

Questionnaire

1

Section 2 describes Plan Making, Neighbourhood Planning, Supplementary Planning Documents, and Development Management.

Does this section help you to understand how the planning system works in Lewes District?

Response:

Unlikely for most residents

It needs to be simplified, reduced and better organised with relevant links for those requiring additional information. The format is confusing and lacks clarity and structure. It would have been more effective if all elements related to a particular function e.g. Neighbourhood Plans were under one section, section 4, rather than some items being in section 2 so that all pertinent information can be accessed in one area.

Although driven by central government guidance on SCIs, this document comes across as a mere tick box exercise. There is a perceived disconnect with how any consultation works in practice. It fails to take account of the realities of the planning process and the dictates imposed by central government, ignores the failings in the delivery process, and based on recent consultations carried out will leave communities feeling frustrated and disengaged. This is equally true of any interaction the Council has with Parish and Town Councils.

It is stated that local knowledge can be extremely valuable and lead to better planning decisions with assurance that communities will feel listened to and valued. This creates an expectation that is not being delivered. "Plans should also be shaped by early proportionate and effective engagement" but this is not reflected in practice. Too often decisions are presented as a fait accompli with very little if any opportunity for Parish and Town Councils to change or improve outcomes at an early stage in the processes.

The inclusion of CIL charging is confusing, and it is not clear how Parish and Town councils can or should be consulted on this and whether or if they have any influence on CIL monies collected within their parish or community. This is becoming more critical with the imposition of LGR and devolution where the output on that consultation was completely ignored despite the overwhelming resistance to the proposed changes.

2

Section 3 explains how the Lewes District Council will involve the community in plan-making, including who will be consulted, when consultation will take place, and the methods used.

Do you think the proposed approach to community involvement in plan-making is sufficient?

Response:

No. The current format fails on all the objectives listed and results in the perceived disenfranchisement of the community. The main issues listed are supported in theory but rarely adequately addressed and delivered in practice.

There is an absence of material which is easily understandable let alone in "plain English". It should be made simpler to follow, especially what is meant by "evidence", whereas that provided by local knowledge and expertise is usually ignored. By its nature, planning evidence and policies are likely to be technical and specialist, and there is a vast array of that provided by external consultants to which residents themselves do not have access or the capability of producing. There is too much reliance on quantity and expediency rather than quality and lived experience. Local communities find that these

documents are difficult to access, require detailed knowledge which they largely do not have and/or access to any dedicated resource. It should be possible to supply shorter summaries which are clearer, see p27, with links to further information if required.

Recent Local Plan consultations have been very poorly presented and formatted. Residents in general find the process unusable and off-putting. Presentation to communities has been less than satisfactory and engagement with Parish and Town Councils disappointing.

It would be better to expand under each of the planning stages how you will consult, what you are looking for from the local communities that WILL to be taken account of at that stage that are sensible, realistic and achievable expectations are set for the community.

If communities feel that their input and voice is disregarded and worthless then they will not engage in the process and valuable input and opportunities will be lost despite best intentions.

Parish and Town Councils are similarly not involved in early and effective engagement in any meaningful sense. There is no opportunity for participation which could be used to inform policies and decisions during the development phase but instead Parish and Town Councils are presented with a final document at the same time as it goes out to general consultation with no option or facility to engage at an earlier stage. It is challenging to be able to help to promote consultation and assist residents when councillors are on the same steep learning curve. Parish and Town Councils are a valuable resource which is repeatedly ignored, undervalued and dismissed.

There is little evidence that the additional consultation methods for younger people in particular have been put in practice although this would be welcome.

The policy needs to demonstrate how the consultation responses will be taken account of and what the nature of the feedback will be. It is perceived that this will consist of the usual platitudes rather than constructively explaining how it will be used to shape future iterations of the plans etc.

3

Section 4 explains how the Lewes District Council will support Neighbourhood Planning and the role of communities in preparing neighbourhood plans.

Do you think the level of support offered for neighbourhood planning is sufficient?

Response:

The policy promises much and leads to expectations which are not met in reality and experience shows that it is rather dysfunctional in practice.

The reference to a Neighbourhood Forum (p30) does not make it very clear that this is essentially an alternative option to a Parish or Town Council acting as a Qualifying Body.

The Council must give advice and assistance to bodies in the preparation and adoption of Neighbourhood Plans as required under the Localism Act 2011 and the Neighbourhood Planning Act 2017, but this is not always forthcoming. The “flexible” approach depending on needs and wants is too vague and needs to be detailed along with relevant criteria. The Methods of Support would be very helpful in the process of preparing or reviewing and revising an existing Neighbourhood Plan but have not materialised in practice. Provision of mapping for example would be welcome as would examples of best practice and case law to give consistency between Parishes which can also lead to sharing of knowledge and experience and facilitate self-help between communities.

Sensible timescales should be set and adhered to rather than the long-drawn out procedures and lack of response currently experienced. The Council needs to be able to respond to Parishes on within agreed maximum timescales but there is no existing obligation to do so.

The reality is that the Council is slow to respond, does not seem to want to help, passes the issue around, and treats the plan and those creating it as a nuisance and distraction. Whilst it is accepted that the

Council is under severe resource and financial pressures, the expectation is created in this policy that the Council will, as a matter of good practice, help and support the communities who are working to produce their Neighbourhood Plans, which carry weight when adopted. Failure to do so leads to further disillusionment when that does not happen.

4

Section 5 explains how the public can engage with planning applications, including pre-application, application stage, and appeals.

Do you think the opportunities for community involvement in planning applications is sufficient?

Response:

Similar to previous comments, it would be more helpful if each stage were self-contained, the relevant parts of Section 2 were incorporated here under a single section, setting out in more detail how would work, the sort of feedback that is expected and how it would be dealt with, so that there is a logical sequence.

This section covers the service with which most communities will engage with the Council on a day-to-day basis so would need to be more comprehensive. In terms of managing expectation, by the time the “public” gives their feedback, it is already becoming too late for them to be given any meaning effect.

The section on page 36 is helpful in managing the expectation of the public, i.e. it says what are material planning considerations and what are not. It is however unnecessarily duplicated in Appendix 2.

The section under the heading pre-application stage is misleading as it includes two distinct and separate processes or stages. The first, the pre-application consultation, refers to a recommended or required consultation by the developer with the community, but not with the Council, to allow “the local community to make suggestions which can then be taken into account by the developer in finalising their planning application.” This is again essentially a tick box exercise with limited leading and restrictive questions and is not taken seriously by any developer let alone taken into account. The suggestion that this process can “help reduce local opposition, resolve early design and development problems and ensure that high quality planning applications are received” is frankly laughable. There is no incentive for communities to respond unless this is taken seriously.

The second covers the pre-application advice service between the developer and the Council with the aim of “increasing the chance of a successful application and is likely to speed up a decision.” This is a chargeable service which favours the developer over the community, and which bypasses any local input. Early engagement with Parish and Town Councils during pre-application, although not mandatory, would assist the Council to achieve some of its aims to “reduce local opposition, resolve any issues and problems”. Pre-application advice should be published on the Council’s planning portal to comply with the aim of transparency and not covered by an NDA.

A PPA might be useful subject to further information about what is included.

As an aside it is noted that both Statutory and Non-Statutory Consultees are under a duty to respond to consultations within 21 days and must provide a substantive response but is silent on what happens if such a complete response is not received within the required timescales and the impact on progress of the application. Should this not be forthcoming then logically the application must be put on hold and/or any decision deferred.

This version fails to take into account recent legislation e.g. planning decision making, where new applications for over 150 dwellings and where the LPA was inclined to recommend refusal, would be referred directly to the Secretary of State for a decision within 21 days but this is not mentioned. From 31st October 2026 new rules come into effect where the majority of planning applications would be

decided by a process of delegation with few made by the PAC. Will the SCI be reviewed and updated to reflect this along with new NPPF versions as appropriate?

Clarification on what constitutes Non Material Applications (NMA) and the criteria used to determine these as delegated decisions would be helpful.

5

Please provide any additional comments you have on the Draft Revised Statement of Community Involvement.

Response:

LPAs are required to produce and review their SCI but this has to be undertaken at least every 5 years. The current adopted SCI is dated July 2020 and is therefore out of date and has been for over a year. Section 6 deals with Monitoring and Review but is light on content and it is unclear how this would be measured.

The document should replace “Council” with “Lewes District Council” for clarity.

Text boxes for responses are again too small.

It is apparent that there has been very little revision of the old document and an opportunity has been missed to significantly improve the content and make it more readable and understandable. The document as it was and continues to be is very muddled and lacking in structure, it duplicates some content and oversimplifies other without adding significant value.

It would have been useful and more professional if the document had been proofread and corrected prior to publication. For example, it still refers to PAC meetings being held at County Hall every 3 weeks (p39); for some time, PAC meetings have been held at the Marine Workshops in Newhaven and are less regular. Appendix 5 also refers to planning meetings being held in Lewes, which to most residents means Lewes Town. The Glossary in Appendix 1 (p44) refers to the Core Strategy for Eastbourne 2026-2027. Appendix 3 and Appendix 4 incorrectly list The Highways Agency or Highways Agency which for some years has been National Highways.