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Declaration: By submitting this assignment I am declaring that it is entirely my own work			

Criteria being assessed:	
Knowledge/understanding	Level of knowledge/understanding; evidence of independent study/originality; integration of module materials
Structure/Conclusions	Organisation and structure of assignment; level of analysis; relevance of conclusions
Transferable skills	Development of clear, concise argument and its communication
General assessment including presentation	Adherence to assessment task; standard of English; absence of grammatical and typographical errors and overall presentation. Accuracy of citation, referencing and bibliography
Grades: D+: Distinction (>80%) D: Distinction (70-80%) M: Merit (60-69%) P:Pass(50-59%) F: (<50%)	

Feedback: Strengths

Suggested areas for improvement

%	Grade

Assessor's signature.....

PLOTLANDS AND DOWNLAND FRINGE



Peacehaven in 1928. Copyright: University of Sussex, 2020.

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Green Group

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1. INTRODUCTION

This report will analyse the planning context of the plotlands and the downland fringe of the Neighbourhood Plan area of Peacehaven and Telscombe (Figure 1). The focus of the report will be to establish the suitability to improve and enhance the historic and environmental role of the plotlands and downland fringe and to recommend areas which should be explored further to incorporate into a neighbourhood plan. The report recommendations are set out at the end of the report.

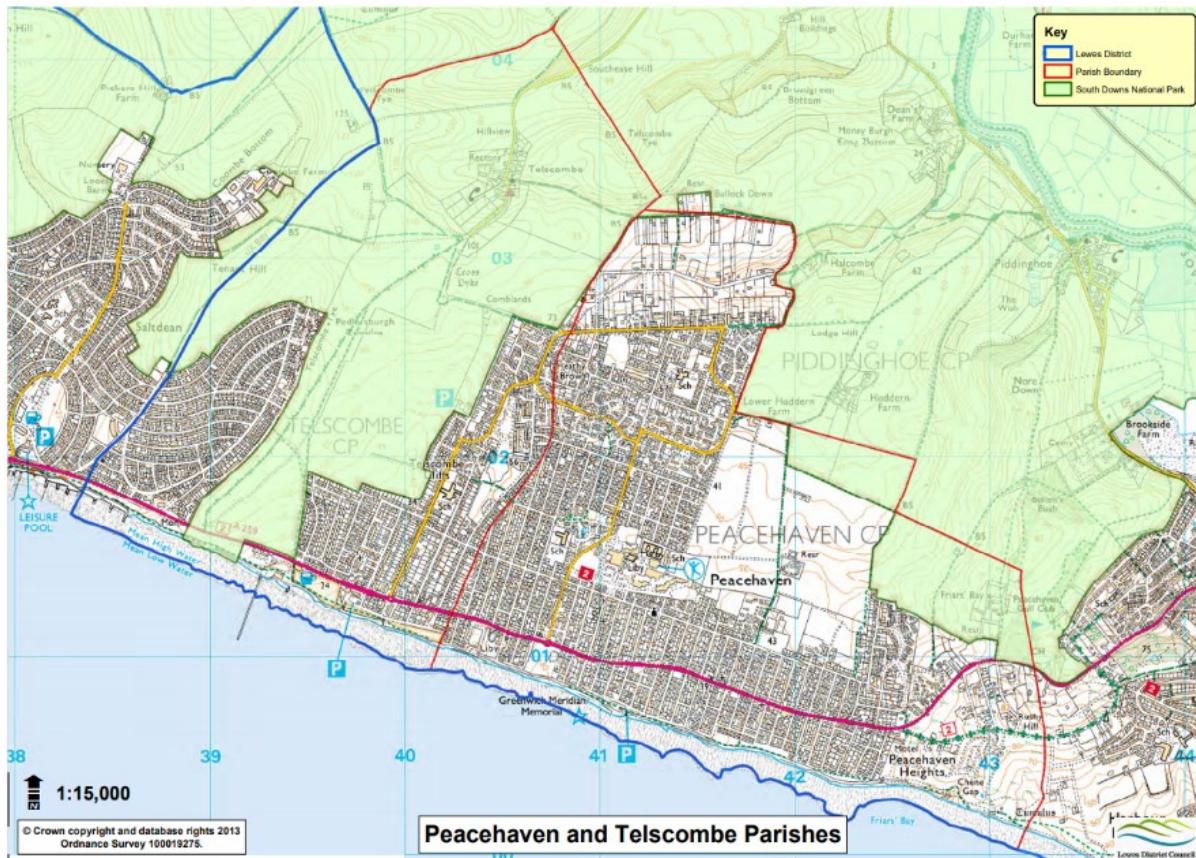


Figure 1: Plan area for Peacehaven and Telscombe (Lewes District Council, 2013).

2. HISTORICAL CONTEXT OF PEACEHAVEN PLOTLANDS

2.1 History of Peacehaven

A failed attempt in the early 1900s by Cavendish Land Company to develop Telscombe Cliffs into a seaside resort triggered interest in the area from land developer Charles Neville (figure 2).

Neville purchased downland within the Parish of Piddington (figure 3) and offered plots as consolation prizes in a 1916 newspaper competition



Figure 2: Charles Neville (Peacehaven Town Council, 2015)

Plotlands and Downland Fringe



*Figure 3: Land at Piddingtonhoe (later Peacehaven) as shown on map c1879
(National Library of Scotland, 2020)*

Neville used his previous experience in Australia and Canada to establish the town of Peacehaven, marketing it as "A Garden-By-the-Sea" (figure 4) and providing a grid pattern layout in which plot owners could construct their own homes. The first houses to be built – in Seaview Avenue in 1920 – were predominantly bungalows made of wood and asbestos (figure 5).



Figure 4: Promotional advertisement 1925 (Peacehaven Town Council, 2015)



Figure 5: The first 'plotlands' homes built in Seaview Avenue c1920 (Peacehaven Town Council, 2015)

These materials typified early construction and it is believed that approximately 200 of these early dwellings remain (figure 6), contrary to a 2004 Historic Assessment Report which not only generalises that "*little of note survives from the 1920s and 1930s*" (Harris, 2004, p.17) but, more specifically when assessing various Plotland areas, erroneously asserts that "*there are no...buildings of local historic importance*" (Ibid, pp.19-20) (See Recommendation 1).



Figure 6: Surviving original 'plotlands' homes in Victoria Avenue, Rowe Avenue and Arundel Road (Google, 2020)

By 1926 the population of Peacehaven numbered around 3,000 but were thinly spread across the whole site rather than concentrated in specific areas. This meant that providing services such as mains sewerage and properly constructed roads and pavements was too costly a feat for the local authority. In effect, these somewhat ramshackle and scattered features, amongst a gridded street pattern, characterised the 'Plotlands' of the early-mid 1900s (figure 7).



Figure 7: Coastal photograph of Peacehaven 1928 showing grid pattern and scattered housing (University of Sussex, 2020)

The lack of planning control led many contemporary critics to echo Virginia Woolf's view of Peacehaven (figure 8) with it being referred to as a "*disgusting blot on the landscape*" (Sharp, 1932, p.143) and "*a colony of shacks, a long ungainly street of houses that all seemed ashamed of themselves*" (William-Ellis, 1937). Such views lacked a social and moral appreciation of what the area truly had to offer; it gave working-class people – many of them war veterans themselves – the opportunity to move out of poor, cramped housing in towns and cities and build themselves an affordable home with views of the sea and the countryside. These virtues did not go unnoticed nationally, as the Daily Chronical reported in 1923:-

"Peacehaven....is one of the most remarkable places in England.....As a piece of town planning I have no hesitation in saying it is the finest thing we have in England, and if I were not afraid of using extravagant language I would say the world....I found Peacehaveners a happy, jolly community, very proud of their infant prodigy of a garden city." (Ruff, 2015, p.224)

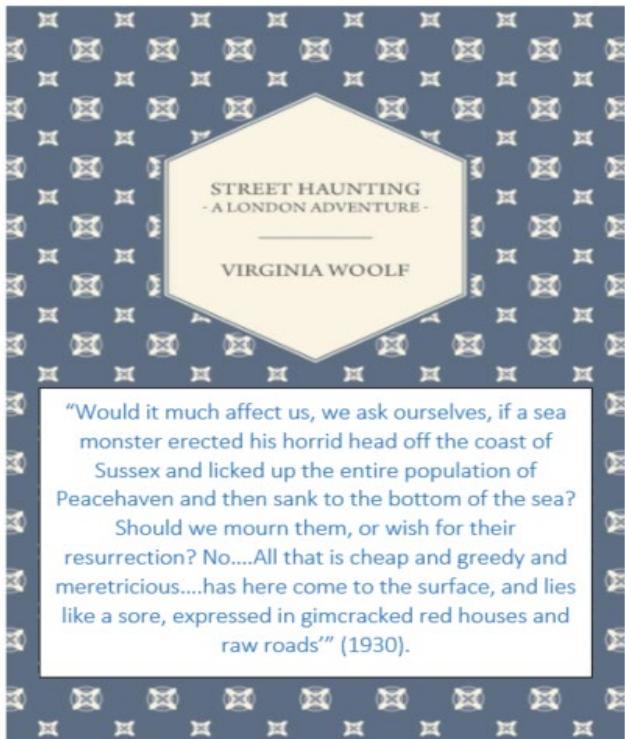


Figure 8: Extract from Street Haunting: A London Adventure (Woolf, 1930)



Figure 9: Postcard used to promote Peacehaven c1922 (Sussex Express, 2017)

In effect, Peacehaven was at the very forefront of the urban sprawl debate which resulted in the establishment of the Campaign to Protect Rural England movement in 1926 and therefore, ironically, influenced the creation of the South Downs National Park.

Early attempts were made to develop Peacehaven into Neville's seaside resort vision (figure 9), but the Bastion swimming pool (1922-39), Pavilion Theatre (1923-29), cinema (1929-40) and luxurious hotel (1922-87) could not be sustained (figure 10). This may have left little, physical, landmark history, but the continued existence and conservation of the Plotlands area should proudly symbolise Peacehaven's unconventional, innovative impact on English social and planning history.



Figure 10: Peacehaven Hotel, Theatre and Cinema in their prime (Peacehaven Town Council, 2015).

3. PLANNING CONTEXT AND SWOT ANALYSIS

3.1 Planning Context

The Neighbourhood Plan area is within Lewes District Council (LDC), with a small proportion within the South Downs National Park (SDNP). As such, any neighbourhood plan policies will need to conform with policies adopted by both LDC and the SDNP.

The district-wide vision for Lewes includes the need to accommodate housing (6900 required over the plan period), provide for sustainable economic growth, and to protect the environment (LDC, 2016). LDC characterise Peacehaven as a District Centre in the settlement hierarchy, which is predominantly low density 20th century grid-pattern housing, reflective of its history of speculative plotland development (LDC, 2016). Any specific visions for Peacehaven focus on improving the transport corridor rather than the setting of the town and its character.

To meet housing need, LDC have allocated 450 units at Lower Hodden Farm in the east of Peacehaven which is currently being built out (see Figures 11, 12 and 13). This land was previously allocated as open green space in the 2003 Lewes Plan to address a shortfall in open space in Peacehaven, but the need for housing has since outweighed the need for open space. Peacehaven and Telscombe also have been given a target of providing 255 dwellings through its Neighbourhood Plan.

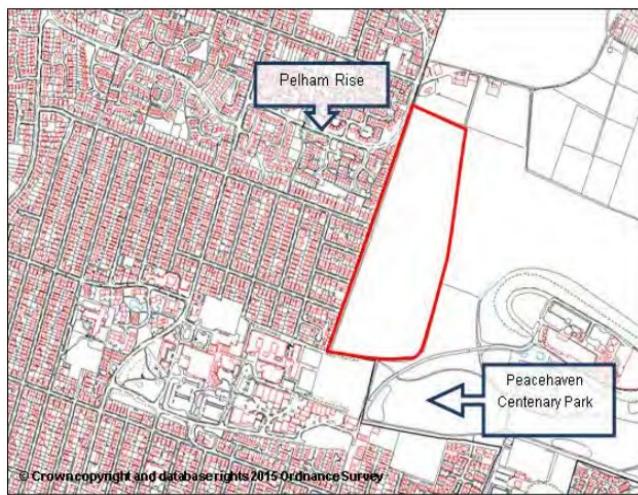


Figure 11 – Allocation at Lower Hodden Farm



Figure 12 – New development at Lower Hodden Farm



Figure 13 – Setting of Lower Hodden Farm against the SDNP downland in the background

Table 1 outlines the national and local planning policies which are deemed applicable to the plotlands and downland fringe in Peacehaven and Telscombe.

Table 1 – Summary of national and local policy applicable to the plotlands and downland fringe

Document	Policy Reference	Policy Comments
<i>National Planning Policy Framework</i>	<i>Chapter 15 - Conserving and enhancing the Natural Environment</i>	Protection and enhancement of both natural and local environment. Includes landscapes, biodiversity, undeveloped coast, important views. Considers great weight is given within National Parks
	<i>Chapter 16 - Conserving and enhancing the historic environment</i>	Protecting assets ranging from those of local significance to national significance, conserved in a manner appropriate to their significance.
<i>Lewes District Local Plan Part 1 (Joint Document by Lewes District and the SDNP)</i>	<i>Core Policy 8 – Green Infrastructure</i>	Protecting and enhancing the open spaces throughout the district, including the local vernacular and cultural heritage of the area. Ensures accessible countryside in fringe areas.
	<i>Core Policy 10 - Natural Environment and Landscape Character</i>	Conserving and enhancing natural environments through maintaining and enhancing natural, distinctive and heritage landscape qualities as informed by ESCC Landscape Assessment and LDC Landscape Capacity Study. Enhancing nature conservation and biodiversity through wildlife corridors ecological networks. Gives priority

		to purposes of the SDNP and European designated sites.
	<i>Core Policy 11 - Built and Historic Environment and High-Quality Design</i>	Seeks high quality design in new development which has regard to the setting of the SDNP, responds to local context, protects listed buildings and other designated assets. Development should positively contribute to the character of the districts unique built and natural heritage.
Lewes District Local Plan Part 2: Site Allocations and Development Management Policies	<i>Policy DM2 - Rural exception sites</i>	Development will be permitted outside the defined built up area boundary where it meets a proven need and is adjacent to the settlement boundary.
	<i>Policy DM14 - Multi-functional green infrastructure</i>	New development should incorporate features to encourage biodiversity, ecological networks should be an essential component of green infrastructure provision to ensure habitat connectivity.
	<i>Policy DM25 - Design</i>	Design of new development should be sympathetic to the characteristics of the site and surroundings, compatible with existing built form, major development should create accessible and easily understandable spaces.
	<i>Policy DM27 Landscape design</i> -	New development landscape design should reflect the distinctiveness of local landscape and add visual interest, retain trees and hedgerows, and take opportunities to connect development with existing green infrastructure network.
	<i>Policy DM33 - Heritage Assets</i>	Development affecting heritage assets will only be permitted where there is a positive contribution to conserving or enhancing the significance of the asset. Where there is a negative impact an assessment of the significance of the asset and its contribution to the setting will need to be made. Justification will be needed for the proposed scheme and remediation measures proposed where there may be harm to an asset.
	<i>Policy DM34 - Areas of established character</i>	LDC has identified areas across the district which are not suitable for designation as conservations areas but provide valuable contributions to the character of the area and are protected as such. (None of these are in Peacehaven or Telscombe).
South Downs National Park Local Plan	<i>Policy SD4 Landscape Character</i>	Development permitted where they conserve and enhance the landscape character, and green and blue corridors are safeguarded. Plan area surrounding Peacehaven and Telscombe classified as 'open downland'.
	<i>Policy SD5 - Design</i>	Development permitted where there is a landscape led approach, which is sympathetic to the landscape character and setting.

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	<i>Policy SD6 – Safeguarding Views</i>	Aims to preserve visual integrity and scenic quality of the park, and enhancing key views (including those views into the park from outside).
	<i>Policy SD8 – Dark night skies</i>	Aims to preserve and enhance the quality of dark night skies in the park. The area of Peacehaven and Telscombe within the park is classified as E1b Transition Zone, meaning the sky quality ranges from poor to the edge of a dark sky zone.
	<i>SD16 – The open coast</i>	The gap between Telscombe and Peacehaven is identified as a 'zone of undeveloped coast' and is to be protected as such.

Of note from the above are;

- LDC Local Plan Part 1: Core Policy 11 – Development should respond to the local context, protect heritage assets and respond to the character and distinctiveness of the area. Peacehaven has an historic uniqueness which any new development should consider in the design process, and non-designated heritage assets should also be considered.
- LDC Local Plan Part 2: Policy DM34 – LDC has designated areas of established character which are to be protected. Peacehaven has established historic character but is not benefitting from higher levels of protection in this instance.

There are also nine saved policies from the Lewes District Local Plan 2003. A summary of those relevant to the plotlands and downland fringe is provided in Table 2.

Table 2 – Summary of Saved Policies from the LDC Local Plan 2003

Policy Reference	Policy Comments
<i>Policy PT12 – The Coast and The Countryside</i>	Entire cliff top and foreshore in the Neighbourhood Plan area is protected as a zone of public amenity value
<i>Policy PT13 – Cliff top</i>	Protects public access to the cliff top – no development will be permitted which prejudices this
<i>PT18 - Allotments</i>	Safeguards land at Conwall Avenue for an extension to the existing allotments
<i>PT20 – Valley Road Equestrian Uses</i>	Planning permission will be granted in the Valley Road area for equestrian uses, subject to a number of requirements

3.2 SWOT Analysis

Figure 14 sets out a SWOT (strengths, weaknesses, opportunities, threats) analysis of the plan area in terms of the plotlands and downland fringe. As a result of this, the main focus of research have been historic appraisals, design of new development to preserve the character of the area and improving the setting of the town to the park.

Figure 14 – SWOT analysis for Peacehaven and Telscombe

Strengths

- Unique historic character which was pioneering in the evolution of town planning
- Excellent proximity and access to the SDNP and wider countryside
- Coastal setting with cliff scapes popular with walkers
- The north of Peacehaven still retains original character of large plot sizes and small holding uses
- Meridian line runs through Peacehaven; a monument signifies this on the cliff top
- Excellent views from the towns through to both the sea and the downlands

Weaknesses

- Despite the historic character of Peacehaven, there are only two Listed Buildings in the town.
- New development responds poorly to its setting in the SDNP
- Many historic buildings are falling into disrepair and their original character is being lost
- Lack of mature trees and hedgerows in the area
- There is no historic core to the town due to its sporadic development over time
- The majority of Peacehaven and Telscombe does not respond to its context in the SDNP
- New development is not reflective of the town's history

Opportunities

- Provision of development which improves the link between the town and with both the coast and SDNP
- Expand on the historic origins of the town by offering self-build plots and chalet bungalow development
- Improve the town's setting within the SDNP by improving biodiversity, dark skies and access to the countryside
- Improve the green infrastructure of the town with more tree planting and ecological links
- Housing targets could be achieved on brownfield land such as underused car parks and long term vacant industrial units
- Designation of locally important heritage assets in order to preserve and educate future generations of the history of plotlands development

Threats

- Original pioneer bungalows and plots being lost to redevelopment or dwarfed by new development
- History of town not recognised by future generations and its pioneering importance is lost
- New builds do not respond to the history as they are cost driven - providing high density flats and terraced housing which is what people moved away from to build their own property in Peacehaven
- New builds threaten the views to and from the SDNP from existing property
- Residents see the town as a 'development dumping ground' due to the lack of designations for protection and its location between Brighton and Newhaven

4. DESIGN OF PLOTLANDS DEVELOPMENT

4.1 Design Guide Principles

The Ministry for Housing, Communities and Local Government (MHCLG) state that well designed places 'have been shown to affect our health and well-being, our feelings of safety, security, inclusion and belonging, and our sense of community cohesion' (MHCLG, 2019).

However, design is subjective, what one person considers visually appealing, someone else may not. In addition, one of the biggest issues in planning 'is the interpretation of identity', which is to say the character and appearance of an area, and how this is applied in determining an application (Kirkland, 2017).

The idea of a local design guide is supported by the Royal Town Planning Institute (RTPI) who believe that when considering design, this should be 'evidence based and localised', as 'planning authority area-wide design codes are not as effective' (RTPI, 2020).

Table 3 outlines several paragraphs and sections within the National Planning Policy Framework which are concerned with 'design', 'identity', and the 'character and appearance of an area'.

Table 3 – Summary of NPPF Paragraphs related to design

Paragraph number	Summary
Paragraph 8	Identifies three overarching objectives for sustainable development, one of which is the environmental objective. This objective requires developments to contribute to protecting and enhancing the built and historic environment.
Paragraph 9	States that decisions should take account of local circumstances, to reflect the character, needs, and opportunities of the area.
Paragraph 79	States that decisions should avoid the development of isolated homes in the countryside, or rural areas, unless the design is of exceptional quality, in that it: <ul style="list-style-type: none">• is truly outstanding or innovative, reflecting the highest standards in architecture, and would help to raise standards of design more generally in rural areas; and• would significantly enhance its immediate setting, and be sensitive to the defining characteristics of the local area
Paragraph 122	When addressing density, requires decisions to support development that makes efficient use of land, taking into account the desirability of maintaining an area's prevailing character and setting, including residential gardens.

<i>Section 12</i>	Sets out the requirements for achieving well design places, specifically paragraph 124 which states that 'the creation of high-quality 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'.
<i>paragraph 126</i>	Section 12 is further supported by Paragraph 126, which states that the use of visual tools, such as a design guide will help provide clarity about design expectations, and 'provide a framework for creating distinctive places with a consistent and high quality of design'.
<i>Paragraph 127</i>	<p>Requires decisions to ensure developments:</p> <ul style="list-style-type: none"> • Add to the overall quality of the area • Are visually attractive in terms of <ul style="list-style-type: none"> ◦ Layout ◦ Architecture ◦ Landscaping • Are sympathetic to local character/history, including the surrounding built environment and landscape setting • Maintain a strong sense of place, to create attractive, welcoming and distinctive places to live, work and visit, having regards to <ul style="list-style-type: none"> ◦ Street layout ◦ Building types ◦ Materials <p>Create a safe place, with a high standard of amenity for future and existing users</p>
<i>Paragraph 130</i>	States that 'permission should be refused for developments of a poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions'.

It is clear that the NPPF requires decision making to take account of the local area, to protect and enhance, to create high quality buildings and places, and that the design of any development fundamentally facilitates meeting those objectives, and thus, 'design' underpins what 'the planning and development system should achieve'.

4.2 Development Examples

Large plot sizes are prevalent in Peacehaven and as a result frequently redeveloped. Figure 15 shows a redeveloped plot, where the single storey detached dwelling was demolished for the erection of a pair of semi-detached dwellings. The new dwellings are set back from the front boundary line, have amenity space to the front and a low wall on the front boundary, which are all 'key' characteristics of the plotlands developments.

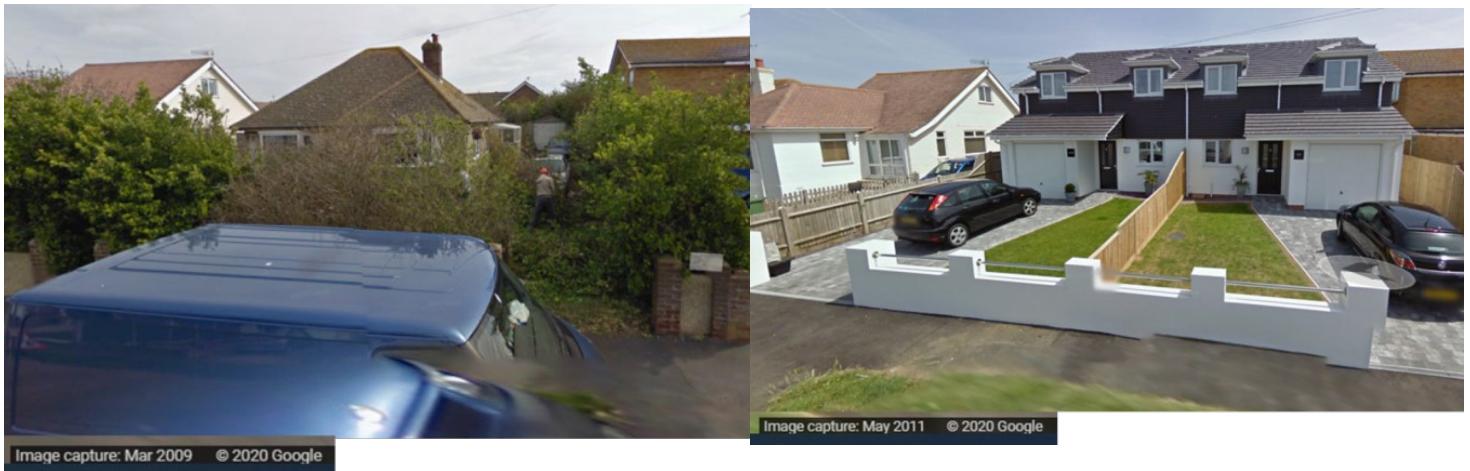


Figure 15: Redevelopment on Malines Avenue – original dwelling left image, redevelopment right image (Google, 2020)

Large plot sizes not only provide an opportunity for demolition and redevelopment, but also for owners to sell part of their land or build a new dwelling on part of the land. Figure 16 shows redevelopment on Arundel Road; the new building may be seen to be out of keeping within the street scene.



Figure 16: Redevelopment on Arundel Road – original dwelling left image, redevelopment right image (Google, 2020)

Figure 17 shows two original plotlands development and their replacement dwellings. Although the first example is a bungalow development, the second development is considered to create more of a sense of identity within its surroundings.



Figure 17: Keymer Road - Original plotlands development on the right with their replacement dwellings on the left. (Google, 2020)

Figure 18 shows redevelopment in Peacehaven that considered to have taken account of the character and appearance of the area, whereas Figure 19 shows an unsympathetic development; there is no boundary treatment to the front and the front elevation abuts the public footpath. This results in a development which appears overly dominant in the street scene and unsympathetic to the character of the area even as a bungalow.



Figure 18: Sunview Avenue redevelopment of vacant plot, original left image, development right image (Google, 2020)



**Figure 19: Unsympathetic development on Roderick Avenue
(Google, 2020)**

Part of the Design Guide could look at establishing areas of established character, such as Bayview Road (Figure 20) which has uninterrupted single storey bungalows, or Bolney Avenue (Figure 21) where there is a collection of uniquely designed bungalows.



Figure 20: Street scene in Bayview Road (Google, 2020)



Figure 21: Street scene in Bolney Avenue (Google, 2020)

5 THE DOWNLAND FRINGE

5.1 Views

One of the key characteristics of Peacehaven's appeal is in its location; uninterrupted views of the English Channel to the south and the South Downs National Park to the north. Alongside the charm of the original plotlands developments, the rural-coastal location provides another aspect of character for the area that deserves to be properly maintained.

In a similar fashion to safeguarding of the original plotlands buildings, it should be considered a matter of importance to protect the sweeping views of the downs from the urban edge in accordance with the SDNP Safeguarding Views policy SD6 (2019) (see figures 22-26). Taking inspiration from neighbouring Seaford and their Neighbourhood Plan, the steering group, in consultation with local residents, should look to devise a statement on local landscape and character for Peacehaven in order to preserve views both out of and towards the town.



Figure 22: View from the east corner of Telscombe Road north east across the downs

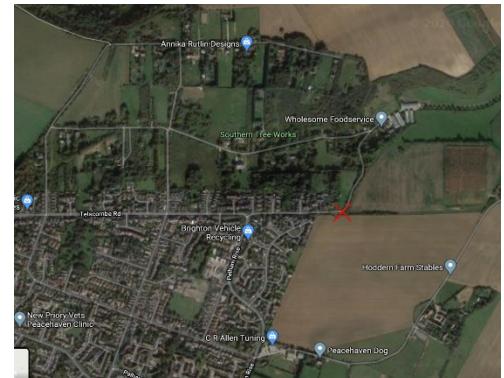


Figure 23: Location of viewpoint in Figure 22 (Google, 2020)



Figure 24: View from the west corner of Telscombe Road looking north



Figure 25: View from the west corner of Telscombe Road looking east

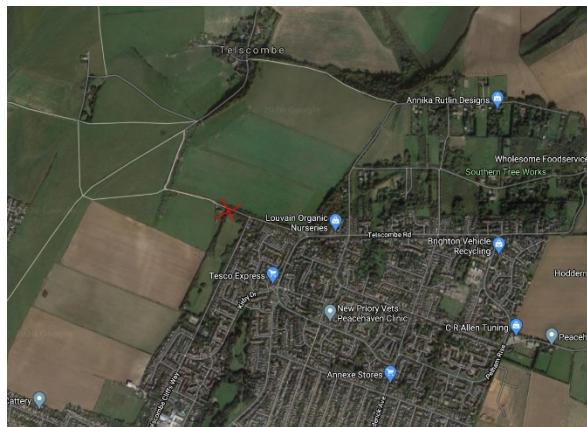


Figure 26: Location of viewpoint for Figures 24 and 25

5.2 Green spaces

Important hedgerows and trees will need to be safeguarded to help maintain and preserve local character. The East Sussex Landscape Character Assessment (2016) highlights the fact that the “grid layout of Peacehaven lacks open space and trees” (ESCC, 2016, p. 28), therefore it is important to safeguard the green assets that are present. Support for this recommendation comes in the form of the East Sussex Green Infrastructure Study (2014), which highlights the ability of a neighbourhood plan to identify and protect designated green

space. Figure 27 shows locations within Peacehaven which the steering group should consider for inclusion as potential Local Green Spaces.



Figure 27: Areas for potential inclusion as Local Green Space

While the most characterful views need protecting, there will be aspects of the downland fringe that won't meet safeguarding criteria. In the instances where development will be permitted, it is still important to reduce the impact that any dwellings will have on these views. SDNP Strategic Policy SD6.3 states that "development proposals will be permitted provided they conserve and enhance sequential views, and do not result in adverse cumulative impacts within views" (SDNP, 2019, p.51). This could be achieved by placing a restriction on development height to ensure that no development extends above tree lines or hills and therefore does not dominate a particular view (see figure 28). This could be complimented by the ideas set out in the Peacehaven design code, especially in terms of bungalows.

Plotlands and Downland Fringe



Figure 28: Development blending into the landscape on the downland fringe

The LDC Local Plan (2016) identifies in policy PT18 (paragraph 13.73) the need for more allotments in the town. Whilst there are existing provisions for allotments at Cornwall Avenue, allotment holders are only allocated a plot between two due to their popularity. For this reason, and in accordance with the LDC Local Plan, further allotment sites could be allocated on the urban edge of town (see figure 29 for suggested location). Not only would this allocation promote healthy and safe communities (as recommended by Section 8 of NPPF) but would also enhance and protect the local green belt (East Sussex Green Infrastructure Study 2014; NPPF section 13 (2012)).



Figure 29: Suggested location for allotments

6 SOUTH DOWNS NATIONAL PARK SETTING

6.1 Telscombe and Peacehaven

Telscombe Village falls to the north of the neighbourhood plan area and within the boundary of the South Downs National Park Authority (SDNPA); Telscombe Village is a designated conservation area with 17 Grade II listed buildings (see figures 30 and 31).

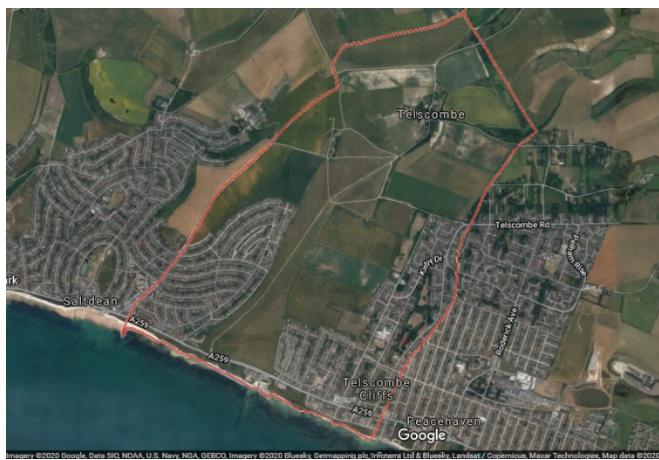


Figure 30: Boundary of Telscombe Town (Google, 2020)

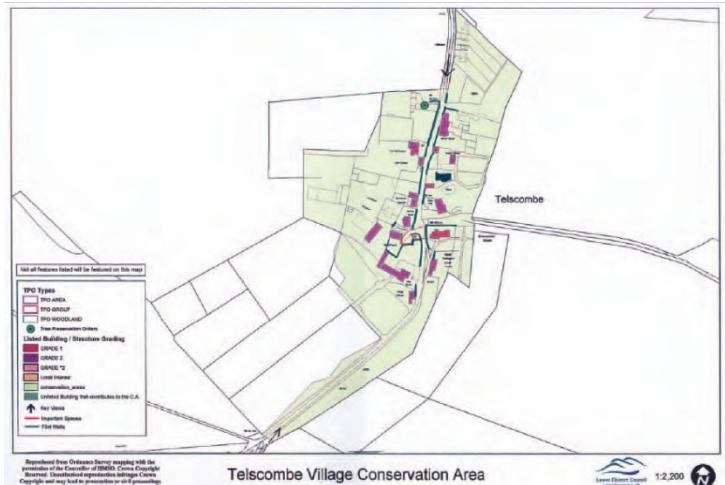


Figure 31: Telscombe Village Conservation Area (Lewes District Council, 2004)

With the policies of the SDNPA, the identification as conservation area and the designation of listed buildings it is felt that for the neighbourhood plan to identify or recommend policies in terms of design and protection for Telscombe Village would be a duplication of already adopted policies and frameworks.

The urban areas of Peacehaven and Telscombe other than Telscombe Village do not fall within but immediately border the SDNP boundary (see figure 32). Developments on the edges of the planning boundary are likely to impact the character of the national park. The neighbourhood plan could provide policies that supplement the SDNPA Dark Skies Policy in terms of limiting light pollution on the downland fringe, improving biodiversity and green infrastructure.



Figure 32: Planning Boundary of SDNP in green (Lewes District Council, 2013)

6.2 Light Pollution

The SDNP surrounding the urban areas have been classified as a dark skies transition zone, 'While the skies are relatively brighter it is still important to reduce light pollution as these areas have the potential to become dark zones in the future.' (SDNPA Dark Skies Technical Advice Note, 2018, p. 11) (see figures 33 and 34).

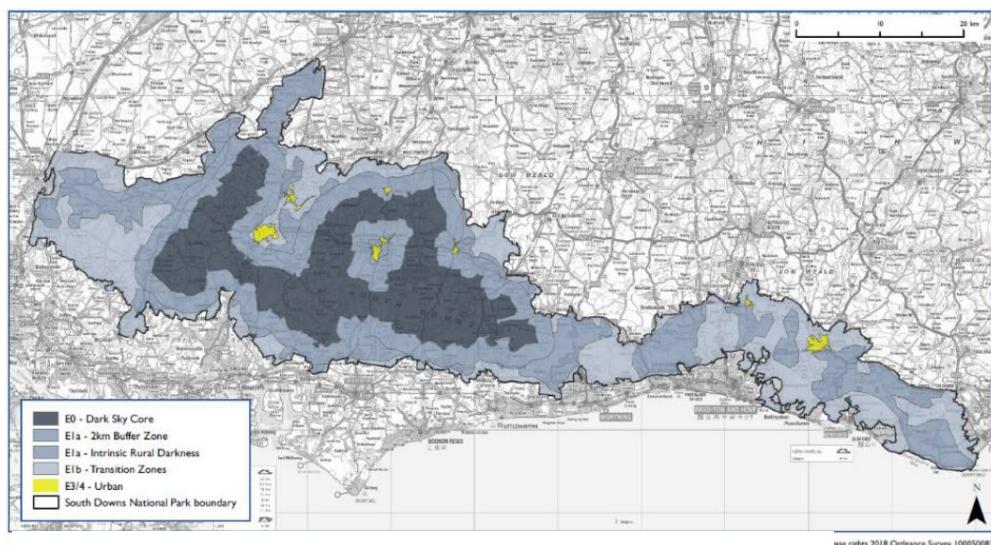


Figure 33: Dark sky zones across the SDNP (SDNP, 2018)

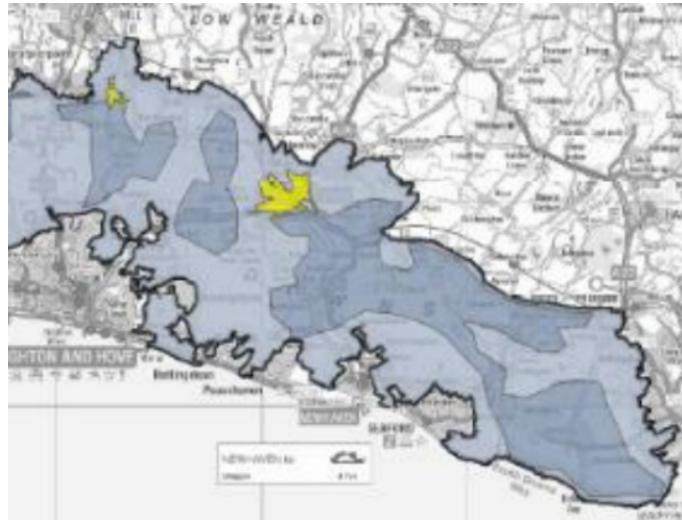


Figure 34: Extract of dark sky zones around Peacehaven and Telscombe

The neighbourhood plan could provide its own dark skies policy to further protect the transition zone from new development on the downland fringe that falls under Lewes District Council. Table 4 below shows extracts from other Neighbourhood Plans within Lewes District Council in relation to light pollution.

Table 4: Examples of dark sky policies from Neighbourhood Plans around Lewes District

Plan Name	Policy Number	Policy Wording
Ringmer to 2030 A Neighbourhood Plan for Ringmer 2010-2030 February 2016	Policy 4.11 Avoidance of Light Pollution	<i>New development, especially new development in the countryside, should minimise additional light pollution, through careful design, location and inclusion of mitigation measures if necessary</i>
Seaford Neighbourhood Plan 2017-2030 December 2019	Policy SEA1 Development within or affecting the South Downs National Park	<i>Development within or impacting upon the South Downs National Park should have a landscape led approach to design, having regard to the setting of the National Park in terms of its landscape and visual amenity. Development within or impacting upon the South Downs National Park must respect... C) tranquility and dark night skies</i>
Plumpton Parish Neighbourhood Plan 2017-2030, January 2018	Policy 2 New-build environment and design	<i>New development should reflect the scale, density, massing, landscape design and material of surrounding buildings, having regard to the Plumpton Design Statement. New development should... avoid light pollution by careful design, location and mitigation measures where lighting is necessary for health and safety reasons</i>

6.3 Green Infrastructure and Biodiversity

Core Policy 8 Green Infrastructure of the Lewes Local Plan Part 1 and SDNP Strategic Policy S4 Landscape Character highlight that green infrastructure is 'essential for conserving and enhancing biodiversity' (Lewes Local Plan Part 1, 2016 p. 111).

There are currently a few paths and bridleways that provide access into the SDNP with the main path running north to south. In consultation with SDNPA and East Sussex Highways the neighbourhood plan could look to provide for the provision of new footpaths and cycle paths improving the accessibility and reducing the requirement to use the A259 for local trips (see figure 35 for some examples).

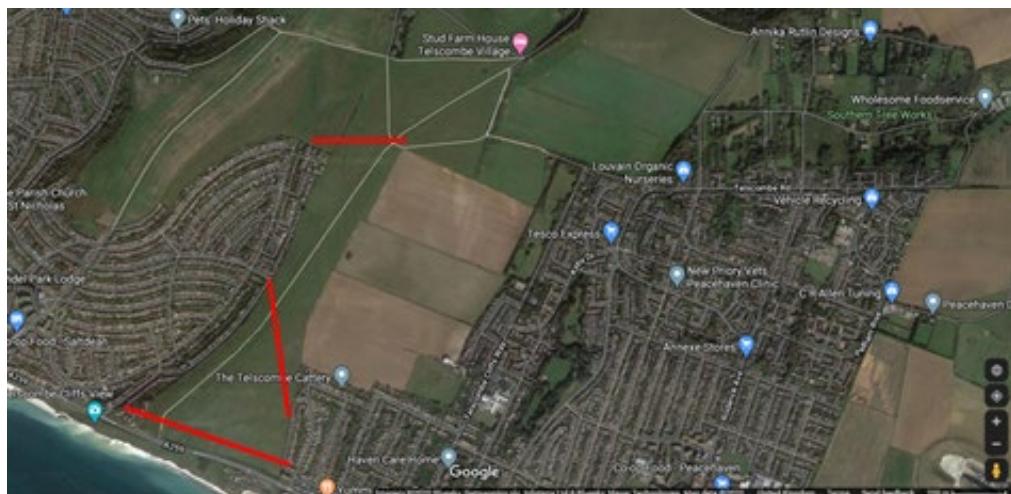


Figure 35: Suggestions of worn routes to be formally designated



Figure 36: Street scenes in Peacehaven and Telscombe (Google, 2020)

Throughout the towns whilst there are grass verges along the streets there are limited public street trees and planting, particularly in Peacehaven (see figure 36). With the coastal setting it can be difficult for trees and plants to survive in the area, a review should be conducted to see where street trees and planting could be placed and the plan could also recommend an increased requirement for new development to include soft landscaping schemes with planting to encourage more wildlife and provide new habitats (see figure 37). Table 5 shows examples of other neighbourhood plan policies from the surrounding area.



Figure 37: Species found around Telscombe and Peacehaven

Table 5: Examples of biodiversity policies from Neighbourhood Plans around Lewes District

Plan Name	Policy Number	Policy Wording
Ringmer to 2030 A Neighbourhood Plan for Ringmer 2010-2030 Adopted February 2016	Policy 4.10 Maintaining and enhancing biodiversity	<i>Development proposals should consider their impact on biodiversity and, where appropriate, include provisions to ensure biodiversity is maintained or, where possible, enhanced.</i>
Plumpton Parish Neighbourhood Plan 2017-2030, adopted January 2018	Policy 3 Landscape and biodiversity	<i>Layout and landscape schemes of new development should be informed by the landscape character of the area, seek to achieve landscape and biodiversity enhancements</i>
Ditchling Street and Westmeston Neighbourhood Development Plan, Plan Period 2017-2032 Adopted May 2018	CONS 9 Protect and Enhance Biodiversity	<i>Habitats and biodiversity will be protected and where possible enhanced in accordance with LDC, SDNPA and national policies. New development should be designed to provide a net gain for nature conservation, noted in the NPPF as a key component of sustainable development.</i>

7 CONCLUSIONS AND RECOMMENDATIONS

Peacehaven and Telscombe have an important historical and environmental legacy which could be protected and enhanced through a Neighbourhood Plan. The following recommendations are suggested for the steering group to explore further in order to safeguard the area for future generations.

- 1) A new Historic Assessment of Peacehaven should be commissioned in view of the highlighted deficiencies in the 2004 report. This assessment should examine the historical significance of 20th Century Peacehaven in more detail and consider whether there is merit in listing early "Plotlands" buildings.
- 2) Undertake an assessment to understand and identify 'key' design qualities of the plotlands development which can be used to inform a 'Design Guide'.
- 3) 'Key' design qualities could include the following as these are prevalent in Peacehaven:
 - Dwellings set back from front boundary
 - Garden/Amenity Space to front and rear of dwelling
 - Boundary treatment to front should be low
 - Dwelling sited away from at least one side boundary (provide access to rear garden)
 - New dwellings to take account of current roofscapes
 - New dwellings to be single storey or two storey chalet style bungalows
- 4) Part of the design guide could look at areas of established character, and how these could be protected through 'design'.
- 5) The design guide could also:
 - Take account of the potential for extensions, and that these should not lead to a terracing effect
 - Request dormers to be sited to the rear of the dwelling so that they are not visible from the public realm, and they should have pitched roofs rather than flat roofs to take account of roofscapes
- 6) To devise the Peacehaven statement on local landscape and character in order to preserve and protect specific views across the downlands from the urban edge, the downlands looking towards the town, and to safeguard the minimal amount of existing green space in the town, including trees and hedgerows.

- 7) To consult with the SDNP to allocate land on the urban edge for the provision of further allotments.
- 8) Improve accessibility and provide new foot and cycle paths across the downland to link into strategic routes in the towns.
- 9) Conduct a review for new street trees and planting and an increased requirement for development to have soft landscaping schemes.
- 10) Reduce light pollution on the urban/downland fringe

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