



Mr. L Spurling
Lidl GB
c/o Mr. L Spurling
Carney Sweeney Ltd
Brunel House
2 Fitzalan Road
Cardiff
CF24 0EB

Our Ref: SDNP/25/00767/PRECON
Contact Officer: Stella New
Tel. No.: 01730 819216

2 May 2025

Dear Mr. L Spurling

PRE-APPLICATION ADVICE

Applicant: Mr. L Spurling, Lidl GB
Proposal: Development of Class E(a) retail foodstore
Location: Land East of, Brooks Road, Lewes, East Sussex,

Thank you for your correspondence received 20 February 2025 seeking pre-application advice.

Executive Summary

The principle of redevelopment of this site for a commercial/retail E a) class use is acceptable, providing 12 month marketing evidence can be provided to demonstrate there is no market demand for the office building.

However, in its current form, the proposal is unlikely to receive officer support. Our advice is that the layout and building design require further work, drawing on the available landscape evidence to inform a scheme that is better suited to its context, and capable of meeting the National Park's statutory First Purpose. Further evidence gathering and analysis is required before the scheme can be successfully evolved further.

Whilst it is accepted that large retail buildings are necessarily of a certain form and design, there are clear opportunities for the scheme to deliver an overall enhancement. Particular focus should be given to the animation of the southern elevation, the positioning of the building to allow more green space along the southern and western boundaries, and the greening of Daveys Lane. A biodiverse green roof would greatly assist any application in meeting a range of different policy requirements, including SuDS. The treatment of hard surfaces, shading within the car park, and safe routes for pedestrians and cyclists should also be addressed.

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

South Downs National Park Authority, South Downs Centre, Midhurst, GU29 9DH
Tel: 01730 819361 Email: planning@southdowns.gov.uk

ACKAPP

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

PLANNING ASSESSMENT

Existing Site and Context

The approximately 0.9ha site is prominently located at the entrance of the Brooks Road mixed employment area of Lewes, which is the second largest employment site in the National Park and protected in the main part as a principal employment site under Policy SD35. It is currently occupied by a former car service and repair workshop, a well-being centre, car dealership and office building and parking areas.

Immediately adjacent to the north-eastern boundary of the site is the Old Brewery, which is a Grade II listed building, and it will be important for any proposal to have regard to its setting. The site also falls within the setting of the Conservation Area which lies to the south. There are three mature sycamore trees in the south-western corner which are protected by a Tree Preservation Order.

The main industrial area to the north and east 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, and there are a number of residential uses close to the site.

The site is accessed directly from Brooks Road via a mini roundabout. Daveys Lane, which

adjoins the site's northern boundary, is identified in the Lewes Neighbourhood Plan as a Green Link under policies SS1/SS2. Malling Street to the east is identified as an Arrival Street under the same policies.

Only the garage building and associated parking fall within the Central Lewes Principal Employment area, 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 remainder of the site falls outside the Central Lewes Principal Employment Site.

The site is relatively flat, with the majority of it located in Flood Zone 3 and a small proportion in Flood Zone 2.

Existing Site and Context

The relevant planning history for the site is as follows:

SDNP/13/00798/LDP Application for a Certificate of Lawfulness for use for the sale or display for sale of motor vehicles with ancillary uses including servicing and parts, MOT bay, car wash, offices and staff facilities. Approved 03.05.2013

SDNP/13/05800/TPO 3 x Sycamore (T1 - T3 of the Order) - Reduce crowns by 50%. Refused 03.01.2014

SDNP/14/03749/FUL & SDNP/14/03750/LIS Re-roofing of existing Parts Department building. Approved 16.09.2014

SDNP/14/04954/DCOND Discharge of condition 3 relating to planning approval SDNP/14/03749/FUL. Approved 12.11.2014

SDNP/14/04957/DCOND Re-roofing of existing Parts Department building. Approved 27.10.2014

SDNP/14/04983/DCOND Discharge of condition 3 relating to planning approval SDNP/14/02879/FUL. Approved 27.10.2014

SDNP/14/05687/FUL Re-cladding of workshop walling to replace timber cladding with profiled metal. Approved 06.01.2015

SDNP/15/00259/ADV Two sets of internally illuminated dealer name letters. Approved 24.02.2015

SDNP/17/03431/PRE Erection of 48 Assisted Living (Extra Care) apartments for older persons (C2 use) and 30 Retirement Living apartments for older persons (C3 use) with associated communal facilities, parking and landscaping. Advice provided 08.12.2017

SDNP/19/03583/PRE Erection of Free Standing Mcdonald's restaurant with drive thru lane, car parking and associated works. Advice provided 21.08.2019

SDNP/23/00604/PRE Mixed use development of 20 commercial and 83 residential units. Advice provided 14.08.2023

Proposal

The proposal seeks to demolish the existing buildings and erect a new Lidl store of some 2,185 sqm gross external area. Some 538 solar roof panels would be provided.

The existing access off the roundabout on Brooks Road would be widened, and parking for 113 cars, including 2 electric vehicle spaces would be provided. There would also be customer parking for 12 cycles.

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

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 provided that evidence of a robust marketing campaign of at least 12 months clearly demonstrates that there is no market demand for the business premises.

It is acknowledged that there are a range of different employment uses on the site, including a sui generis garage, and a car sales, beauty clinic and offices which fall into various E class uses. For the purposes of SD35, an E a) (display or retail sale of goods, other than hot food, principally to visiting members of the public) use of the majority of the site would be acceptable. However, the loss of floor space currently deemed to be in a E g) class use (the office building) would only be supported if evidence of marketing for a 12 month period demonstrates that there is no market demand for it.

Given that the new retail floor space would fall outside the defined Market Town boundaries but within the settlement policy boundary and would exceed the 750sqm threshold, any proposal would need to be supported by a retail impact assessment as required by S38.

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. Although not a development plan requirement, Para 91 of the NPPF also 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.

In summary, the proposal would result in the loss of E g) i) class use land that falls outside a principal employment area. Providing 12-month marketing evidence can be provided that there is no market demand for the office building, the proposal would not be contrary to the development plan, meaning that a sequential test would not be required under para 91 of the NPPF. In the absence of such evidence, a sequential test should be provided for the avoidance of any doubt. The SDNPA is not aware of any other large sites that are better related to the town centre.

Design, Heritage 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.

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. The Brief identifies the listed Old Brewery building on the north eastern boundary and other related brewery buildings as the area's historic core. The creation of a green link along Daveys Lane, an arrival street, open space, a gateway to the Brooks Road area and improved pedestrian permeability/cycle network is also sought by the Brief.

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 1,000 sqm, Appendix 6 (Major Non-Residential Development) will apply, which requires new development to achieve a BREEAM NC excellent standard of energy efficiency (building fabric) and a range of renewable energy measures. Please note that policy SD48 will be significantly amended under the Local Plan Review and will supersede the SPD in at least some regard. The draft policy encourages proposals involving extension to existing buildings to take opportunities to improve the energy efficiency, overall carbon emissions, water consumption and embodied carbon across the planning unit.

Both the Design and Historic buildings officers have raised concerns with regard to the standard Lidl design being proposed. The proposal has also been informally considered by the SDNPA's Design Review Panel, and their views have been included in the commentary below.

The impact of the proposal on the settings of the Conservation Area and nearby listed buildings should be addressed within a Heritage Statement. It is unclear how the proposal has responded

to the adjacent listed building or the Conservation Area. It is also unclear whether demolition will expose parts of the Old Brewery building, if so, any treatment of the exposed elevation will need to be agreed.

The submission does not provide any assessment of landscape context. The statutory requirement to enhance natural beauty also applies to urban locations within the National Park. The success of any proposal will depend to a large degree upon how well the site and its location have been understood and responded to, which will require a different approach. Any application would need to be supported by comprehensive evidence drawing together information laid out in the Brooks Road Planning Brief, the relevant Landscape Character Area and detailed survey and analysis to establish the landscape baseline setting out what is important about it and how it could be characteristically enhanced. This should include a Landscape Visual Assessment to assess key views in and out of the site, including from Malling Hill, the Conservation Area and the arrival from the Cuilfail Tunnel, development patterns, historic evidence, and an assessment of the water environment to understand how water could be managed in a characteristic way (see also Drainage below.)

The above information can then be used to help determine parameters for the building (height, scale, massing, location) and surface water management. We would strongly 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 understood its context, incorporating a range of appropriate enhancements and positive design features including a section of flint walling, native landscaping scheme with an open brook, and the largest biodiverse green roof in the National Park to date.

At our meeting you suggested that the proposal would be an enhancement when compared to the site as it currently exists, however officers are not of the same view. The existing car sales building on the site currently integrates with the prevailing colour palette in the area through its materiality. It is also set back from the southern boundary and presents an active frontage. There is certainly scope to enhance the site however this is currently not achieved by the large size and standard design of the proposed building, which takes up most of the available space along the southern and western boundaries of the site and leaves very little room for softening boundary treatments, or the existing TPO'd trees. It is also currently unclear how the proposal has responded to what has been identified as a key gateway opportunity site. The design of the proposal is therefore not considered to be landscape-led as it does not take into account its context, and fails to meet policy SD4.

The layout appears purely functional and does not respond to its prominent position. It erodes the arrival experience through turning its back on Malling Street and presenting a large carpark to Brooks Road. It is dominated by car parking and expanses of tarmac. Both the built form and soft landscaping should be the dominant elements that frame the street and contribute to the street scenes. The parking should be designed and positioned to be as discreet as possible, making use of the built forms and landscaping to provide some mitigation through screening. The delivery area appears to be close to existing residential properties, which may raise noise and amenity issues.

The southern elevation of the building is the most problematic due the sensitive context (setting of conservation area, prominent gateway location and first impression of town as visitor enters.) Currently this presents a very long, blank white elevation which is completely uncharacteristic. A non-standard bespoke store layout and building is likely to be needed here to provide active frontages and avoid public facing blank facades. A more activated southern elevation with more appropriate materials would be appropriate, potentially with some fenestration or greening within the elevation and more articulation. The materials appear to have been selected for maintenance reasons rather than their context. The material palette should be reconsidered to make use of materials that are more locally appropriate and result in a high quality finish. The SDNP Design Guide provides further guidance in Para C.12.1. Re-use of some of the existing building materials on site to animate/break up the southern elevation would be beneficial. The applicant could also consider inviting local artists to provide murals on the southern elevation.

Large canopy trees are needed in car park to provide shade and cooling. A reduction in the number of parking spaces would allow for more space for trees within the car park. Porous paving such as grasscrete would also allow larger tree pits for trees. Roof coverings should be considered for car parking which could have green roofs and/or pv panels. Some bench / seating provision outside the store would also be a positive addition.

Sustainable Construction

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/>

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 1,000 sqm, Appendix 6 (Major Non-Residential Development) will apply, which requires new development to include a range of energy efficiency (building fabric) and renewable energy measures to BREEAM standards.

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 extent of tarmac proposed will serve to create an urban heat island in hot weather. Any proposal will need to demonstrate how the scheme will adapt to predicted climate change (increase in heat and rainfall) providing cooling and sustainable drainage features. A pre-demolition audit would be helpful to identify the potential for materials re-use e.g. steels, slates and timber cladding, particularly to help break up blank building elevations.

The northern boundary will also need to reflect the Neighbourhood Plan aspiration for a green link along Daveys Lane.

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.

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. The assessment should include a data search from the Sussex Biodiversity Record Centre, and surveys should be carried out in accordance with national best practice guidance and Natural England's standing advice. Cumulative and in-combination effects of this development with other local developments/plans/projects should also be considered.

The Authority's ecologist has advised that other than the retention of the TPOd trees it is unclear from the submission whether any of the vegetated habitat on site will be impacted. Providing the proposals would impact less than 25sqm of onsite area habitat, or less than 5m of linear habitat,

the scheme would be exempt from statutory biodiversity net gain. This would need to be demonstrated using the DEFRA metric.

Even if it can be demonstrated that an application would be exempt from mandatory BNG, there is still a requirement under SD9 and an expectation in the SDNPA's Biodiversity Technical Advice Note for major development to provide a minimum 10% net gain. This is also one of the ways that the proposal can meet Purpose 1 objectives in terms of enhancement. A target of 75% native and/or non-native species of recognised wildlife value should be achievable.

Obvious ways to achieve this would include biodiverse green roof provision on the main building and ancillary structures, which can be combined with the solar panels already proposed. Where green walls (with climbing plants) are to be used it is recommended that the supporting structure for the green wall is fixed c.200mm off any façade to increase air flow and space for the plants to grow, but also to increase the habitat opportunity for nesting bird species. Trees should also be provided within the car parking area to provide shade and cooling. All ecological enhancements and BNG should be included in the iterative design process from the start.

New roosting opportunities for bats and birds (boxes) should only be pursued where levels of lighting, disturbance etc. are sufficiently low that there is a realistic likelihood of their uptake by the target species, which is unlikely in this location.

Any formal application should be supported by an updated PEA as a minimum along with BNG information meeting national and local requirements as necessary.

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. Any proposal should be supported by a Lighting Impact Assessment.

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. 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 is also likely to be land contamination due to the previous/existing uses.

Surface water drainage should be considered early in the design process. Care will also need to be taken to avoid discharge of potential pollutants to the water environment.

It is currently unclear what the SuDS approach will be, other than piping water straight to the combined sewer. 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.

The Environment Agency have advised that they offer advice to developers which is a chargeable service. Further information regarding Source Protection Zones and dealing with contaminated land can be found here:

<https://www.gov.uk/guidance/groundwater-source-protection-zones-spzs>

<https://www.gov.uk/government/publications/land-contamination-risk-management-lcrm>

The ESCC Local Lead Flood Authority (LLFA) have also only advised that they operate a chargeable pre-application advice service, which you may wish to pursue. Advice provided on previous applications would indicate that any proposal will need to be supported by a Sustainable Drainage Strategy, with discharge rates limited to as close to the greenfield runoff rate and not exceeding predevelopment runoff rates. If infiltration is proposed, this should be supported by findings of infiltration testing in accordance with the BRE365 and groundwater monitoring undertaken **between November and April**. If infiltration is not feasible discharge into a watercourse should be considered. Should connection to the sewer network be proposed, this should be a last resort and accompanied by evidence of an agreement from Southern Water.

Further information and recommendations for a site-specific FRA, and the suitability and 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.

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.

The proposals currently include 113 customer parking spaces, only 2 of which would have EV charging. A minimum of one EV charge point for every five spaces is required for major non-residential development under the SDNPA's Sustainable Development Brief. There does not appear to be any provision for accessible spaces.

Both the SDNPA and ESCC guidance on parking suggest 1 parking space per 14 sqm for retail/commercial uses. For a sales floor space of c.1,516 sqm this equates to 108 spaces, so there would be a slight over provision with 113 spaces, which would be a slight over-provision. As parking provision is generated by the size of the store building, you are strongly encouraged to consider how parking could be reduced. Given the issues identified within the Brooks Road Planning Brief, and the proposed re-development of North Street Quarter which will generate significant pedestrian traffic to nearby supermarkets, travel by sustainable means should be actively encouraged.

It is currently unclear how the proposal has been designed to encourage travel by sustainable means. 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 15 staff and 15 customer cycle parking spaces. The proposed cycle parking provision of 12 spaces is considered insufficient. Similarly, arrival on foot is currently challenging, with Brooks Road not being served by a pedestrian crossing. It is recommended that any application is supported by a strategy identifying the routes/desire lines for pedestrians from all arrival points/directions both inside and outside the site, and how the proposal has responded to them.

It is noted that you are seeking separate pre-application advice from the ESCC Highway Authority. The Highway Authority have nonetheless provided high level advice raising a number of concerns that will need to be addressed. These relate to the proposed access via the small roundabout which already experiences high levels of trips and often backs up with vehicles queuing to get into the two existing food stores; and the focus that will need to be given to the provision of direct, convenient pedestrian and cycle links to local facilities and bus services. Off-site highway works to achieve those connections may be required, along with contributions towards bus services. As a minimum, the Highway Authority would wish the following to be provided at application stage:

- o Stage 1 Road Safety Audit of proposed highway works and designers' response, including amended plans
- o Proposed trip rates supported by TRICS outputs and site selection methodology, including potential offset against existing trips already on the network travelling past or in the vicinity of the site
- o Summary to support the site access/highways works proposals, including plan (scale 1:250 or similar) with achievable visibility splays, access widths and gradients indicated
- o A 'Transport Report/Statement', including location of key services, availability of sustainable modes of transport and existing/future vehicular traffic generation
- o Travel Plan
- o Parking strategy, including provision of parking for all modes of transport
- o Relevant data collected to date
- o Proposed trip rates supported with TRICS outputs and site selection methodology

National Highways have also advised that they would require details of the net change in trip generation (including trip rates) compared to the previous use of the site, as well as data on trip distribution and assignment. They recommend that this information is provided within a Transport Statement and shared with them prior to submission of an application. Further work may be necessary if it is likely that the development would have a material impact on the operation of the Strategic Road Network (SRN), in this case the A27, which extends as far as the Cuilfail Tunnel roundabout. They also draw attention to the wider transport policy context surrounding sustainable development and the SRN, in particular DfT Circular 01/2022.

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 $\frac{1}{2} \times 163.48$ psqm.

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 Statement and Impact Assessment
- Details of hard and soft landscaping including surfacing, planting plans and any boundary treatments;
- 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, Local Lead Flood Authority, ESCC Highways, Historic Buildings and National Highways.

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 SD12 - Historic Environment

- Development Management Policy SD15 - Conservation Areas
- 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
- 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
- Development Management Policy SD50 - Sustainable Drainage Systems
- Development Management Policy SD52 - Shop Fronts

Other plans considered

- Lewes Neighbourhood Plan

End of Document

