

Waste and Minerals Sites Plan Examination in Public - Main Modifications Consultation (Summer 2016)

List of Respondents

ID	Respondent
MM02	General Dynamics United Kingdom Limited
MM03	Barbara Browning
MM04	Oxalis Planning
MM05	Sea Change Sussex
MM06	Hove Neighbourhood Forum
MM07	Brett Aggregates Ltd
MM08	Hove Civic Society
MM09	Highways England
MM10	Southern Water
MM11	Marine Management Organisation
MM12	Rother District Council
MM13	Hastings District Council
MM14	Natural England
MM15	Kent County Council
MM16	Mr Smith

MM02

Name and address:

Mr. Naresh K. Mehar,

Head of Commercial Services

General Dynamics United Kingdom Limited,

100 Castleham Road,

St. Leonards-on-Sea, TN38 9NJ (Main)

with a further facility in Sidney Little Rd, St. Leonards-on-Sea, TN38 9PU.

Comment: Our main concerns are in respect of the I/H Castleham and I/K Churchfields sites and these relate to air quality and the potential inconvenience of added road traffic especially on the I/K site (Queensway junction with Napier road).

MM03

Name and address:

Barbara Browning

23 De Cham Road,

St Leonards on sea TN37 6JP

Comment: Hastings needs employment opportunities and regeneration. The proposal for west of Queensway does neither of those.

MM04

Name and address: Ben Holmes

Oxalis Planning

Unit 7 Wheatcroft Business Park

Nottingham NG12 4DG

Comment: Support is given to the proposed modifications. In particular for the reasons set out in previous representations the removal of the Coal Yard site as a waste site allocation is fully justified and essential in order to ensure that the Plan is sound. The change to the Plan is therefore fully supported.

MM05

Name and address: John Shaw

Sea Change Sussex,

Innovation Centre,

Highfield Drive,

St Leonards on Sea, East Sussex, TN38 9UH

Comment: Re: Waste and Minerals Sites Plan Main Modification Consultation Please find below our response to the Waste and Minerals Sites Plan Main Modification Consultation.

1.0 Strategic Overview

1.1 As an Economic Regeneration Company delivering strategic employment sites and their infrastructure, wholly in accordance with and supporting Local Policy, there is still key concern regarding the inclusion of SP-O/G Queensway (Land west of), Hastings and SP-S/C Sidley (Land north of), Bexhill.

1.2 These sites are a critical component of the employment land supply for Hastings and Bexhill, delivering key economic outputs.

2.0 The Strategic Policy Context

2.1 The wider Planning and Economic Development policies for both Hastings Borough Council (HBC) and Rother District Council (RDC) are now supported regionally by SELEP with its Strategic Economic Plan now identifying the “A21/A259 – Hastings to Bexhill Growth Corridor” as one of 12 key Growth Corridors throughout the South East.

2.2 The largest employment land use allocation within Hastings is on the Queensway sites to the west of Queensway. These sites and infrastructure have been identified for some time firstly in the 2004 Hastings Local Plan and more recently in the current Development Management Plan.

2.3 The largest employment land use allocation in the Growth Corridor is within the urban extension along the north east edge of Bexhill. These sites and infrastructure have been identified in the 2006 Rother Local Plan, the 2009 Supplementary Planning Document (SPD) for North East Bexhill and re-stated in the 2014 Rother Local Plan, Core Strategy.

2.4 Collectively the employment land supply at Bexhill Enterprise Park South and North provides the largest enabled employment land supply in East Sussex. The whole of Bexhill Enterprise Park is in the ownership of Sea Change Sussex whose commitment is to development in pursuance of the employment land policies of Rother.

3.0 Main Modification Consultation

3.1 The deletion of SP-S/E Whitworth Road under MM3 is supported.

3.2 The strengthening of the policy wording in relation to Development Considerations and Opportunities and other Local Plans for Policy SP2, SP3 and SP5 under MM2,MM3 and MM5 is supported.

MM06

Name and address:

Professor M S Gibson,

40 Fonthill Road,

Hove BN3 6HD

On behalf of Hove Neighbourhood Forum.

Comment: The Hove Station Neighbourhood Forum re-iterates its support for the withdrawal of Site SP/AB Coal Yard Adjacent to Sackville Trading Estate because the allocation is incompatible with the proposals of the emerging Hove Station Neighbourhood Plan. The public support for withdrawal was demonstrated by the 700 signatures to our petition. Moreover our initial Concept Plan for the comprehensive redevelopment of BHCC City Plan Development Area 6 was very positively received at our Have Your Say public meeting on July 3rd.

MM07

Name and address:

Richard Ford,
Brett Aggregates Ltd,
Robert Brett House,
Ashford Road,
Canterbury, CT4 7PP.

Comment: We are now supportive of the inclusion of Broomhill, near Lydd, but we would like to have seen a supporting plan identifying the area of land to be safeguarded. We would also like to see a further bullet point that recognises that there might be opportunities to identify further areas of sand and gravel bearing land, which, if the East Sussex landbank falls below 7 years, would be considered favourably. There should also be an obligation upon East Sussex to review this Plan on a 5 yearly basis, to ensure that there is an adequate and consistent supply of sand and gravel throughout the Plan period.

MM08

Name and address:

Helmut Lusser
Hove Civic Society
43 Hove Park Villas
Hove, BN3 6HH

Comment: Thanks you for consulting the Society of the proposed modifications to the Waste & Minerals Sites Plan. The Society very much welcomes and fully supports the proposal to withdraw the Site SP-A/A Coal Yard adjacent to Sackville Road Trading Estate.

MM09

Name and address:

Elizabeth Cleaver, Assistant Spatial Planning Manager,
Highways England,

Bridge House,
1 Walnut Tree Close,
Guildford, Surrey, GU1 4LZ

Comment: Thank you for your email dated 26 August 2015, advising Highways England of the above consultation.

Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity. Highways England will therefore be concerned with proposals that have the potential to impact on the safe and efficient operation of the SRN.

We have examined the main modifications and do not wish to make any comments.

Thank you again for consulting Highways England.

MM10

Name and address:

Kirsten Williamson

Planning Coordinator, Southern Water.

Comment: Thank you for notifying us of the proposed Modifications to the Waste and Minerals Sites Plan. Southern Water welcomes the inclusion of our suggested changes to the policy on wastewater treatment, and the inclusion of water and wastewater infrastructure as development considerations within each of the relevant site policies.

We have no other comments to make at this time but would like to be kept updated as the examination progresses.

MM11

Name and address:

Marine Management Organisation

Lancaster House, Hampshire Court, Newcastle upon Tyne, NE4 7YH

Comment: The Marine Management Organisation (MMO) is a non-departmental public body responsible for the management of England's marine area on behalf of the UK government. The MMO's delivery functions are; marine planning, marine licensing, wildlife licensing and enforcement, marine protected area management, marine emergencies, fisheries management and issuing European grants.

Marine Licensing

Activities taking place below the mean high water mark may require a marine licence in accordance with the Marine and Coastal Access Act (MCAA) 2009. Such activities include the construction, alteration or improvement of any works, dredging, or a deposit or removal of a substance or object below the mean high water springs mark or in any tidal river to the extent of the tidal influence. You can also apply to the MMO for consent under the Electricity Act 1989 (as amended) for offshore generating stations between 1 and 100 megawatts in England and parts of Wales. The MMO is also the authority responsible for processing and determining harbour orders in England, and for some ports in Wales, and for granting consent under various local Acts and orders regarding harbours. A wildlife licence is also required for activities that that would affect a UK or European protected marine species.

Marine Planning

As the marine planning authority for England the MMO is responsible for preparing marine plans for English inshore and offshore waters. At its landward extent, a marine plan will apply up to the mean high water springs mark, which includes the tidal extent of any rivers. As marine plan boundaries extend up to the level of the mean high water spring tides mark, there will be an overlap with terrestrial plans which generally extend to the mean low water springs mark. Marine plans will inform and guide decision makers on development in marine and coastal areas. On 2 April 2014 the East Inshore and Offshore marine plans were published, becoming a material consideration for public authorities with decision making functions. The East Inshore and East Offshore Marine Plans cover the coast and seas from Flamborough Head to Felixstowe. For further information on how to apply the East Inshore and Offshore Plans please visit our Marine Information System. The MMO is currently in the process of developing marine plans for the South Inshore and Offshore Plan Areas and has a requirement to develop plans for the remaining 7 marine plan areas by 2021.

Planning documents for areas with a coastal influence may wish to make reference to the MMO's licensing requirements and any relevant marine plans to ensure that necessary regulations are adhered to. For marine and coastal areas where a marine plan is not currently in place, we advise local authorities to refer to the Marine Policy Statement for guidance on any planning activity that includes a section of coastline or tidal river. All public authorities taking authorisation or enforcement decisions that affect or might affect the UK marine area must do so in accordance with the Marine and Coastal Access Act and the UK

Marine Policy Statement unless relevant considerations indicate otherwise. Local authorities may also wish to refer to our online guidance and the Planning Advisory Service soundness self-assessment checklist.

Minerals and waste plans and local aggregate assessments

If you are consulting on a mineral/waste plan or local aggregate assessment, the MMO recommend reference to marine aggregates is included and reference to be made to the documents below:

- The Marine Policy Statement (MPS), section 3.5 which highlights the importance of marine aggregates and its supply to England's (and the UK) construction industry.
- The National Planning Policy Framework (NPPF) which sets out policies for national (England) construction minerals supply.
- The Managed Aggregate Supply System (MASS) which includes specific references to the role of marine aggregates in the wider portfolio of supply.
- The National and regional guidelines for aggregates provision in England 2005-2020 predict likely aggregate demand over this period including marine supply.

The NPPF informed MASS guidance requires local mineral planning authorities to prepare Local Aggregate Assessments, these assessments have to consider the opportunities and constraints of all mineral supplies into their planning regions – including marine. This means that even landlocked counties, may have to consider the role that marine sourced supplies (delivered by rail or river) play – particularly where land based resources are becoming increasingly constrained.

If you wish to contact the MMO regarding our response please email us at consultations@marinemanagement.org.uk or telephone us on 0300 123 1032.

MM12

Name and address:

Tim Hickling MRTPI, MCM1 Service Manager – Strategy and Planning

Rother District Council

Town Hall,

Bexhill-on-Sea,

East Sussex TN39 3JX

Comment:

MM3 – Alterations to SP3

1. The inclusion of the amended (enlarged) area for Burgess Road, Hastings is supported.
2. However, in relation to the additional policy wording requiring consideration of any policies in relevant Local Plans, the District Council is bound to point out that, in relation to site SP-S/C Sidley (Land north of), Bexhill, there is a fundamental incompatibility between the site's identification as an 'area of search' for waste uses and its status in the District Council's own Local Plan, as set out in its earlier Written Statement. This makes the proposed main modification difficult to apply.
3. The District Council has advised that the landowners support its vision for this development and that it is committed, over the long-term, to deliver business development on that basis. Furthermore, its Chief Executive has made it clear that waste uses, or the prospect of waste uses, are not compatible with that.
4. On this basis, the District Council does not believe that its identification in the WMSP meets the 'Effective' test or the NPPF's clear emphasis of the deliverability of development generally.
5. Therefore, it is not considered that the amended wording provides a satisfactory basis for resolving the contradiction introduced by incorporating site SP-S/C into policy SP3.
6. The Inspector is respectfully urged to further consider whether the wording in the Main Modification satisfactorily addresses the policy conflict created by the inclusion of site SP-S/C in Policy SP3 and whether it passes the 'effectiveness' test.
7. The wording of the Main Modification differentiates site SP-S/A Burgess Road from all other sites in relation to the regard to other plans. It is not clear what the justification for this is. Compatibility with all relevant development policies is regarded as appropriate for all sites. The policy should be consistently worded for all sites accordingly.

MM7 – Broomhill, near Lydd

8. The District Council notes that this area was safeguarded for minerals in an earlier Plan and it had no objections at that time.
9. While there have been further international nature conservation designations – Special Protection Area and Ramsar sites - in the locality of the safeguarded area more recently, the views of Natural England in relation to any impact on these designations would be relied upon.

MM13

Name and address: Hastings Borough Council,

Aquila House,

Breeds Place,

Hastings,

East Sussex, TN34 3UY

Comment:

1. This representation is made by the Borough Council in response to the Main Modifications published by the three Authorities following the Hearing sessions into the examination of the above submitted Plan and to the Inspector's invitation to receive representations on these by 7th October 2016. The Borough Council has already made strong objections to various elements of the Plan as submitted as part of the examination process.

2. References made in this representation to these "Main Modifications" are to the Schedule of Main Modifications tabled by the three Authorities on the 3rd August 2016. These are acknowledged within the Inspector's letter of 5th August to the Authorities as being "albeit a limited number" – a view that Hastings would wholly concur with. Other matters suggested for consideration by the 3 Authorities within the Inspector's letter are referred to later on in this representation.

3. From Hastings perspective these limited Main Modifications, together with the Authorities published explanatory paper, simply do not adequately address the concerns and objections previously lodged to this Waste Plan. Our reading of these limited Modifications is that, with the exception of Whitworth Road now being deleted, pretty well everything in respect of the range of potential waste, waste management and waste recycling facilities is still acceptable in principle for all sites and areas with the notable exception of the process of open windrow composting.

4. For Hastings this means that all of the Areas of Opportunity (Queensway Sites) - Policy SP2, the Areas of Search, (Ivyhouse and Burgess Road) - Policy SP3, and all of the existing industrial estates/employment sites (Castleham, Churchfields, Ponswood and Bulverhythe) are deemed acceptable in principle for waste related activities. This unchanged situation also remains in respect of land at North East Bexhill and where Rother District and relevant identified landowners have lodged strong objections to the inclusion of this land in the Plan.

5. Whilst Hastings has welcomed the acknowledgement as to the unacceptability of open windrow composting on any site we would, with respect, point out that this acceptance appears more to have come forward belatedly and as confirmed within the Inspector's

letter of 5th August rather than in response to objections or concerns as to the significant adverse impact that waste processes can have locally. This further underscores concerns the Borough Council has previously raised as to the “one size fits all approach” in the Plan’s identification of opportunities for waste related processes.

6. Whilst we also note in MM3 the deletion of land at Whitworth Road, we again, emphasise that as this land is in Hastings ownership and the Borough Council had previously made strong objection to its inclusion within the Plan this “Main Modification” also is not any great concession on the part of the 3 Authorities.

7. We would accordingly comment first upon MM3 and in particular the deletion or otherwise of sites.

MM3

8. In respect of proposed MM3 and deleted sites/land, Hastings, do not consider that the proposed modifications go far enough. We would firstly question on the basis of the reasons behind deletion of land at Whitworth Road how other land at Queensway and in the ownership of Sea Change Sussex (Reference SR8-01a: Appendix F) can still be included on the basis of evidence given to the examination by Mr Shaw as to the unacceptability and thus unavailability of this land for any waste related purposes. We would request the deletion of this land from the Plan.

9. This argument, although for our neighbours in Rother District to make more eloquently, would seem to be equally applicable to land at NE Bexhill. Whilst not pressed upon the matter at the Hearings sessions, the Borough Council had also raised a query as to why land within the County Council’s ownership at Queensway appeared not to have been included as a possible Area of Opportunity for waste purposes when their proposed MM’s confirm that all other land/employment sites at Queensway are apparently deemed suitable for such.

10. Hastings Borough Council is currently in advanced negotiations to purchase land amounting to 1.61 hectares (3.95 acres) that is allocated for employment purposes within the Queensway corridor. This purchase is to better enable the Local Authority to deliver upon one of its primary and strategic economic objectives as set down in the Planning Strategy and as it relates to the Queensway employment corridor. As with the Council’s case in respect of its land at Whitworth Road (now deleted from the Plan) the Council would confirm that it would be unwilling to see any of this additional land within Queensway used for any waste related purpose. This unacceptability, and thus undeliverability, of yet more land within Queensway for the purposes of the Waste Plan is significant. It emphasises Hastings view that the Plan’s identification of all employment sites in Queensway as Areas of Opportunity for waste related activity when key landowners have confirmed the unavailability of their land renders the Plan unsound in this regard. These sites cannot be

relied upon to deliver nor should policies within it suggest the opposite. We would request they be deleted as is the case with the land at Whitworth Road. Attached as Appendix A to this representation is the relevant Cabinet Report confirming the Council's purchase of the land in the Queensway Corridor. Set out below are the reasons identified within the Cabinet report for purchase of the land.

- *“The land is allocated for employment use in the Development Management Plan (DMP) and adjoins vacant plots in the Council's ownership so offers opportunities for development.”*
- *“The Council is seeking income generation opportunities in the future but most importantly looking to ensure economic development opportunities continue within Hastings.”*

11. On the matter of the general assumed suitability of these identified Areas of Opportunity in the Queensway corridor to meet the full range of waste facilities (other than for open windrow composting) In Vessel Composting (IVC) processes are acknowledged by the 3 Authorities in their own submitted evidence as potentially causing problems with odour, visual impact and traffic. For Anaerobic Digestion (AD) processes all of the above impacts are similarly identified but additionally the scale of building heights at c.20 metres is an acknowledged concern. Other processes such as Advanced Thermal treatment (ATT) are identified as having no significant track record within the UK but having also potential daily traffic movements of 60 vehicles for a small scheme and up to 300 daily for a larger one. Identified health and related risks are also shown as “potentially significant but controllable” for ATT processes. We disagree with the 3 Authorities that many facilities, however modern, are likely to be acceptable here.

12. Following the Inspector's 5th August letter the 3 Authorities have endeavoured to address some of these matters through revisiting site profiles. This work though welcome has not gone far enough in relation to the proposed wording put forward in the Main Modification regarding assessment of proposals.

Main Modification 3-5 MM3, MM4, MM5

13. These Modifications are aimed at addressing the lack of clear reference to Local Development Plans, their Policies, and how any final version of the Waste and Minerals Plan relates to them in the consideration of future waste related proposals. There are no clear references to the relative weight to be afforded to these Plans either in isolation or in relation to each other (Local Development Plan v. Waste Plan) - a matter which we also consider should be addressed for the purposes of clarity.

14. In responding to strong concerns that there was insufficient weight being afforded to Local Development Plans within the submitted Waste Plan, the 3 Authorities have

endeavoured to address this through their proposed modifications MMs 3-5 relating to Areas of Opportunity, Areas of Search and to existing industrial/employment sites.

15. Whilst there is now some proposed enhanced and expanded reference to Local Development Plans critically the wording now proposed refers simply to waste proposals showing (in all three, MM3-5).

16. "how the matters referred to have been considered and where appropriate, how they have been incorporated into the design of the scheme". The expression where appropriate is somewhat vague and could indeed relate to where and when the developer considers it appropriate (there being no specific reference here to the Waste Authority and their assessment of what is deemed appropriate). In the Borough Council's submission much stronger wording is required within each of these proposed Main Modifications in relation to Local Development Plans to confirm the following:

a. that proposals will be required to show and prove the efficacy of (and subsequently implement) any appropriate mitigation measures considered necessary by the Waste Authorities - whether these relate to minimising emissions, odour, noise controls or the limiting of traffic movements. These should also be agreed and implemented prior to commencement of operations/use of the site for waste purposes.

b. Policies should also make it clear that any proposals put forward and which may require imposing of conditions to make an otherwise unacceptable scheme acceptable, need to be clearly and unambiguously worded, and enforceable by the Waste Authority in light of the labour intensive nature of enforcement and the limited resources available to the Authorities to deal with condition compliance.

c. that a clear assessment of any proposal and its potential conflict with matters set down in adopted Local Development Plans will be required to enable assessment of whether their implementation would have significant adverse impacts upon wider objectives set down in those Local Development Plans.

17. In the case of Hastings we consider this last point absolutely vital in view of the Borough Council's key economic strategy for the Queensway Corridor – matters of concern already put to the examination.

18. The strengthening of these Policies as suggested through amendments to MM3, MM4 and MM5 will go some way towards meeting Hastings concerns regarding the apparent "one size fits all" approach currently adopted in the Waste Plan's identification of Areas of Search and Areas of Opportunity and will provide a more transparent, unambiguous and rigorous way of assessing proposals that may come forward.

19. An example of this need for very detailed assessment in relation to clear Local Development Plan Objectives and allocations is a proposal recently considered by the

County Council in November 2015 regarding one such facility within Whitworth Road (Appendix B). What is abundantly clear from the attached report from the County Council's Director of Communities, Economy and Transport is the clear need to significantly limit traffic movements to and from the site in this instance.

20. Indeed with no less than 29 conditions imposed in respect of this particular permission we do not consider that many proposals relating to waste management and waste processing can therefore be said to be likely to be acceptable within the Queensway Corridor as has been suggested by the Authorities.

21. Our clear view remains that many waste related proposals are indeed unlikely to be acceptable within the Queensway corridor and we believe that the Waste Plan policies should clearly reflect this if the Inspector's conclusions do not align with our submissions that the area should preferably be deleted as an Area of Opportunity for waste purposes.

22. Indeed in his letter of 5th August the Inspector has confirmed that whilst some of the work undertaken since the close of the Hearings by the 3 Authorities gives a clear steer (as to the likely acceptability or otherwise of uses) the letter goes on to confirm this (proposals submitted) should essentially only "be considered if all of the development considerations and opportunities can be successfully addressed".

23. In our submission this approach must therefore necessitate the inclusion of Policy wording as set out above in respect of each of the proposed Main Modifications MM3, MM4 and MM5 as they relate to Local Development Plans and the development management process.

24. Hastings Borough Council is grateful for this opportunity to make further representations upon the Waste and Minerals Plan as submitted for examination and proposed to be modified by the published Main Modifications. Our significant concerns remain in the main and the Council hopes that these further points, requests and suggestions as set out above will be favourably received and incorporated by the Inspector in his final recommendations.

MM14

Name and address: Rebecca Bishop MRTPI, Adviser Sustainable Development Sussex & Kent Team

Natural England

Mail Hub Natural England,

County Hall,

Spetchley Road,

Worcester, WR5 2NP

Comment: Thank you for your email and attachments. We have no comments to add to those made in previous responses.

MM15

Name and address: Sharon Thompson, Kent County Council

Invicta House, County Hall, MAIDSTONE, ME14 1XX

Comment: It is considered that the proposed main modifications to the Plan do not have any significant cross border implications between the two authorities and that the modifications increase clarity of the Plan with regard to local matters. Main modification number 7, as detailed below, has a cross border mineral supply implication that Kent County Council is aware of and wishes to comment on. It states;

Main Modification 7 - Extension of Broom Hill, Lydd Quarry Safeguarding Area

Main Modification 7 amends Policy SP8 to include the land at Broom Hill, near Lydd, as a safeguarded mineral resource. The modification arose out of discussions during the Public Examination, Matter 2. As a result, the Authorities consider that the mineral resource at Broom Hill should be included as a Minerals Safeguarding Area.

The modification will ensure the safeguarding of potentially important mineral resources in this locality. This could well support the future ability of the responsible authorities to maintain a steady and adequate supply of aggregate in the area as required by the National Planning Policy Framework.

Until recently the supply in this area has been provided by extraction in Kent, which is becoming constrained given the increasing scarcity of the resource and the sensitivity of the land designations in relation to potential new resources. This matter is one that affects both mineral planning authorities in this part of the Kent and East Sussex area. Therefore the modification is supported by Kent County Council.

MM16

Name: Mike Smith (address withheld)

Comment: To take account as regards the Centenary Industrial Estate site (On which is labelled the two sites O/C & I/I) I have taken O/C as the major site for which most of the comments below refer to.

The impact on the two adjacent (2) large schools to the site (O/C). (On the supplied map, Downs Infants School is labelled PW. The word Sch (school), is mistakenly attributed to a house)

- Downs Junior School - Which has approximately (in the academic year) 500 students attending in the age range 7-11.
- Downs Infants School - Which has approximately (in the academic year) 360 students attending in the age range 4-7

In particularly the impact (of O/C):

- Any pollutants from the site, which could impact on developing bodies. For example on, families with young children and the two large schools nearby.
- The impact of increased traffic on pupils walking to and from the schools.
- The change in the traffic flow on the Lewes road, which has been recently reduced from two lanes in each direction to 1 lane in each direction. This has impacted on the ability of traffic to flow freely. Resulting in traffic jams at many times during the day.
- On the large human residential population near to the site, which has been increased by the continued development of high density housing/accommodation.
- The loss of commercial premises on the site.
- The safe handling of products containing ionising material. For example smoke detectors. A detailed statement needs to be included on how such products can be safely handled.

Other issues

The inability to provide rail and or water transport to/ from the sites without major demolition and relocation of existing close by facilities, and the high costs that this would entail.

The poor access between the two sites identified, with the existing busy road link passing under a narrow bridge, which large vehicles must navigate by driving down the centre of the road. Approaching traffic going under the bridge can not see oncoming traffic from the other direction.

The only other way of connecting the sites is a new bridge or tunnel to cross the existing railway.

The pedestrian footpath under the bridge is narrow, and has no protection from vehicles swerving to avoid oncoming traffic. This route is taken by children attending the 2 adjacent schools to the site, and other schools whose catchment area will entail travelling on this footpath.

The above route (under the bridge) would also be the normal access to the proposed major site labelled O/C.

No mention is made of access via routes which for other site(s) are identified as problematic (O/C and I/I)

For example Centenary Industrial Estate *“Short distance to the A270 offering good access to the A27.”* This will entail passing the Home farm industrial estate.

However for Home Farm Industrial Estate *“The site has relatively good access to A270 and A27 bypass to the east. However, there may be road network capacity issues in the wider network. Proposals should detail any proposed access arrangements and include an assessment of the expected number and expected routing of vehicle movements”*

Mention is made of encouraging developers to engage with the local community. East Sussex County council and Brighton city council have not actively engaged with the local community over this proposal (O/C and I/I).