

Peacehaven and Telscombe Neighbourhood Plan

Pre-Submission (Regulation 14) Consultation Statement

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Introduction

This consultation statement, required by the Neighbourhood Plan regulations, sets out the main issues and ideas raised by residents and stakeholders over the period 2018 to 2022. It also includes a detailed analysis of submissions to the consultation on the Pre-Submission Neighbourhood Plan carried out between 1st February and midnight on 14th March 2022.

The Locality Roadmap (guidance on Neighbourhood Plans) suggests the following approach to consulting the community (residents) and stakeholders (groups, businesses or organisations with a stake in the area):

- Details of people and organisations consulted about the proposed neighbourhood plan;
- Details of how they were consulted;
- A summary of the main issues and concerns raised through the consultation process;
- Descriptions of how these issues and concerns were considered and addressed in the proposed neighbourhood plan.

In line with this guidance, the responses which are listed in full in the Appendix are summarised here. Some issues such as those in relation to the A259, housing numbers and community infrastructure were raised frequently. A summary of these Frequently Asked Questions (FAQs) and how the PTNP has responded to them are also listed towards the end of this report. A few issues raised, particularly by residents, while legitimate are outside the scope of the PTNP to address. These are also addressed in the FAQs. All the responses to the Pre-Submission PTNP Consultation are included in their entirety in Appendix E but have also been summarised towards the end of this report.

The Submission PTNP has been altered as a result of these submissions and will be brought formally to the two town councils in the summer of 2022 – Peacehaven Town Council on 2nd August and Telscombe Town Council on 15th September. Following the agreement of the two town councils, acting jointly as the qualifying body, the PTNP will then be submitted to Lewes District Council for the Submission or Regulation 16 Consultation to take place in the autumn of 2022. Accompanying documents will include:

- This Consultation Statement
- A Basic Conditions Statement or Report setting out how the PTNP complies with neighbourhood planning regulations.
- The Strategic Environmental Assessment – Environment Report – which has also been updated to reflect the changes in the PTNP
- The Design Codes

Other supporting evidence documents will remain on the PTNP Steering Group website including:

- Housing Needs Assessment
- Masterplan and Masterplan Consultation Statement
- Reports produced by post-graduate students at the University of Brighton on behalf of the PTNP steering group

Timeline

The PTNP process started in late 2017. Delays have resulted from changes in national and local plans and the pandemic. To follow is a timeline that sets out the key steps in developing the PTNP.








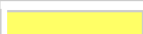




2017	2018	2019	2020	2021	2022	2023
Steering group formed Consultants appointed	First conversations events and drop ins		Business Event and Survey	Masterplan consultation Design Codes	PSNP consultation SNP consultation (Autumn)	Examination Referendum

First Conversation April 2018

With the help of Planning Consultants Homer O’Neil, an event was held on 3rd April at Peacehaven Community House where a SWOT analysis (strengths, weaknesses, opportunities, threats) was carried out. A survey was developed and promoted at a series of consultation drop-in events were held between April 7th and April 21st at the Saltdean Lido Community Hall, the Community House and Telscombe Civic Centre (see Appendix A Exhibition Boards). The results of that survey which can be found in Appendix B Survey Summary 2018 were the foundation for developing the plan. The first question that was asked was:

- Which of the future visions set out would you most like the Neighbourhood Plan to follow.
Future 1. A shorter term plan of 10 -15 years concentrating on locating new housing (255 units) to meet the Government Targets set for the area? **Future 2. A middle term plan 15 - 20 years looking at locating new housing and redefining the Meridian Centre and South Coast road business area.** Future 3. A longer term plan 2030 years looking at creating a new town centre which would cater for Peacehaven, Telscombe and East Saltdean and provide new housing, new business space, new leisure facilities etc.

- Future 2 had the highest level of support (in bold) with 42% (82 responses) followed by Future 3 with 30.5% (59 responses).
- Question 2 asked about residents' worries about future development with 'Increased traffic' ranked highest at 15.3% (155 respondents), followed by 'oversubscribed medical facilities' 14.9% (151 respondents) and 'overstretched amenities' by 12.6% (128 respondents). These have consistently been the highest ranked concerns over the course of the continuing consultation and again in 2022 in response to the Pre-Submission Neighbourhood Plan.

2. What worries you about further development in the area? (You can tick more than one)					Response Percent	Response Total		
1	A weaker sense of community.				4.3%	44		
2	Air Quality				6.1%	62		
3	Increase in crime and anti-social behaviour				11.2%	113		
4	Increased traffic				15.3%	155		
5	Lack of adequate parking				6.6%	67		
6	Lack of school places				8.6%	87		
7	Loss of countryside/open space				10.1%	102		
8	Overstretched Local Amenities				12.6%	128		
9	Oversubscribed Medical Facilities				14.9%	151		
10	Undermine local business				2.6%	27		
11	Unsafe pedestrian routes				3.9%	40		
12	Insufficient Sports and Leisure Facilities				3.1%	32		
Analysis	Mean:	43.48	Std. Deviation:	97.17	Satisfaction Rate:	333.33	answered	174
	Variance:	9442.71	Std. Error:	18.7			skipped	19

- Question 3, asked about the type of housing most needed, with 'low cost housing' prioritised by 14.2% (69 respondents) followed by 2-3 bed house by 13.8% (67 respondents). This is addressed in the housing chapter and policies
- Question 4 showed that people didn't support taller buildings (4-8 storeys) at the Meridian Centre which was borne out in the consultation on the Masterplan that happened in 2021.
- Question 5 for employment showed greatest support at 30% for 'shops and retail' with 'market stalls' next at 14.3% and 'starter units' at 14%. These are all reflected in the PSNP. Question 6 asked about allocating land for the 'visitor economy' and was well supported by 70% (126 respondents). Question 7 related to retail along the A259 with 75.2% of respondents supporting more retail and question 8 referring to increased retail on Longridge Avenue with 62% respondents supporting extending the area to provide more shops for East Saltdean.
- Question 9 related to the environment with 14.8% supporting more land for walking routes, 13.7% each for parks and green corridors, bridleways 12.1%, cliff tops 11.9% and cycling networks 9.9%.
- Question 10 related to heritage assets with the following being proposed for conservation:
- Dew Drop Inn, Central Club, Peacehaven Pillars, Telscombe Village, Bells Club, Meridian Monument, Chatsworth Park, Peacehaven Oval, The Big Park, Telscombe Tye, The Dell, Telscombe Playing Fields Under Park Cliff Walk, Peace /Howard Park, Pinnorr Bungalow, War

Memorial, Shepherd's Cottage, Saxon Church (St. Laurence), Gracie Fields House, Coast Guard Cottages. Again these are reflected in the list of Local Green Spaces and Local Heritage Assets proposed for protection in the PSNP.

Steering group

Following the First Conversations, a steering group was formed that then met during the remainder of 2018 and 2019 to gather evidence and support for the Neighbourhood Plan. These minutes of these meetings can be found on the Steering Group's website: <https://www.peacehaven-and-telscombe-neighbourhood-plan-steering-group.co.uk/>:

- December 2017 – first steering group meeting different futures discussed
- January 2018 – discussions with MP and Neighbourhood Planning Officer at LDC
- February 2018 – First Conversations launch event and drop-ins in April proposed
- March 2018 – 1000 leaflets printed and 2040 visioning
- June 2018 – initial results of survey
- August 2018 – discussions and visioning on Meridian Centre, walking and cycling routes and call for sites (for 255 homes proposed by LDC)
- September 2018 – reports on work with local businesses, Environment Group and meeting proposed by the Co-op
- October 2018 – updates on call for sites, meeting with Co-op and LDC's Strategic Housing and Economic Land Allocations Assessment (SHELAA)
- November 2018 – reports on business involvement, Strategic Environmental Assessment, Meridian Centre and Call for Sites.
- December 2018 – reports on St Aubyns development in Rottingdean, site assessments and the Tye
- January 2019 – Locality grant of £9000 confirmed and freelance support agreed
- August 2019 – updates on AECOM Site Assessments, Community Energy Scheme and freelance support.
- April 2020 – updates on Co-op plans, social media and website, withdrawal of St Modwens Valley Road Proposal, Masterplanning and Design Guidance, Reports and Policy Recommendations by the University of Brighton.
- July 2020 – appointment of planning consultant
- February 2020 – update on Masterplan consultation, Character Assessment and Design Guidance, Housing Needs Assessment, Strategic Environmental Assessment Scoping Report, plan writing.

Business Survey February 2020

It had proven challenging to engage with the business community in the neighbourhood plan area. A business networking meeting was held in January 2020 and followed up with a survey of local businesses. Key issues for a minority of businesses included:

- Poor transport connections
- Small premises
- Poor ICT connections or services
- Premises in need of improvement / refurbishment

Asked what would improve their business environment businesses listed:

- More banks / financial services
- Meeting spaces
- Better parking

Key markets included:

- Local (within 10 miles)
- EU
- East Sussex
- Lewes District

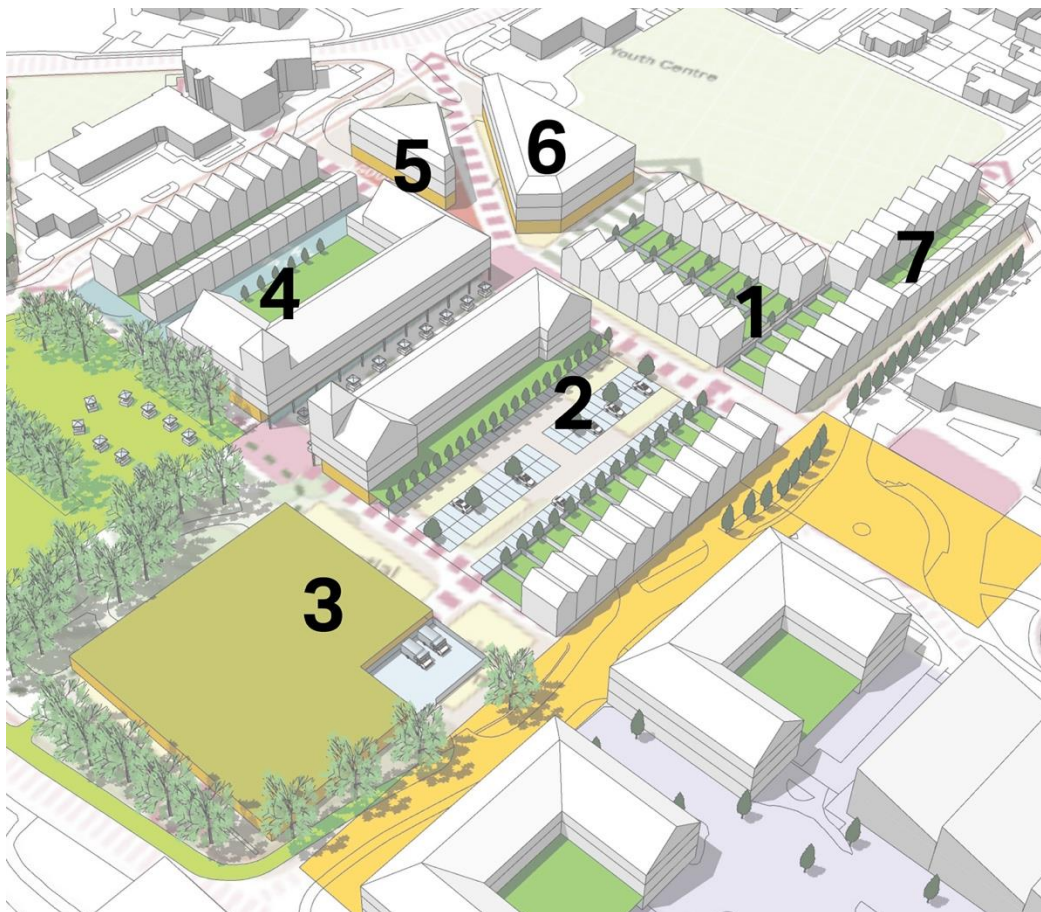
The full report can be found in Appendix C Business Survey

Masterplan development and consultation winter 2020-21

Over the winter of 2020-21 residents of Peacehaven and Telscombe (including East Saltdean) were asked their views on a Masterplan for the redevelopment of the Centre of Peacehaven including the Meridian Centre. The Masterplan was drawn up by an Urban Design Team from international civil engineering and planning consultants AECOM working closely with the PTNP Steering Group.

To develop the Masterplan, a project initiation meeting, walkabout and then a visioning and design workshop were held with the PTNP Steering Group over the summer of 2020. A 1st draft Masterplan was drawn up in the autumn of 2020, reviewed by the Steering Group and a draft Masterplan with a preferred option was then shared with residents.

A summary leaflet was designed including the preferred option and delivered to every house in Peacehaven and Telscombe. There were 844 responses – 223 on paper and 621 online– which generated 2327 separate piece of data to be analysed.



No. of building	Commerical		Communtiy	Residential- Flats		Residential- House	
	Floor area (sqmt)	No. of units	Floor area (sqmt)	Floor area (sqmt)	No. of units	Floor area (sqmt)	No. on units
1	0	0	0	0	0	2530.00	23
2	766.85	12	0	1886.50	34	1310.00	12
3	2485.12	1	0	0	0	0	0
4	766.85	12	0	1886.50	34	1200.00	11
5	0	0	1007.78	0	0	0	0
6	0	0	3031.11	0	0	0	0
7	0	0	0	0	0	670.00	9
Total	4018.82	25	4038.89	3773.00	68	5710.00	55

While the majority of respondents agreed with the proposed new pedestrian streets and squares for the new centre, a majority also disagreed with the Masterplan overall. From an analysis of the comments made in response to the question “What other comments would you like to make ... about the Masterplan” it appeared that:

- 204 respondents were concerned over the impact on roads and traffic, particularly the A259;
- 167 were opposed to more housing particularly its impact on infrastructure;
- 156 wanted more retail particularly smaller shops;
- 136 were concerned about the impact on GPs and Dentists;
- 126 respondents wrote about the proposals to reduce the size of the current Co-op supermarket and of these 39 wanted to retain a large (or larger supermarket) for the weekly shop and 87 wanted a new provider or competition for the Co-op;
- 77 respondents wanted the community centre library retained or enhanced;
- 62 respondents wanted to see a greater hospitality offer including cafes and restaurants.

There is a fuller analysis of the responses on pages 16-25 of the Masterplan Consultation Statement report which can be found the PTNP Steering Group website. The Masterplan Consultation was an important milestone in the development of the Neighbourhood Plan.

Junior (young people survey) February 2021

It had also proven difficult to engage young people, particularly through the other consultation events and activities, and so a survey just for young people was devised and prompted with Peacehaven Community College. New sports areas identified were overwhelmingly a new swimming pool, followed by ten pin bowling. New play items for play parks were (top 3):

1. Slides
2. Zip wire
3. Climbing wall

Young people generally hung out (top 3):

1. Home
2. School
3. Meridian Centre

Words used to describe Peacehaven and Telscombe were (top 4):

1. Peaceful
2. Quiet
3. Dull
4. Boring

When asked if they planned to stay in the area as adults, the majority were unsure, while roughly equal numbers were positive and negative. The full report can be found in Appendix D Junior Survey.

Newsletters

Newsletters or updates have been published from time to time to keep residents and groups updated on the progress of the plan.

- April 2021 – to update residents on the consultation on the Masterplan and provide a layperson’s guide to the Neighbourhood Plan.
- June 2021 – a layperson’s guide to the public realm, how Design Codes could be used to improve the appearance of the two towns and the Strategic Environmental Assessment.

Design codes November 2020 to May 2021

Much less contentious than the Masterplan and perhaps ultimately more long-lasting was a parallel exercise to identify Character Areas and develop Design Codes for the Neighbourhood Plan. The same Masterplanning team from AECOM, now familiar with the area were appointed to develop the Design Codes. As a first step they worked with the PTNP Steering Group to identify a series of Character Areas for the area:



Each character area was described in detail (layout, height, street, plot, building) followed by the design codes for each area (street codes, building codes, sections) and then specific codes for each area ie coastal road shop front codes. The Character Areas and Design Codes were consulted on alongside the PSNP.

Pre-Submission Neighbourhood Plan (Regulation Consultation)

The Pre-Submission Neighbourhood Plan consultation was carried out between 1st February and midnight on 14th March 2022. Following the model developed for the Masterplan consultation, a summary leaflet was printed and circulated widely. Articles were sent to the media and posted on line on both town council's Facebook pages.

Links to the PTNP Steering Group website which hosted the online survey were also posted on the two council's websites. Public events were held on Zoom on 10th February, at Peacehaven Community House on 16th February 2-7pm and at Telscombe Civic Centre on 21st February at 1-4.30pm. Full copies of the PTNP were also made available at:

- Peacehaven Community House
- Telscombe Civic Centre
- Gateway Café, Peacehaven
- Pharmacies
- The library in Peacehaven
- Wave Leisure Centre, Peacehaven

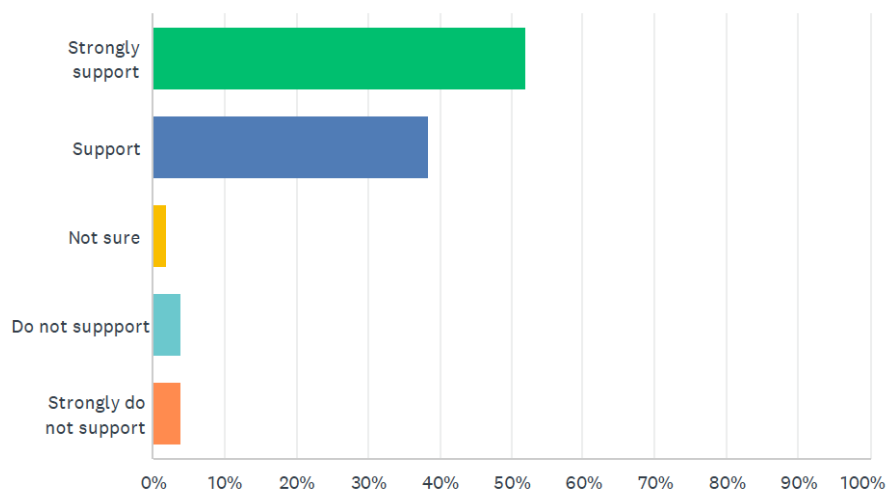
A list of statutory consultees, including neighbouring parishes and boroughs including Brighton and Hove City Council and the South Downs National Park Authority, was provided by SDNPA and checked with LDC and an email notification sent to them, as well as landowners and developers.

The number of submissions was much lower than for the Masterplan. This may in part have been due to the less contentious nature of the PSNP. Of the 52 respondents, 25 of them were from Peacehaven, 7 from Telscombe, 6 from Saltdean (part of Telscombe) and 3 from outside the area. Most gave their postcodes and all gave their email addresses.

The online survey encouraged participants to give responses on the Vision, the Objectives, generally on the Policies contained in the PSNP and then detailed responses to specific policies. Most of the questions were open ended (see Appendix E) but a few closed questions were also used:

Q7 Do you support the vision statement (please tick one box only)?
"Peacehaven and Telscombe Towns aim to be sustainable, with clean air and an environment providing a good quality of life for all inhabitants and visitors."

Answered: 52 Skipped: 0



Positively the vast majority strongly supported or supported the vision (90.36%). There were 37 comments or suggestions on the Vision. These are set out in Appendix each with a response on behalf of the PTNP Steering Group. And while people generally supported the plan as a whole, they did raise a number of issues. For example:

- A number of people asked why the plan isn't explicitly seeking a new GP surgery or school. The plan does require all major applications to contribute to the provision of local and social infrastructure including education, healthcare, childcare facilities and community halls.
- Also, they asked why the plan was no longer allocating sites – this was following the advice of LDC as this will be addressed in the next District wide Local Plan.
- A large number of concerns related to traffic and the A259. The plan requires any medium or large planning for development to agree with ESCC Highways (as part of the planning process) measures to lessen the impact of further traffic generation on the A259 through encouraging a shift from car to more sustainable transport methods particularly public transport improvements.
- The PTNP is also seeking improvements for cycling, walking, mobility scooters, pushchairs and public transport (hence 20 minute neighbourhood).
- Some people also wanted 'better' shops. While the plan can't specify the brand of shops, it has policies on retaining shops and not reducing the amount of floor space available. It also argues for retaining a 'weekly shop' sized supermarket.

- Inevitably many people didn't want any more housing. The Housing Needs Assessment commissioned by the two councils identified the need for more housing particularly affordable housing for residents on low or modest incomes and so the plan, while not allocating sites, does make provision for affordable housing to meet local needs.
- Another common concern was that no more homes should be built without better infrastructure (roads, school, doctors etc) and that the infrastructure should be built first. The NP aims to address this through the Community Infrastructure Levy (CIL). A portion of CIL is payable to the Town Councils for spending on local projects in the Neighbourhood Plan area. When the Neighbourhood Plan is 'made' (or adopted), the Town Councils will receive 25% of all CIL monies paid to Lewes District Council. Alongside CIL, the District Council will continue to negotiate Section 106 agreements with applicants.

Areas where the plan will be changing are in relation to the future management of estates or developed land as poor ongoing management or maintenance is recognised as a weakness in some recent developments. Planting native species of trees, grasses and wildflowers in new developments that are suitable for the cliff top / maritime location is now specified. Greening up the two towns, creating outdoor community spaces such as allotments, community gardens and pocket parks are all encouraged. Also, rather than demolish existing buildings, developers will be encouraged to retrofit or refurbish existing buildings as this has a much reduced impact on the environment. And while the revised plan still doesn't allocate sites for development it does identify opportunities and constraints for development across the two towns across eight character areas

Frequently Asked Questions

Q1. What is Neighbourhood Planning?

A. A set of tools to help local communities to get better quality development or 'the right types of development in the right place'.

Q2. How much influence does a Neighbourhood Plan have?

A. Once a plan is adopted, the planning policies have the same weight as the policies in the Local Plan.

Q3. How can I respond to the Neighbourhood Plan?

A. Our preference is online via the survey form on the website, but you can also download and complete a paper form and return it to either town council office or simply write a letter.

Q4. Why is the Neighbourhood Plan not seeking a new GP surgery or a new school?

A. Policy Com1: Community Facilities will require all major applications to contribute to the provision of local and social infrastructure including education, healthcare, childcare facilities and community halls.

Q5. Why is the Neighbourhood Plan no longer allocating sites for development?

A. This is in response to advice received from Lewes District Council. This will be addressed either in the next Local Plan or else in a future revised Neighbourhood Plan.

Q6. What will be the impact of the Neighbourhood Plan on the A259?

- Any medium or large planning proposals for development will need to agree with ESCC Highways (as part of the planning process) measures to lessen the impact of further traffic generation on the A259 through encouraging a shift from car to more sustainable transport methods.
- The Neighbourhood Plan is seeking improvements for cycling, walking, mobility scooters, pushchairs and public transport (hence 20 minute neighbourhood).
- Also see LDC Local Plan Spatial Policy 2 and PSNP Policy TR1 & TR3.

Q7. Can we have better shops?

A. The neighbourhood plan cannot specify the brand of shops. Instead it has policies on retaining shops and not reducing the floor space available. It argues for retaining a 'weekly shop' sized supermarket.

Q8. We don't need any more housing

A. The housing needs assessment identified the need for more housing particularly affordable housing for residents on low or modest incomes. See policy HS4 Low-Cost Housing Tenure.

Q9. Can the plan make provision for a swimming pool?

A. There is already the Lido at West Saltdean, a swimming pool at Newhaven and another at Seaford. It is therefore unlikely that Lewes District Council would support another pool when others are available, unless Peacehaven's population was to grow dramatically. Also see Lewes District Council sports provision policies.

Q10. Can we have a direct walking / cycling route to Brighton?

A. The NP can only make provision for walking and cycling linked to new developments. It is likely that these will mainly be in the north of the two towns. However, the plan does suggest improvements and links to create more joined up cycling and walking provision – see policies TR1 Active Travel and TR2 Promoting accessibility to the South Downs and Coastal Areas.

Q11. No more housing without infrastructure / put in the infrastructure first.

This is an ongoing challenge for all areas where major housebuilding is taking place. The health service is responsible for improvements in primary care (including GP surgeries) and the county council for highways (A249). The NP aims to influence decisions makers and identify infrastructure needs and measures needed to address these. In a small way, the NP can address local infrastructure needs through the Community Infrastructure Levy (See PTNP Section 7 page 92 Community Infrastructure Levy). A portion of CIL is payable to the Town Councils for spending on local projects in the Neighbourhood Plan area. When the Neighbourhood Plan is made the Town Council will receive 25% of all CIL monies paid to Lewes District Council. Alongside CIL, the District Council will continue to negotiate Section 106 agreements with applicants.