



C/o Charly Stringer

Our Ref: SDNP/25/01028/PRE
Contact Officer: Stella New
Tel. No.: 01730 819216

8 May 2025

Dear Charly Stringer

PRE-APPLICATION ADVICE

Applicant: C/O Charly Stringer
Proposal: STAGE 2 - The proposed development comprises of the demolition of the four units to the north of the Aldi store and an extension to the existing Aldi into this area.
Location: Aldi House, Brooks Road, Lewes, East Sussex, BN7 2BY

Thank you for your correspondence received 7 March 2025 seeking pre-application advice.

Executive Summary

Despite the fact that partial occupation of the B8 class units identified for demolition means that it will be inherently difficult to evidence to demonstrate lack of market demand, the principle of development is considered acceptable in broad terms. This is due to the permission granted in 2020 which, although now lapsed, considered the loss of the units acceptable within the same development plan context.

As previously, to offset the loss of employment space, you should consider supporting any application with a 'Framework Relocation Strategy' to provide relocation assistance to existing tenants. Any proposal should also focus on providing public realm enhancements in and around the site, in accordance with the guidance set out in the Brooks Road Planning Brief. Further work is also required to refine the proposed materials and address issues relating to sustainable drainage and climate change measures, in particular the notable lack of any green roof, and the layout and planting in and around the car park.

Please note that the advice contained within this letter constitutes an informal Officer's opinion and does not prejudice, nor is binding upon, any future decision taken by the South Downs National Park Authority.

Planning Policy

See Appendix 1. The South Downs Local Plan is undergoing a period of review, and the First Publication (18 Consultation) is underway. This is the first publication of the Local Plan Review and therefore can only be attributed very little weight. As it progresses through the consultation system the plan will gain more weight.

The policies relevant to this application are the same as those currently and none of the changes proposed will have a significant impact upon the proposals.

The Lewes Neighbourhood Development Plan (NDP) has been adopted by the SDNPA and forms part of the Development Plan. The following policies are relevant:

- o LE1 Natural Capital
- o LE2 Biodiversity
- o HC2 New Services and Facilities
- o PL2 Architecture and Design
- o PL3 Flood Resilience
- o PL4 Renewable Energy and the Resource and Energy Efficiency of New Buildings
- o HC3A Heritage Protection of Landscape and Townscape
- o HC4 The Working Town
- o AM1 Active Travel Networks
- o AM3 Car Parking Strategy

Please also note the following SPDs, TANs and development briefs which are relevant to the application:

- o The Design Guide SPD
- o Sustainable Construction SPD
- o Dark Skies TAN
- o Biodiversity TAN
- o Ecosystem Services TAN
- o The Brooks Road Planning Brief

Planning Assessment

Existing Site and Context

The site relates to a 0.48ha parcel of land in the industrial centre of Lewes, including the current Aldi site, occupied by an existing Aldi store and its car park, and four existing industrial units to the north west, which would be demolished to make way for a store extension. All of the site is previously developed, brownfield land.

The existing Aldi site is located on mainly flat land, however there are significant changes in level in the northern part of the site where the store extension would be located.

The site falls within the Settlement Policy Boundary and outside the Market Town centre of Lewes. The existing employment units, which comprise some 638 sqm in total, are located within the Central Lewes Principal Employment Site, which is identified and safeguarded under Policy SD35 of the South Downs Local Plan and is the traditional industrial heart of the town. The Central Lewes site is identified in the 2017 Employment Land Review Update, which describes it as a large mixed employment area close to Lewes Towns Centre and recommends safeguarding it as a principal employment area. The application site falls also wholly within the Area of Interest covered by the Brooks Road Planning Brief.

The main industrial area to the west and south is characterised by large warehouse buildings in a mix of commercial and storage uses, but the area has seen an increase in residential uses in recent years, predominantly in the north and east. A large Tesco supermarket is located to the west of the site and its petrol filling station is located to the south.

Aldi is currently accessed from Brooks Road and is adjacent to a roundabout which provides access onto one of the main routes through the town. The site is located close to the River Ouse. The majority of the site is located in Flood Zone 2 and a small proportion is in Flood Zone 3.

Planning History

The relevant planning history for the site is as follows:

LW/10/1254/NP Erection of foodstore and associated parking and landscaping. Approved 27.05.2011

LW/11/0602/CD/NP Discharge of conditions 1, 2, 3, 4, 5, 6, 7, 8, 9, 12, 15, 16, 18 and 24 relating to planning approval LW/10/1254/NP. Approved 14.10.2011

SDNP/15/04122/CND Variation of condition 11 attached to planning permission LW/10/1254/NP to reduce the length of free car parking from 3 hours to 1.5 hours. Allowed at appeal 28.07.2016.

SDNP/18/02766/PRES Store extension. Advice provided 26.07.2018

SDNP/18/05206/FUL Redevelopment of a Retail (A1) unit at Brooks Road, Lewes, with associated parking, servicing and landscaping to include a 1,254 sqm retail space. Approved 19.05.2020, not enacted

Proposal

The proposal seeks to extend the existing 855 sqm store, which is understood to be smaller than the standard Aldi store size, by around 265sqm to provide an overall sales area of c.1,120 sqm. The main extension to the north would include a new store warehouse, loading bay, and amenities, and a smaller extension built on the east for customer WC and office.

The existing building would be re-clad to improve appearance and energy performance, and the landscaping in and around the site would be expanded by some 320sqm with increased tree planting. The parking provision would be increased from 81 to 93 standard spaces, which would assist with relieving congestion, and 20 new EV spaces would be provided. Access by active modes would be encouraged by increasing cycle parking spaces from 8 to 27. There would also be cycle storage provided for staff.

Principle of Development

Policy and Guidance

Policy SD25 of the South Downs Local Plan (SDLP) directs new development to within settlement policy boundaries, with support for proposals of a scale and nature appropriate to the character and function of the settlement in its landscape context. Policy PL1 supports the residential development of unidentified brownfield sites within the settlement boundary which do not involve the loss of identified employment land and premises in active employment use.

Policy SD35 states that all existing employment sites and allocations that are fit for purpose shall be safeguarded from development proposals for non-employment uses. Change of use applications that would result in a loss of employment land will only be permitted on principal employment sites where supported by evidence of a robust marketing campaign of at least 18 months clearly demonstrating that there is no market demand for B Class employment uses (now E g) and B8 uses). The supporting text sets out that the continued use of principal employment sites in the National Park for B (E g) Class employment is supported and development proposals for alternative commercial uses will be resisted. Policy SD38 requires a retail impact assessment for retail development outside of defined Market Town boundaries but within the settlement policy boundaries, where the proposal exceeds 750 sqm.

Policy HC4 of the Lewes Neighbourhood Plan seeks to protect and enhance existing employment uses and premises (Use Classes E g) and B8) across the plan area.

The SDNPA Brooks Road Planning Brief sets out an approach to redevelopment and guidance on key issues relevant to the area. The Brief's vision includes retaining Brooks Road's role as a 'functioning and thriving employment centre with buildings and spaces between that are flexible, functional and of high environmental standards.' In terms of uses, the Brief supports redevelopment proposals that provide enhanced employment floorspace and retains the diversity of employment uses.

Analysis

There is a general policy steer that resists the loss of employment land, particularly where such land fall within principal employment sites as is the case here. The loss of such land is normally only countenanced when supported by robust evidence in the form of a minimum 18-month marketing campaign that clearly demonstrates there is no market demand for the business premises.

The four business units proposed for demolition are understood to be within the applicant's ownership, in a B8 (storage and distribution use) and are described in the submission as 'underutilised,' with only two of the units currently occupied on a short-term lease basis. At least two of the units appeared to be occupied at the time of the officer's site visit on 9 April. Their partial occupation makes the provision of evidence to demonstrate lack of market demand for an employment use difficult. Nonetheless, their loss was considered to be acceptable when the application was determined in 2020, and although no longer extant, the 2020 permission is a material consideration that carries significant weight given that the same development plan policy context still applies.

The SDNPA Brooks Road Planning Brief was published in February 2023 and is also an important material consideration in making planning decisions relating to the Brooks Road area. However, whilst it sets out an approach to redevelopment that echoes development plan policies in resisting the loss of employment land, it does not carry more weight than the 2020 permission in this regard.

The principle of development is therefore considered to be broadly acceptable in terms of the loss of the business units and increase in commercial floor space. The increase in FTE provision was considered a significant positive in 2020, and any planning application should highlight what this benefit would be.

The 2020 permission was subject to a S.106 agreement to secure a 'Framework Relocation Strategy' to provide relocation assistance to existing tenants in the form of a year's lease extension, and any future application should include a similar provision. The £125K Economic Development Contribution towards the enhancement of Lewes Town Centre and local employment initiatives is understood to have arisen from the Retail Impact Assessment; however, as the uplift in new floor space would be less than the 750sqm threshold, a retail impact assessment is no longer required under SD38. Instead, the scheme should focus on providing enhancements in and around the site, in accordance with the guidance set out in the Brooks

Road Planning Brief. This is considered in more detail below.

The submission also queries the Retail Evidence Study (2016) which relates solely to the market towns of Midhurst and Petworth and the village centre of Liss, and whether there has been an updated retail study as part of the emerging Local Plan Review that includes Lewes. The most recent study in Lewes was carried out in 2012 https://www.southdowns.gov.uk/wp-content/uploads/2016/11/Lewes-Shopping_and_town_centre_study-2012.pdf The need for updated retail evidence is being considered as part of the Local Plan Review

The proposal is not considered to be major development for the purposes of para 190 of the NPPF or SD3 of the Local Plan.

Sequential Test

Although not a development plan requirement, Para 91 of the NPPF requires main town centre uses 'which are neither in an existing centre nor in accordance with an up-to-date plan' to carry out a sequential test.

Although outside the town centre, the proposal would result in the loss of B8 use land within a principal employment area. The use would be a commercial employment use, however given that 18month marketing evidence cannot be provided, the proposal is not strictly in accordance with the development plan. The advice from our policy team is that, given the proposal is for a store extension rather than a new store, a sequential test is "less critical" however should be carried out for the avoidance of any doubt and for Para 91 to be satisfied. The SDNPA is not aware of any other large sites that are better related to the town centre.

Design and Landscape

The first statutory purpose of the National Park is to conserve and enhance the natural beauty, wildlife and cultural heritage of the area, and development within it must accord with this purpose.

Section 245 of the LURA 2023 amends and strengthens the Section 11A (2) duty of the National Parks and Access to the Countryside Act 1949 upon relevant authorities, which includes the National Park Authority itself, to "seek to further the specified purposes of Protected Landscapes." The Government's 'Guidance for relevant authorities on seeking to further the purposes of Protected Landscapes', published 16 December 2024, sets out that this duty is active not passive and that, as far as is reasonably practicable, 'relevant authorities should seek to avoid harm and contribute to the conservation and enhancement of the natural beauty, special qualities, and key characteristics of Protected Landscapes.' It is therefore incumbent on the National Park Authority, as the Local Planning Authority, to give significant weight to the S.245 duty when determining applications.

Policies SD4, SD5 and PL2 require the design of development to adopt a landscape-led approach to improve and enhance the built environment, conserve and enhance existing landscape character features; and be of a scale and nature appropriate to the character and function of the settlement in its landscape context.

Policies SD48, PL2 and PL4 require the design of new development to address climate change mitigation through the on-site use of zero/low carbon technologies, sustainable design and construction, and low carbon materials. Further information is available in the SDNPA Sustainable Construction Supplementary Planning Document <https://www.southdowns.gov.uk/planning-policy/supplementary-planning-documents/supplementary-planning-documents/sustainable-construction-supplementary-planning-document/>

Key design principles, challenges and opportunities for the area are also set out in the Brooks Road Planning Brief, with a focus on efficient land use, adaptable buildings, and improved connectivity and public realm. SD38 7) requires all retail development outside centres to consider and take opportunities to increase people's awareness, understanding and enjoyment of the special qualities of the National Park.

Any development proposal should demonstrate that it meets the minimum requirements for new development as per the SDNPA Sustainable Construction SPD. As the uplift in floor space would be more than 250 sqm and less than 1,000 sqm, Appendix 5 (Minor Non-Residential Development) will apply, which requires new development to include a range of energy efficiency (building fabric) and renewable energy measures.

We would encourage you to consider the details approved under permission SDNP/20/05058/FUL for the Petersfield Aldi, which is a new store within the National Park. This landscape-led scheme successfully incorporated a range of enhancements and positive design features including a section of flint walling, native landscaping scheme with an open brook, and one of the largest biodiverse green roofs in the National Park to date. It is also a good example of a mix of planted area to surfacing.

The Design officer has advised that the size and location of the proposed extension is preferable to the rebuild approach submitted in 2018 in terms of sustainability and embodied carbon, and the reuse of the existing cladding is welcomed providing the painted surface will be durable and weather the same as the new panels it is seeking to match. Any development proposal should demonstrate that it meets the minimum requirements for new development as per the SDNPA Sustainable Construction SPD. As the uplift in floor space would be less than 1,000 sqm, Appendix 5 (Minor Non-Residential Development) will apply, which requires new development to include a range of energy efficiency (building fabric) and renewable energy measures.

However, further refinement is required to the design of the building before it can be supported in design terms. The introduction of material changes to visually break up the mass and horizontal emphasis of the main facades is positive, however the proposed panels currently fail to add texture and would result in smooth surface finishes, creating a pre-fabricated appearance. Artificial versions of materials should be avoided. The window sizes serving a meeting room and staff room appear small for the size of rooms, and it is queried whether these rooms would be adequately daylit without relying on artificial lighting during daylight hours. There is also a concern that the roof area to the new extension is not proposed to be green as we discussed at the meeting. The Brooks Road Development Brief identifies green roofs as an opportunity to provide water management, biodiversity and landscape amenity benefits, and you are strongly encouraged to incorporate a green roof within the design as this will assist you in meeting a range of other policies.

In terms of the car park and public realm, the introduction of a pedestrian route running south from the store entrance is welcomed. However, the revisions to the car park layout appears to reduce the existing vegetation along the west boundary. This is important for screening the west-facing facade, and any works within the site must seek to retain it and avoid the risk of causing its failure or decline. It is also currently unclear how pedestrians could access the site from the north without utilising the vehicular access. The pedestrian route to the shop perimeter and the pavement around the south west corner of the store is also narrow and requires further consideration.

It is worth noting that Brooks Road has been demonstrated to be the hottest part of Lewes due to the extent of existing hard surfacing, buildings and general lack of trees/greenery. The car park as proposed is a large area of hardstanding which risks a heat island effect during summer months. Providing more vegetation, particularly trees within the parking area to provide maximum shade would be beneficial and more climate resilient. The proposed trees around the delivery yard are welcomed in principle, however care is needed to ensure they are positioned with sufficient distance to existing and proposed buildings. Further information regarding trees can be found from page 43-47 in the SDNP Design Guide. Some bench / seating provision outside the store would also be a positive addition.

Ecology, Trees and Ecosystem Services

Policies SD2, SD9, SD11, SD45, LE1 and LE2 support proposals that conserve and enhance biodiversity, trees and green infrastructure; retain, protect and enhance features of biodiversity and supporting habitat, and identify and incorporate net gains for biodiversity and green infrastructure.

The Local Nature Recovery Strategy (LNRS) is a material consideration especially where the development plan pre-dates the publication of a LNRS. In this case, the East Sussex (inc. Brighton) LNRS is at an early stage and not yet been subject to statutory public consultation. It is therefore afforded limited weight.

Providing the proposals would impact less than 25sqm of habitat, they would be exempt from statutory biodiversity net gain. This is not currently clear as it appears that an area of planting along the western boundary would be lost to provide parking. Any exemption would need to be demonstrated using the Defra metric and supported by a preliminary ecological appraisal. Even if it can be demonstrated that an application would be exempt from mandatory BNG, biodiversity enhancements should be sought to comply with SD2 and SD9. This could be achieved through a mix of locally appropriate native planting and bat and bird boxes on buildings, and of course a green roof.

Any formal application should be informed by an ecological assessment of the proposed development, assessing the likely impacts of the scheme on biodiversity and recommendations for appropriate mitigation, compensation and enhancement made in accordance with CIEEM guidance. Enhancements should aim to strengthen connectivity between existing habitats and provide biodiversity net gain.

Dark Night Skies

Policy SD8 requires proposals to take all opportunities to reduce light pollution and ensure that the measured and observed sky quality in the surrounding area is not affected.

Further information is available in the SDNPA Dark Skies Technical Advice Note <https://www.southdowns.gov.uk/planning-policy/supplementary-planning-documents/technical-advice-notes-tans/dark-skies-technical-advice-note-tan/>

The site is located within the Dark Skies Transition Zone (E1b), which lies between dark zones and the urban environment. Whilst the skies are relatively brighter in this area, it is still important to reduce light pollution as these areas have the potential to become dark zones in the future. Any external lighting should meet minimum safety requirements but still aim to accord with the SDNPA Dark Skies Technical Advice Note in avoiding upwards light spill. Where feasible, glazing should be recessed or located under overhangs.

Drainage, Contamination and the Water Environment

Policies SD17, SD49 and SD50 seek to reduce flood risk and ensure proposals within Groundwater Source Protection Zones (SPZs) do not have an adverse impact on the quality of the groundwater source. The Brooks Road Planning Brief highlights water management (water quality and quantity) as being a particular problem in the area

Proposals should incorporate measures to eliminate risk of pollution to groundwater features, and sustainable drainage solutions provided to avoid increase of surface water run-off, taking account of climate change. SuDS features should be appropriate to the landscape context, utilising where possible the historic/existing drainage routes as set out in the Planning Brief and the principles set out in the Design Guide SPD.

PL3 states that new or additional residential or commercial development which would materially add to water discharge generally in the neighbourhood area, and into the River Ouse in particular, should assess fluvial (up and down stream), coastal and groundwater flood risk, and surface water drainage.

Policy SD55 requires proposals on sites with known or suspected contamination to submit appropriate contamination investigations and remedial measures. This is particularly important in areas of groundwater vulnerability.

In this case the site is located in Flood Zone 3, a Source Protection Zone and an area of major groundwater vulnerability due to the underlying aquifer. There may also be land contamination due to previous/existing uses. Any application will need to be supported by a Flood Risk Assessment (FRA) using flood data that can be obtained directly from the Environment Agency. Further information and recommendations for a site-specific FRA is available in the Lewes District Strategic Flood Risk Assessment Level 1 Update and Level 2.

It is currently unclear what the SuDS approach will be. You should note that Southern Water changed their policy with regard to connections to the combined sewer network, and that there is no longer a historic right of connection when brownfield sites are redeveloped. Opportunities to attenuate water as close to the source as possible should be taken with the aim being to maximise above ground non engineered solutions that benefit amenity, biodiversity, water quality and reducing flow volume. The provision of permeable paving and a green roof would assist with this.

Surface water drainage should be considered early in the design process. The incorporation of SuDS (swales, green roofs) is supported wherever feasible. Care will also need to be taken to avoid discharge of potential pollutants to the water environment. The ESCC Local Lead Flood Authority (LLFA) have only advised that they operate a chargeable pre-application advice service. Further information and recommendations for the design of SuDS is available in the Lewes District Strategic Flood Risk Assessment Level 1 Update and Level 2, and the SDNPA Design Guide SPD. Should connection to the sewer network be proposed, this should be a last resort and accompanied by evidence of an agreement from Southern Water.

It should be noted that the 2018 application received a late objection from the LLFA raising concerns regarding the proposed surface water drainage strategy. This showed surface water runoff from the development discharged to the adjacent public sewer at a rate restricted to 25 l/s for all events up to a 1 in 100 (plus climate change allowance) annual probability of occurring, with the volume of storage estimated using the MicroDrainage 'Source Control' module. Instead, the capacity of the surface water system should be evidenced using the MicroDrainage 'Network' module (or equivalent) to demonstrate that the proposed discharge rate will be achieved during the 1 in 1, 1 in 30 and 1 in 100 rainfall events including climate change. The climate change allowance should also be 40% (instead of 20%).

Access and Parking

Policies SD19, SD22, AM1 and AM3 seek to promote sustainable modes of transport including electric vehicles; and a level of parking provision that is appropriate to the site's needs and proximity to facilities and services, and of a location, scale and design that reflects its context. Policies SD21 and AM1 seek to promote the safety and amenity of all road users, and prioritise and support existing safe, direct, walking and cycling routes.

The Brooks Road Planning Brief highlights a number of current movement and connectivity challenges, and development opportunities to address them (see section 6.04.) The Brooks Road area is currently focused on vehicle movements, and there is a general lack of coherent pedestrian and cycle connectivity for what is a sustainable location close to Lewes Town centre, shops and services. For this reason the Planning Brief generally supports employment uses that do not lead to high traffic or generate many vehicle movements. Any proposal should therefore focus on sustainable transport provision to reduce the use of cars as far as possible.

Both the SDNPA and ESCC guidance on parking suggest 1 parking space per 14 sqm for retail/commercial uses. For a floor space of c.1,200sqm this equates to 80 spaces, so there would be a slight over provision with 93 spaces. It is acknowledged that the anecdotal evidence provided suggests that an increase in parking spaces is required, however given the above, travel by sustainable means should be actively encouraged. The SDNPA parking SPD requires large retail units (in excess of 1,000sqm) to provide 1 cycle parking space per 100m² for staff and 1 space per 100m² for customers. This would equate to 12 staff and 12 customer cycle parking spaces. The improved cycle parking provision of 27 spaces for customers is therefore welcomed. At least 12 staff cycle parking spaces should also be provided. The position of the proposed staff bike parking does not appear convenient for users or well positioned in relation to the lorry turning zone. To support cycling to work the provision of changing space and showers within the extension is also encouraged.

It is understood that the 20 EV charge points are intended to be the standard 7KW. It is questioned whether this amount of EV charge points could potentially result in an under provision of regular car parking spaces for those with non-electric vehicles, and you may wish to support this with evidence of electric car usage amongst customers. You may wish to consider the provision of a lower number of 50KW charge points, with passive infrastructure to allow the provision to be increased in future as demand grows.

The ESCC Highway Authority offer a paid service at pre-app stage. They have advised that any application would need to be supported by details of:

- A Construction Management Plan
- Tracking drawings of the largest delivery vehicles to demonstrate they can safely turn within the site to egress in a forward gear
- 6m of manoeuvring space behind car parking spaces
- Existing and proposed trip rates supported by TRICS outputs and site selection methodology
- Appropriate improvements to the local network to ensure safe access, and accessibility by all modes of transport
- Safe, direct and convenient pedestrian routes should be provided from the car park into the store
- A 'Transport Report/Statement', including location of key services, availability of sustainable modes of transport and existing/future vehicular traffic generation
- Parking strategy, including provision of parking for all modes of transport

Other matters

The proposed development would meet the definition of 'large format retail' (convenience-based supermarkets and superstores and retail warehouses with a net retail selling space of over 280m² providing shopping destinations in their own right where weekly food shopping needs are met and can include non-food floorspace as part of the overall mix.) It would therefore trigger the requirement for a Community Infrastructure Levy contribution of £163.48 psqm for the area of newbuild.

We have not been made aware of a requirement for any financial contributions. However you may wish to seek clarification from ESCC Highway Authority in this regard.

Should you proceed to a formal application, in addition to the highways information above you will need to submit the following information:

- A LVIA setting out the contextual evidence and analysis and how this has informed the scheme;
- Ecology Assessment;
- Ecosystem Services statement;
- Detailed drainage information and Surface Water Management Plan including Infiltration testing to BRE365 standard and groundwater monitoring between November and April if infiltration is proposed;
- Land Contamination Survey;
- Heritage Impact Assessment (archaeology);
- Details of hard and soft landscaping including surfacing, planting plans and any boundary treatments;
- Sectional drawings indicating how the change in levels near the northern boundary will be addressed;
- Colour and finishes of any external building materials;
- Details of parking and integrated cycle parking and refuse storage;
- Noise assessment;
- Light impact assessment and external lighting details, to include mitigation measures to minimise light spill.

Please also consult the SDNPA's Local Validation List <https://www.southdowns.gov.uk/planning-applications/apply/local-validation-list/>

Consultations

The following consultation responses have been provided separately and should be read alongside this response: Design, ESCC Highways, Environmental Health (Contamination) and the Environment Agency.

If you pursue a formal planning application please note that the requirements of the South Downs National Park Authority Local Validation List will apply with regard to the information required to be submitted. Further information is available at <https://www.southdowns.gov.uk/planning/making-an-application/local-validation-list/> .

It would be advisable to contact the Building Control department at your Local Authority to check if building regulation approval is required.

Please note that the advice contained within this letter constitutes an informal Officer's opinion and does not prejudice, nor is binding upon, any future decision taken by the South Downs National Park Authority.

Yours sincerely,

Stella New
Development Management Lead
For and on behalf of South Downs National Park

Appendix

National Park Purposes

The two statutory purposes of the SDNP designation are:

- To conserve and enhance the natural beauty, wildlife and cultural heritage,
- To promote opportunities for the public understanding and enjoyment of the special qualities of their areas.

If there is a conflict between these two purposes, conservation takes precedence. There is also a duty to foster the economic and social wellbeing of the local community in pursuit of these purposes.

Partnership Management Plan

The South Downs Partnership Management Plan (SDPMP) was adopted on 3 December 2013 and amended for 2020-25 in December 2019. It sets out a Vision and long term Outcomes for the National Park, as well as 5 year Policies and a continually updated Delivery Framework. The SDPMP is a material consideration in planning applications.

The following Policies and Outcomes are of particular relevance to this case:

National Planning Policy Framework (NPPF) and Circular 2010

Government policy relating to National Parks is set out in English National Parks and the Broads: UK Government Vision and Circular 2010 and The National Planning Policy Framework (NPPF) which was updated in December 2024. The Circular and NPPF confirm that National Parks have the highest status of protection, and the NPPF states at paragraph 189 that great weight should be given to conserving and enhancing landscape and scenic beauty in national parks and that the conservation and enhancement of wildlife and cultural heritage are also important considerations and should be given great weight in National Parks.

Development Plan

The development plan policies listed below have been assessed for their compliance with the NPPF and are considered to be compliant with the NPPF.

The following policies of the **South Downs Local Plan** are relevant to this application:

- Core Policy SD1 - Sustainable Development
- Core Policy SD2 - Ecosystems Services
- Strategic Policy SD4 - Landscape Character
- Strategic Policy SD5 - Design
- Strategic Policy SD6 - Safeguarding Views
- Strategic Policy SD8 - Dark Night Skies
- Strategic Policy SD9 - Biodiversity and Geodiversity
- Strategic Policy SD17 - Protection of the Water Environment

- Strategic Policy SD19 - Transport and Accessibility
- Development Management Policy SD21 - Public Realm, Highway Design and Public Art
- Development Management Policy SD22 - Parking Provision
- Strategic Policy SD25 - Development Strategy
- Strategic Policy SD34 - Sustaining the Local Economy
- Strategic Policy SD35 - Employment Land
- Strategic Policy SD36 - Town and Village Centres
- Development Management Policy SD37 - Development in Town and Village Centres
- Development Management Policy SD38 - Shops Outside Centres
- Strategic Policy SD45 - Green Infrastructure
- Strategic Policy SD48 - Climate Change and Sustainable Use of Resources
- Strategic Policy SD49 - Flood Risk Management
- Development Management Policy SD50 - Sustainable Drainage Systems
- Development Management Policy SD52 - Shop Fronts

Other plans considered

- Lewes Neighbourhood Plan

End of Document

