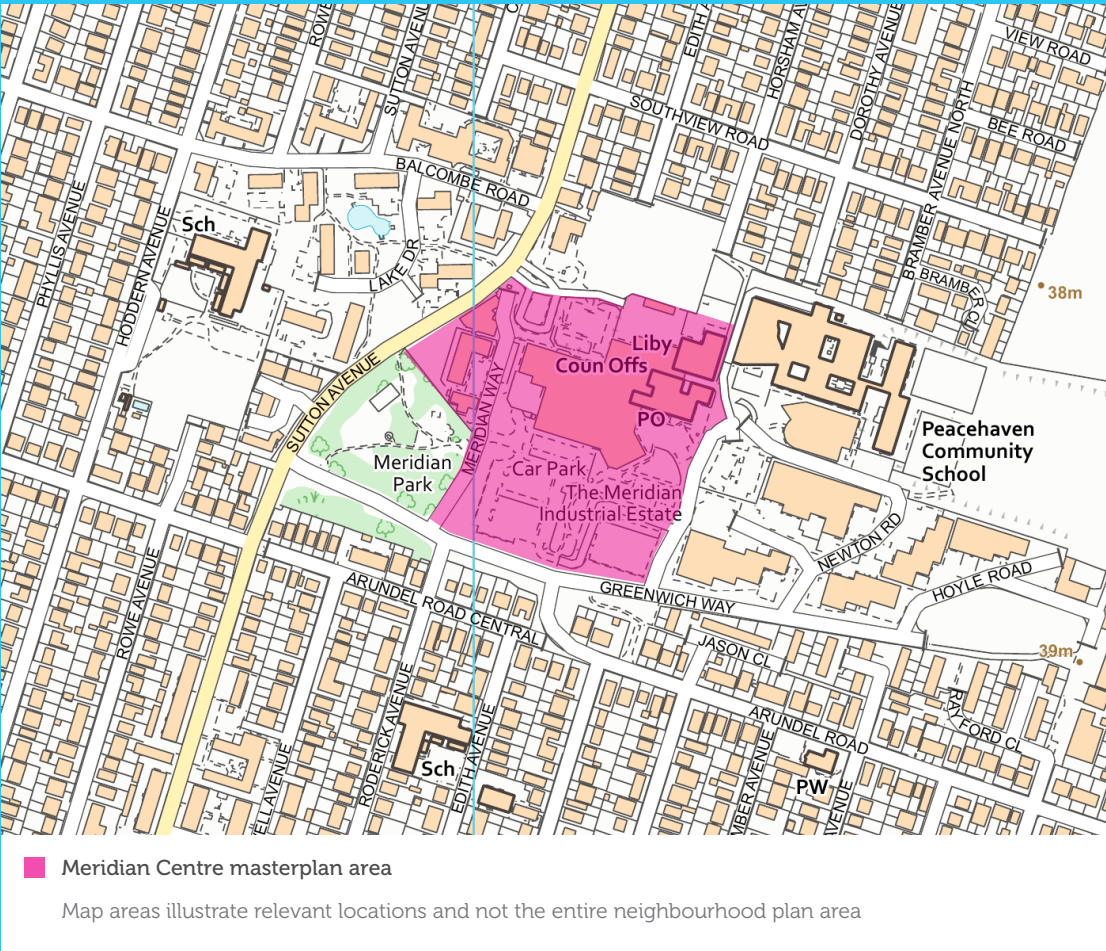


Diagram 2 - Masterplan area

Town centre

Currently the Meridian Centre is a district retail centre which hosts a medium sized supermarket, post office, library, nursery, town council offices, and approximately a dozen smaller units, many of which are vacant, due to impending redevelopment.

New floorspace alone will not deliver the step change required in the centre. It is hoped that Peacehaven Centre will become the core of the wider neighbourhood plan area, where public, economic and cultural life all come together. The Brighton University Study undertaken in 2020 suggests that the quality of the public realm in the town centre should be enhanced, as well as the commercial spaces be improved, as could connectivity to and within the centre area itself. Improving the connectivity of the site and the public realm will enhance the visitor experience.

Providing for some new residential development in the town centre may also help create life and activity and offer new housing close to facilities for those starting out in first homes, as well as those downsizing.

Town centre weaknesses

The main issues as identified within the masterplan are:

- The area has many differing land uses, many of which will need to be retained but could potentially be relocated to other parts of the site.
- Limited active frontages within the site area, with uninviting entrances contributing to possible opportunities for anti-social behaviour.
- Main pedestrian route through the site is through the Meridian Centre providing only limited permeability for pedestrians.
- Not enough retail provision.
- There are many mature trees surrounding the car park which should be retained.
- Parking is not always at full capacity. Retaining parking is essential, however, spaces need to be utilized properly.
- Poor active modes of movement and poor public transport links to the site.
- Poor relationship to the nearby industrial estate.
- Poor link to the retail area on the A259.
- Lack of vibrancy, evening economy or cultural activities.
- No link to nearby employment areas.

Development of the town centre should capitalise on the site’s potential and encompass a vibrant mix of uses which meet the needs identified in the town centre masterplan .

A larger retail offering as well as covered shopping areas and a covered market, should be incorporated into the centre area to provide greater diversity and encourage more people to use the area throughout the day and evening.

Key opportunities

The main opportunities as identified within the masterplan are³⁵:

- Creating a well-designed, good quality mixed development that would enhance vibrancy, expand existing employment uses, and improve the green infrastructure of the site.
- Strengthening the key connections through the site, linking green spaces in the wider area.
- Pedestrian/cycle pathway through the centre of the site from north to south. The route should contain plenty of street trees and shelter to protect from wind and rain.
- Pedestrian/cycle pathways from east to west, allowing leisure, school and industrial estate to become better connected to the centre.
- Encourage better public transport links to leisure, school and industrial estate facilities and reduce reliance on cars.
- Promote public realm improvements consisting of public squares which can provide flexible space and allow for a range of social and cultural activities.
- Encourage modal shift from car use to more active movement modes, including the use of chain journeys to and from the site.
- Creating active, well-articulated frontages is incredibly important for creating vibrancy. To make the most of the active frontage, there should be entrances and large ground floor windows at the ground floor level, allowing people to see inside as well as people seeing out. Following feedback from the public consultation, frontages should also seek to be covered to allow outside activities and protect from the wind.

35 Masterplan consultation

Policy PT34: Peacehaven Centre

Development in the centre of Peacehaven (area defined in the masterplan document and shown on Diagram 2) should have regard to the design principles and guidelines in the Peacehaven town centre Masterplan and are particularly encouraged to achieve all of the following criteria.

- (1) Promote the area as a mixed-use area comprising leisure, business, residential and community spaces.
- (2) Seek to introduce "open workspace" and training facilities to support the local economy.
- (3) Seek to improve the public realm and create open spaces which can be enjoyed by all people of all ages and abilities.
- (4) Encourage integration with the nearby school, leisure centre, health centre and Hoyle Road Industrial estate.
- (5) Will retain and enhance the community facility provision.
- (6) Will seek to reduce car trips within the area and promote, walking, cycling and public transport use.
- (7) Will demonstrate good placemaking principles and a landscape approach as set out in policies PT35 and PT36.
- (8) Will promote the area as a vibrant and enjoyable experience for residents and visitors.
- (9) Will undertake any necessary investigations to ensure that development will not adversely affect the water environment due to potential contamination from historic landfill

Policy PT35: Community Facilities in Peacehaven Centre

Applications for new or enhanced community, health and cultural facilities within the Peacehaven Centre are welcomed.

Applications should seek to offer inclusive and flexible facilities that cater for all ages and all abilities and capitalise on the benefits of the centre location to promote shared vehicle usage, public transport, cycling and walking.

Applications for community, health and cultural facilities should seek to undertake an holistic approach in service provision. Further, they should undertake additional community engagement to help define the services needed for the area and in accordance with good placemaking principles.

Policy PT36: Market Place and Outdoor events

- (1) Applications for the provision of a sheltered outdoor marketplace and for other outdoor events that help encourage tourism and community cohesion will be supported, subject to there being no adverse impacts on amenity, landscape or biodiversity.

Section 6

Community Infrastructure Levy

The Community Infrastructure Levy (CIL) is a charge that local authorities can set on new developments in their area. Its purpose is to raise funds for infrastructure needs in the area to support growth.

Lewes District Council is responsible for collecting and allocating the neighbourhood element to Town & Parish Councils that fall within the Lewes District Charging Authority Area. Telscombe village and the surrounding rural area lies outside the Lewes District and as such the South Downs National Park Authority are the collecting and allocating authority.

The legislation which sets out how CIL is spent requires that a portion of the CIL income raised from development, within a charging authority area is paid to the Town Council where the development has taken place. This is referred to as Neighbourhood CIL. The Neighbourhood CIL is increased to 25% in areas that have an adopted Neighbourhood Development Plan.

CIL receipts are to be spent by Town councils within five years of receipt and it must be spent on (see Regulation 59C of the CIL Regulations 2010 as amended):

- providing, replacing, improving, operating or maintaining infrastructure that supports development in the area; or
- anything else concerned with addressing the demands that development places on the area.

Within this Neighbourhood Development Plan the Town Councils have identified possible projects that it would like to take forward and it is hoped that CIL receipts would enable these to commence.



Final Comment

The Neighbourhood Development Plan is a starting point to gaining better quality developments and placemaking in the area. Future delivery of the projects and policies of this plan are intended to be monitored and reviewed regularly to ensure progression and implementation.

The Town Councils will therefore work alongside a variety of partners in a coordinated and cohesive manner and will update the residents of the neighbourhood area regularly to ensure that all the necessary information is provided in an easy to access way.

This will include:

- A review of planning decisions and appeal decisions to ensure the Neighbourhood Development Plan policies are given due consideration.
- A survey of applicants/developers to ensure that the policies are relevant and useable.
- Review the production of materials, both electronic and printed, to communicate with residents on the neighbourhood plan.
- Engagement with developers in the use of the Neighbourhood Development Plan and future delivery of policy objectives.
- Interim recommendations for changes and amendments for future Neighbourhood Development Plan development.

Planning Jargon Explained

The following definitions are to help understand the planning language and acronyms used within this document. These definitions have been shaped from Locality’s Neighbourhood Planning Glossary 2021³⁶.

Adoption – The final confirmation of a local plan by a local planning authority.

AECOM – A global provider of professional, technical and management support services, specifically in the areas of master planning, transportation, facilities, engineering etc.

Biosphere - A designated urban biosphere reserve, helping to protect the living coast between Newhaven and Shoreham-by-Sea in Sussex.

Community Infrastructure Levy (CIL) – Allows Local Authorities to raise funds from developers undertaking new building projects in their area. Money can be used to fund a wide range of infrastructure such as transport schemes, schools, health centres, leisure centres and parks.

Department of Levelling Up, Housing and Communities – The Government department with responsibility for planning, housing, urban regeneration and local government.

Design Code – A design code provides detailed design guidance for a site or area they prescribe design requirements (or ‘rules’) that new development within the specified site or area should follow

Development Plan - A development plan is a document which details the overall strategy of the council for the proper planning and sustainable development of an area and generally consists of a written statement and accompanying maps. The plan usually includes the broad aims of the council for specific topics, e.g. housing, infrastructure, community facilities which are reinforced by more detailed policies and objectives.

Evidence base – A body of information and statistics that are used to scope out planning issues.

Green Assets – Green Assets are anything that helps reduce energy, water or natural resource usage and helps mitigate climate change. This can include physical assets like renewable energy infrastructure (wind farms, solar panels), natural resources (forests, water bodies), and waste recycling plants.

Greenfield site - Land where there has been no previous development.

Greenspace – Green space – Those parts of an area which are occupied by natural, designed or agricultural landscape as opposed to built development; open space, parkland, woodland, sports fields, gardens,

allotments, and the like.

Independent Examination – An examination of a proposed Neighbourhood Developing Plan carried out by an independent person to consider whether a Neighbourhood Development Plan conforms with the relevant legal requirements.

Infrastructure – Basic services necessary for development to take place, for example, roads, electricity, sewerage, water, education and health facilities.

Infill Development – Development on a vacant or underused plot within an already developed site.

Listed Building – Listed buildings – Any building or structure which is included in the statutory list of buildings of special architectural or historic interest.

Local Planning Authority – Local government body responsible for formulating planning policies and controlling development; a district council, metropolitan council, county council, a unitary authority or South Downs National Park Authority.

Local Plan – The plan for the future development of the local area, drawn up by the local planning authority in consultation with the community and subject to an examination before an independent Planning Inspector. These set planning policies for the area as well as allocating land for development or protection. A Local Plan is part of the development plan for an area.

Local Development Documents (LDDs) - These include Development Plan Documents (which form part of the statutory development plan) and Supplementary Planning Documents (which do not form part of the statutory development plan). LDDs collectively deliver the spatial planning strategy for the local planning authority’s area.

Local Development Framework (LDF) – The Local Development Framework (LDF) is a non-statutory term used to describe a folder of documents, which includes all the local planning authority’s local development documents. An LDF is comprised of:

- Development Plan Documents (which form part of the statutory development plan)
- Supplementary Planning Documents

The local development framework will also comprise of:

- Statement of Community Involvement Local Development Scheme
- Authority Monitoring Report
- Any Local Development Orders or Simplified Planning Zones that may have been added

36 Locality Neighbourhood Plan Glossary <https://neighbourhoodplanning.org/toolkits-and-guidance/neighbourhood-planning-glossary/>

Local Development Order – An Order made by the local planning authority (under the Town and Country Planning Act 1990) that grants planning permission for a site-specific development or classes of development.

Local Development Scheme – The local planning authority’s scheduled plan for the preparation of Local Development Documents. This essentially provides the timetable for Local Plan production

National Park – The statutory purposes of national parks are to conserve and enhance their natural beauty, wildlife and cultural heritage and to promote opportunities for public understanding and enjoyment of their special qualities. National parks are designated by Natural England, subject to confirmation by the Secretary of State under the National Parks and Access to the Countryside Act 1949.

National Planning Policy Framework – Sets out the Government’s planning policies for England and how these are expected to be applied.

Neighbourhood Development Order - A neighbourhood planning tool that allows communities to essentially grant planning permission for a specific form of development either on a specific site or over a wider area. The process is subject to independent examination and a community referendum as per a neighbourhood development plan.

Neighbourhood Development Plan – A local plan prepared by a Town or Parish Council for a particular Neighbourhood Area, which includes land use topics.

Planning Permission - Formal approval granted by a Council in allowing a proposed development to proceed.

Planning Practice Guidance – Planning Practice Guidance adds further context to the National Planning Policy Framework (NPPF) and it is intended that the two documents should be read together.

Previously Developed Land – Land which is or was occupied by a permanent structure including the curtilage of the developed land, but excluding land in built-up areas such as residential gardens, parks, recreation grounds and allotments.

Public Realm – relates to all parts of the built environment where the public has free access. It encompasses: all streets, squares, and other rights of way, whether predominantly in residential, commercial or civic uses.

Settlement Development Boundary – Also referred to as the extent of the built-up area, settlement or development boundaries seek to set clear limits to towns and villages. They are designed to define the existing settlement and to identify areas of land where development may be acceptable in principle, subject to other policies and material planning considerations.

Site of Special Scientific Interest (SSSI) – A statutory conservation designation denoting a protected area due to its fauna, flora, geological or physiographical features in the United Kingdom.

Soundness – The soundness of a statutory local planning document is determined by the planning inspector against three criteria: whether the plan is justified (founded on robust and credible evidence and be the most appropriate strategy), whether the plan is effective (deliverable, flexible and able to be monitored), and whether it is consistent with national and local planning policy.

Stakeholder – People who have an interest in an organisation or process including residents, business owners and national organisations and government departments.

Statement of Community Involvement – This sets out the processes to be used by the local authority in involving the community in the preparation, alteration and continuing review of all local development documents and development control decisions.

Sustainable Communities – Places where people want to live and work, now and in the future. Sustainable Development – An approach to development that aims to allow economic growth without damaging the environment or natural resources.

Use Classes Order – The Town and Country Planning (Use Classes) Order 1987(as amended) is the statutory instrument that defines the categories of use of buildings or land for the purposes of planning legislation. Planning permission must be obtained to change the use of a building or land to another class.

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The Peacehaven and Telscombe Neighbourhood Plan 2022 – 2030

Independent Examiner's Report

By Ann Skippers MRTPI FHEA FRSA AoU

28 November 2025

Contents	
	Summary
	3
1.0	Introduction
	4
2.0	The role of the independent examiner and the examination process
	4
3.0	Neighbourhood plan preparation
	8
4.0	Compliance with matters other than the basic conditions
	9
5.0	The basic conditions
	10
	<i>National policy and advice</i>
	<i>Sustainable development</i>
	<i>The development plan</i>
	<i>European Union (EU) obligations</i>
	<i>European Convention on Human Rights (ECHR)</i>
	14
6.0	Detailed comments on the Plan and its policies
	15
1.	Introduction to the Neighbourhood Plan
	15
2.	Peacehaven and Telscombe Plan Area
	16
3.	Neighbourhood Development Plan – Area Wide Policies
	17
-	High Quality Design and Local Distinctiveness (Policies PT1 – PT5)
	18
-	Housing – Creating High Quality Housing for All (Policies PT6 – PT10)
	26
-	Movement – Promoting Active, Smarter and More Sustainable Modes of Travel (Policies PT11 – PT13)
	30
-	Open Space and Amenity (Policies PT14 – PT16)
	34
-	Biodiversity (Policies PT17 – PT19)
	37
-	Coastal Protection and Flooding (Policy PT20)
	39
-	Reaching Net Zero (Policies PT21 – PT23)
	41
-	Employment Space (Policies PT24 – PT28)
	42
-	Historic Character (Policy PT29)
	44
-	Community Facilities (Policy PT30 - PT32)
	44
-	Advertisements (Policies PT33 & PT34)
	47
4.	Shaping Growth (Policies PT35 – PT37)
	47
5.	A Centre for Peacehaven (Policies PT38 & PT39)
	48
6.	Neighbourhood Community Infrastructure Levy
	50
	Final Comment
	51
	Planning Jargon Explained
	51
7.0	Conclusions and recommendations
	51
	Appendix 1 List of key documents
	52
	Appendix 2 Note of Interim Findings and questions of clarification from the examiner
	53

Summary

I have been appointed as the independent examiner of the Peacehaven and Telscombe Neighbourhood Development Plan.

The Plan area consists of two coastal towns between Brighton and Newhaven; Peacehaven and Telscombe. Both towns are geographically distinct areas each with their own history. Telscombe comprises three distinct settlements separated by Telscombe Tye with the small village of Telscombe situated in the South Downs National Park. East Saltdean was developed in the 1920s and 1930s as a resort development. Both Peacehaven and Telscombe were developed from the first quarter of the twentieth century, from speculative resort development schemes, but Peacehaven in particular, relates to the later inter-war years of plotland developments, where people were encouraged to buy (or won via raffles) individual plots to build their own homes. Both towns extend above the chalk cliffs to the open downland of the National Park.

The Plan is presented to a high standard and contains 37 policies covering many different issues. Whilst there are no site allocations, the Plan seeks to enhance the quality of the environment for its residents. There is recognition that growth is needed, but infrastructure has not kept in pace with the development which has taken place. There is an emphasis on health and well-being throughout the Plan. The vision and the Plan's aims and objectives are clear in their intent.

The examination was paused to allow a focused period of consultation to be held on a new NPPF published in the interim period. There was also a considerable delay whilst additional work was carried out on habitats regulations assessment.

It has been necessary to recommend some modifications. In the main these are intended to ensure the Plan is clear and precise and provides a practical framework for decision-making as required by national policy and guidance. These do not significantly or substantially alter the overall nature of the Plan.

Subject to those modifications, I have concluded that the Plan does meet the basic conditions and all the other requirements I am obliged to examine. I am therefore pleased to recommend that the Peacehaven and Telscombe Neighbourhood Development Plan can go forward to a referendum.

In considering whether the referendum area should be extended beyond the Neighbourhood Plan area I see no reason to alter or extend this area for the purpose of holding a referendum.

Ann Skippers MRTPI
Ann Skippers Planning
28 November 2025



1.0 Introduction

This is the report of the independent examiner into the Peacehaven and Telscombe Neighbourhood Development Plan (the Plan).

The Localism Act 2011 provides a welcome opportunity for communities to shape the future of the places where they live and work and to deliver the sustainable development they need. One way of achieving this is through the production of a neighbourhood plan.

I have been appointed by Lewes District Council (LDC) with the agreement of the South Downs National Park Authority and the two Town Councils, to undertake this independent examination. I have been appointed through the Neighbourhood Planning Independent Examiner Referral Service (NPIERS).

I am independent of the qualifying body and the local authorities. I have no interest in any land that may be affected by the Plan. I am a chartered town planner with over thirty years experience in planning and have worked in the public, private and academic sectors and am an experienced examiner of neighbourhood plans. I therefore have the appropriate qualifications and experience to carry out this independent examination.

2.0 The role of the independent examiner and examination process

Role of the Examiner

The examiner must assess whether a neighbourhood plan meets the basic conditions and other matters set out in paragraph 8 of Schedule 4B of the Town and Country Planning Act 1990 (as amended).

The basic conditions¹ are:

- Having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the neighbourhood plan
- The making of the neighbourhood plan contributes to the achievement of sustainable development
- The making of the neighbourhood plan is in general conformity with the strategic policies contained in the development plan for the area
- The making of the neighbourhood plan does not breach, and is otherwise compatible with, those European Union (EU) obligations now assimilated into UK law

¹ Set out in paragraph 8 (2) of Schedule 4B of the Town and Country Planning Act 1990 (as amended) and paragraph 11(2) of Schedule A2 to the Planning and Compulsory Purchase Act 2004 (as amended)

- Prescribed conditions are met in relation to the neighbourhood plan and prescribed matters have been complied with in connection with the proposal for the neighbourhood plan.

Regulations 32 and 33 of the Neighbourhood Planning (General) Regulations 2012 (as amended) set out two additional basic conditions to those set out in primary legislation and referred to in the paragraph above. Only one is applicable to neighbourhood plans. It states that:

- The making of the neighbourhood development plan does not breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017.

The examiner is also required to check² whether the neighbourhood plan:

- Has been prepared and submitted for examination by a qualifying body
- Has been prepared for an area that has been properly designated for such plan preparation
- Meets the requirements to i) specify the period to which it has effect; ii) not include provision about excluded development; and iii) not relate to more than one neighbourhood area and that
- Its policies relate to the development and use of land for a designated neighbourhood area.

I must also consider whether the draft neighbourhood plan is compatible with Convention rights.³

The examiner must then make one of the following recommendations:

- The neighbourhood plan can proceed to a referendum on the basis it meets all the necessary legal requirements
- The neighbourhood plan can proceed to a referendum subject to modifications or
- The neighbourhood plan should not proceed to a referendum on the basis it does not meet the necessary legal requirements.

If the plan can proceed to a referendum with or without modifications, the examiner must also consider whether the referendum area should be extended beyond the neighbourhood plan area to which it relates.

If the plan goes forward to referendum and more than 50% of those voting vote in favour of the plan then it is made by the relevant local authority. The plan then becomes part of the 'development plan' for the area and a statutory consideration in

² Set out in sections 38A and 38B of the Planning and Compulsory Purchase Act 2004 as amended by the Localism Act and paragraph 11(2) of Schedule A2 to the Planning and Compulsory Purchase Act 2004 (as amended)

³ The combined effect of the Town and Country Planning Act Schedule 4B para 8(6) and para 10 (3)(b) and the Human Rights Act 1998

guiding future development and in the determination of planning applications within the plan area.

Examination Process

It is useful to bear in mind that the examiner's role is limited to testing whether or not the submitted neighbourhood plan meets the basic conditions and other matters set out in paragraph 8 of Schedule 4B to the Town and Country Planning Act 1990 (as amended) and paragraph 11 of Schedule A2 to the Planning and Compulsory Purchase Act 2004 (as amended).⁴

Planning Practice Guidance (PPG) confirms that the examiner is not testing the soundness of a neighbourhood plan or examining other material considerations.⁵

The fact that a modification would be of benefit is not a sufficient ground in itself to recommend it. So, for example, the fact that a policy could be added to or strengthened does not justify a modification unless this is necessary for the reasons given above.

In addition, PPG is clear that neighbourhood plans are not obliged to include policies on all types of development.⁶

Often representations suggest amendments to policies or additional policies and, as in this case, the allocation of sites. As explained above, where I find that policies do meet the basic conditions, it is not necessary for me to consider if further amendments or additions are required and plans do not have to contain site allocations or address housing supply.

PPG⁷ explains that it is expected that the examination will not include a public hearing. Rather the examiner should reach a view by considering written representations. Where an examiner considers it necessary to ensure adequate examination of an issue or to ensure a person has a fair chance to put a case, then a hearing must be held.⁸

I sent a Note of Interim Findings and sought clarification on a number of matters from the Town Councils and LDC in writing on 17 July 2024 and this is attached to this report as Appendix 2. I am grateful to both parties who have provided me with comprehensive answers to my questions. The responses received (all publicly available) alongside an unaccompanied site visit on 5 November 2025 have enabled me to examine the Plan without the need for a hearing.

A representation expresses concern about the process, governance and other issues relating to the Steering Group. An independent examiner has no authority to consider

⁴ Paragraph 11(3) of Schedule A2 to the Planning and Compulsory Purchase Act 2004 (as amended) and PPG para 055 ref id 41-055-20180222,

⁵ PPG para 055 ref id 41-055-20180222

⁶ Ibid para 040 ref id 41-040-20160211

⁷ Ibid para 056 ref id 41-056-20180222

⁸ Ibid

such allegations. Such matters should be dealt with through internal complaints handling procedures of the qualifying body or local planning authority.

In 2018, the Neighbourhood Planning Independent Examiner Referral Service (NPIERS) published guidance to service users and examiners. Amongst other matters, the guidance indicates that the qualifying body will normally be given an opportunity to comment upon any representations made by other parties at the Regulation 16 consultation stage should they wish to do so. There is no obligation for a qualifying body to make any comments; it is only if they wish to do so. The Town Council made comments on some of the representations and I have taken these into account.

The Government published a revised National Planning Policy Framework (NPPF) on 19 December 2023, with an update on 20 December 2023. A short focused consultation was held to allow an opportunity for any comments to be made on the revised NPPF with regard to the basic conditions. The focused consultation was held from 16 – 30 April 2024.

The Government published a new NPPF on 12 December 2024. Transitional arrangements set out in the document⁹ explain that the policies in the updated NPPF will only apply to those neighbourhood plans submitted from 12 March 2025 onwards. This Plan was submitted before that date and so, as a result, this examination uses the NPPF updated in December 2023.

How to read this report

Where modifications are recommended they appear in a bullet point list of **bold text**. Where I have suggested specific changes to the wording of the policies or new wording these appear in ***bold italics*** in the bullet point list of recommendations. Modifications will always appear in a bullet point list.

As a result of some modifications consequential amendments may be required. These can include changing policy numbering, section headings, amending the contents page, renumbering paragraphs or pages, ensuring that supporting appendices and other documents align with the final version of the Plan and so on.

I regard these issues as primarily matters of final presentation and do not specifically refer to all such modifications, but have an expectation that a common sense approach will be taken and any such necessary editing will be carried out and the Plan's presentation made consistent.

⁹ NPPF December 2024, para 239

3.0 Neighbourhood plan preparation

A Consultation Statement has been submitted with a number of appendices, A - E.

Work began on the Plan in 2017. A Steering Group was established. A 'First Conversation' launch event was held in 2018 with public exhibitions in three locations. A SWOT analysis was carried out and a survey developed and promoted at a series of drop-in events. The survey formed the foundation for the Plan. Over 2017 and 2018 a number of events and meetings were held whilst evidence was gathered.

A Business Survey was carried out in 2020. A Masterplan for the redevelopment of Peacehaven centre was developed and consulted upon. A summary leaflet of the Masterplan was delivered to every household. A Young People Survey was carried out in 2021. Design Codes were developed in late 2020 and 2021.

Throughout this period, newsletters kept the local community informed and minutes of the Steering Group meetings were available.

Pre-submission (Regulation 14) consultation took place between 1 February – 14 March 2022. A summary leaflet was circulated and articles sent to the media and on the Town Councils' Facebook page and websites. Three events were held including a virtual event. Paper copies were available at various locations.

I consider that the consultation and engagement carried out is sufficient.

Notwithstanding comments made in representations about the process and the relationship between the Town Councils and the Steering Group, having regard to the information in the Consultation Statement, there is nothing to lead me to conclude that the preparation up to submission was not satisfactory.

The Plan was then submitted and Regulation 16 consultation took place between 18 January – 9 March 2023.

A second period of Regulation 16 consultation then took place between 12 October – 24 November 2023. I asked why a second period of consultation had been held. I understand a potential issue arose with the use of copyrighted material and the Plan was amended to address any issues arising. I am informed by the Steering Group that LDC reviewed the Plan as amended and considered that the nature of the Plan had not significantly changed. Therefore there was no need for the Plan to 'return' to a pre-submission stage, but a second period of submission consultation was duly carried out.

It is this second period of consultation I have taken to be the pertinent Regulation 16 consultation period.

The Regulation 16 stage resulted in 29 representations.

As explained earlier in this report, a focused period of consultation was held between 16 – 30 April 2024 to address the publication of the revised NPPF. This resulted in five representations.

I have considered all of the representations received and taken them into account in preparing my report.

4.0 Compliance with matters other than the basic conditions

I now check the various matters set out in section 2.0 of this report.

Qualifying body

I am advised that the Town Councils of Peacehaven and Telscombe are the qualifying body able to lead preparation of a neighbourhood plan. This requirement is satisfactorily met.

Plan area

The Plan area is coterminous with the administrative boundary for the Parishes of Peacehaven and Telscombe. The designation of the area was approved by Lewes District Council and the South Downs National Park Authority on 17 June 2013. The Plan area is shown on page 3 of the Plan. The Plan relates to this area and does not relate to more than one neighbourhood area and therefore complies with these requirements.

Plan period

The Basic Conditions Statement indicates the Plan period is 2022 – 2030. This should also be clearly stated in the Plan itself. The requirement is satisfactorily met.

- **Put the Plan period of 2022 – 2030 on the front cover of the Plan and state this at an appropriate place within the Plan itself**

Excluded development

The Plan does not include policies that relate to any of the categories of excluded development and therefore meets this requirement. This is also helpfully confirmed in the Basic Conditions Statement.

Development and use of land

Policies in neighbourhood plans must relate to the development and use of land. Sometimes neighbourhood plans contain aspirational policies or projects that signal the community's priorities for the future of their local area, but are not related to the

development and use of land. If I consider a policy or proposal to fall within this category, I will recommend it be clearly differentiated. This is because wider community aspirations than those relating to development and use of land can be included in a neighbourhood plan, but actions dealing with non-land use matters should be clearly identifiable.¹⁰

In this instance, a number of “Council Projects” are found throughout the Plan. The Plan explains what they are.¹¹ They are clearly distinguishable from the planning policies. I consider this to be an appropriate approach for this particular Plan.

5.0 The basic conditions

Regard to national policy and advice

The Government revised the National Planning Policy Framework (NPPF) on 19 December 2023 and updated it on 20 December 2023. This revised NPPF replaces the previous NPPFs published in March 2012, revised in July 2018, updated in February 2019, revised in July 2021 and updated in September 2023. All references in this report relate to the NPPF of December 2023 unless otherwise stated.

The NPPF is the main document that sets out the Government’s planning policies for England and how these are expected to be applied.

In particular it explains that the application of the presumption in favour of sustainable development will mean that neighbourhood plans should support the delivery of strategic policies in local plans or spatial development strategies and should shape and direct development that is outside of these strategic policies.¹²

Non-strategic policies are more detailed policies for specific areas, neighbourhoods or types of development.¹³ They can include allocating sites, the provision of infrastructure and community facilities at a local level, establishing design principles, conserving and enhancing the natural and historic environment as well as set out other development management policies.¹⁴

The NPPF also makes it clear that neighbourhood plans gives communities the power to develop a shared vision for their area.¹⁵ However, neighbourhood plans should not promote less development than that set out in strategic policies or undermine those strategic policies.¹⁶

¹⁰ PPG para 004 ref id 41-004-20190509

¹¹ The Plan page 5

¹² NPPF para 13

¹³ Ibid para 28

¹⁴ Ibid

¹⁵ Ibid para 29

¹⁶ Ibid

The NPPF states that all policies should be underpinned by relevant and up to date evidence; evidence should be adequate and proportionate, focused tightly on supporting and justifying policies and take into account relevant market signals.¹⁷

Policies should be clearly written and unambiguous so that it is evident how a decision maker should react to development proposals. They should serve a clear purpose and avoid unnecessary duplication of policies that apply to a particular area including those in the NPPF.¹⁸

On 6 March 2014, the Government published a suite of planning guidance referred to as Planning Practice Guidance (PPG). This is an online resource available at www.gov.uk/government/collections/planning-practice-guidance which is regularly updated. The planning guidance contains a wealth of information relating to neighbourhood planning. I have also had regard to PPG in preparing this report.

PPG indicates that a policy should be clear and unambiguous¹⁹ to enable a decision maker to apply it consistently and with confidence when determining planning applications. The guidance advises that policies should be concise, precise and supported by appropriate evidence, reflecting and responding to both the planning context and the characteristics of the area.²⁰

PPG states there is no 'tick box' list of evidence required, but proportionate, robust evidence should support the choices made and the approach taken.²¹ It continues that the evidence should be drawn upon to explain succinctly the intention and rationale of the policies.²²

Whilst this has formed part of my own assessment, the Basic Conditions Statement sets out how the Plan's policies correspond to the most up to date NPPF at the time of submission. Consultation has been held as explained in earlier sections of this report to allow interested parties to comment in relation to the subsequently published NPPF which is applicable to the examination.

Contribute to the achievement of sustainable development

A qualifying body must demonstrate how the making of a neighbourhood plan would contribute to the achievement of sustainable development.

The NPPF confirms that the purpose of the planning system is to contribute to the achievement of sustainable development.²³ This means that the planning system has three overarching and interdependent objectives which should be pursued in mutually supportive ways so that opportunities can be taken to secure net gains across each of

¹⁷ NPPF para 31

¹⁸ Ibid para 16

¹⁹ PPG para 041 ref id 41-041-20140306

²⁰ Ibid

²¹ Ibid para 040 ref id 41-040-20160211

²² Ibid

²³ Ibid para 7

the different objectives.²⁴ The three overarching objectives are:²⁵

- a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
- b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and
- c) an environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

The NPPF confirms that planning policies should play an active role in guiding development towards sustainable solutions, but should take local circumstances into account to reflect the character, needs and opportunities of each area.²⁶

Whilst this has formed part of my own assessment, the Basic Conditions Statement includes a section showing how the Plan helps to achieve sustainable development as outlined in the NPPF.

General conformity with the strategic policies in the development plan

The development plan includes the Lewes District Local Plan Part 1 Joint Core Strategy 2010 – 2030 (LPP1) adopted on 11 May 2016 by Lewes District Council and on 23 June 2016 by the South Downs National Park Authority; the Site Allocations and Development Management Policies Development Plan Document (Local Plan Part 2) (LPP2), adopted on 24 February 2020; and a number of saved policies of the Lewes District Local Plan 2003 (LP) adopted in March 2003.

The relevant saved policies of the LP are Policies PT6, PT9, PT10, PT11, PT12, PT13 and PT18.²⁷ All pertain to this Plan area and remain part of the development plan until and if this (Neighbourhood) Plan is made.²⁸

LDC has confirmed that strategic policies are contained only within LPP1.

As part of the Plan area falls within the South Downs National Park, the South Downs

²⁴ NPPF para 8

²⁵ Ibid

²⁶ Ibid para 9

²⁷ Confirmed in LPP2 Appendix 3, page 127

²⁸ Specified in LPP2 para 1.8, page 7, but Policies PT19 and PT20 superseded by the SDLP pages 308 and 309

Local Plan 2014 – 2033 (SDLP) also forms part of the development plan where that part of the Plan area falls within the National Park. This document was adopted on 2 July 2019 and supersedes LPP1 for the area of Lewes District within the National Park.

The SDLP contains a number of strategic policies defined in the SDLP itself.

The East Sussex, South Downs and Brighton and Hove Waste and Minerals Sites Plan also forms part of the development plan along with other made neighbourhood plans.

Whilst this has formed part of my own assessment, the Basic Conditions Statement contains a list of how each policy generally conforms to the relevant development plan policy.

Where I have not specifically referred to a strategic policy, I have considered all strategic policies in my examination of the Plan.

Emerging Local Plans

A new local plan is being prepared by Lewes District Council with the aim of providing the planning framework for the area to 2040. Local Plan: Defining our policies and early site allocation proposals (Phase 1 – Regulation 18 consultation) was consulted upon between 6 January – 28 February 2025.

The South Downs National Park Authority is reviewing its Local Plan. The first public consultation on the revised Local Plan (Regulation 18) ended on 17 March 2025.

Work on the new local plans continues.

European Union Obligations

Strategic Environmental Assessment

A Screening Opinion dated December 2018 has been prepared by LDC. This concluded that likely significant environmental effects could not be ruled out. Consultation with the statutory bodies was undertaken. Responses from Historic England and the National Park Authority concurred; the Environment Agency disagreed; and no response was received from Natural England. It should be noted at this time, it was anticipated the Plan would allocate sites for residential development.

An Environmental Report (ER) dated September 2022 was duly prepared by AECOM has been submitted. At this stage, the Plan did not contain any site allocations on the basis of advice from LDC.

The ER confirms that a Scoping Report was prepared and sent to the statutory consultees.

The ER was published for consultation alongside the submission version of the Plan.

The ER concludes that the Plan is expected to result in significant positive benefits in relation to population and community and the health and wellbeing themes. Positive effects are also expected in relation to the landscape; biodiversity and geodiversity; and historic environment themes. There will be potentially positive effects on the climate change theme. There will be beneficial approaches to the transportation theme and the Plan will help to support the capacity of the landscape.

The ER is a comprehensive document that deals with the issues appropriately for the content and level of detail in the Plan. This in line with PPG advice that confirms the SEA does not have to be done in any more detail or using more resources than is considered to be appropriate for the content and level of detail in the Plan.²⁹

In my view, it has been prepared in accordance with Regulation 12 of the Environmental Assessment of Plans and Programmes Regulations 2004. Therefore I consider that the requirements in in respect of SEA have been satisfied.

Habitats Regulations Assessment

On 17 July 2024, I wrote to the main parties to outline my interim findings. This Note is attached as Appendix 2. I explained that there were concerns over the adequacy of the information submitted on HRA which made it difficult to conclude that the Plan would meet the prescribed basic condition.

As a result, a HRA was produced by AECOM dated May 2025. The HRA identifies the following sites: Ashdown Forest Special Protection Area and Special Areas of Conservation (SAC), Castle Hill SAC and Lewes Downs SAC. It concludes that no likely significant effects are predicted, either alone or in combination with other plans and projects.

Natural England concurred with the findings of the HRA.

I have no reason to disagree with the conclusion of the HRA and consider that the prescribed basic condition relating to the Conservation of Habitats and Species Regulations 2017 is complied with.

European Convention on Human Rights (ECHR)

The Basic Conditions Statement contains a statement in relation to human rights.³⁰ Having regard to the Basic Conditions Statement, there is nothing in the Plan that leads me to conclude there is any breach or incompatibility with Convention rights.

²⁹ PPG para 030 ref id 11-030-20150209

³⁰ Basic Conditions Statement page 29

PPG establishes that the ultimate responsibility for determining whether a plan meets EU obligations lies with the local planning authority.³¹ Neither local planning authority raise any concerns in this regard.

6.0 Detailed comments on the Plan and its policies

In this section I consider the Plan and its policies against the basic conditions. Where modifications are recommended they appear in **bold text**. As a reminder, where I suggest specific changes to the wording of the policies or new wording these appear in ***bold italics***.

The Plan is presented to a very high standard and contains 39 policies. There is a positively worded foreword which sets the scene and a helpful contents page at the start of the Plan

The Plan is interspersed with numerous photographs of the area which gives it a distinctive feel.

It would be helpful to update NPPF references. This recommendation applies throughout the Plan and is not repeated elsewhere in this report.

- **Update references to the NPPF as necessary throughout the Plan**

Section 1 Introduction to the Neighbourhood Plan

This is a helpful introduction to the Plan setting out information about the structure of the Plan, the process undertaken and the rationale behind the Plan.

A commitment to review the Plan is made and whilst this is not mandatory, I very much welcome this as a point of good practice.

As the SDLP also forms part of the development plan, a reference and link to the SDLP should be included on page 7 of the Plan.

- **Insert reference to the SDLP and footnote link to the SDLP on page 7 of the Plan**

³¹ PPG para 031 ref id 11-031-20150209

Section 2 Peacehaven and Telscombe Plan Area

Section 2 sets out the history of the Plan area and the concerns of its local residents and businesses. These include poor quality development and social infrastructure, pressure on the A259 South Coast Road and local services, particularly health related services and a lack of connectivity.

These concerns have led to a simply worded and effective vision which states:

“Peacehaven and Telscombe Towns aim to be sustainable, with clean air and a healthy environment providing a good quality of life for all inhabitants and visitors.”

The vision is supported by seven aims and nine objectives. The vision, its aims and objectives are well articulated, relate to the development and use of land and are unique to this Plan area.

The Plan also adopts the concept of a twenty-minute neighbourhood as a way of helping to achieve its vision.

This section of the Plan, the vision and its aims and objectives and the adoption of the twenty-minute neighbourhood concept as a starting point are thoughtful, distinctive and exemplary.

The SDNPA point out the importance of consistent referencing in their representation. I found two examples of this in relation to the neighbourhood concept.³² A modification is duly made.

The SDNPA makes the point that abbreviations to “NP” throughout the Plan could be confused for National Park or Neighbourhood Plan. I can find four instances of “NP” throughout the Plan, but there may be others I have missed.³³ In the interests of clarity, abbreviations to “NP” where they refer to the Neighbourhood Plan should be changed to “NDP” to remove the SDNPA’s concern.

A suggestion is also made that the National Park should be referred as a proper name. I can only find one instance where this is not the case.³⁴ A modification to change such references throughout the Plan is made.

Lastly, there are instances when the National Park is referred to, but the reference should instead be to the National Park Authority.

³² See page 17 of the Plan where reference is made to 20-minute town and 20-minute areas rather than 20-minute neighbourhood

³³ See pages 13, 40, 65 and 73 of the Plan

³⁴ See page 10 of the Plan

- Ensure that references to the “twenty minute neighbourhood” are consistent throughout the Plan
- Change references to “NP” throughout the Plan to “NDP”
- Ensure that the National Park is referred to as “National Park” throughout the Plan
- Ensure that references to “National Park” and “National Park Authority” are corrected as necessary throughout the Plan

Section 3 Neighbourhood Development Plan – Area Wide Policies

The start of this section contains a definition of “major development”. This is important because a number of the policies refer to major developments. There is a definition of major development in the NPPF and I consider it is this definition which should be used for clarity and consistency. Different considerations also apply to the National Park. The references to waste and minerals should be removed as neighbourhood plans cannot deal with these types of development.

Therefore, in the interests of clarity, consistency and accuracy, a recommendation is made regarding the definition of major development found on page 18 of the Plan.

- Change the definition of “major development” on page 18 of the Plan to read:

“A major application consists of...

- *For housing development where ten or more homes will be provided, or the site has an area of 0.5 hectares or more*
- *Non-residential development consisting of additional floorspace of 1000 square metres or more or a site of 1 hectare or more or*
- *As otherwise provided in the Town and Country Planning (Development Management Procedure) (England) Order 2015*

Within the National Park, whether a proposal is ‘major development’ is a matter for the decision maker, taking into account its nature, scale and setting and whether it could have a significant adverse impact on the purposes of the National Park.”

High Quality Design and Local Distinctiveness

This sub section has five policies relating to design.

The NPPF states that good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.³⁵ Being clear about design expectations is essential for achieving this.³⁶

It continues that neighbourhood planning groups can play an important role in identifying the special qualities of an area and explaining how this should be reflected in development.³⁷ It refers to design guides and codes to help provide a local framework for creating beautiful and distinctive places with a consistent and high quality standard of design.³⁸

It continues that planning policies should ensure developments function well and add to the overall quality of the area, are visually attractive, are sympathetic to local character and history whilst not preventing change or innovation, establish or maintain a strong sense of place, optimise site potential and create places that are safe, inclusive and accessible.³⁹

In relation to meeting the challenge of climate change, flooding and coastal change, the NPPF states that the planning system should support the transition to a low carbon future.⁴⁰ It continues that plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures.⁴¹ Policies should support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts.⁴²

The NPPF is clear that planning policies should contribute to and enhance the natural and local environment including through the protection of trees.⁴³ It states that trees make an important contribution to the character and quality of urban environments, and can also help mitigate and adapt to climate change encouraging tree-lined streets and trees to be incorporated in developments such as in parks and community orchards.⁴⁴

LPP1 Core Policy 10 conserves and enhances the natural environment. It seeks the retention and enhancement of natural, locally distinctive and heritage landscape qualities and characteristics such as hedgerows. It seeks to maintain local biodiversity

³⁵ NPPF para 131

³⁶ Ibid

³⁷ Ibid para 132

³⁸ Ibid para 133

³⁹ Ibid para 135

⁴⁰ Ibid para 157

⁴¹ Ibid para 158

⁴² Ibid

⁴³ Ibid para 180

⁴⁴ Ibid para 136

resources. It gives the highest priority to the first purpose of the National Park and the integrity of European Sites in, and around, the District.

LPP1 Core Policy 11 seeks a high quality of design. It refers to the creation of sustainable places and the character and local distinctiveness of the area citing a number of criteria that cover crime, flooding, living conditions, heritage and the efficient use of land. It refers to resource and energy consumption. It refers to adaptability, safety and accessibility to all including in relation to housing development.

LPP1 Core Policy 14 seeks the reduction of contributing causes of climate change including through the implementation of sustainable construction techniques in new developments.

The SDLP takes a landscape-led approach to a dispersed medium development strategy which means that the spatial strategy for the National Park is for a medium level of growth dispersed across the towns and villages in the National Park.

SDLP Core Policy SD2 permits development where it has an overall positive impact on the ability of the natural environment to contribute goods and services. This is achieved through high quality design and 11 other criteria which include flood risk management; resilience to, and mitigation of, climate change; the sustainable management of land and water environments; protection of, and connection of, natural habitats; improvement of health and wellbeing and access to natural and cultural resources.

SDLP Strategic Policy SD4 only permits development where landscape character is conserved and enhanced.

SDLP Strategic Policy SD5 takes a landscape-led approach to development requiring development to be of sensitive and high quality design that makes a positive contribution to the character and appearance of the area.

SDLP Strategic Policy SD6 seeks to conserve and enhance key views and views of key landmarks within the National Park.

SDLP Strategic Policy SD7 seeks to ensure development does not harm the relative tranquility of the National Park.

SDLP Strategic Policy SD8 seeks to ensure that development does not harm the quality of dark night skies and sets out a hierarchy for levels of protection.

SDLP Strategic Policy SD11 conserves and enhances trees, hedgerows and woodlands and encourages new appropriate planting.

SDLP Strategic Policy SD48 encourages high standards of sustainable building design and construction as part of the National Park's response to the challenges of climate change.

The Plan explains that, with support from AECOM, a set of Design Codes have been produced for all development across the towns.

Policy PT1: High Quality Design has four components. The first is to encourage accessible and safe places for people of all ages and those with reduced mobility. This has support in the NPPF which emphasises the need for the planning system to support healthy, inclusive and safe places and supports the creation of safe, secure and attractive places that have a high degree of amenity.⁴⁵ However, a modification is made to ensure that purpose-built accommodation is referred to so that the policy does not inadvertently prevent development that would otherwise be acceptable.

The second deals with context, including the landscaping and longer views of coastal areas and the South Downs National Park. It refers to positive impact and whilst this is a high bar, given the stance of the Plan which is to improve quality, this is important in the context of this Plan area as maintenance of the same will not achieve the enhancement the community seeks.

The third encourages opportunities such as biodiversity, green technologies and Sustainable Drainage Systems (SuDs) to be taken.

The last criterion refers to the local design codes which have been prepared and requires them to be taken into account in preparing development schemes.

The SDNPA has suggested amendments to the second, third and fourth criteria to include references to the setting of the National Park and to help update and future proof the policy. The suggestions are helpful and will make the policy more robust.

In addition, two of the components require demonstration of compliance. Modifications are made to the policy to set out how these requirements should be demonstrated.

Finally, in relation to Policy PT1, a helpful suggestion from the SDNPA that a hyperlink to the Design Code is inserted is also recommended in the interests of consistency and clarity and use of ease to the users of the Plan.

The second policy in this section, **Policy PT2: Innovation and Good Management**, firstly encourages innovation in relation to sustainable design and digital infrastructure. I consider the policy would read better if the first criterion were split into two.

Secondly, major applications (now defined appropriately given my recommendation earlier in this report) are encouraged to set out management and maintenance systems for areas of public parking, waste management and so on. The onward management of a place is seen as an important component of enhancing the quality of development.

⁴⁵ NPPF paras 96, 116 and 135

However, this part of the policy refers to internal communal areas which would be difficult to manage through the planning system. A modification is therefore made to remove this element from the policy.

Policy PT3: Landscaping seeks to ensure that new development protects natural features such as mature trees and hedges and that appropriate materials and native species are used in new landscaping schemes. Proposals should contribute to urban greening of the street scene. Lastly, in relation to major applications, outdoor community spaces should be included. These are areas for growing food, allotments, pocket parks or gardens and so on.

This policy, as well as protecting and enhancing landscaping features and biodiversity, also focuses on the importance of, and contribution made, by high quality public realm.

Modifications are made to make the policy more robust in its clarity.

Policy PT4: Impacts on the South Downs National Park, sets out a landscape-led approach to development within close proximity to the National Park. This policy also protects views to and from the National Park as well as features of biodiversity and geology and its tranquil nature. Lastly, the policy protects the dark skies of the National Park.

The NPPF is clear that great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks which have the highest status of protection in relation to these issues.⁴⁶ It continues that the scale and extent of development should be limited, while development within its setting should be sensitively located and designed to avoid or minimise adverse impacts.⁴⁷

Whilst the SDNPA welcome and support this policy, some changes have been put forward by the SDNPA which would mean both the policy and its supporting text would have better regard to the NPPF and the SDLP and would also improve both the clarity and outcomes of this policy. Modifications are therefore recommended to both Policy PT4 and its supporting text.

The last policy in this sub section is **Policy PT5: Sustainable Design**. The Plan explains that Peacehaven Town Council declared a climate emergency in 2021 and aims to be carbon neutral by 2030.

In addition, Peacehaven and Telscombe are classified as water stressed areas by the Government.

In line with a suggestion from the SDNPA, some revision to the supporting text for Policy PT5 is recommended to update it and to ensure that it is clear that the text and policy relates to the entire Plan area.

⁴⁶ NPPF para 182

⁴⁷ Ibid

The SDNPA also suggest some changes to the policy.

Policy PT5 seeks to achieve high standards of sustainable development through the use of natural resources and the reuse of existing resources, incorporating SuDs where appropriate and showing how proposals will be resilient to climate change impacts.

It also refers to the Building Regulations water efficiency standard. Whilst there is no doubt, the planning system should help to shape places in ways that contribute to reductions in greenhouse gas emissions; minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure,⁴⁸ the Government is also clear that neighbourhood plans should not set out any local technical standards or requirements.

Finally, the policy encourages a holistic building approach to the renovation of traditional buildings referring to the PAS 2035. PAS 2035, as I understand it, is a framework for the management and delivery of retrofit projects using public funding. Its specifications and guidance could be used more widely.

The Government introduced national technical standards for housing in 2015. A Written Ministerial Statement (WMS)⁴⁹ explains that neighbourhood plans should not set out any additional local technical standards or requirements relating to the construction, internal layout or performance of new dwellings.

That WMS is now effectively moot in this respect following a Government Statement on Planning – Local Energy Efficiency Standards Update.⁵⁰ This embeds a general rule of thumb that policies which propose standards or requirements that go beyond current or proposed standards should be rejected at examination if they do not have a well-reasoned and robustly costed rationale. I consider the principle is applicable here.

Having carefully considered the wording of the policy and the third and fifth criteria of Policy PT5, they both do not set a standard and therefore are acceptable. I do, however, recommend modifications to Policy PT5 to reflect the SDNPA's comments and those of the Environment Agency and to make the policy more precise.

With these modifications, I consider that Policies PT1 – PT5 will meet the basic conditions by having regard to national policy, particularly with regard to design and climate change considerations referred to above, and by adding a local layer to, and being in general conformity with, LPP1 Core Policies 10, 11 and 14 and SDLP Core Policy SD2 and Strategic Policies SD4, SD5, SD6, SD7, SD8, SD11 and SD48 in particular and by helping to achieve sustainable development.

⁴⁸ NPPF para 157

⁴⁹ Written Ministerial Statement 25 March 2015

⁵⁰ Statement made on 13 December 2023

- Amend Policy PT1 to read:

“(1) All proposals for developments and public spaces should be designed to be accessible and safe to use by people of all ages and for those whose mobility may be *reduced*. *The only exemptions to this is development providing specialist accommodation for a group of people with specific needs (such as purpose-built accommodation for older people or students) or where the specific requirements will depend on the nature of the accommodation or development provided.*”

(2) Proposals should demonstrate *through the submission of a proportionate statement to accompany the planning application* how they *will* have a positive impact *by considering the local landscape, the setting of and longer views to and from the South Downs National Park, coastal areas and other local environmental assets including trees and woodland.*

(3) Proposals should incorporate opportunities to address climate change including enhancing biodiversity, green roofs and walls, green technologies, water saving and SUDs in accordance with *the development plans, supplementary plans and guidance adopted by Lewes District Council and the South Downs National Park Authority as appropriate.*

(4) Proposals should demonstrate *through the submission of a proportionate statement to accompany the planning application* how they *have considered, and been informed by, the Peacehaven and Telscombe Design Code(s) (and any other relevant design codes and guidance) for the neighbourhood development plan area*”.

- Add a hyperlink to the Design Code at a suitable point in the Plan
- Separate the first criterion of Policy PT2 into two with the new, separate criterion beginning “Proposals for new developments should seek to provide flexible and adaptable spaces...”
- Delete the words “...internal communal areas...” from [existing] criterion (2) of Policy PT2
- Change Policy PT3 to read:

“(1) Protect and enhance natural features by *respecting and* incorporating existing landscape *features* into the design. In particular, proposals should *retain* mature or *otherwise important* trees and hedges.

(2) Use appropriate high-quality materials and native species that are suitable *for the site.*”

- Add new supporting text in relation to Policy PT4 after the first paragraph on page 23 of the Plan which reads:

“The South Downs was established as a National Park in 2010. The South Downs National Park Authority became the local planning authority for the National Park in 2011. The National Park contains over 1,600 km² of England’s most iconic lowland landscapes stretching from Winchester in the west to Eastbourne in the east.

The purposes and duty of the National Park Authority are set out in Section 5 (1) of the National Parks and Access to the Countryside Act 1949, as amended by Section 62 of the Environment Act 1995.

The National Park purposes are to conserve and enhance the natural beauty, wildlife and cultural heritage of the area and to promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public.

The National Park Authority also has a duty to seek to foster the economic and social well-being of the local communities within the National Park when carrying out its purposes.

The 2023 Levelling Up and Regeneration Act (s245) and subsequent 2024 Government guidance, places a duty on those bodies preparing neighbourhood plan to seek to further the purposes of the National Park.

Paragraph 182 of the NPPF states that great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks which have the highest status of protection in relation to these issues. It continues that the scale and extent of development should be limited, while development within its setting should be sensitively located and designed to avoid or minimise adverse impacts on the National Park. This is particularly important as many areas outside of the National Park are still considered to be within the setting of the National Park.”

- Change Policy PT4 to read:

“Development in, or within the setting of, the South Downs National Park (SDNP) should have a landscape led approach which seeks to further the purposes of, and makes a positive contribution to, the landscape character, visual amenity and special qualities of the National Park.

Development proposals must not detract from, or cause detriment to, biodiversity, dark night skies, geology, tranquility, and other essential characteristics of the National Park.

Proposals should not adversely affect transitional landscape character in the

setting of the National Park, including the views, outlook and aspect, into and out of, the National Park by virtue of its location, scale, form and/or design.”

- Amend the third paragraph on *page 24* of the Plan to read:

“All new developments should aim to be net zero in accordance with the legally binding target in the Climate Change Act 2008 (2050 Target Amendment) Order 2019. This commits the UK to reducing greenhouse gas emission to Net Zero by 2050.

All new development proposals in the Plan area need to show how thought has been given to being climate friendly and should seek to demonstrate that the sourcing of materials, facilities and water-drainage strategies and other actions are contributing to this target. Reference should be made to the policies and guidance set out by Lewes District Council and the South Downs National Park Authority.”

- Amend Policy PT5 to read:

“All development within the Neighbourhood Plan area should seek to achieve high standards of sustainable development and where appropriate demonstrate in proposals how design, construction and operation has sought to:

- (1) Promote the use of natural resources and the reuse of or recycle existing resources.*
- (2) Support the use of sustainable drainage systems (SUDS) to conserve and enhance the landscape and wildlife, reduce the effects of storm water runoff, reduce the effects of summer heatwaves, and reduce the effects of summer droughts.*
- (3) Meet the Building Regulations water efficiency standard of a maximum of 110 litres per person per day for residential use (or subsequent standards).*
- (4) Show how the proposals seek to be resilient to the impacts of climate change by including adaption measures in terms of, but not limited to heat and water stresses.*
- (5) Use a holistic building approach in accordance with the principles set out in PAS 2035 (or its successor) in the renovation of traditional buildings or heritage assets to help improve the sustainability of the structure whilst preserving or enhancing its architectural and/or historic interest, appearance, character, setting, significance and long-term preservation.”*

Housing – Creating High Quality Housing for All

There are five policies in this section on housing.

Although there are no site allocations in the Plan, the Plan identifies eight character areas as part of the work on the Design Code. Opportunities and constraints for housing development in each area are set out. It would be helpful to include a map showing the eight character areas at this point in the Plan for clarity.

A Housing Needs Assessment (HNA) has also been prepared by AECOM. This shows the private rented sector has expanded considerably and above the growth rate of both Lewes and nationally. This is systematic of the declining affordability of home ownership with average prices across the Plan area increasing by a median average price of some 48%.

One of the Plan's key objectives is to support a better balance between jobs and homes. The HNA shows a growth in households with non-dependent children. As well as issues of increasing unaffordability, the mix of housing in the locality does not meet demographic needs. Furthermore some of the housing stock would benefit from upgrading.

The Plan is generally supportive of retrofitting, prioritising brownfield land, maximising development of sites, meeting local needs and providing a mix of housing.

The NPPF makes it clear that the Government's objective is to significantly boost the supply of homes.⁵¹ As well as ensuring there is a sufficient supply of land, it is also important to ensure the needs of groups with specific housing requirements are addressed.⁵²

The overall aim should be to meet as much of an area's identified housing need as possible, including with an appropriate mix of housing types for the local community.⁵³ This includes affordable housing, families with children, older people (including those who require retirement housing, housing-with-care and care homes), students, people with disabilities, service families, travellers, people who rent their homes and people wishing to build their own homes.⁵⁴

A Key Strategic Objective in LPP1 is to deliver the homes and accommodation for the needs of the District and to ensure that housing growth requirements are accommodated in the most sustainable way.

LPP1 Core Policy 1 refers to affordable housing. LPP1 Core Policy 2 sets out that a range of dwelling types and sizes to meet identified needs will be needed. Regard is also had to the character and housing mix of the vicinity including the setting of the National

⁵¹ NPPF para 60

⁵² Ibid

⁵³ Ibid

⁵⁴ Ibid para 63

Park. Flexible, socially inclusive and adaptable accommodation to meet diverse needs and the changing needs of occupants over time is specifically referenced particularly in relation to older people and disabled residents. The LPP1 explains that neighbourhood plans can provide more details on the appropriate housing type, mix and density for their area.

SDLP Strategic Policy SD27 refers to housing mix. This should be informed by up to date evidence. It also supports flexible and adaptable accommodation to meet the needs of less mobile people or homecare needs as well as housing for older people.

The supporting text to this section in the Plan should refer to both LDC and the SDNPA. In addition, there are some other changes to the supporting text to ensure it is clear and up to date.

Policy PT6: Housing Design sets out 11 criteria aimed at addressing some of these issues. It covers space standards, living conditions, views, crime, technology, bicycle storage and electric charging points and refers to the design guides for each area. Overall it seeks to ensure that residential development is of a high quality and appropriately designed for the locality as well as improving the quality of housing stock.

I recommend some modifications to ensure that the policy applies to all residential development and to make it more precise and clearer and consistent with other policies in the Plan.

Policy PT7: Adaptable Housing supports the adaption of existing housing and new builds that create high quality accommodation suitable for all groups of people. This is supported by the HNA which encourages standards of accessibility and adaptability in new development and the adaption of existing homes.

The policy's five criteria seek housing which is readily accessible to facilities and services, provides satisfactory amenity and communal spaces, include facilities for medical and other support staff and internal adaptations to address needs. It also refers to building regulations standard M4 (2).

I note that the HNS suggests such a reference, but as explained in relation to Policy PT5 earlier in this report, neighbourhood plans cannot propose standards or requirements of this nature. A modification is made in this respect.

This policy particularly supports the social objective of achieving sustainable development, namely to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being.⁵⁵

⁵⁵ NPPF para 8

It supports the NPPF's objective of promoting healthy and safe communities⁵⁶ and the creation of places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users.⁵⁷

Policy PT8: Low Cost Housing seeks to support housing developed by Community Land Trusts, housing associations or co-operative housing schemes, self build housing and Build to Rent housing in Character Areas 1, 4, 5 and 6.

The rationale of the policy is that the provision of affordable housing has been poor and this policy offers specific support for these categories of housing in those Character Areas identified as those areas have good accessibility and opportunities for improvement.

I note that both local planning authorities are reviewing their local plans. The SDNPA feels it may be more appropriate for this policy to set out the types of housing supported rather than the locations. However, this policy seems to me to set out the housing types which would be supported in various Character Areas deemed to be the more accessible to existing facilities and services. The policy also supports affordable housing on a site by site basis anyway.

The only modification therefore recommended is to ensure the policy is future proofed to take into account the latest and most up to date housing needs assessment available.

Policy PT9: Housing Mix supports the provision of housing that meets local needs based on the HNS and any site specific requirements. This element of the policy should be future proofed.

The second element of the policy contains a clause that adds flexibility to the policy's requirements which is needed as all development must be sustainable and deliverability forms part of this. However, I add to this element in the interests of clarity.

The last policy in this section is **Policy PT10: Reusing the Existing**. The policy lends support to the efficient use of brownfield land and existing buildings within the built-up boundaries and seeks the retrofitting of existing buildings in accordance with PAS 2035. This standard is also referred to in Policy PT5: Sustainable Design.

I have carefully considered whether the wording of the policy sets a standard and have concluded it encourages development rather than requires compliance with the standard and is therefore acceptable.

The NPPF promotes the effective use of land, including brownfield land.⁵⁸

With the modifications, I consider all five policies will meet the basic conditions by having regard to national policy, contributing to the achievement of sustainable

⁵⁶ NPPF para 96

⁵⁷ Ibid para 135

⁵⁸ Ibid para 123

development and being in general conformity with strategic policy, and adding a local layer of detail to LP Core Policies 1, 2 and 11 and SDLP Strategic Policy SD27 as appropriate.

- Insert a map showing the eight character areas at an appropriate place in this section

- Replace paragraphs three and four on page 27 of the Plan with:

“Whilst the Lewes District Local Plan Part 1 sets out the housing figure for the Neighbourhood Development Plan Area and is the local planning authority for the areas of the Parishes outside the National Park, the South Downs National Park Authority is the local planning authority for the areas of the Parishes inside the National Park. Both local planning authorities set out in their respective local plans how they wish to improve the quality and amount of affordable housing in their plan areas, including the need for a mix of housing type, mix and density.”

- Amend [existing] paragraph five on page 27 of the Plan to read:

“In terms of the areas outside of the National Park, Lewes District Council have not been able to demonstrate (at the time of writing) a five year housing land supply. Therefore some of the housing policies within the Lewes Core Strategy will be weighted in favour of...”

- Alter Policy PT6 to read:

“All new residential development (including conversions) must:

(1) meet the nationally described internal space standards for each individual unit.” [retain remainder of policy as is to criterion (5)]

(5) “Adopt a landscape-led approach to ensure development positively contributes to the overall appearance and landscape/townscape character of the area taking account of street layout, density, plot size, scale and roofscapes whilst avoiding or minimising any adverse impacts on the South Downs National Park, its setting and views to and from the National Park and views to the sea.” [retain remainder of policy as is to criterion (11)]

(11) “Be in conformity with the Peacehaven and Telscombe Design Codes and any other adopted design codes and guidance for the neighbourhood development plan area.”

- Delete criterion (2) of Policy PT7

- Add the words *“or any successor document or the most up to date housing needs assessment”* after “...Housing Needs Assessment” in paragraph (4) of Policy PT8
- Add the words *“or any successor document or the most up to date housing needs assessment”* after “...Housing Needs Assessment” in paragraph (1) of Policy PT9
- Add the words *“based on specific site characteristics”* after “...technically feasible to do so...” in paragraph (2) of Policy PT9

Movement: Promoting Active, Smarter and More Sustainable Modes of Travel

The Plan explains that the A259 is the only road link to and from the Plan area. It is an important route and part of the Major Route Network and is subject to a study by East Sussex County Council (ESCC).

ESCC has also produced a Local Walking and Cycling Infrastructure Plan. As part of the work on this, a study by Sustrans was also been carried out in 2020. This found that the area had potential for large numbers of active travel users as well as potential for ‘chain journeys’ by linking active travel to public transport hubs.

A representation from ESCC updates the information on page 40 of the Plan and I recommend these are included to ensure the most relevant information is given.

Peacehaven and Telscombe are set on a grid pattern of streets. Although many day to day services are within a 15 -20 minute walk, cycle or bus journey, connectivity is poor. There is an interesting diagram on page 41 of the Plan which shows the car dependency cycle.

The NPPF seeks to promote sustainable transport. It indicates that transport issues should be considered in the earliest stages of plan-making and development proposals so that, amongst other things, opportunities to promote walking, cycling and public transport use are identified and pursued and are integral to the design of schemes and the making of high quality places.⁵⁹

It continues that planning policies should provide for attractive and well-designed walking and cycling networks with supporting facilities such as secure cycle parking.⁶⁰

LPP1 Core Policy 13 promotes and supports development that encourages travel by walking, cycling and public transport.

SDLP Strategic Policy SD19 seeks to encourage development to the most sustainable locations. It expects new development to be located and designed to minimise the

⁵⁹ NPPF para 108

⁶⁰ Ibid para 110

need to travel and maximise sustainable transport options. Amongst the improvements are improvements to walking, cycling and public transport.

SDLP Strategic Policy SD20 safeguards and enhances the walking, cycling and equestrian networks.

The three policies in this section of the Plan are aimed at improving active travel choices.

Policy PT11: Travel Planning seeks to ensure that all new development considers site connectivity and promotes sustainable transport modes through a proportionate connectivity statement.

A modification is needed to this policy to accord with the South Downs National Park Guidance which follows a landscape led approach and the supplementary planning guidance in full. Other modifications are made to reflect the representation from ESCC.

Otherwise the policy is a systematic way of trying to improve accessibility and encourage active travel within the Plan area.

Policy PT12: Enhancing Accessibility to the South Downs National Park and Coastal Areas supports and welcomes proposals that enhance the quality and accessibility of the National Park, Coastal Path or undercliff walkways. Improvements in the policy include new links and junctions for pedestrians, cyclists and horse riders, the creation of active frontages along routes, improved legibility and development that encourages such activities.

I note that the SDNPA supports the overall approach of the policy and particularly welcomes criterion (5) which supports development that encourages walking, cycling and horse riding. The representation from the British Horse Society also discusses the importance of the needs of equestrians from an active travel and health and well-being perspectives. A representation from ESCC suggests some changes to the policy and the one I recommend is incorporated will also address the importance of the public rights of way network which includes bridleways.

The last policy in this section relates to public transport. **Policy PT13: Enhancing Public Transport in the Neighbourhood Plan Area** seeks to ensure that public transport is improved. The Plan explains that the majority of residents do not have convenient access to bus services and Telscombe village is reliant on the private car although there is access to bus services along the A259.

The policy requires major developments to help facilitate better public transport connections and support public transport. ESCC has suggested some amendments to the policy which I consider are helpful.

With these modifications, Policies PT11, PT12 and PT13 will meet the basic conditions. They will have regard to the NPPF's stance on the promotion of sustainable transport

and are a local expression of LPP1 Core Policy 13 and SDLP Strategic Policies SD19 and SD20. They will help to achieve sustainable development.

Council Project 3 Travel Planning is found on page 48 of the Plan. The SDNPA has asked to be added to the list of partner authorities and I see this as important given some of the projects will fall within the National Park. ESCC has suggested the separation of the third element of the Council Project and this would make it clearer.

At the end of this section is a “Provisional Routemap” (pages 50 and 51 of the Plan). I asked the Town Councils about the status of the Routemap as it is not explicitly referred to in any policy or Council Project in the Plan. The Routemap shows the 20-minute neighbourhood which is a well established planning concept and referred to in various places in the Plan including the vision and relates to various policies.

I am advised that the routes identified are not policy, but are highlighted to encourage “...future discussion about the possibility of creating new and improved cycle routes, green routes and walking routes that help connect places. These conversations continue with Councils and the public and have helped promote new cycle routes and pathways.”⁶¹

ESCC made a number of comments about the Routemap suggesting it should be made wider, but not raising any other issues of concern. I asked the Town Council to comment on the points made in ESCC’s representation. The Town Council would now like to widen the indicative 20-minute walking area to include the Meridian Community Primary School, the Telscombe Cliffs Primary School and the football ground to the east. A new map has been provided to show the revisions.

The revised map also makes it clear that the routes shown are indicative and so the status is now clearer.

The substitution of this map will make the Plan clearer and more accurate.

I also note that National Highways welcomes the Plan’s intent that new developments should create well connected walking and cycling infrastructure to promote the 20-minute neighbourhood.

- **Amend the second paragraph on page 40 of the Plan and add new third and fourth paragraphs to read:**

“The A259 corridor is a key part of the Major Route Network (MRN) due to the high level of mixed-use traffic that uses it (e.g. pedestrians, cyclists, buses, cars/vans etc.) and its economic importance to the area in terms of providing inter-urban connectivity from Peacehaven & Telscombe with Brighton to the west, and east to Newhaven. At the time of writing the Neighbourhood Plan, a study of the A259 has been undertaken by East Sussex County Council. This

⁶¹ Response from Steering Group to my questions of clarification

identifies a package of transport schemes along the A259 from east of Brighton to east of Eastbourne, including the section through Peacehaven and Telscombe. The outcomes of the study have been used to inform the development of a Strategic Outline Business Case which was submitted to the Department for Transport in October 2023.

The proposed schemes for the Peacehaven/Telscombe section of the A259 comprise:

- *Longridge Avenue – Traffic management*

Minor widening of A259 / Longridge Avenue junction approaches aiming to reduce blocking back on A259 and improve journey time reliability for public transport and general traffic.

- *Rottingdean-Peacehaven – activated message signs 5.*

Introduction of markings / activated message signs along route aiming to reduce excessive speeding.

These will meet with the five objectives of the MRN which include reducing congestion, supporting economic growth and rebalancing, supporting housing delivery, supporting all road users, and supporting the Strategic Route Network.”

- Update the [existing] third paragraph on page 40 of the Plan to read:

“ESCC has published the East Sussex Local Walking and Cycling Infrastructure Plan. This identifies that Peacehaven and Telscombe have the potential to increase active travel (walking, wheeling and cycling) through improved walking and cycling infrastructure. This includes linking active travel route to public transport. ESCC is also producing Local Transport Plan 4 and will update the Local Walking and Cycling Infrastructure Plan as part of their work.”

- Amend the first criterion of Policy PT11 to read:

“All planning applications should set out the site’s connectivity to nearby key services, education facilities and community spaces. These statements should be proportionate to the size of the proposed development and be tailored to address local circumstances strengthening existing links to such facilities and services.”

- Amend the last paragraph in Policy PT11 to read:

“Encouragement is given for developers to set out new parking areas in the Neighbourhood Plan area in accordance with the South Downs National Park Authority’s Guidance on Parking for Residential and Non-Residential Development Supplementary Planning Document April 2021 that follows a landscape led approach to designing parking facilities.”

- Add a new paragraph at the end of Policy PT12 which reads:

“ All development should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for all users.”
- Add the words *“where appropriate to the development’s type and scale”* after *“....(major)...”* in the first sentence of Policy PT13
- Add the word *“trip”* before *“...chain journeys...”* in criterion (4) of Policy PT13
- Separate out the two elements in paragraph (3) of Council Project 3 on page 48 of the Plan so that a new fourth criterion starts *“With regards to...”* and add the South Downs National Park Authority to the list of partner organisations in this new criterion
- Substitute the *“Indicative 20-minute Walking Radius”* map supplied with the Town Council’s response to my questions of clarification for the existing plan on pages 50 and 51 of the Plan

Open Space and Amenity

The NPPF is clear that planning policies should support the retention and development of accessible local services and community facilities including meeting places, sports venues and open space.⁶² It supports policies which provide access to safe and accessible green infrastructure, sports facilities and allotments.⁶³

It encourages the positive planning of the provision of shared spaces and facilities like sports venues and open space and guards against the loss of valued facilities.⁶⁴ Access to a network of high quality open spaces and opportunities for sport and physical activity is regarded as important for the health and well-being of communities, and can deliver wider benefits for nature and support efforts to address climate change.⁶⁵

The NPPF is clear that existing open space, sports and recreational buildings should not be built on unless it is clearly demonstrated it is surplus to requirements or the loss would be replaced by equivalent or better provision in a suitable location or the development is for alternative sports and recreational provision where the benefits clearly outweigh the loss of the previous or existing use.⁶⁶

LPP1 Core Policy 8 on green infrastructure promotes a connected network of multi-functional green infrastructure by protecting and enhancing open spaces.

⁶² NPPF para 88

⁶³ Ibid para 96

⁶⁴ Ibid para 97

⁶⁵ Ibid para 102

⁶⁶ Ibid para 103

SDLP Strategic Policy SD45 promotes green infrastructure including protecting existing sites and the overall network.

Policy PT14: Protection of Green Spaces within the Neighbourhood seeks to do two things. The first is to encourage all new development to take opportunities to contribute to the existing green network and create new open spaces, playing fields and urban greening.

The second element of the policy resists the loss of a number of listed green spaces unless it can be demonstrated they are surplus to requirements and seeks alternative provision to be made or that the development results in a net improvement in the quality of facilities available.

The 16 green spaces are listed on page 53 of the Plan. However, no plan was provided of the location of these spaces and I requested one be prepared as part of my questions of clarification. I am grateful to the Steering Group for providing me with a very clear map.

However, an issue arises. The map that has been provided is titled “Local green spaces for protection within the NDP”. However, the policy refers to “Protection of Green Spaces” and there is no mention of “Local Green Spaces”, which are a specific designation in the NPPF,⁶⁷ either in Policy PT14 or elsewhere in the Plan (except for Council Project 4). Therefore I cannot treat these spaces as Local Green Spaces for the purposes of the NPPF. My view is reinforced by the wording of the policy which would permit loss of the spaces subject to the aforementioned criteria. In contrast the designation of a Local Green Space should be capable of enduring beyond the end of the plan period⁶⁸ and the policy for managing development within a Local Green Space should be consistent with those for Green Belts.⁶⁹

I appreciate this may be a disappointment to the Town Councils. It is important that if green spaces are proposed to be designated as Local Green Spaces there is clarity particularly for landowners. The stance I have taken does not, however, mean that all or any of the green spaces referred to in Policy PT14 could not be appropriately designated as Local Green Spaces through a review of the Plan or through the Local Plan process.

With regard to the map provided, this should be included alongside Policy PT14 for clarity, but the title changed to reflect the discussion above.

Turning back to the wording of the second element of the policy seeks to replicate the stance taken in the NPPF for open spaces, but there could be improved clarity in the wording of the policy. The SDNPA also seek an amendment to ensure that alternative provision is accessible. For those reasons, a modification is recommended to this part of the policy.

⁶⁷ NPPF paras 105, 106, 107

⁶⁸ Ibid para 105

⁶⁹ Ibid para 107

Policy PT15: Amenity, Green and Blue Spaces seeks to enhance the connectivity and accessibility to open spaces and public realm in the Plan area along with management plans for green infrastructure on sites. Native tree and hedgerow planting is encouraged. A net gain in biodiversity is sought.

The NPPF defines green infrastructure as a network of multi-functional green and blue spaces and other natural features, urban and rural, which is capable of delivering a wide range of environmental, economic, health and wellbeing benefits for nature, climate, local and wider communities and prosperity.

It explains that plans should distinguish between the hierarchy of international, national and locally designated sites and, amongst other things, take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure.⁷⁰

It encourages plans to identify, map and safeguard local habitats and wider ecological networks.⁷¹

The NPPF seeks to enable and support healthy lifestyles including through the provision of safe and accessible green infrastructure for example.⁷² Access to a network of high quality open space and opportunities for recreation is also supported.⁷³ As part of this, the protection and enhancement of public rights of way (PROW) is supported including through the provision of better facilities by adding links to existing networks.⁷⁴

Policy PT15 seeks to achieve these aims.

Policy PT16: Enhancement of Formal Sports Areas and Children's Equipped Play Areas supports new play areas, new formal sports facilities and the improvement of existing facilities and supports development of the Hub for sports/leisure/community facilities.

Criterion (3) of Policy PT16 refers to the development of the Hub building in accordance with AECOM's Site Options and Assessment report of November 2019. I asked a question about this site. The Town Councils have responded confirming that this is a site allocation for larger and enhance community facilities as per AECOM's assessment. Some detailed wording and a plan have been provided.

I consider that it would be clearer if this were a standalone policy. I recognise that the proposal may not happen within the Plan period, but it sends a signal of intent and allows further conversations to take place including about viability.

When I saw the Hub and its surrounds at my visit, I considered that a development of this nature would be, in principle, acceptable on this site.

⁷⁰ NPPF para 181

⁷¹ Ibid para 185

⁷² Ibid para 96

⁷³ Ibid para 102

⁷⁴ Ibid para 104

With these modifications, Policies PT14, PT15 and PT16 will meet the basic conditions by having regard to national policy as set out above, being in general conformity with LPP1 Core Policy 8 and SDLP Strategic Policy SD45 in particular and helping to achieve sustainable development.

Council Project 4 on page 55 of the Plan refers to local green spaces, but the Plan does not designate any. This reference should therefore be changed to avoid confusion. In addition, it refers to the National Park rather than the SDNPA.

- **Amend criterion (2) of Policy PT14 to read:**

“Development which would result in the loss of existing areas of formal and informal recreational space such as playing fields, amenity spaces and allotments as listed *below* should *clearly* demonstrate that the facility is surplus to requirements *or that the loss is replaced by* alternative provision *in a suitably accessible location* elsewhere *in* the neighbourhood plan area that is equivalent *or better* in terms of size, quality, and amount of facilities offered or would result in a net improvement in the quality *and type* of facilities available.

- **Include a map of the 16 green spaces relevant to Policy PT14 similar to the one submitted with the Town Council’s response to my questions of clarification but with the title amended to “*Policy PT14 Green Spaces for Protection*”**
- **Change the reference to local green spaces in Council Project 4 on page 55 of the Plan to “*green spaces*”**
- **Remove criterion (3) from Policy PT16 and convert it into a new policy using the information supplied in the response to my questions of clarification**
- **Add the word “*Authority*” after “...South Downs National Park...” in Council Project 4**

Biodiversity

The next three policies relate to biodiversity. The NPPF is clear that policies should contribute to and enhance the natural and local environment by protecting and enhancing sites of biodiversity value in line with their statutory status and minimising impacts on, and providing net gains for, biodiversity.⁷⁵ It supports proposals whose primary objective is to conserve or enhance biodiversity; opportunities to improve biodiversity in and around developments should be integral to scheme design.⁷⁶

SDLP Strategic Policy SD9 sets out a positive strategy for the conservation and enhancement of biodiversity and geodiversity across the hierarchy of designated sites

⁷⁵ NPPF para 180

⁷⁶ Ibid para 186

and aims to achieve a net gain in biodiversity.

SDLP Strategic Policy SD11 conserves and enhances trees, hedgerows and woodlands and encourages new appropriate planting.

Policy PT17: Protection of Biodiversity and Habitats refers to proposals which have a negative impact on biodiversity. It indicates that such proposals should be accompanied by an Ecological Assessment that sets out a clear mitigation strategy as well as ensuring an ecologist will be on site throughout the main construction phases.

I am mindful that the NPPF sets out principles for the determination of planning applications.⁷⁷ This, in summary, states that if significant harm to biodiversity cannot be avoided, adequately mitigated or compensated for as a last resort, permission should be refused. Development resulting in the loss or deterioration of irreplaceable habitats should be refused unless there are wholly exceptional reasons and a suitable compensation strategy is in place.

Policy PT18: Biodiversity Net Gain is a short policy that seeks the incorporation of safe nesting spaces and refers to LDC's Biodiversity Net Gain Technical Advice Note. This is too narrow a focus.

I find that there would be merit in combining Policies PT17 and PT18 into one new policy which has better regard to the NPPF's stance and takes account of the suggestions from the SDNPA and Southern Water which better reflect the current policy position and make the policy more robust. A modification to this effect is duly made.

The last policy in this section is **Policy PT19: Urban Greening**. This encourages development proposals to provide green assets with the maximum practicable coverage, retain mature landscaping and have a planting plan. It encourages major developments to include watering systems. Lastly, it indicates that schemes should have maximum visibility from public realm to capture the associated well-being benefits for the community.

I asked the Town Councils to clarify what was meant by "green assets". Their response is as follows: "Green Assets are anything that helps reduce energy, water or natural resource usage and helps mitigate climate change. This can include physical assets like renewable energy infrastructure (wind farms, solar panels), natural resources (forests, water bodies), and waste recycling plants." This definition should be added to the supporting text and the Plan's glossary in the interests of clarity.

With the modification to combine Policies PT17 and PT18 and the clarification to the phrase "green assets" in Policy PT19, I find all the policies in this section will meet the basic conditions by having regard to national policy, being in general conformity with LPP1 Core Policy 10 and SDLP Strategic Policies SD9, SD11 and SD45 and helping to achieve sustainable development.

⁷⁷ NPPF para 186

There is also a correction to the supporting text to refer to the SDNPA.

- **Combine Policies PT17 and PT18 into a new policy that reads:**

“(1) All development proposals which are likely to affect a protected habitat or species must protect and, where possible, enhance the protected habitats and species. Planning applications must be accompanied by an appropriate and proportionate Ecological Assessment which sets out a clear and deliverable conservation (and enhancement) strategy which, amongst other measures, includes any necessary mitigation measures and ensures that there is a satisfactory level of monitoring by a suitably qualified ecologist to ensure the risk to protected habitats or species is managed effectively. This may include the need for the ecologist to be onsite throughout the main construction phases.

(2) All development must achieve at least 10% biodiversity net gain (BNG) using the appropriate DEFRA metric, and any gain must be secured for at least 30 years, as per the Environment Act 2021 (as amended). In doing so, proposals should be delivered in accordance with the local policies and supplementary guidance adopted by Lewes District Council and the South Downs National Park Authority as appropriate.”

- **Add the following definition of “green assets” referred to in Policy PT19 to the supporting text and the Plan’s glossary “Planning Jargon Explained”:**

“Green Assets are anything that helps reduce energy, water or natural resource usage and helps mitigate climate change. This can include physical assets like renewable energy infrastructure (wind farms, solar panels), natural resources (forests, water bodies), and waste recycling plants.”

- **Add the word “Authority” at the end of the third paragraph on page 57 of the Plan**

Coastal Protection and Flooding

The Plan explains that undefended sections of the cliffs are experiencing coastal erosion of between 0.28 – 0.48m a year. Along the protected parts, less erosion is being experienced but depends on defences being maintained and reinforced.

In addition, some areas of Peacehaven and Telscombe are prone to surface water flood risk.

The Environment Agency has suggested some additions to the supporting text on page 60 of the Plan which I consider are appropriate to include in the interests of clarity.

There also appears to be a typo on page 60.

Policy PT20: Drainage Management has three elements which seek to help to address these issues. Firstly, development proposals should demonstrate how they will provide surface water drainage and sewerage systems. Secondly, proposals should ensure that surface water run-off is managed in line with a drainage hierarchy set out in the policy. Lastly, SuDs are encouraged in all suitable developments.

The NPPF is clear that the planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change.⁷⁸ It continues that plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures.⁷⁹

The encouragement for SuDs is in line with the NPPF which encourages new development to incorporate SuDs where appropriate.⁸⁰

The LPP1 recognises that flood risk and coastal erosion are significant concerns in the District. LPP1 Core Policy 12 seeks to reduce the impact and extent of flooding and damage from slope failure including through the use of SuDs as appropriate.

SDLP Strategic Policy SD17 protects the water environment.

SDLP Strategic Policy SD49 deals with flood risk management and seeks to reduce the National Park's vulnerability to flood risk and the impacts of flooding associated with climate change.

The policy meets the basic conditions by having regard to national policy, being in general conformity with the strategic policies referred to above and by helping to achieve sustainable development. Therefore no modifications to it are recommended.

- **Add at the end of the second paragraph on page 60 of the Plan:**

“It should also be noted that these works are dependent on the economic, environmental and technical viability of the proposals, and the necessary permissions being granted. Any improvements to coastal protection would be subject to the assessment of environmental impact on the Site of Special Scientific Interest and the Marine Conservation Zone and will require consultation with and approval from the relevant organisations.”

- **Change the sentence which reads ““The increase in rainfall and temperatures from climate change is exacerbating the erosion of the cliff top” in the third paragraph on page 60 to read:**

“There are various ways in which climate change could affect the weathering

⁷⁸ NPPF para 157

⁷⁹ Ibid para 158

⁸⁰ Ibid paras 173, 175

and erosion of the cliff top.”

- **Change “non-permeable” to “permeable” in the last paragraph on page 60 of the Plan**

Reaching Net Zero

The NPPF supports the transition to a low carbon future in a changing climate, taking full account of flood risk. The planning system should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.⁸¹ It continues that plans should take a proactive approach.⁸²

Policy PT21: Renewables and Energy Efficiency supports renewable energy, energy efficiency and seeks to promote sustainable development through encouraging development proposals to incorporate a number of measures.

As previously discussed, the wording of the policy is such that it is not seeking to set standards.

Policy PT22: Net Zero encourages developments to install electric vehicle and bike charging points, include car/bike/motorcycle sharing schemes and use low polluter vehicles during construction phases.

Policies PT21 and PT 22 meet the basic conditions as they take the approach of encouraging rather than requiring, have regard to the NPPF, are in general conformity with LPP1 Core Policies 11 and 14 and SDLP Core Policy SD2 and help to achieve sustainable development.

Policy PT23: Air Quality seeks to ensure that development should not adversely affect air quality.

The NPPF seeks to prevent new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of air pollution.⁸³

LPP1 Core Policy 9 seeks to improve air quality including through mitigation measures where necessary.

There are no Air Quality Monitoring Areas in the Plan area.

⁸¹ NPPF para 157

⁸² Ibid para 158

⁸³ Ibid para 180

Policy PT23 meets the basic conditions by having regard to national policy, being in general conformity with relevant strategic policies and by helping to achieve sustainable development.

No modifications to any of the three policies in this section are therefore recommended.

Employment Space

This section contains five policies.

The Plan explains that Peacehaven and Telscombe have small amounts of employment space and so many residents have to commute elsewhere for work. Diversifying the Local Economy, a Report by University of Brighton for the Plan, suggested that tourism, expanding the night time economy and creating flexible workspaces would be beneficial. Given the higher than average number of self-employed people, this latter suggestion could also benefit those people.

As one of the three overarching objectives in the NPPF as part of the achievement of sustainable development, the economic objective seeks to build a strong, responsive and competitive economy by ensuring that sufficient land of the right type is available in the right locations and at the right time.⁸⁴

The NPPF indicates that planning policies should help create the conditions in which businesses can invest, expand and adapt⁸⁵ and proactively encourage sustainable economic growth.⁸⁶

LPP1 Core Policy 4 seeks to encourage economic development and regeneration. A flexible approach to economic development is set out in the policy including the identification of suitable sites for employment space, safeguarding existing employment sites from other uses unless there are demonstrable reasons for not doing so, upgrading existing sites, supporting new office and start up businesses, promoting tourism, promoting home working and live/work units, promoting digital communications and improving skills.

LPP1 Core Policy 5 supports the visitor economy encouraging sustainable tourism.

SDLP Strategic Policy SD23 supports sustainable tourism.

SDLP Strategic Policy SD34 supports the local economy subject to a number of criteria.

⁸⁴ NPPF para 8

⁸⁵ Ibid para 85

⁸⁶ Ibid para 86

SDLP Strategic Policy SD35 safeguards existing employment sites in the National Park as well as setting out employment land provision figures.

Policy PT24: Providing for a Mix of Employment Opportunities supports local skills and skilled employment opportunities within the towns. It offers support for new employment uses including meanwhile uses. Lastly, it offers support for sustainable economic growth on accessible land. This last category includes retail, leisure, culture, tourism and education uses.

Policy PT25: Open Workspace supports the provision of open workspace. The Plan explains this term is used by the South East Creative Economy Network to refer to high quality workspace that allows flexible sharing.

Policy PT26: Tourism supports the provision and enhancement of the existing tourism offer. It refers to the need for new tourist facilities to create a strong sense of place connecting to existing assets.

The three policies above support economic growth, take into account local business needs and the wider opportunities which have been identified as part of the plan making process.

Policy PT27: Local Labour Agreement is a policy that seeks to encourage employment from the local area and seeks a local labour agreement for major developments. It supports education and training opportunities.

Whilst the objectives of the policy are to be welcomed, in my experience, usually such agreements are negotiated through planning obligations or form part of Council Corporate policy. I therefore consider this should be an aspiration rather than a development and use of land policy. Accordingly a modification is made in respect of Policy PT27.

Policy PT28: Digital Infrastructure supports better infrastructure provision. The provision of high quality and reliable communications infrastructure is widely recognised as essential for economic growth and social well-being.⁸⁷ The Plan explains that coverage is poor in the Plan area and this policy will help to remedy that.

With the deletion of Policy PT27, the policies in this section will meet the basic conditions by having regard to national policy, being in general conformity with LPP1 Core Policies 4 and 5 and SDLP Strategic Policies SD23, SD34 and SD35 as relevant and will help to achieve sustainable development by helping to address the local issues identified in the Plan.

- **Delete Policy PT27: Local Labour Agreement from the Plan. This can be converted into a Council Project if desired with suitable rewording to be agreed with the local planning authorities**

⁸⁷ NPPF para 118

Historic Character

The Plan area has a rich history. Telscombe Tye has a Conservation Area, several listed buildings and three scheduled monuments. A further scheduled monument is found elsewhere in the Plan area. The East Sussex Heritage Environment Record shows there have been a number of interesting finds over the years including axe heads and scrapes from the Neolithic and Bronze Age. Large areas of the Plan area fall within Archaeological Priority Notification Areas. There are also a number of heritage assets which are not protected, but valued by the local community for their historic importance.

The NPPF is clear that heritage assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance.⁸⁸ It continues⁸⁹ that great weight should be given to the assets' conservation when considering the impact of development on the significance of the asset.

In relation to achieving well-designed places, the NPPF explains that neighbourhood planning groups can play an important role in identifying the special qualities of each area and explaining how this should be reflected in development, both through neighbourhood plans and engagement with the development industry and local planning authorities.⁹⁰

LPP1 Core Policy 11 seeks to safeguards historic assets.

SDLP Strategic Policy SD12 sets out a strategy for the historic environment.

Policy PT29: Heritage Assessment encourages all planning applications to undertake a proportionate heritage assessment of the site. Where appropriate, a mitigation strategy should be included. This will help to both record and assess the historic assets of the area. As a result, it meets the basic conditions by having regard to the NPPF, being in general conformity with LPP1 Core Policy 11 which seeks to safeguards historic assets and SDLP Strategic Policy SD12 and helping to achieve sustainable development. A future review of the Plan could consider identifying non-designated heritage assets to help conserve these important attributes and character of the area.

Community Facilities

The NPPF states that policies should plan positively for community facilities and other local services and guard against the unnecessary loss of valued facilities and services as part of its drive to promote healthy and safe communities.⁹¹ In relation to more rural

⁸⁸ NPPF para 195

⁸⁹ Ibid para 205

⁹⁰ Ibid para 132

⁹¹ Ibid para 97

areas, the NPPF expects planning policies to enable the retention and development of accessible local services and community facilities.⁹²

LPP1 Core Policy 7 protects, retains and enhances existing community facilities. Resisting the loss of such facilities, the policy sets out three circumstances where such a loss would be acceptable.

There are three policies in this section. **Policy PT30: Community Facilities** supports the provision of new facilities encouraging all major applications to contribute to such provision. In particular new provision is encouraged close to the Meridian Centre where public transport is available. Outside the district centre, new facilities should provide an appropriate level and type of parking, including dementia friendly parking to help social inclusion and promote accessibility. Facilities should be provided at an early stage of development to assist with social cohesion.

Policy PT31: Loss of Community Facilities guards against the loss or change of use of community facilities. The policy only supports such a scenario where alternative provision is made or already exists in an accessible location and where it can be demonstrated that the facility is no longer economically viable for a community use.

I asked a question of clarification about this policy. There is a list of community facilities to be safeguarded on page 71 of the Plan, but it was not fully clear to me whether Policy PT31 applied only to those named facilities or applied more generally.

In response the Town Council has indicated they should be named in the policy and has provided a helpful map to show the location of the facilities. Revised wording for the policy reflecting its more specific focus has been provided.

Modifications are therefore made to ensure that the policy is clear and robust in its purpose. I have also added to the list to reflect the named facilities provided to me on the map as part of the response to the questions of clarification (the facility that has been added is the Scout Hut, Longridge Avenue) and cross referenced the map to the policy.

With the modifications to Policy PT31, both Policies PT30 and PT31 will meet the basic conditions by having regard to national policy and guidance, being in general conformity with LPP1 Core Policy 7 in particular and helping to achieve sustainable development.

▪ **Revise Policy PT31 to read:**

“ Proposals that include the loss or change of the following community facilities; Peacehaven Library, Tyedean Hall, Telscombe Village Hall, The Scouts Hut in Arundel Road, the Scouts Hut in Longridge Avenue, East Brighton Masonic Centre (Seaview Road), Community House, Telscombe Civic Centre, Community Centre for Peace and Mosque, Kempton House Day Centre, The Joff

⁹² NPPF para 88

Youth Centre, Central Avenue & Longridge Avenue Post Offices and shown on Map XX will only be supported where:

- (1) adequate alternative provision exists or will be provided in an equally accessible or more accessible location within 800 metres walking distance; and**
 - (2) all reasonable efforts have been made to preserve the facility, but it has been *satisfactorily* demonstrated that it would not be economically viable, feasible or practicable to retain the facility or provide any other type of community service within the site/building.”**
- Inset the map titled “Protection of Community Facilities” submitted as part of the response to the questions of clarification into the Plan at an appropriate location to sit alongside Policy PT31**

Policy PT32: Statement of Community Involvement encourages applicants of major developments or proposals involving community uses to engage with the Town Councils at an early stage by submitting a statement of community involvement as part of the planning application.

There is no doubt that such engagement can have a number of benefits including on the quality of prospective developments. Working collaboratively and openly, including with local communities, is recognised in the NPPF which refers to effective engagement between applicants, communities, local authorities and others throughout the planning process including at pre-application stage and in the pursuit of achieving well-designed and beautiful places.⁹³

It even goes as far as indicating that applications which can demonstrate early, proactive and effective engagement with the community should be looked on more favourably than those that cannot⁹⁴ and in PPG.⁹⁵ However, this is not mandatory except in the case of certain wind turbine developments.⁹⁶

However, it is not a development and use of land matter. Therefore whilst the sentiment of Policy PT32 is strongly supported and I encourage developers and others to adhere to it, I have no option but to recommend it is deleted as a policy, but it can be retained as a community action if desired.

- Delete Policy PT32 and turn it into a Council Project if desired with suitable wording to be agreed with the local planning authorities**

⁹³ NPPF paras 16, 39, 131, 137

⁹⁴ Ibid

⁹⁵ PPG para 001 ref id 20-001-20190315

⁹⁶ Ibid para 010 ref id 20-010-20150326

Advertisements

There are two policies in this section dealing with advertisements. The Plan explains there is a wide range of commercial premises and the quality of signage varies greatly. The Plan rightly recognises that poorly sited and designed advertisements affects the visual appearance and appeal of the Plan area.

This is reflected in the NPPF which states that the quality and character of places can suffer when advertisements are poorly sited and designed.⁹⁷ It explains that there is a separate consent process within the planning system which controls the display of advertisements.⁹⁸ Advertisements are subject to control only in the interests of amenity and public safety, taking account of cumulative impacts.

Policy PT33: Shutters resists the use of external roller shutter or removable grills unless they are concealed or incorporated into the fabric of the building.

Policy PT34: Signage sets out four criteria which seek to ensure that signage and associated illumination is proportionate and appropriate to the host building.

Both policies meet the basic conditions by having regard to the NPPF, being in general conformity with LPP1 and the SDLP and helping to achieve sustainable development. They will particularly help with the enhancement of public realm in the area. Therefore no modifications to either policy are recommended.

Section 4 Shaping Growth

The Plan recognises that there are opportunities in the area for growth. It advocates a master planning approach which is landscape-led given the landscape characteristics of the area including the National Park and the coast. This also mirrors the approach taken by the SDLP.

The first policy in this section relates to masterplanning. **Policy PT35: Masterplanning** sets out seven criteria for masterplans to include. All the criteria are appropriate given the aims of the Plan and the characteristics of the area.

The second policy is **Policy PT36: Design and Placemaking Principles**. This policy advocates a place making approach to new major development. Setting out four detailed principles for such development to adhere to, it puts people at the centre of growth strategies. The principles encompass accessibility and legibility, the efficient use of land that encourages community cohesion, future proofing both in terms of the environment and the economy and measuring success.

⁹⁷ NPPF para 141

⁹⁸ Ibid

Policy PT36 is interesting, well written and unusual in that it includes a mechanism for measuring targets such as modal change, biodiversity net gain and well-being.

Both policies to me illustrate the importance of taking a comprehensive and coherent approach which is based on a clear vision for the area. Both policies meet the basic conditions by having regard to the NPPF in the round, being in general conformity with LPP1 Core Policy 11 and SDLP Strategic Policy SD5 in particular and helping to achieve sustainable development.

Section 5 A Centre for Peacehaven

The three policies in this section are all aimed at the town centre in Peacehaven. The Meridian Centre is a district centre which is purpose-built and housed a supermarket, library, post office, town council offices, nursery and around a dozen smaller units. Some of the units are vacant.

The Plan's ambition for the district centre is that it will become the heart of the Plan area economically and culturally and bring people together with associated public realm enhancement alongside greater connectivity.

The Plan identifies a number of town centre weaknesses including limited active frontages, poor connectivity, lack of vibrancy and different land uses. The redevelopment of the area presents a number of opportunities to create a much improved place.

The Plan refers to a town centre masterplan and this is the Peacehaven Town Centre Masterplan dated October 2020 prepared by AECOM.

LPP1 Core Policy 6 supports development that reinforces or enhances the identified role of the centre in the retail hierarchy. The Meridian Centre is identified as a District Centre in LPP1. Within the District Centres, retail is to be retained alongside a range of supporting uses with offices supported in more peripheral areas of the town centres where they support the wider function, vitality and viability of the town centre.

Saved LP Policy PT9 supports town centre uses subject to improved accessibility, no overall loss of parking capacity or adverse effect on the car park's landscaping and the integration of new uses.

Policy PT37: Peacehaven Centre aims to encapsulate the many opportunities identified in the Masterplan into a policy.

A number of representations indicate this policy has now been overtaken by events including a permission for Morrisons and mixed-use scheme. I asked for an update of the context for this policy. In response I am informed by the Town Council that the Meridian Centre was built in the 1980s specifically for the Co-op. The Centre had

become outdated and was in need of substantial repair. The Co-op began consultations on the redevelopment of the site around the same time as the masterplanning exercise. In 2022 the site was sold to Morrisons and a planning application was submitted for a larger store on the site with units for smaller partner stores and food outlets in 2023. The planning application was approved by LDC, but no development has yet commenced.

Given that development has not commenced on the site, in my view the inclusion of Policy PT37 in the Plan remains valid in case other schemes are put forward.

It would be helpful to include a map of the relevant area. One has helpfully been provided as part of the response to my questions of clarification and a modification is made to insert this in to the Plan and reference it within the policy itself.

The policy has eight criteria all aimed at supporting high quality mixed use development in this area. However, there is not direct reference to the Masterplan which is a comprehensive document that has been based on community consultation and which sets out a series of design principles. A modification is made to the policy so that regard is given to the Masterplan in the interests of clarity and completeness.

A representation from the Environment Agency points out there is a historic landfill site on and adjacent to the Centre boundary. The Town Council has suggested a further criterion be added to the policy and I consider this is needed in the interests of clarity about the site.

Policy PT38: Community Facilities in Peacehaven Centre supports new or improved community, health and cultural facilities. It seeks development which is accessible and inclusive and which takes a holistic approach.

Policy PT39: Market Place and Outdoor Events supports a sheltered outdoor market place and outdoor events which enhance the tourism offer.

The three policies in this section are all aimed at achieving high quality development in this central area.

The NPPF is clear that town centres play an important role at the heart of local communities.⁹⁹ It sets out a positive approach to their growth, management and adaption.¹⁰⁰ It indicates that a range of uses should be encouraged and markets should be supported.¹⁰¹ As well as the enhancement of this central area, the policies aim to enhance public realm, the offer and attractiveness to locals and visitors alike and to provide the type of accommodation needed.

⁹⁹ NPPF para 90

¹⁰⁰ Ibid

¹⁰¹ Ibid

With the modifications to Policy PT37, all three policies meet the basic conditions as they have regard to national policy, are in general conformity with LPP1 Core Policy 6 in particular and will help to achieve sustainable development.

- **Insert the “Centre of Peacehaven masterplan area October 2020” sent to me as part of the response to my questions of clarification on page 83 of the Plan**

- **Amend the first sentence of Policy PT37 to:**

“Development in the centre of Peacehaven (area defined in the masterplan document and shown on Figure XX) should have regard to the design principles and guidelines in the Peacehaven town centre Masterplan and are particularly encouraged to achieve all of the following criteria:”

- **Add a new criterion to Policy PT37 that reads”**

“Will undertake any necessary investigations to ensure that development will not adversely affect the water environment due to potential contamination from historic landfill.”

Section 6 Neighbourhood Community Infrastructure Levy

The Community Infrastructure Levy (CIL) is a charge which can be levied by local planning authorities on new development in their area. It is an important tool for local authorities to use to help them deliver the infrastructure needed to support development in their area.

This section of the Plan refers to CIL explaining that 25% of CIL receipts go to the Town Councils when the Plan is made. A number of [Town Councils] Council Projects have been identified throughout the Plan and it is anticipated that the receipts from CIL will enable some of these, and other projects, to be realised.

LDC has also requested an amendment to the title of this section and in the interests of clarity, a modification is recommended.

A correction is made to the text to refer to the SDNPA.

- **Delete the word “Neighbourhood” from the title of this section**
- **Add the word “Authority” after the “...South Downs National Park...” in the second paragraph on page 86 of the Plan**

Final Comment

It is refreshing to see this final comment section recognises the dynamic nature of the plan-making process. This section indicates that regular reviews and monitoring of the Plan's effectiveness will take place. In addition engagement with the local community, other partners and developers is paramount.

Whilst monitoring of neighbourhood plans is not, as yet, mandatory, I consider this to be an exemplary approach which I commend to others.

Planning Jargon Explained

There is a useful glossary. There is one definition which should be amended to reflect the definition in the NPPF's glossary.

- **Amend the definition of previously developed land on page 90 of the Plan to**

“Land which is or was occupied by a permanent structure *including the curtilage of the developed land, but excluding land in built-up areas such as residential gardens, parks, recreation grounds and allotments.*”

7.0 Conclusions and recommendations

I am satisfied that the Peacehaven and Telscombe Neighbourhood Development Plan, subject to the modifications I have recommended, meets the basic conditions and the other statutory requirements outlined earlier in this report.

I am therefore pleased to recommend to Lewes District Council and the South Downs National Park Authority that, subject to the modifications proposed in this report, the Peacehaven and Telscombe Neighbourhood Development Plan can proceed to a referendum.

Following on from that, I am required to consider whether the referendum area should be extended beyond the Neighbourhood Plan area. I see no reason to alter or extend the Plan area for the purpose of holding a referendum and no representations have been made that would lead me to reach a different conclusion.

I therefore consider that the Peacehaven and Telscombe Neighbourhood Development Plan should proceed to a referendum based on the Peacehaven and Telscombe Neighbourhood Plan area as approved by Lewes District Council and the South Downs National Park Authority on 17 June 2013.

Appendix 1 List of key documents specific to this examination

The Peacehaven and Telscombe Neighbourhood Plan

Basic Conditions Statement (Submission Version) June 2023

Strategic Environmental Assessment Screening Opinion December 2018 (LDC)

Strategic Environmental Assessment Environmental Report September 2022 (AECOM)

Habitats Regulation Assessment May 2025 (AECOM)

Consultation Statement including Appendix A Exhibition Boards April 2018, Appendix B Survey Summary 2018, Appendix C Business Survey February 2020, Appendix D Junior Survey February 2021 and Appendix E Regulation 14 Responses and Commentary

Design Code Final Report April 2021 (AECOM)

Housing Needs Assessment December 2021 (AECOM)

Site Options and Assessment November 2019 (AECOM)

Peacehaven Town Centre Masterplan Final October 2020 (AECOM)

Saved policies of the Lewes District Local Plan 2003 adopted in March 2003

Lewes District Local Plan Part 1 Joint Core Strategy 2010 – 2030 adopted May 2016

Lewes District Local Plan Part 2 Site Allocations and Development Management Policies February 2020

South Downs Local Plan 2014 – 2033 adopted July 2019

Guidance on Parking for Residential and Non-Residential Development Supplementary Planning Document April 2021 (SDNPA)

List Ends

Appendix 2 Questions of clarification and note of interim findings from the examiner

Peacehaven and Telscombe Neighbourhood Plan Examination Questions of Clarification and Note of Interim Findings from the Examiner to the Town Councils and local planning authority.

Having completed my initial assessment of the Neighbourhood Plan (the Plan), I am writing to set out some interim findings which will necessitate a decision from the Town Councils and LPA as to how best to proceed.

I also set out some questions of clarification which either relate to matters of fact or are areas in which I seek clarification or further information.

I would be grateful if all Councils (as appropriate) could kindly assist me as appropriate. Please do not send or direct me to evidence that is not already publicly available at this stage.

Interim Findings

A Strategic Environment Assessment and Habitats Regulations Assessment

One of the basic conditions the Plan must meet in order for it to be put to a referendum is that the making of the Plan does not breach, and is otherwise compatible with, retained European Union (EU) obligations.

Planning Practice Guidance (PPG) advises us that in some limited circumstances, where a Plan is likely to have significant environmental effects, it may require a Strategic Environment Assessment (SEA).

In relation to Habitats Regulations Assessment, a prescribed basic condition was introduced in 2018 in addition to those set out in primary legislation. This provides that the making of the plan does not breach the requirements of Chapter 8 of Part 6 of the Habitats Regulations, including consideration of the effect on habitats sites. A screening process is undertaken to see whether a plan is likely to have a significant effect on habitats sites, either alone or in combination with other plans and projects. This initial assessment has to be done on the basis of objective information. If significant effects cannot be ruled out, then an appropriate assessment under the Habitats Regulations is carried out.

Usually if the plan is determined to require appropriate assessment, then a SEA is also needed.

In this case, a SEA Screening Opinion dated December 2018 has been prepared by Lewes District Council. This concluded that likely significant environmental effects could not be ruled out. A SEA Environmental Report was duly prepared.

In relation to Habitats Regulation Assessment (HRA), the Basic Conditions Statement states that the nearest European sites are the Lewes Downs Special Area of Conservation (SAC) and the Castle Hill SAC. Given the 7km distance from these sites, it is not expected that direct impacts will arise. The Basic Conditions Statement indicates the only site scoped in by the HRA prepared for the Core Strategy is Ashdown Forest Special Protection Area and SAC. This site is some 30km away from the Plan area.

The only information available to me on HRA are these short statements in the Basic Conditions Statement. Given the SEA Screening Opinion's conclusions and the preparation of an Environmental Report and the lack of specific response from the statutory bodies in relation to

HRA, it makes it difficult to conclude, on the basis of the information I have at the moment, that the Plan meets the basic conditions in respect of retained European Union obligations and the prescribed basic conditions. In particular, there is insufficient information in respect of HRA and it is not clear whether the statutory bodies have been consulted in respect of both SEA and HRA.

I therefore ask that further clarification is given to me on these points. Once I have your thoughts on these matters, we can determine whether any further work is needed.

If further work is needed on HRA, once this work had been concluded, this would usually result in the need for a further period of consultation, firstly with the statutory consultees and then secondly with the public and other consultees for a period of six weeks.

I understand this will be worrying news to those involved in the production of the Plan, but please let me your thoughts and we can determine a way forward together.

B Questions of Clarification

During the course of an examination, it is not unusual for me to have a number of questions of clarification. I set out these below.

1. Could a brief explanation be given both by the Town Council and LDC as to why a second period of Regulation 16 consultation was held please? Did the nature of the Plan change significantly? Was consideration given to the need to hold a further pre-submission period of consultation?
2. Please would LDC confirm that the strategic policies are to be found in Local Plan Part 1 and named as such i.e. no other policies or those in Local Plan Part 2 are regarded as strategic in nature.
3. Please could LDC provide copies of any relevant saved development plan policies.
4. Please confirm the status of the "Provisional Improved Routemap" on pages 50 and 51 of the Plan as I do not think it is not referred to in any policy or Council Project. What policy or Council Project does it relate to? Should some supporting text be included to set out the context and intention for the Routemap? If so, please provide some suggested text.
5. I invite the qualifying body to comment on the comments from East Sussex County Council on the 20 minute walking radius shown on the Routemap.
6. With regard to Policy PT14 (Protection of Green Spaces within the Neighbourhood) is it only the 16 listed spaces on page 53 of the Plan which are intended to be covered by criterion (2) of the policy? If so, please provide a map which shows the location of each of the green spaces.
7. With regard to criterion (3) of Policy PT16 (Enhancement of Formal Sports Areas and Children's Equipped Play Spaces) please confirm whether the support for Site Ref PTNP5 is an allocation or what status does this have? Should this be a separate policy? Is the reference to AECOM's site options assessment relevant? Please provide some supporting text setting out the context, background and proposal for this site. Please provide a map/plan of the relevant area for inclusion in the Plan. Please confirm that the owner of the site has been approached and is agreeable (or not) to this proposal.

8. Green assets are referred to in Policy PT19 (Urban Greening). Please provide a definition of green assets for inclusion in the glossary.
9. A list of community facilities to be safeguarded is to be found on page 71 of the Plan. Policy PT31 protects against their loss. Should the policy specifically refer to these facilities? Should the facilities be shown on a map? Or is Policy PT31 intended to apply more generally?
10. Please provide a copy of the town centre masterplan referred to on page 83 of the Plan and in Policy PT37. Does the masterplan include a map of the area concerned and if not, please could a map be provided (at a bigger scale than the one on page 81)?
11. A number of representations indicate this policy has now been overtaken by events including a permission for Morrisons and mixed use scheme (?) If development has not commenced, the policy could be retained and apply generally to development in the centre, but I would like to understand the masterplan and context for the policy. Please provide me with any update.
12. I invite comments on the Environment Agency's comment on a centre for Peacehaven and the historic landfill site and the water environment. Should any additional text be included and if so, please provide the form of words.

Conclusions and Way Forward

To summarise, based on the information before me, I regret to say that, at the present time, I do not consider that the submitted information on HRA is sufficient. I will however await your thoughts on this matter before I reach a firm conclusion on this issue.

I understand that this will be unwelcome news to those involved in the production of the Plan. However, there are many other aspects of this Plan which are to be complimented.

I am also not seeking, and will not accept, any representations from other parties regarding any of the matters covered in this Note at this stage.

This Note will be a matter of public record and your answers will also be in the public domain. Both my questions and your responses should be placed on the relevant websites at earliest convenience.

It may be the case that, on receipt of your anticipated assistance on these matters, that I may need to ask for further clarification or that further queries will occur as the examination progresses. These queries are raised without prejudice to the outcome of the examination.

Please remember to only send me information that is already within the public domain.

Thank you very much for your help on these matters.

Ann Skippers
Independent Examiner
17 July 2024



Committee:	Full Council	Agenda Item:	C1492
Meeting date:	February 12 2026	Authors:	Chair and Vice Chair of Planning
Subject:	Peacehaven and Telscombe Neighbourhood Plan		
Purpose:	To agree		

Recommendation(s):

That Peacehaven Town Council set to work immediately to prepare amendments to the Peacehaven and Telscombe Neighbourhood Plan.

1. Background

The Peacehaven and Telscombe Neighbourhood Plan has been many years in the making. The last occasion that Peacehaven Town Council had an opportunity to examine its contents policy-by-policy and chapter-by-chapter was many years ago. Much hard work has been put into it, notably by the Chair of the Steering Group: the Chair and Vice Chair of PTC Planning Committee pay tribute to this and take the view that final version is in many respects an improvement on the printed draft agreed by PTC about five years ago. However, the version that will be voted on in a Referendum in May is now very out-of-date and many of the policies in it are not appropriate for Peacehaven today.

The Neighbourhood Plan covers the areas of both Peacehaven Town Council and Telscombe Town Council (which includes East Saltdean). Standing orders agreed before 2023 by the previous PTC and difficult to change gave control of the final version of the Neighbourhood Plan to a Steering Group. We pay tribute to their hard work. But so far as we know, changes made by the Peacehaven and Telscombe Neighbourhood Plan Steering Group were not individually discussed with Peacehaven Town Council and, since 2023, Peacehaven Town Council has not been offered an opportunity to discuss or debate individual policies or text.

Once adopted in a referendum of local residents, now expected in May 2026, the Neighbourhood Plan will take precedence over the current Lewes District Local Plan for non-strategic decisions on planning applications.

The arrangements for Neighbourhood Planning that central government has recently put in place have cut back financial support for town councils, notably for the cost of the referendum that could be necessary to amend the Peacehaven and Telscombe Neighbourhood Plan. However, a referendum to make changes could be held at little or no cost to Peacehaven Town Council to coincide with another election. The next such occasion will occur in May 2027. Many changes can be made without referendum.

The Neighbourhood Plan will be an important indicator of the needs of Peacehaven and the views of its residents to be taken into account by all superior strategic authorities, whether those are Lewes District Council (LDC, as at present), East Sussex County Council (or the new ESCC unitary Authority), the proposed new Brighton and Hove unitary authority, and the new Mayor of Sussex – all these to take office in May 2028 when LDC will cease to exist.

We believe that the necessary amendments are not many and no further research expenditure is needed. However, the matter is urgent because national legislation lays down procedures and co-ordination with Telscombe Town

Council will necessary, even though the amendments that we believe are essential for the welfare of Peacehaven residents will not significantly affect Telscombe or East Saltdean.

2. Options for Council

To agree to prepare Amendments to the Neighbourhood Plan

Not to agree to prepare such Amendments

3. Reason for recommendation

To reflect the needs and wishes of Peacehaven residents

4. Expected benefits

Improved decision-making in Planning Application Decisions and other decisions by Strategic Authorities (including the Mayor to be elected in 2028). A Neighbourhood Plan that better reflects the needs of Peacehaven and the wishes of its residents

5. Implications

5.1 Legal	Neighbourhood Plan will take precedence over LDC current local Plan
5.2 Risks	Planning Application decisions opposed by residents and Policies will be out-of-date
5.3 Financial	To be established
5.4 Time scales	Three months to prepare proposed amendments
5.5 Stakeholders & Social Value	Improved resident input and bringing plan up-to-date
5.6 Contracts	n/a
5.7 Climate & Sustainability	Update
5.8 Crime & Disorder	Update
5.9 Health & Safety	Update
5.10 Biodiversity	Update
5.11 Privacy Impact	n/a
5.12 Equality & Diversity	Update

6. Values & priorities alignment

Which of the Core Values does the recommendation demonstrate?	
6.1 Empowering and supporting the community	X
6.2 Growing the economy sustainably	X
6.3 Helping children and young people	X
6.4 Improving the quality of life for residents and visitors to Peacehaven	X
6.5 Supporting residents in need	X
6.6 Valuing the environment	X

6.7 Which business plan item(s) does the recommendation relate to? All
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7. Appendices