

BARCOMBE PARISH COUNCIL

Minutes of a Meeting of Barcombe Parish Council held at the Sports Pavilion, Barcombe on Tuesday 17th November 2009 at 7.00 p.m.

1456. Present: Councillors A J MacGillivray, D J Lloyd, R Hepple, C M Arbenz, J O Cornwell, J C Cornwell, N C Lear, D Skan and R A Williams.

Also in attendance were County Councillor R St. Pierre, Leighton Rowe Housing Allocation and Policy Development Manager from Lewes District Council. R Peters, J Kay (Ringmer PC), D Walters (Newick PC) and 21 members of the public

1457. To receive apologies for absence: Received from Cllr N Gant and District Councillor D Mitchell.

1458. Lewes District Council – Housing allocations policy – Mr Leighton Rowe: The Chairman welcomed Mr Rowe to the meeting and summarised the history of provision of affordable housing in Barcombe over the past 25 years. Mr Rowe then gave a presentation explaining a) the new Choice Based Lettings policy which would become mandatory for local councils from 2010 b) the need to offer greater choice to those in need c) the desire to provide homes in rural areas for those with local connections d) exception site and Section 106 developments. He confirmed that in rural areas Lewes DC policy was to give priority to applicants with a proven local connection (residence/employment/close relation resident for 5 years or special circumstances). A question and answer session followed, this is summarised in Appendix 1 to these minutes. Importantly, he confirmed that a local connection will override need for the new Barcombe scheme at The Willows. This was the first rural scheme of this type that Lewes DC were involved with and inevitably there have been some teething troubles and the priority of local need could not be recognised by the existing computer programme so manual intervention would be necessary, but applicants must still apply by CBL. Not all Housing staff have been trained in the application of the rules in rural areas but this would be addressed before the new accommodation was advertised.

After a short adjournment the Chairman then formally reconvened the meeting.

1459. Confirmation and signature of the last Minutes of the Council: The Minutes of the Meeting of the Council held on Tuesday 22nd September 2009 as recorded by minutes 1368 to 1382 having previously been circulated were confirmed as a true record and signed by the Chairman.

1460. Declarations of Interest: None were declared

1461. Urgent Business Pursuant to Standing Order No.16: There was none

1462. Public Question Time: None

1463. Questions from Councillors: None

1464. Report from Chairman: This is attached as appendix 2 to these minutes

1465. Reports of Committees:

(i) Transport and Highways: : After being proposed by Cllr J C Cornwell, seconded by Cllr R Williams, the Minutes of the Meeting held on 3rd November 2009 as recorded by minutes 1395 to 1410 were adopted. **(a) Parking** – The Clerk has had a response from ESCC that the interim regulations will now be enforced. He has enquired if the regulations in force are still “temporary” and a reply is awaited.

(b) Strengthening Local Relationships and Highways – Information on regulations for “gateway” signage is awaited. Disappointingly, plans by ESCC for more kerbing have not been passed by the parish council as promised at the last SLR meeting. The Clerk was asked to send an e mail to County Councillor R St.Pierre, who had left the meeting due to a prior engagement, expressing the concerns over a lack of action by ESCC on a range of issues. A copy would also be sent to Councillor M Locke, the Lead Member for Transport ESCC.

(c) Deans Meadow car parking – District Councillor D Mitchell has been unwell but will now pursue with officers

(d) Cycle races – a response to the action points in minute 1399 is awaited.

(e) ESCC draft bus strategy: Cllr J C Cornwell will respond; some councillors have responded in an individual capacity

(f) Barcombe Mills car park: The Clerk had circulated by e mail details of the ESCC grant funding and planned works. It was agreed to support the general principle of the improvements subject to seeing the design plans and being party to the ongoing work.

(ii) Recreation Ground: After being proposed by Cllr D J Lloyd, seconded by Cllr R Hepple, the Minutes of the Meeting held on 5th November 2009 as recorded by minutes 1411 to 1425 were adopted.

(a) grant applications and Wild About Barcombe – A meeting is arranged for 24th November to pursue grant funding; Cllr N C Lear reported that the WAB project group had met and tasks had been allocated to specific members of the group to ensure progress would be made.

(b) caretaker – The Clerk reported that an advert will appear in the next edition of Barcombe News

(c) playground matters: The Clerk reported that a new spring has been ordered for the self closing gate. The Clerk confirmed that Lewes DC had been asked to undertake a monthly check. A schedule of works following the recent safety inspection was being prepared.

(d) school building works: Minute 1422 was noted

(e) pavilion – store: It was agreed to support the plans outlined in minute 1418.

(iii) Planning and Community Services: After being proposed by Cllr C M Arbenz, seconded by Cllr N C Lear, the Minutes of the Planning Application Sub Committee meetings held on 13th October and 5th November as recorded by minutes 1383 to 1388 and 1440 to 1445 respectively were adopted.

After being proposed by Cllr N C Lear, seconded by Cllr J O Cornwell, the Minutes of the Meeting held on 5th November 2009 as recorded by Minutes 1426 to 1439 were adopted.

(a) Affordable housing: See minute 1458 above.

(b) Village Action Plan: The next meeting of Action Plan group is on 8th December at 7.30 p.m. in the sports pavilion

(c) ESCC – Waste and Minerals Development Framework Consultation: A paper had been circulated in advance to members of PCS Committee and Cllr A J MacGillivray had volunteered to prepare a response. He reported that this was a far more serious matter than might have first been thought. To date there appears to have been little response from parish councils perhaps because the consultation procedures based partly on electronic means had not been effective. Although there are no obvious direct implications for Barcombe the possibility of “land raise” rubbish disposal sites being developed in nearby parishes was very real. It was agreed that the Chairman should contact SALC to seek their involvement in the discussion of this controversial Strategy and a paper from the Ringmer PC Vice-Chairman who was also acting for the CPRE is attached as Appendix 3. It was agreed that the Chairman and the Clerk should prepare a response to the consultation on behalf of the parish council.

(iv) Finance and General Purposes: After being proposed by Cllr R Hepple, seconded by Cllr A J MacGillivray, the Minutes of the Meetings held on 13th October and 5th November 2009 as recorded by Minutes 1389 to 1394 and 1446 to 1455 respectively were adopted.

(a) Precept for 2010/11: It was agreed to accept the recommendation of FGP Committee in minute 1451 that the Precept requested should be £25,600, an approximate 5% increase.

1466. Casual vacancy: The Clerk confirmed that Lewes DC had not received the required number of requests for an election and therefore a new councillor could be appointed by co-option. The clerk was asked to advertise the vacancy in the December edition of Barcombe News

1467. SALC – training survey for parish councillors: The Clerk had previously circulated a survey from SALC trying to determine the training requirements of the parish council. Some had found the documents too difficult to open so few responses had been received and the Clerk was asked to prepare a simple summary for councillors and circulate by e mail

1468. Correspondence: i) Planning training – It was agreed Cllrs J O Cornwell, C M Arbenz and R Williams would attend the next session provided by Lewes DC **ii) Planning training –** An invitation had been received from Hamsey PC which is considering some bespoke planning training sessions with a firm of consultants if enough local parishes can commit to attend. The Clerk was asked to ascertain what benefits would be forthcoming as the topics covered in the example of a typical session were covered in the Planning Handbook – are there any National Park considerations? **iii) ESCC’s Local Transport Plan 3 Newsletter** was noted

1469. Accounts for payment: The following were approved for payment:
D Lloyd - £9.99 – reimbursement for pavilion gate padlock
Playground Services - £44.85 – playground gate spring

1470. Outstanding action points: Land registration issues remain on 2 parcels of land

1471. Date time and place of next meeting: The Chairman announced the next meeting will be held on Tuesday 19th January 2010 at 7.30 p.m. in the Sports Pavilion, Barcombe

1472. Close of meeting: There being no further business to discuss the chairman closed the meeting at 9.10 p.m.

Appendix 1 – see minute 1458 Q & A summary

Q – why can childless couples only bid for a one bedroom property?

A – there will be more flexibility for this rural scheme than the web site indicates; Hastoe will need to look at the mix of applicants but local people will take precedence

Q – should I bid for a one bedroom property and hope to get upgraded by Hastoe?

A – yes, those with a local connection will be noticed by Hastoe

Q - please can you confirm those with a local connection take precedence in the bidding process?

A – yes, in Barcombe this is the case

Q – Isn't CBL a nonsense in exception site developments?

A – CBL has to be used, but Lewes DC will do so sensibly

Q – Will the advert in the housing magazine say the Barcombe properties are for local people?

A – No, but it will say priority will be given to people with appropriate local connections

Q – can childless couples bid for a two bedroom flat?

A – Yes

Q – how will the overall allocation be managed?

A – it depends on who applies Lewes DC and Hastoe will work on the best and fairest allocations with the parish council involved to confirm local credentials

Q – because of my particular circumstances I was told I should kick out my adult grown up son so I could be better placed to apply – is this right?

A – No, and an apology was made for inappropriate comments – not all staff are trained in the rural allocations policy

Q – I live in Chailey but want to apply so my Barcombe resident family can help with childcare?

A – the presence of local family gives local qualification

Q – if more local people apply than there are properties available how will the properties be allocated?

A – normal housing need criteria will then be used

Q – When can we bid?

A – Hastoe expect to take over the properties in February 2010 so bidding will start soon

Q – what about those who aren't on e mail or on line?

A – Lewes DC provide telephone support

Q – can you confirm the priority of local need is in the planning approval?

A – yes

Q – if my bid is unsuccessful will I be told why?

A – not normally, the volumes are too great but if this scheme Hastoe might be able to give this information

Q – can I apply for both rented and shared ownership properties?

A – yes.

Appendix 2 – Chairman's report

Lewes District Association (LDALC) Meeting 5 October 2009.

Main issues dealt with were as follows

Sustainable Communities Act. A meeting in September of the Lewes SCA Panel with the DC Working Group had concluded that none were satisfied with the exercise carried out during the summer and that changes had to be made should the Secretary of State ask for a repeat in 2010. In these respects it had been agreed to make various recommendations to the DC Cabinet. The LDALC meeting noted the proposed amendment to the Act which would give P/TCs a statutory role in the implementation of the Act. It was agreed that the Association should nominate representatives for any future Lewes SCA Panel and Candida Terry (Peacehaven) and David Walters (Newick) were willing to put their names forward.

SALC Subscriptions. Members were asked to note and convey to their councils the decision by the SALC Executives and JLC to increase the 2010/11 subscription by 2p to 25p per elector. The reasons are: the estimated deficit of £5000-6000 in 2009/10 can be met from reserves but the future would be uncertain; AirS as a charity had been subsidising SALC for some years and now had to operate a Full Cost Recovery system; SALC benefits by operating within AirS and alternative arrangements unlikely to equivalent services; a Working Party to be set up with AirS to review running costs.

T/PC Conference, 21 Oct 2009. In reviewing the agenda for the Conference it was agreed that Barcombe's reports on dissatisfaction with the housing allocation system and apparent lack of a rural housing policy in the Lewes District should form an item on the main agenda of the conference. SALC agreed to request that this item be included.

Sussex Police Budgets. The six-monthly meeting with the Chief Constable and the Secretary of the Police Authority took place on 23 September and the details reported to the September meeting of the ESALC Executive Committee. Five Lewes member councils had submitted queries for consideration by Sussex Police. The Chief Constable went on to discuss future Police budgets. The public spending cuts are estimated to produce a deficiency of £35 million in a current annual budget of £250 million. The 2010/11 budget cut of 2% can be coped with but thereafter the future is unknown. 85% of the police budget covers staffing and the estimated deficiency

could lead to a loss of 40 police staff. A major concern of T/PCs would be the effect on policing by PCSOs. These are early days but the ESALC Executive Committee was concerned that Sussex Police might have been given the impression that T/PCs would willingly help to subsidise the cost of their PCSOs should cuts occur. The Committee felt that policing and crime should be looked at comprehensively, e.g. tackling sources of crime such as social deprivation; at the same time would the Sussex Police approach of intelligence-led policing through PCSOs in communities be at risk? The suggestion by LDALC Vice-Chairman that at an appropriate time SALC should meet with the Sussex Police Authority was favourably received.

Town/Parish Council Conference; Plumpton College, 21 October 2009.

The annual conference sponsored by Lewes DC was well attended by councillors and clerks. The main theme was "Community Empowerment"; Powerpoint Presentations can be accessed on www.lewes.gov.uk/news/15934.asp

Trevor Leggo (SALC) - 3 topics

a. Parish Meeting Debate. There are some 1200 parishes in England with no parish council, only Parish Meeting (PM) status meaning that their electorates have the right to meet twice a year. The Local Government Act 1972 gives PMs limited powers but they are not corporate bodies so that legal action cannot be taken against them. They have the power to precept but their officials (chairman, clerk) are not subject to the Code of Conduct and they tend to be ignored by government departments and agencies in any furtherance of local democracy. There are 10 PMs in East Sussex, 6 of which are located in the Lewes District (Streat, St. John Without, St Anne Without, Iford, Southease, Tarring Neville). Only 3 of these appear to be active in any way (Streat, Iford, Southease) and only Streat raises a precept. Their existence and future has come under consideration due to the consultations on the South Downs National Park and the recent debate on parish councils/parish meetings by the Lewes Sustainable Communities Act Panel.

b. Local Democracy Bill. This is currently being discussed in the House of Commons. Whilst there are some positive elements such as the ability of councils to use electronic banking, it is more a case of what is missing from the bill particularly no attention to a right of appeal to the SoS against a District/Borough Council's rejection of a petition by a community for parish council status (Sovereign Harbour v Eastbourne BC) or granting PCs the ability to use electronic banking.

c. Power of Well Being for P/TCs. Repeat of information on the Power, its advantages and training necessary to obtain such.

Choice Based Lettings in Rural Areas - Sarah Findlay, Housing, Lewes DC. An outline of this presentation and ensuing discussion has already been circulated by email. The main outcomes were that Lewes DC does have a housing policy which includes attention to rural areas and Section 106 occupancy conditions but a failure to communicate with PCs very evident. It should also be reported that with Newick PC's support we raised the issue that Lewes DC now has no policy to consult PCs on first and subsequent occupants of dwellings on Exception Site Policy/Section 106 developments; Newick stressed the point that this was a means of giving a community assurance that the system for allocations to such dwellings was satisfactory.

Since the conference copies of Homemove literature have been circulated to T//PCs.

South Downs National Park (SDNP): Update on Progress and Issues for T/PCs; Liz Ballard, Head of Communications, and Jim Redwood, Head of Planning, Interim SDNP Authority. [JR is a former Director of Planning, Lewes DC, and known to many at the conference] Although much of the information given in these presentations has been available for some time, perhaps because of a slightly different audience this became the major part of the conference with much discussion on numerous points. A new aspect centred on the NP Authority beginning to ask how it can help T/PCs to deliver for the new National Park through suggesting opportunities such as community-led projects, additional funding and influencing the Authority (here SALC is proposing to establish a group of T/PC representatives from within the Park area which would support the assumed two PC representatives from East Sussex on the Authority). The final form of planning for the NP area has yet to be decided as JR and colleagues are still considering the various options. Concern was shown regarding the NP share, if any, of future housing allocations to be devised by the regional authority and the effects on parishes outside the Park boundary; again there is no information on such aspects as yet.

Financial Scenario for next three years: John Magness, Director of Finance & Community Services, Lewes DC. An entertaining presentation but in describing the financial future of Lewes DC as “The Perfect Storm” JM produced some grim facts and predictions. These were based on rising costs, falling income, grant reductions, election year, council tax freeze and capping. The budget for 2008/09 had been slightly overspent and predictions suggested even more so for 2009/10. Although the DC carried considerable reserves, investment facilities for local authorities were very limited compared to those available to the public. However, some actions could be taken through funding obtained for partnership working, e.g. with local groups, Section 106 funds etc.

Hot topics.

Director of Planning/Environment, Lindsay Frost, and Chief Executive, John Crawford, handled a number of queries from T/PCs, viz.

- a. PC Business Plans and Design Statements: SALC has carried out a Business Plan exercise with Plumpton PC and similar advice can be given to other councils on request. The DC Planning Dept. has experience of Design Statements which is available to T/PCs.
- b. Dual Purpose Dog/Litter Bins. These seem possible and will be investigated particularly regarding costs.
- c. Election Expenses. Although a local resolution was found to these increased costs in 2007, it was stressed to the DC Officers that it would have been useful for T/PCs to have had some prior warning of the increases even after annual budgets had been set. Discussion moved to the funding of elections especially in small parishes. It was noted that the Government’s Councillor’s Commission had reported their surprise that PCs had to fund their own elections but DC Officers pointed out that even if DCs as electoral authorities had to bear the cost funds would still have could from public taxation. How about using the Sustainable Communities Act to convince Government to fund our elections ? Concern was shown that the current funding arrangements did not encourage elections in small communities even to fill casual vacancies.

- d. Section 106 Agreements - information on and participation in Section 106 agreements for T/PCs. It was agreed that T/PCs should comment through the current consultation by the DC on Section 106 arrangements. Whilst most interest in this area centres on financial contributions, I added that in fairness it should be noted that Lewes DC Housing had invited Barcombe PC to contribute to the wording of the occupancy conditions for our new affordable housing development.
- e. Devolution of Powers from DC to T/PCs. The DC already had a policy in these respects.
- f. Sites for Travellers/Gypsies. It seemed likely that in addition to the transit facility at Southeram, 11 pitches on two separate sites might be established.
- g. Communications with T/PCs. Several instances of lack of communication with T/PCs had emerged during the conference and the Chief Executive reported that such matters needed addressing (e.g. information on Homemove circulated recently)
- h. Code of Practice. Chief Executive and LDALC Chairman would put its revision back on track. Director of Planning would look for someone to revise The Planning Handbook incorporating appropriate material from the existing Code of Practice.

SALC/AirS Meetings, Ardingly, 6 November 2009

The SALC AGM produces its fair share of comments, moans and suggestions. The main issues highlighted this year were as follows.

Electronic banking. Some banks are attempting to force PCs to operate electronic banking but such action is illegal according to current local council law. The omission of this electronic facility from the Local Democracy Bill going through parliament has caused SALC to survey the situation. A very large number of PCs responded quickly to report such pressures from their banks. NALC is aware of the problem and is lobbying Government to act but according to Justin Griggs, NALC Policy Officer, who was at the AGM said this is but one piece of legislation awaiting attention.

E-Agendas. The question was raised as to the validity of sending agenda papers by email. Answer: perfectly legal so long as the Clerk has a signed copy for inspection.

Contentious issues. SALC now spends significant time dealing with minor/medium squabbles and friction within councils. Society and its demands change and these can be reflected in the conduct of our councils. SALC Officers are now undergoing training in mediation.

Training. Once again, and relevant to the above topic, the need for training in procedures and updates was emphasised. One questioner suggested that compulsory training might be introduced.

AirS AGM. Outgoing Chairman, Cllr. Katryn Field, reported that national politicians needed to get to grips with rural issues. Bodies such as AirS were getting there in these respects.

Jeremy Leggett, AirS Chief Executive, gave an update of activities since the last AGM/Conference. AirS continues to be under financial pressure and is looking at various aspects of its membership. DEFRA and principal local authority funding remains shaky. AirS has few individual members (some 70 only) and wishes to encourage these to increase and be more active. Membership by organisations was

more complicated as service costs to some could be more than the subscription. Parish councils could be major financial contributors.

On policy and practical matters rural areas are often forgotten when delivery of services is being planned. This was the theme of last year's conference when a number of service providers attended and consideration given to those in rural communities who missed out. The feedback exercise had been very helpful. Some successes had been recognised such as county care and health organisations paying more attention to rural deprivation, the new focus on village halls (Heart of the Village Campaign), broadband for small rural businesses and home working, change in perception of rural young as assets in their communities. In progress were: reversing the despondency about achieving affordable housing in small villages; no capital funding for village halls or for resources/advice; more to be done to have apprentices in small rural businesses; essential subsidised transport as a rural lifeline; rural needs to be considered in imminent changes, e.g. reductions in local government funding.

Village Halls - Heart of the Village Campaign - Main Conference Theme

AirS saw the essentials of/for village halls as: community meeting places, people running them were also the heart of the village, more support required for AirS VH support services, rural community buildings need national funding, parish/town council support needed (have tools).

Actions by AirS: Newsletter articles, letter to MPs, petition to No. 10 (which led to an invitation to the Cabinet Office re transfer of community assets - illuminating as bias very urban).

Campaign in 2010: prioritise activities, focus on activities/raise awareness in specific villages particularly assisting in recruiting volunteers, focus on people issues e.g. supporting committees.

National 10 Year Village Hall Survey Results

10,000 villages contacted; 32% return from Sussex.

Main findings:

Village Halls: community ownership (90% charities, 10% parish councils); sustained by volunteers; use has trebled (important for health/well being of ageing population)

Problems: recruiting volunteers difficult; bureaucracy/taxation/lack of funding; viability of some at risk; 7% unable to find funds

Finances: running costs up to £30,000 per year but Sussex halls better at forward planning and more financially self-sustaining; over 50% make a surplus; less than 40% receive full rate relief.

Buildings: ageing; 8% need urgent repair; difficulties in meeting major users' needs; opportunities for carbon emission reduction (only Cooksbridge to date); accessibility has improved

Capital Works: 70 halls in Sussex looking for funding; steady planning of improvements but lack of capital funds; grant aid of over £5 million sought; 16% need more than £200,000; scope for borrowing by PCs; £500,000 spent on VAT

Conclusion: Theme of Heart of Village Campaign correct.

Keynote presentations: Nick Herbet, MP for Arundel & South Downs, Shadow SoS DEFRA; Serena Tierney Lib Dem prospective parliamentary candidate for Mid Sussex. Both speakers highlighted their political leanings particularly as far as

solving rural problems, NH from personal parliamentary experience, ST from a more distant and local viewpoint. Both stressed that “government should get out of people’s lives”. NH was very critical of the establishment of the South Downs National Park which he would not have supported if in office - a democratic deficit and another quango. ST, as a copyright lawyer felt it inappropriate that village halls should come under this legislation; like attempts to change the Licensing Act there was no fast track to government.

Overall conclusion. The Barcombe contingent felt that in SALC and AirS Sussex was very lucky in having two strong organisations to represent and support different aspects of county life.

AJMacG
Nov 2009

Appendix 3 -

East Sussex County Council & Brighton & Hove Waste & Minerals Strategy

Consultation deadline 2 December 2009

Proposals for waste disposal by landraising in East Sussex

This extensive draft policy covering up to 2026 is presently out for consultation and can be viewed on-line at: <http://consult.eastsussex.gov.uk/portal>

While there are many proposals that will, if approved, affect East Sussex rural communities (e.g. the need for several new waste recovery and composting facilities), the key section for most rural local councils and organisations in East Sussex is Section 12, and particularly draft policy CS6. This proposes disposal of very large quantities of Brighton & East Sussex non-inert waste by tipping it onto large areas of unspoilt East Sussex countryside (not exactly their words, but what the proposal means).

Five “areas of search” for suitable tips have been identified. These are illustrated in the very broad-brush map shown in Plan 4, to be found in the “Waste Plans and Minerals, Key Diagram” section. Identified sites must have a minimum area of 25 hectares. My best interpretation of these five sites is:

No.1. A large area north of the A27 and the Lewes-Eastbourne railway, immediately east of **Glynde**, north of Firle, west of Selmeston, Ripe and Chalvington and south of Laughton. This appears to correspond to the southern half of the Laughton levels. Of the five areas this is by far the most convenient for Brighton and the coastal towns west of Eastbourne.

No.2. An area to the south-east of the A272 east of **Newick** and west of Piltdown. This is the most convenient for Uckfield and the nearest to northern Wealden towns such as Crowborough.

No.3. A large area south-east of the A22, between Halland, **East Hoathly** and Whitesmith, with the B2192 its northern boundary and extending as far west as Shortgate. This appears to correspond broadly to the former Halland Park.

No.4. An area south-west of the A22 at **Golden Cross**, with its northern boundary the B2124.

No.5. An area north of the A22 and west of the A267, just north of the **Boship** roundabout and Lower Dicker. Of the five areas this is the most convenient for Eastbourne, Polegate and Hailsham, and the nearest to Bexhill & Hastings (unless the Ashdown brickworks site at Bexhill becomes available).

It should be noted that now the Beddingham site has closed, East Sussex waste is already being transported a considerable distance to a site in West Sussex for landfill, and from the Draft Strategy's perspectives all of these five sites would be considered potentially suitable for waste from anywhere from Brighton to Hastings.

East Sussex County Council appear to be leading on this plan, with the lead ESCC officer Ian Blake. The identification of the five areas above was carried out by external consultants Scott Wilson employed for the purpose, project lead Andrew Wooddisse. An initial 31 candidate sites were studied, with 8 characterised as 'red' (unsuitable), 23 'amber' (failed some criteria) and 0 'green' (suitable). The 'amber' sites were then re-categorised to identify six candidate sites where it was felt the constraints were more easily overcome. Two of these sites were adjacent and have been merged, to give the five above.

The specific aim of this section of the consultation, in which the actual sites are deliberately undefined, is to take "difficult decisions". Once the "difficult decisions" have been taken, the framework for planning applications for the actual sites will be much more straightforward. I interpret this as meaning that contesting specific planning applications that fit an approved Strategy, perhaps to be made by operating companies in association with landowners, will be much more difficult.

If individuals, organisations or councils wish to comment on the proposals within the current consultation, information below from a seminar held 16 November to which CPRE was invited may be helpful.

1. The consultation process has failed to attract adequate attention from the community intended to be consulted. Only a tiny fraction of East Sussex parish councils were represented at the meeting held for them in Uckfield earlier this month, and the exhibition held in Lewes last week was also very thinly attended. The significance of the proposals seems not to have been appreciated in due time. Plan 4 showing the areas of search for the new countryside landfill tips is deeply buried within a very long and complex document, and the scale of the map is deliberately broad brush.

2. In considering where the waste from Brighton & Hove should go, the Plan is bound by administrative boundaries that link the city with East Sussex. Administrative issues have been given undue priority over sustainability. Thus the planners have deliberately ignored the possibility that there might be more sustainable sites much closer to the city in West Sussex.

3. The assumptions about the amount of waste for which landfill capacity is needed are unsound because they are based on South East Plan norms for disposal by various routes,

rather than what could actually be achieved locally, especially when the Newhaven incinerator is completed. An exception is that the draft assumes a below-Plan target for recycling and composting, because the Plan target is considered too hard to achieve here. The fundamental assumption throughout the draft is that tipping waste onto unspoilt countryside is regrettable but necessary, with the Strategy's role only to identify the necessary sites. This should be turned upside down. The East Sussex Strategy should be based on real East Sussex data. The Strategy should start with the assumption that tipping waste onto unspoilt countryside is unacceptable in principle, and direct its attention to identifying alternative routes for waste removal, recycling and reutilisation. This should include recycling and composting rates that are far above, rather than well below, South East Plan norms; incineration of 100% of non-recycled municipal waste; and much more ambitious targets for minimisation, recycling and recovery of commercial, industrial and construction waste.

4. The draft is based on the adopted South East Plan projections for household and population growth that are already obsolete. The South East Plan itself may well have been abolished prior to the earliest date at which the draft East Sussex Strategy will be ready for submission to ministers (June 2010).

John Kay
17 November 2009