

Report to	Planning Committee
Date	11 December 2025
By	Director of Planning
Application Number	SDNP/25/00292/FUL
Applicant	Home Sussex 1 Limited
Application	Demolition of existing industrial buildings and provision of 18 residential units with associated amenity, car and cycle parking provision
Address	Former Garden Street Auction Rooms, Garden Street, Lewes, BN7 1TJ

Recommendation:

- 1) That planning permission be granted subject to:
 - i) The conditions set out in paragraph 9.1 of this report and any amendments or other conditions to address technical matters; and
 - ii) A legal agreement, the final form of which is delegated to the Director of Planning, to secure the following:
 - a) Two affordable 1-bedroom homes of a discounted market sales tenure; and
 - b) The management and monitoring of the biodiverse green roofs for a period of 30 years as significant onsite biodiversity net gain, including a £41K monitoring fee.
- 2) That authority be delegated to the Director of Planning to refuse the application with appropriate reasons if the legal agreement is not completed, or sufficient progress has not been made, within 6 months of the Planning Committee meeting of 11 December 2025.

Executive Summary

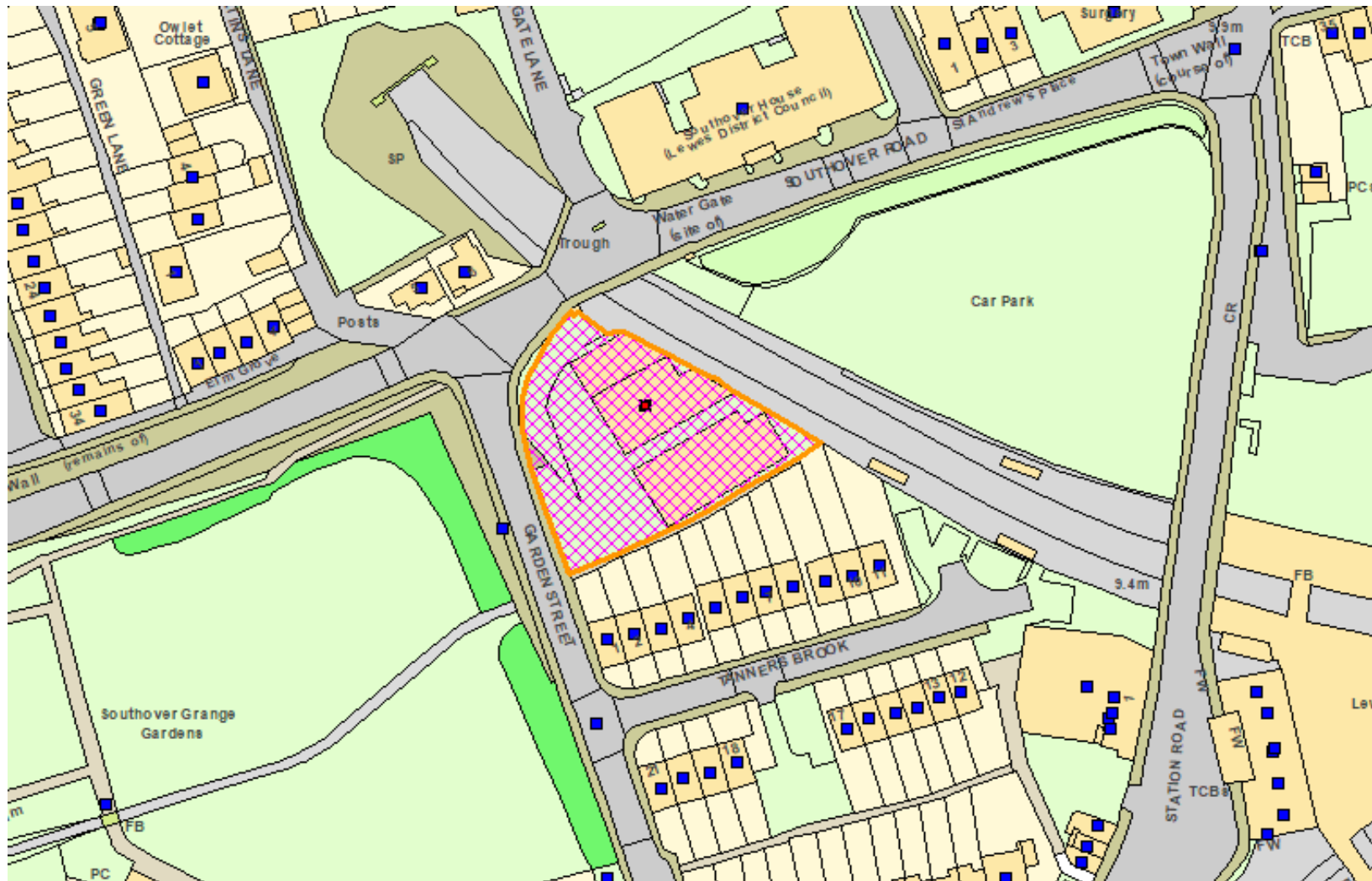
The proposal is for 18 dwellings, on a site allocated under policy PL1B (3) of the Lewes Neighbourhood Plan for 'an expected 11 dwellings,' and the principle of a residential use of the site is therefore established. Following an independent viability review, taking into account Vacant Building Credit and other relevant factors the provision of 2 No onsite affordable homes, which would be of a 30% discounted market sales tenure, is also policy compliant.

The main issues for consideration therefore relate to the design of the development and heritage and amenity impacts as well as drainage, highways and ecology matters, which are set out in detail in the following report. The proposals have evolved during the course of the application in response to officer and consultee concerns. The relevant consultees are now satisfied that the issues have been satisfactorily addressed, and that any remaining details required can be secured via suitably worded planning conditions.

Lewes Town Council have objected to the proposals due to the lack of affordable housing and concerns regarding flood risk and the potential for contamination of the Winterbourne stream and overdevelopment of the allocated site and impact upon important views. There are also a number of third-party concerns about the design and impacts upon the Conservation Area and impacts from traffic, including loss of on-street parking in the locality.

The application is placed before the Planning Committee due to the concerns raised, and a previous scheme being considered by the Committee.

Site Location Map



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1. Site Description

- 1.1. The application relates to a 0.15 hectare (ha) site allocated through policy PL1 B(3) of the Lewes Neighbourhood Plan for an “expected 11 dwellings.”
- 1.2. The site is centrally located adjacent to the railway station within the settlement boundary of Lewes Town and falls within the Southover Character Area of the Lewes Conservation Area. Formerly a physic garden associated with the 16th Century Lewes Priory, it is occupied by two warehouse buildings, a storage shed and small parking area that until recently were used as an auction rooms. The two main buildings are former World War I (WWI) huts relocated from Seaford in c.1920 and are considered to have historic and cultural value in their own right. The Grade II listed Lewes Railway Station (Booking Hall, footbridge and platform buildings) is located some 70metres (m) to the south east.
- 1.3. The site falls within a predominantly residential area with a close grain. Immediately south of the application site is Tanners Brook which features two storey terraces of traditional design. To the north of the site Southover Road features larger detached dwellings and Southover House, the former Lewes District Council’s offices. To the west of the application site is Southover Grange Gardens, which is a designated local green space.
- 1.4. The site is prominent and can be viewed from multiple vantage points, including from Lewes railway station and the road bridge over the railway. The site’s ground levels are significantly lower than the surrounding street levels to the north and west, and the existing vehicular access from Garden Street is steeply ramped. The site features steeply sloping northern and western boundaries dominated by self-seeded scrub and sycamore trees and a mature fir tree in the north corner. The eastern boundary is bordered by the railway line.
- 1.5. The site is located within the United Nations Educational, Scientific and Cultural Organization (UNESCO) Brighton and Lewes Downs Biosphere Reserve. The Lewes Brooks Site of Special Scientific Interest (SSSI) is located c. 560m to the south and the Lewes Railway Land Meadows Local Wildlife Site (LWS) lies c. 245m east.
- 1.6. The site falls primarily within flood zone 2, Water Source Protection Zones 2 and 3 and area of groundwater vulnerability due to the underlying aquifer. There is a culverted winterbourne stream (statutory main river) running east-west close to the southern boundary, and a main storm tunnel that runs east west through the site.

2. Relevant Planning History

- 2.1. The following is the most relevant planning history pertaining to the site:
 - LW/07/0061 Demolition of existing buildings and construction of terrace of six town houses with associated gardens and parking. Withdrawn 07.03.2007
 - SDNP/18/00653/PRE 10 new homes. Advice provided 10.10.2018
 - SDNP/18/03011/DINPP Demolition of existing buildings prior to separate residential application to follow. Planning permission required 30.05.2018
 - SDNP/18/05444/FUL Redevelopment of 'former auction rooms' into ten residential units comprising two no. two-bed split-level apartments, four no. three-bedroom houses and four no. four-bedroom houses. Refused 18.03.2020, allowed on appeal 06.04.2021 (appeal decision appended **at Appendix 2**)
 - SDNP/22/03728/PRE Redevelopment of 'former auction rooms' into ten residential units. Advice provided 01.03.2023 (**see Appendix 3**)
 - SDNP/23/03275/FUL Demolition of existing buildings and erection of 17no. residential units. Withdrawn 30.05.2024
 - SDNP/24/02204/LDE Implementation of planning permission SDNP/18/05444/FUL (allowed at Appeal - 3256462) for redevelopment of 'former auction rooms' into ten residential units comprising two no. two-bed split-level apartments, four no. three-bedroom houses and four no. four-bedroom houses, prior to confirmation of discharge of pre-commencement conditions. Refused 02.07.2024.

3. Proposal

- 3.1. The application seeks the provision of 18 No flatted homes in the form of a single block within the northern part of the site. The proposed location of the building allows for the required 5m easement either side of the main storm tunnel crossing the site and 8m easement to the culverted winterbourne stream located along the southern boundary. The accommodation would be spread over four floors (lower ground, ground, first and second floors) and would be of the following mix and tenure:

	1 Bed	2 Bed	3 Bed	TOTAL
Market	2	6	8	18
Discounted Market Sales	2	0	0	0
TOTAL	4	6	8	18

- 3.2. The building would be of a contemporary design, with an irregular footprint and varied elevations with a number of curved corners. It would utilise a varied palette of locally traditional facing materials including red/brown and grey vernacular brick laid in a mix of Flemish bond and hit and miss brickwork screen, with a knapped flint boundary wall and plinth. There would be stacked brick soldier courses above openings and forming part of the parapet wall, and stone cills. Metal railings and balcony frames would be galvanised, powder coated metal, with triple glazed aluminium windows and Brise soleil features of a matching colour. All homes will meet Part M and Lifetime Homes accessibility requirements. The flat roof would accommodate a solar panel array and biodiverse green roof, which makes a significant contribution to the estimated 12.65% onsite biodiversity net gain. Heating, hot water and cooling will be provided via a Nilan Compact P integrated ventilation and heating system, which is passive house certified.
- 3.3. All of the flats would have private outside space in the form of terraces and/or balconies, with a small communal garden located to the east of the car park, which would be planted with herbs, medicinal and edible plants to reflect the historic physic garden. A single non-native tree would be removed and 3 No new trees would be planted, 1 No at the site entrance and 2 No within the shared amenity garden and a native hedgerow provided along the southern boundary. There would also be a number of raised beds to the southern elevation of the building which would provide space for small tree/shrub planting.
- 3.4. A new vehicular access would be provided via a straight ramp from Garden Street down to the 11-bay parking area in the southern part of the site, which includes an accessible parking space. Pedestrian access would be provided at ground floor level from Garden Street to the main foyer and lift, and at lower ground floor level from the car park. Secondary pedestrian access at ground floor would also be provided to the terrace gardens of units 8 and 9. Cycle storage for 40 cycles (1 space per bedroom) would be provided within the lower ground floor of the building, with 8 visitor cycle spaces provided in the car park area. Refuse storage would be provided to the west of the car parking area by the site entrance.

4. Consultations

- 4.1. **Archaeology:** No objection subject to conditions.
- 4.2. **Design Officer:** No objection, subject to conditions. Comments:
- Contemporary building design is appropriate in this town centre location;
 - Height and massing reflects topography and provides a presence on Southover Road that is not over dominant;
 - Detailing and materials successfully break up the perceived mass of the building
 - References Lewesian character and responds well to the site's constraints and opportunities;

- Relatively high standards of embodied and operational energy performance;
 - Arrangement of car parking could be improved with central area of planting.
- 4.3. **Ecology:** No objection, subject to conditions.
- 4.4. **Environment Agency:** No objection, subject to conditions.
- 4.5. **Environmental Health (Contamination):** No objection, subject to conditions.
- 4.6. **East Sussex County Council Highway Authority:** No objection, subject to conditions.
- 4.7. **Historic Buildings Officer:** No objection.
- A traditional bond should be specified given the amount of brickwork proposed.
- 4.8. **Lewes Housing Officer:** Comments:
- Good number of 3-bed units is welcomed;
 - Unfortunate that the affordable offer is limited by viability, discounted market sales supported as unlikely a Registered Provider would be interested in only 2No units.
- 4.9. **Lewes Town Council:** Objection. Comments:
- No affordable housing;
 - Site is allocated for 11 homes; provision of 18 results is over massing and scaling, and views being obscured;
 - Concerns regarding drainage, flood risk and contamination to the Winterbourne stream.
- 4.10. **Local Lead Flood Authority:** No objection, subject to conditions.
- 4.11. **Network Rail:** No objection.
- 4.12. **Southern Water:** No objection, subject to conditions.
- 4.13. **Sustainable Construction:** No objection, subject to conditions.

5. Representations

- 5.1. 26 letters of objection and two neutral representations were received, including from the Friends of Lewes, Friends of the South Downs and the Lewes Conservation Area Advisory Group, raising the following concerns:

Principle

- Does not meet reason for allocation, i.e. small, traditional terraced family houses to rent or buy;
- Homes in the area cost 14x average local wage; locally affordable housing is main requirement of Lewes NDP;
- Meets developer's requirement for profit rather than real local housing needs;
- Ignores Lewes Low Cost Housing policy that seeks to address new housing that is too expensive for local people;
- 18 units is over 150% of number allocated by Lewes Neighbourhood Plan;
- Unfair if this is permitted when dormer windows and UPVC double glazing are not permitted in neighbouring properties;
- Fails to comply with Network Rail requirements that all parts of building need to be more than 3 metres from the station curtilage;
- Will have unacceptable impact on doctors, dentists and schools;
- There are only 5 primary schools in Lewes, not 11 as stated;

Design, Heritage and Amenity Impacts

- Ignores site's context in terms of services and amenities;
- Improvement over last application;
- Building too tall and out of place, especially northern elevation facing Southover Road;
- Unsympathetic, large brick structure next to streets of modest houses between the listed Railway Station and the Grange Gardens;
- Modern, bland and imposing block is visually offensive and incongruous over-development that fails to preserve or enhance architectural or historic interest of Conservation area or conserve historic and quaint landscape character;
- South and West elevations are ponderous, overbearing brick lumps, not mitigated by overly fussy brickwork detailing;
- North east corner and elevation to Southover Road monolithic, dominating and overbearing, could be alleviated with more vertical detailing;
- Unit 17 should be removed or set back to create a two-storey block on Southover Road;
- More variety could be introduced using vertical forms and more pleasing materials;
- Visual impacts study is misleading;
- Visual impact on the Conservation Area must be assessed to ensure detailing and choice of materials will make a positive contribution to local setting;
- Will impinge on important views protected within the Lewes NDP including view 04 of the Castle from the railway station, and of Mount Caburn and the downs to the east;
- Will impact negatively on arrival impressions of the town from train station platforms;
- No other curved wall buildings in Lewes;
- Curved forms reference Lewes streetscape, but have a horizontal emphasis and are too wide;
- Architecture has the characteristics of an office complex, at odds with town's picturesquely irregular appearance;
- South elevation window and door detailing is stark; this should instead have distinctive casements, mullions, lintels and sills, and painted reveals;
- Obstructs natural light and views of Castle from properties on Dorset Road;
- Noise impacts to properties on Dorset Road, which is short cut to station;
- Trees on rooftops will damage the building;

Access and Parking

- Insufficient parking provision, should be 21+ spaces for 18 homes;
- Parking already strained in the area, especially on football match days and events in Southover Grange Gardens and Charleston House;
- Already more allocated Zone D parking permits than spaces for Garden Street, Dorset Road, Eastport Lane and Southover Road;
- No further parking permits should be issued for occupants;
- Parking does not account for visitors or contractors;
- Parking provision excessive for this central site within easy walking distance of transport links and facilities;
- Unclear whether parking will be restricted along Garden Street at site entrance;

- Nearby sites have low levels of car ownership with underground car parks underutilised;
- Station Road railway bridge not open to heavy vehicles including refuse trucks;
- Garden St not wide enough for two vehicles to pass; lack of on-site turning for large vehicles will cause highway safety issues;
- Congestion will cause safety risk to pedestrians to local schools;
- Significant impacts from construction;

Drainage and Flood Risk

- Infrastructure insufficient to cope with additional sewage and drainage;
- Main sewerage drains at the junction of Eastport Lane and Garden Street and the other end of Eastport Lane already require pumping out every two or three weeks;
- Unclear whether onsite sewer is decommissioned or connects to main sewer;
- Onsite sewer in poor condition, unable to cope with large volumes and requires repairing/replacing;
- Site in Flood Zone 3 at high risk of flooding; development will increase flood risk elsewhere;
- Fails to consider culverted Winterbourne stream;
- Unclear whether surface water will be discharged into Storm Tunnel or culverted Winterbourne;
- Directing surface water to Winterbourne will cause flooding; Winterbourne flooded in October 2000 with flooded basements in Dorset Road and Eastport Lane;

Other

- Inaccuracies in Planning Statement; refers to 11 primary schools when there are only 5.

6. Planning Policy

Particularly Relevant Sections of the National Planning Policy Framework (NPPF):

- NPPF11 - Making effective use of land
- NPPF12 - Achieving well-designed and beautiful places
- NPPF15 - Conserving and enhancing the natural environment
- NPPF16 - Conserving and enhancing the historic environment

Most relevant Policies of Adopted South Downs Local Plan (2014-33) (A full list of relevant policies can be found in Appendix 1)

- SD4: Landscape Character
- SD5: Design
- SD15: Conservation Areas
- SD19: Transport and Accessibility
- SD22: Parking Provision

Relevant Policies of the Lewes Neighbourhood Plan (2015-33)

- Policy LE1 Natural Capital
- Policy LE2 Biodiversity
- Policy HC3 A Heritage Protection of Landscape and Townscape
- Policy HC3 B Planning Application Requirements and Heritage Issues

- Policy PL1 A General Housing Strategy
- Policy PL1 B (Site 3) Housing Allocations
- Policy PL2 Architecture & Design
- Policy PL3 Flood Resilience
- Policy PL4 Renewable Energy and the Resource and Energy Efficiency of New Buildings
- Policy AM1 Active Travel Networks
- Policy AM3 Car Parking Strategy
- Policy SS1 Historic Streets
- Policy SS3 Protection & Enhancement of Green Spaces

Relevant Policies of the South Downs Management Plan (2020-2025)

Policies 1, 3, 5, 9, 25, 50 and 57 are relevant.

Other Relevant Policy Documents (including Supplementary Planning Documents (SPDs) and Technical Advice Notes (TANs))

- SDNPA Affordable Housing SPD (Jul 2020)
- SDNPA Biodiversity Net Gain TAN (Jun 2025)
- SDNPA Dark Skies TAN (May 2021)
- SDNPA Design Guide SPD (Jul 2022)
- SDNPA Ecosystem Services TAN
- SDNPA Parking SPD (Apr 2021)
- SDNPA Sustainable Construction SPD (Aug 2020)

7. Planning Assessment

Major Development

- 7.1. Although the proposal falls within the Town and Country Planning (Development Management Procedure) (England) Order 2010 definition of major development, being a development of more than 10 No dwellings, it is not considered to be major development for the purposes of policy SD3 and paragraph 190 of the NPPF, which relate to development in National Parks.
- 7.2. The NPPF accompanying footnote 67 advises that whether a proposal is ‘major development’ in designated areas is a matter for the decision maker, taking into account its nature, scale and setting, and whether it could have a significant adverse impact on the purposes for which the area has been designated. The proposal relates to a brownfield site within the settlement boundary of Lewes, which is allocated for a residential use by the Lewes Neighbourhood Plan. Therefore, any potential impacts on the designated landscape as a result of development are not considered to be significant for the purposes of SD3 or paragraph 190. The proposal is therefore not considered to be major development for the purposes of SD3 or paragraph 190.

Principle of Development

- 7.3. Policy SD1 encourages a presumption in favour of sustainable development where development proposals accord with other relevant policies in the South Downs Local Plan and the National Park’s statutory purposes. 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.
- 7.4. Policy SD26 allocates a housing provision of approximately 875 dwellings to Lewes, which is provided via a number of allocations made by the Lewes Neighbourhood Development Plan (NDP). This includes policy PL1B(3) which allocates the site for an ‘expected 11 dwellings’ subject

to a number of site-specific criteria relating to design, access, drainage and noise and other impacts. The site is also the subject of lapsed permission SDNP/18/05444/FUL for 10 dwellings which was allowed at appeal on 6 April 2021 (ref APP/Y9507/W/20/3256462,) which is a material consideration (see **Appendix 2**).

- 7.5. The development of the site for a C3 residential use is therefore acceptable in principle, subject to compliance with the criteria of policy PL1B(3) and other relevant policies.
- 7.6. The main issues for consideration are:
 - Design and heritage impacts;
 - Amenity and visual impacts;
 - Housing provision;
 - Sustainable construction;
 - Ecology and biodiversity net gain;
 - Access and parking;
 - Dark night skies.

Design and Heritage Impacts

- 7.7. 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. Paragraphs 189 and 190 of the NPPF state that planning decisions should protect and enhance valued landscapes, and that great weight should be given to conserving and enhancing the landscape and scenic beauty in National Parks.
- 7.8. Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires special regard to be had to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess. Section 72 of the same Act requires special attention to be paid to the desirability of preserving or enhancing the character or appearance of a Conservation Area.
- 7.9. When assessing proposed changes to heritage assets, Paragraphs 212 and 215 of the NPPF require that 'great weight' be given to the objective of conserving designated heritage assets and they should be conserved in a manner appropriate to their significance. Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal.
- 7.10. 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. Policy PL1B(3) also sets out the following site-specific design criterion:
 - 1) Improve the townscape to Garden Street and Southover Road, avoiding adverse impacts upon Grange Gardens and housing along Southover Road and Tanners Brook, and having regard to the allocated site Land at Lewes Railway Station Car Park (allocated under PL1B(57) for an 'expected 20 dwellings.')
- 7.11. Policies SD12, SD13 and SD15 require development within the setting of conservation areas and listed buildings to conserve and enhance the historic environment and preserve or enhance their special architectural or historic interest. Policies HC3A and HC3B also seek to protect the historic character and form of streetscape within the Lewes Conservation Area, and the roofscape of the Conservation Area from within the town and in the countryside setting. Developments where the choice of design and use has sought to avoid or minimise harm to the significance of heritage assets and include the palette of materials identified in the relevant Lewes Conservation Area Appraisal will be supported.

- 7.12. Conservation Area designations aim to preserve or enhance the character and appearance of an area which is of special architectural or historic interest. The Lewes Conservation Area includes a large proportion of the town and is varied in character, with a wide range of different building types. The Lewes Conservation Area Appraisal and Management Plan (CAAMP) (2023) identifies the varied topography and chalk hill setting as being significant contributors to the town's character. As a result of the varied topography, the roofscape and rear elevations of buildings are highly visible. Unsympathetic changes to these features will have a more significant impact on the special interest of the Conservation Area than in other settlements with less hilly terrain.
- 7.13. The application site falls within the Southover Area of the Conservation Area which is mainly residential in character with areas of open green space. The CAAMP does not specifically mention the application site but identifies adjacent land to the north-east (currently the station car park) as an opportunity for enhancement. The CAAMP identifies residential buildings as being the most common in the Southover Area, which vary considerably in size, decoration and appearance. Distinctive local materials include knapped flints and vitrified bricks, broad, patinated timbers and soft red/brown and grey tiles and bricks.
- 7.14. Third-party concerns have been raised with regard to the height and design of the building and its impacts upon the character of the Conservation Area.
- 7.15. As well as being located within the Conservation Area, the site is prominently located on a corner where three streets converge, and visible from multiple vantage points, including from Lewes Station and the road bridge over the railway. The ground floor levels are significantly lower than that of surrounding streets, with a drop of some 4.5m between Southover Road and the northern edge of the site. It is heavily constrained by the presence of the culverted watercourse, which requires an 8m easement, and the main storm tunnel crossing the site which requires a 5m easement either side, which significantly restricts the developable area of the site. The existing vehicular access is also awkward. To bring the site forward as an allocation for housing has therefore necessitated a bespoke design approach, taking all the above constraints into account.
- 7.16. The scheme has been iteratively evolved to take account of the above constraints. The previously withdrawn proposal was the subject of pre-application advice in 2023 and a number of Design Review Panel workshops, and the current proposal has been designed taking previous design advice into account. Although the height of the building is some 1.3m higher than the original appeal scheme where it faces onto Southover Road, the height of the building is not uniform and would step downwards as it extends southwards along the descending slope, reflecting the topographical changes along Garden Street. The building would also take up less than half of the site and occupy only the northern portion where the ground levels are at their lowest in relation to the surrounding streets. The building would introduce what would in effect be a three-storey presence on Southover Road without appearing over dominant. In comparison, Southover House which is partially opposite the site would present a full storey higher. Given the intervening railway line, the form and scale of development is unlikely to have any adverse impact on future development on the allocated housing site at the Lewes Railway Station Car Park.
- 7.17. The application is supported by an analysis of the material vernacular of the Lewes Conservation Areas including the Southover character area, which includes a varied mix of grey and red brick, clay, mathematical tiles, stone and flint laid in a range of patterns and bonds and examples of curved frontages. The indicative schedule of materials indicates that the main facing materials would be a mix of red/brown and grey vernacular brick laid in a mix of Flemish bond and hit and miss brickwork screen, with a knapped flint boundary wall and plinth, which are reflective of the local vernacular. The red and grey brick elevations, together with the architectural details noted above, also serve to break up the perceived mass of the building. Although the building will be evident in a range of views within the Conservation Area, its varied appearance will be seen from the railway bridge against the wider, rising backdrop of the townscape which presents a variety of roof forms and colours.
- 7.18. The roof form is also varied in terms of its different heights and treatments, with extensive areas of green roof and balcony gardens. The bulk and massing of the building is also mitigated by the stepping back of some elevations, giving it a faceted and varied form, and the introduction of

curved corners, which are a typical architectural historic feature found in Lewes. The contemporary design and level of architectural detailing, including balconies, parapets, roof terraces, window reveals and brick, are considered appropriate to the town centre and Conservation Area location.

- 7.19. The scheme also includes a range of green elevational treatments, including planters and climbers, which are welcomed, however these features would be largely located within private terraces, and their management and maintenance would be dependent upon future occupants. Nonetheless, these green features are not considered to be pivotal in terms of mitigating visual harm, as the design and materiality of the building are already considered to be successful in breaking up the mass of the building and softening its appearance. The relocation of the awkward and prominently located vehicular access, which extends alongside much of the site's frontage onto Garden Street, is also considered to be a positive intervention.
- 7.20. The scheme initially included a row of trees along the southern boundary; however, these have been removed due to concerns raised by the Environment Agency (EA) with regard to potential impacts upon the culverted Winterbourne stream. Instead, a native hedgerow is proposed along this boundary which is considered acceptable. The presence of car parking is considered to detract from the scheme; however, the constraints of the site mean that these cannot be easily located elsewhere. The row of spaces is also proposed to be broken up by planting and a tree to provide shade. Although the communal garden would be small, all flats would have access to balconies and private amenity space. The proposed medicinal planting within this area to reflect the former historic physic garden is welcomed.
- 7.21. The lapsed appeal permission (see **Appendix 2**) is also a material consideration. The Inspector was of the view that the topography of the site and its surroundings allowed a development of similar height to be assimilated within the historic setting without harm and would reinstate an urban frontage that was currently absent. They also considered that a contemporary design and use of varied materials was appropriate to the mixed townscape in the vicinity and supported relocation of the vehicular access to a less prominent location.
- 7.22. Given the above, it is the view of officers that the development will result in less than substantial harm to the Conservation Area and will preserve and enhance its character and appearance. Due to intervening development, the development would not also have any material impact upon the setting of the Grade II Lewes Railway Station to the south-east.
- 7.23. Although the two WWI huts on site have historic and cultural value in their own right, they are not listed, and their significance derives from their former use rather than their character and appearance. They also make a limited contribution to the character and appearance of the Conservation Area, and their removal would not result in any harm to its significance. The applicant is nonetheless encouraged to liaise with local interest groups to enable suitable storage of the buildings whilst a new site can be found for them. The applicant has stated their intent to dismantle the buildings to be collected by one of the local community groups interested in reassembling them on another site in the future, and Officers are aware that a location to store the huts has been identified.
- 7.24. Third party concerns have been raised about the proximity of the proposed building to railway land, which is less than the 3m normally required by Network Rail for access and maintenance. The proposed structure will be set back from the boundary by at least 2m in the most part, with a 6m section of the north-eastern elevation being closer but at least 0.7m away at the closest point. However, the existing buildings mostly abut railway land along this boundary, and Network Rail themselves have not raised the proposed building's proximity as a concern but have recommended that the applicant seeks advice from their Asset Protection and Optimisation team as to whether an Asset Protection Agreement may be necessary. The proposal is therefore considered to be acceptable in this regard.
- 7.25. In summary, the proposal would preserve and enhance the character and appearance of the Conservation Area and would safeguard the adjacent heritage assets and their setting in accordance with Section 66 and Section 72 of the Planning (Listed Buildings and Conservation

Areas) Act 1990, Policies SD12, SD13 and SD15 of the South Downs Local Plan and Policies HC3A and HC3B of the Lewes Neighbourhood Plan. It will also improve the townscape to Garden Street and Southover Road in accordance with PL1B(3). It is considered appropriate to secure final details of materials and samples, including sample panels of brick and flint work, by means of suitably worded planning conditions.

Amenity and Visual Impacts

- 7.26. Policy SD5 k) requires proposals to avoid harmful impact upon, or from, any surrounding uses and amenities. SD6 requires proposals to preserve the visual integrity, identity and scenic quality of the National Park, including views from publicly accessible areas. HC3A seeks to protect the visibility of the open countryside setting from within the built-up area and identifies the prominence and form of the chalk ridge as a distinctive positive feature of the Conservation Area. Proposals that obscure its outline in views are not supported unless substantial public benefit is delivered, and all means to mitigate harm through design have been taken. The Lewes Conservation Area Appraisal and Management Plan (CAAMP) (2023) also identifies the town's chalk hill setting as a significant contributor to the town's character. SS3 requires new development to respect key views from the town to the countryside, and the view from the railway bridge is identified as protected view 04 in the Lewes NDP. PL 1B 2) also requires that massing not to disrupt views out toward the chalk ridge on the other side of town beyond The Ouse river.
- 7.27. Concerns have been raised by third parties that the building will obstruct important views of the chalk hills, and result in loss of light and privacy to properties on Southover Road and Dorset Road and should only present a 2-storey height to Southover Road.
- 7.28. It is acknowledged that, from certain points within the Conservation Area, the building will interrupt some views, including views of the lower portion of the town from the road bridge over the railway, and of the chalk downs to the east when approaching the site along Southover Road from the west. However, when approaching from other points, including from lower down on Garden Street, far reaching views of the downs would not be affected. The allowed appeal scheme comprised 10 individual dwellings of a similar height to the current proposal, between which glimpsed views of the downland beyond could have still been achieved from some locations. Whereas this scheme does not present gaps between structures, the stepped, varied roof form would also provide for dynamic glimpsed views to be achieved. In views from the railway bridge, the height of the building would not exceed that of the trees to its north, and its varied appearance would be viewed against a background of rising ground and varied roof forms of similar colours and materials. As such, the level of obstruction or interruption to protected views is not considered to be so harmful as to warrant a reason for refusal.
- 7.29. It is acknowledged that the building will present a slightly higher frontage (by c.1.3m) onto Southover Road than the appeal scheme. However, a building of three storeys is not inappropriate in the context, with the near adjacent Southover House being a full storey higher than the proposed building. The proposed site section also indicates that the proposed parapet height would be some 1.6m higher than 5 & 6 Southover Road and at a distance of some 18m. The development would therefore not be unacceptably overbearing or harmful to neighbouring amenities.
- 7.30. The application is also supported by a Daylight and Sunlight study of the new development assessing light conditions for future occupants and potential impacts on surrounding properties, including 5 & 6 Southover Road. This concludes that neighbouring properties are unlikely to experience a material change in daylight/sunlight availability from the proposed development. The study also demonstrates that future occupants of the development will have access to daylight and sunlight levels that meet current BRE guidelines. The majority of the flats are dual aspect, and the few single aspect units being south facing. All of the flats will have private outside space in the form of terraces and/or balconies, with a small communal garden located to the east of the car park.
- 7.31. The proposal is therefore considered to be acceptable in terms of neighbouring amenity and visual impacts and the amenity of future occupants, and accords with SD5, SD6, SS2 and PL1B(3).

Housing Provision

Housing Mix

- 7.32. The SDNPA’s Housing and Economic Development Needs Assessment (HEDNA) (2017) identified a predominant need for smaller 1-3 bedroom dwellings across the National Park, which is reflected in policy SD27. Policy PLIA also requires new development to meet local housing need.
- 7.33. The proposed mix is as follows:

	1 Bed	2 Bed	3 Bed	TOTAL
Market	2	6	8	18
Discounted Market Sales	2	0	0	0
TOTAL	4 (22%)	6 (33%)	8 (44%)	18

- 7.34. The above mix delivers a good number of smaller, 1-3 bedroom homes and compares favourably with that required by SD27 and PLIA. The Lewes Housing Officer has also advised that the good number of 3-bedroom units is welcomed.

Affordable Housing

- 7.35. One of the priority outcomes of the English National Parks and the Broads UK Government Vision and Circular (2010) is that new housing in National Parks will be focused on meeting affordable housing requirements. Policy SD28 requires sites with gross capacity for 11 or more homes to provide a minimum of 50% of affordable homes on-site, of which a minimum of 75% should be of a rented affordable tenure. These requirements were underpinned by a robust evidence base that was tested during the process of adopting the Local Plan, including the SDNPA’S Housing and Economic Development Needs Assessment (HEDNA) (2017) and Strategic Housing Market Assessment (SHMA) (2015). Policy PLI A supports the provision of Lewes Low Cost Housing (LLCH) unless this is demonstrably undeliverable. LLCH is defined as ‘the maximum cost affordable on the average Lewes salary whether for sale or rent.’
- 7.36. Policy Criterion 2) of SD28 recognises that, exceptionally, provision of affordable housing in a way that complies with the policy may render a development financially unviable. Paragraphs 7.64 to 7.68 of the supporting text set out the Authority’s expectations where this is considered to apply. Where viability is a genuine barrier to delivery, the Authority will require the applicant to demonstrate this by submitting a robust viability appraisal.
- 7.37. Vacant Building Credit is a government incentive that benefits developers by providing a financial credit against any affordable housing contribution calculation, equivalent to the existing gross floorspace of any relevant vacant buildings. This means that the affordable housing contribution is only be calculated on the amount of additional new floor space that would be provided.
- 7.38. In this case the application is supported by both a Viability Report and Costs Plan, which has been independently reviewed on behalf of the Authority by Bruton Knowles and B&M quantity surveyors. The independent review, when taking into account realistic land and sales values, the independently assessed costs plan, the abnormal costs in bringing forward this brownfield site, the applicable Vacant Building Credit and a developer’s profit of 15% which is at the lowest end of the scale, concluded that the development is capable of supporting the delivery of 2No affordable housing units. The Applicant has agreed to provide 2No 1-bed flats on site, of a Discounted Market Sales tenure, and the Housing Officer agrees that this tenure is the most suitable given the unlikelihood that a Registered Provider would be interested in taking on such a small number.
- 7.39. Whilst this would not result in the delivery of any Lewes Low Cost Housing, this is generally only feasible on larger schemes, where there is a Registered Provider interested in taking on the ownership and management of the affordable units. The application of the Lewes Low Cost Housing in this case, which necessarily places a greater burden on viability, would also result in a

requirement for a fraction of a unit i.e. a financial contribution which would then be used to cross subsidise affordable housing on a different site in the future. Officers therefore consider that the provision of Lewes Low Cost Housing however desirable is not deliverable. 2No onsite affordable homes, which would be sold at a discount in perpetuity, is therefore acceptable.

- 7.40. Subject to a Section 106 legal agreement to secure the 2No affordable homes, the proposal is therefore in accordance with SD27, SD28 and PL1.

Sustainable Construction

- 7.41. 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. The SDNPA Sustainable Construction Supplementary Planning Document (SPD) requires residential developments of this scale to achieve 39% carbon reduction above Part L, 10% Passivhaus homes, EV charge points and sustainable drainage systems.
- 7.42. The Authority's Sustainable Construction consultant has advised that the indicative Standard Assessment Procedure (SAP) calculation indicates that the dwellings would meet the above emission rate targets. The proposed energy efficiency measures and green energy sources, including PV panels and air source heat pumps, are also welcomed. Although the applicant is committed to providing 2No units to Passivhaus standards, however it is recognised that this is a complex undertaking within a block of flats. The Sustainable Construction consultant has therefore recommended that the estimated site-wide carbon reduction of 45-77% above Part L be secured as a pragmatic alternative.
- 7.43. To ensure the development will fully comply with the requirements of SD48, PL2 and the Sustainable Construction SPD, details of the design of EV charge points, sustainable materials strategy, a Site Waste Management Plan and water use can be secured by means of suitably worded planning conditions.

Ecology, Trees and Biodiversity Net Gain

- 7.44. 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. PL1 B(3) also notes the site's potential to extend the green corridor between Southover Grange Gardens and railway embankment through roof gardens, trees, green walls, pollinator-friendly planting and water butts.
- 7.45. Schedule 14 of The Environment Act (2021) requires that development proposals must provide a minimum of 10% Biodiversity Net Gain (BNG) unless one of the exemptions is met. The SDNPA's Biodiversity TAN sets out a local definition of 'significant BNG,' which if met normally requires the provision and monitoring of new onsite habitat to be secured by means of a S.106 legal agreement.
- 7.46. The development will result in the loss of an area of habitat in excess of 25sqm, meaning that it is statutorily required to deliver at least 10% BNG. The proposal is expected to provide an estimated +12.65% BNG provision via the provision of 351sqm of biodiverse green roof, an area of other neutral grassland, as well as 53m of species rich native hedgerow. The development would result in the overall loss of bramble scrub, which is not being replaced, however given the exemplary nature of the proposed green roofs being proposed the Authority's Ecologist has advised that it would be acceptable in this case for the trading rules to be relaxed. The BNG provision is considered to meet the SDNPA definition of 'significant' due both to the development being major development and the condition the green roofs will need to meet to achieve the statutory requirement. The provision and monitoring of the onsite BNG should therefore be secured via a S.106 agreement.
- 7.47. The Authority's Ecologist is also broadly satisfied with the protection and mitigation measures for wildlife. Although a suitable receptor site for reptiles has not yet been identified, it is considered acceptable for such details to be secured by means of a suitably worded planning condition given that any reptiles that may be present are likely to be individuals of widespread species.

- 7.48. To ensure the development complies with SD2 and SD9, details of compensatory habitat and enhancement measures, the green roof specification and details of appropriately located swift boxes and bee and bat bricks may be secured by means of suitably worded planning conditions.

Drainage and Contamination

- 7.49. Policy SD45 requires proposals to consider potential impacts on noise and air quality. 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. 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 PL1 B(3) also requires the site to be informed by a site-specific flood risk assessment.
- 7.50. Third party concerns have been raised with regard to the ability of local infrastructure to deal with additional sewage and surface water and risk of flooding.
- 7.51. The application site falls primarily within flood zone 2 with a small portion along the southern boundary of the site located within flood zone 3. The site is also located within Groundwater Source Protection Zones 2 and 3 and an area of major groundwater vulnerability due to the underlying aquifer. There is also a culverted Winterbourne stream crossing beneath the site. The applicant's geotechnical and geoenvironmental investigations indicate that the site is underlain by clay in several areas with a high water table, meaning that infiltration is not feasible and discharge of surface water to nearby culverts would therefore be appropriate. Contaminants have also been identified on the site that require remediation.
- 7.52. No concerns have been raised by Southern Water, subject to a condition to secure details of foul and surface water drainage. They note that the foul manhole proposed to be connected to may be decommissioned, however there is an alternative manhole that may be used nearby.
- 7.53. The Lewes Specialist Adviser for Flood Risk Management initially raised concerns with regard to past flooding events and the need for flood resilience to be demonstrated. Similarly, the Environment Agency required further assurance with regard to flood risk assessment, taking into account climate change and the need for finished floor levels to be a minimum of either 600mm above the average ground level of the site, adjacent road level to the building, or estimated river flood level, whichever is the highest. They also required assurance as to how surcharge of the watercourse, which will receive excess surface water from the developing, would be prevented. The East Sussex County Council (ESCC) Lead Local Flood Authority (LLFA) were also concerned that the location and depth of the surface water outfall and greenfield runoff rate had not been demonstrated. Network Rail were also concerned that surface/flood water could impact railway land.
- 7.54. An amended Flood Risk Assessment and CCTV condition survey to accurately map the size, position and condition of the culvert have now been provided. Surface water being discharged would be treated via the various catchpits, permeable paving and green roofs being provided allowing filtration of potential contaminants before they reach the water course. The proposal would also result in a 15% reduction in impermeable area. Both the EA and LLFA are now satisfied in terms of flood risk and surface water drainage, subject to conditions to secure technical details. The concerns raised by Network Rail in terms of drainage and flood risk have therefore been addressed.
- 7.55. The Environmental Health (Contamination) officer is satisfied with the findings of the submitted Geoenvironmental Investigation and has recommended a number of conditions to ensure that the identified contaminants are properly dealt with.
- 7.56. Given the above, the proposed surface water arrangements are considered to comply with the requirements of SD17, SD49 and SD50, subject to suitably worded planning conditions to secure the relevant technical details.

Access and Parking

- 7.57. 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.
- 7.58. 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. Policy PL1B3) also requires that provision be made for easy access from the site on foot and by bicycle to local facilities and services, and the redesign of existing vehicular and pedestrian accesses.
- 7.59. Following the provision of a Stage 1 Road Safety Audit and further information in relation to the visibility and gradient of the access, tracking for delivery vehicles and arrangements for refuse collection and cycle storage, the ESCC Highway Authority has no objection to the proposals.
- 7.60. The Highway Authority has advised that the site is sustainably located adjacent to the railway station, with a bus stop, providing regular services to Brighton located on the High Street to the northeast of the site. There are also several amenities within a short walking distance to the north. Given the previous/potential use of the site as an auction room, the number of vehicular trips to the site would likely be reduced, and it is unlikely the development would result in a severe impact on the local highway network from a capacity perspective. The width and gradient of the proposed access and its visibility setback of 2m are acceptable and in accordance with Manual for Streets due to the relative traffic speeds on Garden Street, and the ability for delivery vans to turn within the site has been demonstrated. The refuse storage and collection area would be located within 10m of the site access, which meets the local Lewes District guidance for refuse and recycling. A ramped (rather than stepped) access to the cycle store has also been provided, which is acceptable. Final details of cycle parking and electric vehicle (EV) charging facilities for all dwellings can be secured by means of suitably worded planning conditions. Conditions are also required to secure a suitable Construction and Environmental Management Plan, a Servicing Management Plan for deliveries and refuse management, and vehicle turning in perpetuity.
- 7.61. Third party concerns have been raised that the lack of onsite parking will exacerbate the lack of available local on-street parking in the area. Whilst the East Sussex Parking Demand Calculator indicates that 15 car parking spaces should be provided, the proposal would meet the requirement of the SDNPA Parking Calculator for 10-11 spaces. The level of parking is also considered to be acceptable given the highly sustainable, central location of the site. The Highway Authority has also advised that occupants of the site are unlikely to be eligible for on-street parking permits.
- 7.62. Subject to the above conditions, the proposal is acceptable from a highways perspective and in accordance with policies SD19, SD21, SD22, AM1, AM3 and PL1B.

Dark Skies

- 7.63. 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.
- 7.64. The site falls within the dark skies zone E3, which include urban residential environments with street lighting. All proposals within E3 areas should strive to achieve a zero upward light ratio via 'night usage' curfews and dark skies treatments of glazed openings to reduce harmful upwards light.
- 7.65. The Authority's ecologist supports the <1 lux light spill onto the southern boundary buffer planting to avoid harm to bats. However, the lighting strategy indicates the use of 3000K luminaires rather than the 2700K luminaries recommended by best practice for bats, and the submitted Energy and Sustainability Strategy. It is also unclear whether the lights proposed will minimise upwards light. It is therefore appropriate to secure details of external lighting by means of a suitably worded planning condition to ensure the proposal will comply with SD8.

8. Conclusion

- 8.1. The proposal delivers on the in-principle Neighbourhood Plan allocation for residential development. It provides 18 homes and a level of affordable housing that meets a policy compliant

number of affordable homes, in line with the requirements of SD28, given Vacant Building Credit and viability.

- 8.2. The scheme has been iteratively designed with input from both officers and the Design Review Panel. It responds appropriately to the site's constrained context and topography and will utilise locally appropriate materials that are typical to the Southover area of the Lewes Conservation Area. The development will result in less than substantial harm to the Conservation Area and will preserve and enhance its character and appearance. The proposal is also acceptable in terms of amenity and visual impacts, ecology, drainage, access and parking, subject to planning conditions. As the onsite biodiversity net gain will be provided by exemplary biodiverse green roofs that meet the SDNPA's definition of significant BNG habitat, it is appropriate to secure its provision, management and ongoing monitoring via a S.106 legal agreement.
- 8.3. The proposal is considered to meet the requirements of allocation policy PL3B and other relevant development plan policies and there are no overriding material considerations to indicate that permission should not be granted. The application is therefore recommended for approval, subject to the conditions set out at paragraph 9.1 and a S.106 legal agreement to secure 2 No affordable 1-bedroom flats of a discounted market sales tenure and the management and 30 year monitoring of the biodiverse green roofs as significant onsite biodiversity net gain, including a £41K monitoring fee.

9. Reason for Recommendation and Conditions

9.1. The application is recommended for approval subject to the following conditions

1. The development to which the permission relates shall be begun not later than two years from the date of this permission.

Reason: To comply with the provisions of Section 92(2) of the Town and Country Planning Act, 1990.

2. The development hereby permitted shall be carried out in accordance with the plans listed below under the heading "Plans Referred to in Consideration of this Application".

Reason: For the avoidance of doubt and in the interests of proper planning.

3. Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) (or any Order revoking and re-enacting that Order with or without modification) no buildings, structures or works as defined within Part I of Schedule 2, classes A-G or any order revoking or re-enacting that Order shall be erected or undertaken on the site.

Reason: To enable the Local Planning Authority to regulate and control the development of land in the interests of the character and appearance of the development and area.

Construction

4. Prior to the commencement of the development hereby permitted, a Construction and Environmental Management Plan and Ecological Method Statement shall be submitted to and approved in writing by the Local Planning Authority. Thereafter the approved plan shall be implemented and adhered to in full throughout the entire construction period. The Plan shall provide details as appropriate but not necessarily be restricted to the following matters:
 - i) Programme and timetable for implementation of works;
 - ii) The anticipated number, frequency and types of vehicles used during construction, including routing, means of access/egress, holding areas, turning and parking, including for site operatives/visitors;
 - iii) The loading, unloading and storage of plant, materials and waste;
 - iv) The erection and maintenance of security hoarding;
 - v) No burning of construction materials on site;

- vi) The provision of wheel washing facilities and other works required to mitigate the impact of construction upon the public highway (including temporary Traffic Regulation Orders);
- vii) Temporary diversion or protection of public rights of way;
- viii) Timetable for implementation, demonstrating that works are aligned with the proposed phasing of construction;
- ix) Persons responsible for implementing the works;
- x) Measures to manage flood risk and control/minimise the emission of dust, dirt vibration, light and air pollution and odour during demolition/construction;
- xi) A scheme for recycling/disposing of waste resulting from demolition and construction works;
- xii) No work to be undertaken on the site except between the hours of 08.00 and 18.00 on Mondays to Fridays inclusive and 08.00 hours and 13.00 hours on Saturdays, and no work to be undertaken on Sundays, Bank and Public Holidays;
- xiii) Details of public engagement both prior to and during the construction works.

The works shall be carried out in accordance with the approved details and shall be retained in that manner thereafter.

Reason: To protect amenity, highway safety, habitats and species identified in the ecological surveys from adverse impacts during construction and to avoid an offence under the Wildlife and Countryside Act 1981, as amended and The Conservation of Habitats and Species Regulations 2017, as amended. This is required to be a pre-commencement condition because it is necessary to have agreed such details prior to commencing any building works.

Contamination

5. Prior to the commencement of the development hereby permitted, a remediation strategy that includes the following components to deal with the risks associated with contamination of the site, shall be submitted to and approved, in writing by the local planning authority:
- i) A preliminary risk assessment which has identified
 - All previous uses;
 - Potential contaminants associated with those uses;
 - A conceptual model of the site indicating sources, pathways and receptors; and
 - Potentially unacceptable risk arising from contamination at the site
 - ii) Additional site investigation scheme, based on (i) to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off site;
 - iii) The results of the site investigation and the detailed risk assessment referred to in (ii) and based on these, an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken;
 - iv) A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in the remediation strategy in (iii) are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action.

Thereafter the approved strategy shall be implemented and adhered to in full throughout the entire construction period.

Reason: To ensure that risks from any land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with the NPPF 2024.

6. Prior to the first occupation of any part of development hereby permitted, a verification report demonstrating completion of works set out in the approved remediation strategy and the effectiveness of the remediation shall be submitted to and approved in writing by the local planning authority. The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the site remediation criteria have been met. It shall include a long term monitoring and maintenance plan for longer term monitoring of pollutant linkages, maintenance and arrangements for contingency action, as identified in the verification plan. The long term monitoring and maintenance plan shall be implemented as approved.

Reason: To ensure that risks from any land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with the NPPF 2024.

7. If, during development, contamination not previously identified is found to be present at the site then no further development shall be carried out until a remediation strategy has been submitted to and approved in writing by the local planning authority detailing how the unsuspected contamination shall be dealt with. The remediation strategy shall then be implemented as approved.

Reason: To ensure that risks from any land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with the NPPF 2024.

8. Prior to the commencement of the development hereby permitted, a full asbestos survey to be carried out on the building to be demolished, including detail of the removal of asbestos containing materials (ACMs) by a suitable qualified contractor and disposal off-site to a licenced facility, shall be submitted to and approved in writing by the local planning authority together with a mitigation plan that removes the risk to future occupiers of exposure to asbestos. Thereafter the approved plan shall be implemented and adhered to in full throughout the entire construction period.

Reason: To ensure that risks from asbestos to the future users of the land and neighbouring land are minimised and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors.

Design and Landscaping

9. Notwithstanding any submitted landscaping and arboricultural details, prior to the commencement of the development hereby permitted, a detailed scheme of hard and soft landscaping works shall be submitted to and approved in writing by the Local Planning Authority. All such works as may be approved shall then be fully implemented in accordance with the approved development. The scheme shall include details of, but not be limited to:
- i) Proposed planting plans and schedules of plants and trees, including written specifications, cultivation and other operations associated with plant, grass, shrub and replacement tree establishment, to be sourced from a peat-free nursery;
 - ii) Native planting within the public realm;
 - iii) Construction of parking spaces and tree-pit construction;
 - iv) Location of services and utilities in relation to planted areas;
 - v) Location, height and materials/construction technique for all boundary treatments including gates;
 - vi) Treatment of surfaces, paths and access ways;

- vii) Design of ancillary structures including cycle and refuse storage, substation and EV charge points;
- viii) A timetable for implementation of the soft and hard landscaping works;
- ix) A schedule of landscape maintenance for a minimum period of ten years to include details of the arrangements for its implementation.

Thereafter the development shall be undertaken in full accordance with the agreed details.

All soft landscaping shall be carried out in the first planting and seeding season following the first occupation of the building, or the completion of the development, whichever is the sooner. All shrub and tree planting shall be maintained free from weeds, avoiding pesticides, and shall be protected from damage by vermin and stock. Any trees or plants which, within a period of ten years, die, are removed, or become seriously damaged or diseased shall be replaced in the next planting season with others of a similar size and species.

Reason: To achieve an appropriate landscaping scheme to integrate the development into the landscape, in accordance with SD2, SD4 and SD5, and the SDNPA Design Guide SPD. This is required to be a pre-commencement condition because it is necessary to have agreed such details prior to commencing any building works.

10. Prior to the first occupation of the development hereby permitted a Landscape Management Plan covering areas of shared public space, access roads, pathways landscaping, and green roofs shall be submitted to and approved in writing by the Local Planning Authority. The Landscape management plan shall include long term objectives for biodiversity and wildlife, management responsibilities and maintenance schedules for all landscape areas, other than small privately owned domestic gardens. The landscape management plan shall thereafter be implemented in full as approved.

Reason: To secure the long-term maintenance of the landscaping scheme, which will contribute to the setting of the development and the surrounding character and appearance of the area in accordance with SD2, SD4, SD5, and the SDNPA Design Guide SPD.

11. Prior to the development above slab level, a schedule of materials and finishes and, where so required by the Local Planning Authority, samples of such materials and finishes (to include but not be limited to bricks, render, doors, pipework, flues, timber cladding and rainwater goods) and sample panel of flint work shall be submitted to and approved in writing by the Local Planning Authority. Thereafter the development shall be provided in full accordance with the approved details.

Reason: In the interests of landscape character and preserving the character of the listed building in accordance with SD4, SD5, SD12 and SD13 and the SDNPA Design Guide SPD.

Drainage

12. Notwithstanding submitted drainage details, prior to the commencement of development hereby permitted, details of the proposed foul drainage and means of disposal shall be submitted to and approved in writing by the Local Planning Authority. The scheme shall subsequently be implemented in full accordance with the approved designs.

Reason: To ensure satisfactory provision of foul water drainage. This is required to be a pre-commencement condition because it is necessary to have agreed such details prior to commencing any building works.

13. The development hereby permitted shall be carried out in strict accordance with the approved Flood Risk Assessment (ref 2405840-ACE-XX-XX-RP-C-301) and FRA Addendum (ref 2495840-ACE-XX-XX-RPC-305, dated 14 Nov 2025) including the following mitigation measures:
 - i) Finished floor levels to be set no lower than 5.41m above Ordnance Datum (AOD);
 - ii) The substation to be positioned as noted in Appendix B of the addendum, to allow sufficient easement over the Winterbourne culvert;

- iii) Planting of no larger than small shrubs in the locations shown in Appendix B of the addendum to minimise potential damage to the culvert structure;
- iv) The provision of a non-return valve to the outfall to the Winterbourne culvert which shall have a maximum discharge rate of 0.5l/s.

These mitigation measures shall be fully implemented prior to occupation and retained and maintained thereafter throughout the lifetime of the development.

Reason: To reduce the risk of flooding to the proposed development and future occupants and blockages to the existing culvert.

14. Notwithstanding submitted drainage details, prior to the commencement of development hereby permitted, details of the proposed surface water drainage and means of disposal, including on and/or off-site works, shall be submitted to and approved in writing by the Local Planning Authority. The details shall include:
- i) Full details of all components of the proposed drainage system including attenuation storage, outfall of the proposed attenuation, connection to the culverted main river, cross sections and invert levels as appropriate;
 - ii) Hydraulic calculations taking into account the connectivity of the different surface water drainage features demonstrating discharge rates not exceeding 0.5 l/s for all rainfall events, including those with 1 in 100 (+45% for climate change);
 - iii) The condition of the sewer taking surface water run-off, and details of any required improvements;
 - iv) An assessment of the risks to controlled waters;
 - v) Information on how surface water flows exceeding the capacity of the surface water drainage features will be managed safely;
 - vi) How surface water flows exceeding the capacity of the surface water drainage features will be managed safely.

No other drainage systems for the infiltration of surface water to the ground shall be provided other than those approved. The scheme shall subsequently be implemented in full accordance with the approved designs and retained thereafter.

Reason: To ensure satisfactory provision of surface water drainage and ensure surface water runoff from the development is managed safely whilst achieving maximum water quality, biodiversity and amenity benefits, in accordance with SD2, SD17 and SD50, and the SDNPA Design Guide SPD. This is required to be a pre-commencement condition because it is necessary to have agreed such details prior to commencing any building works.

15. Prior to development above slab level, a maintenance and management plan for the entire drainage system and surface water attenuation features shall be submitted to and approved in writing the Local Planning Authority to ensure the designed system takes into account design standards of those responsible for maintenance. The management plan shall include the following:
- i) Details of who will be responsible for managing all aspects of the surface water drainage system, including piped drains, and evidence that the appropriate authority is satisfied with the submitted details;
 - ii) Evidence that the responsibility arrangements will remain in place throughout the lifetime of the development.

All works shall be undertaken in full accordance with the agreed details and implemented throughout the lifetime of the development.

Reason: To ensure satisfactory provision of surface water drainage and ensure surface water runoff from the development is managed safely whilst achieving maximum water quality,

biodiversity and amenity benefits, in accordance with SD2, SD17 and SD50, and the SDNPA Design Guide SPD.

16. Prior to the new development being brought into first use, evidence including photographs and a post-work CCTV survey of the culverted watercourse to demonstrate that the drainage system has been constructed in full accordance with the final agreed detailed drainage designs shall be submitted to and agreed in writing by the Local Planning Authority.

Reason: To ensure satisfactory provision of surface water drainage and ensure surface water runoff from the development is managed safely.

Archaeology

17. Prior to the commencement of the development hereby permitted, a Written Scheme of Investigation to secure the implementation of a programme of archaeological assessment shall be submitted to and approved in writing by the Local Planning Authority. Thereafter the provisions of the scheme shall be carried out in full accordance with the approved programme.

Reason: To ensure that the archaeological and historical interest of the site is safeguarded and recorded to comply with the National Planning Policy Framework. This is required to be a pre-commencement condition because it is necessary to have agreed such details prior to commencing any building works.

18. Prior to the first occupation of the development hereby permitted, the archaeological site investigation and a report, setting out and securing any post-excavation assessment, specialist analysis and reports, publication and dissemination of results and archive deposition as appropriate, shall be submitted to and approved in writing by the Local Planning Authority. The archaeological site investigation and post-excavation assessment shall be undertaken in full accordance with the written scheme of investigation approved under condition 17.

Reason: To ensure that the archaeological and historical interest of the site is safeguarded and recorded to comply with the National Planning Policy Framework.

Sustainable Construction

19. Prior to the commencement of the development hereby permitted, a design stage Sustainable Construction Report shall be submitted to and agreed in writing by the local Planning Authority. The report shall include details of:

- i) Design stage SAP data;
- ii) A minimum of site wide DER/TER improvements of 77.81%;
- iii) Waste management (construction and operation);
- iv) Sustainable transport measures to include:
 - a) A Transport Assessment and Travel Plan (including public transport support);
 - b) All dwellings to have EV charge point with a minimum power rating output of 7kW and a universal socket;
- v) A Sustainable Materials Strategy, demonstrating:
 - a) Low carbon and environmentally friendly materials (substituted, re-used, recycled and locally sourced) including alternatives to uPVC building products;
 - b) Elevational details;
 - c) Grown in Britain certified timber (FSC or equivalent where G in B not feasible);
- vi) A design stage BRE water calculator demonstrating a predicted mains water use below 110 litres per person per day;
- vii) Layout or landscape plans demonstrating:

- a) GI and green roofs and green roof calculation;
- b) Sustainable drainage, green infrastructure and GI linkage; and
- c) Adaptation to climate change.

Thereafter the development shall be provided in full accordance with the approved details.

Reason: To ensure the development demonstrates a high level of sustainable performance to address mitigation of and adaptation to predicted climate change, in accordance with SD2, SD48 and the SDNPA Sustainable Construction SPD. This is required to be a pre-commencement condition because it is necessary to have agreed such details prior to commencing any building works.

20. Prior to the first occupation of any residential unit hereby permitted, detailed information in a Post Construction Stage Sustainable Construction Report demonstrating how the development has been carried out in accordance with all of the requirements set out in Condition 19 shall be submitted to, and approved in writing by, the Local Planning Authority. This documentary evidence shall include, but shall not be limited to, as built SAP and SBEM data, and as built stage BRE water calculator.

Reason: To ensure the development demonstrates a high level of sustainable performance to address mitigation of, and adaptation to, predicted climate change, in accordance with SD2, SD48 and the SDNPA Sustainable Construction SPD.

Ecology

21. No development shall take place until an Ecological Design Strategy (EDS) addressing compensation and enhancement measures has been submitted to and approved in writing by the local planning authority. This shall include but not be limited to the provision of a minimum of 18No. bird boxes/bricks and 18No. bee bricks, bat boxes/bricks (all ideally integrated into the fabric of the building) and hedgehog holes in boundary fencing. Information on type, number, size and location of these features should be provided, ideally on detailed plans. The EDS shall include the following.
 - i) Purpose and conservation objectives for the proposed works;
 - ii) Review of site potential and constraints;
 - iii) Detailed design(s) and/or working method(s) to achieve stated objectives;
 - iv) Extent and location /area of proposed works on appropriate scale maps and plans;
 - v) Type and source of materials to be used where appropriate, e.g. native species of local provenance;
 - vi) Timetable for implementation demonstrating that works are aligned with the proposed phasing of development;
 - vii) Persons responsible for implementing the works;
 - viii) Details of initial aftercare and
 - ix) Long-term maintenance;
 - x) Details for monitoring and remedial measures;
 - xi) Details for disposal of any wastes arising from works.

The EDS shall be implemented in accordance with the approved details and all features shall be retained in that manner thereafter.

Reason: To ensure that any adverse environmental impacts of development activities can be mitigated, compensated and restored and that the proposed design, specification and implementation can demonstrate this, and to provide a net gain for biodiversity as required by Section 40 of the Natural Environment and Rural Communities Act 2006, paragraphs 187 and

193 of the National Planning Policy Framework 2024 and Strategic Policy SD9 of the National Park Local Plan 2019.

22. No development above slab level shall take place until details of the green roof construction have been submitted to and approved in writing by the Local Planning Authority. A minimum of 351sqm of biodiverse green roof in good condition should be provided, as set out within the approved Statutory Metric (Amber Howie/Phlorum, May 2025 V3.) The details shall include:
- i) The extent of biodiverse green roof (including shingle perimeter);
 - ii) Cross section to show build-up and substrate depth;
 - iii) Spacing of any PV panels/array to be used;
 - iv) Plants/seed mix, irrigation, defects period;
 - v) Initial aftercare programme;
 - vi) Evidence of how the four criteria to meet 'Good' condition in Technical Annex I (TAB 22) of Defra's Biodiversity Metric version 4 will be met;
 - vii) At least one additional habitat feature, such as sand piles, stones, deadwood/logs.

The roof/s shall then be constructed in accordance with the approved details before first occupation and retained thereafter.

Reason: To secure the measures considered necessary to compensate for the loss of habitats and enhance the site to provide a net gain for biodiversity as required by the Environment Act 2021, Section 40 of the Natural Environment and Rural Communities Act 2006, paragraphs 187 and 193 of the National Planning Policy Framework 2024 and Strategic Policy SD9 of the National Park Local Plan 2019.

23. No development shall take place (including any demolition, ground works, site clearance) until a method statement for the protection of (a) reptiles (b) amphibians and (c) badgers has been submitted to and approved in writing by the Local Planning Authority. The content of the method statement shall include the:
- i) Reptile Mitigation Strategy;
 - ii) Purpose and objectives for the proposed works;
 - iii) Detailed design(s) and/or working method(s) necessary to achieve stated objectives (including, where relevant, type and source of materials to be used);
 - iv) Extent and location of proposed works shown on appropriate scale maps and plans;
 - v) Timetable for implementation, demonstrating that works are aligned with the proposed phasing of construction;
 - vi) Persons responsible for implementing the works;
 - vii) Initial aftercare and long-term maintenance (where relevant);
 - viii) Disposal of any wastes arising from the works.

The works shall be carried out in accordance with the approved details and shall be retained in that manner thereafter.

Reason: To protect habitats and species identified in the ecological surveys from adverse impacts during construction and to avoid an offence under the Wildlife and Countryside Act 1981, as amended and The Conservation of Habitats and Species Regulations 2017, as amended.

Access and Parking

24. Prior to the new development being brought into first use, a turning space for vehicles shall be provided and constructed in accordance with the approved Landscape General Arrangement

plan (drawing No DD689L01 REV E). The turning space shall thereafter be retained for that use and shall not be obstructed.

Reason: To ensure the safety of persons and vehicles entering and leaving the access and proceeding along the highway.

25. Prior to first occupation, the car parking shall be constructed in accordance with the approved Landscape General Arrangement plan (drawing No DD689L01 REV E). The car parking spaces shall thereafter be retained at all times for their designated purpose.

Reason: To provide adequate space for the parking of vehicles and to ensure the safety of persons and vehicles entering and leaving the access and proceeding along the highway.

26. Prior to first occupation, plans and details of covered and secure cycle parking spaces shall be submitted to and approved in writing by the Local Planning Authority. The approved spaces shall be installed prior to the new development being brought into first use.

Reason: To provide alternative travel options to the use of the car in accordance with current sustainable transport policies.

27. Prior to first occupation, an operational Servicing Management Plan for the site shall be submitted and approved in writing by the Local Planning Authority. The Management Plan shall set out the arrangements for the loading and unloading of deliveries and set out arrangements for the collection of refuse. Occupation of the site shall thereafter be carried on in strict accordance with the approved Service Management Plan.

Reason: To safeguard the operation of the public highway.

Biodiversity net gain conditions

28. The Biodiversity Gain Plan shall be prepared in accordance with the approved Ecological Impact Assessment V3 (Phlorum, May 2025); BNG Assessment V3 (Phlorum, May 2025); Statutory Metric V3 (Amber Howie/Phlorum, May 2025); and Statutory Biodiversity Metric Condition Assessment Sheets V3 (Phlorum, undated.)

Reason: To ensure the development delivers a biodiversity net gain on site in accordance with Schedule 7A of the Town and Country Planning Act, Policy SD9 of the South Downs Local Plan (2014-33) and the SDNPA Biodiversity Technical Advice Note.

Informatives

1. The applicant is encouraged to make best efforts in liaising with local community interest groups to enable dismantling and suitable storage of the WWI huts until a new site and/or use can be found for them.
2. In accordance with the UK's Green Roof Code of Best Practice (GRO, 2023) it is recommended that a minimum spacing between photovoltaic panels of 750mm (preferably 1000mm) is provided to ensure sufficient light/space for the biodiverse green roof beneath it and to ensure the targeted condition of 'good' in the Statutory Biodiversity Metric / Biodiversity Gain Plan can be delivered long-term.
3. Any supporting structures for green walls should be fixed c. 200mm off façades to increase air flow and space for the plants to grow, but also to increase the habitat opportunity for nesting bird species. Where possible, the planting specification should include a high percentage of native and/or non-native climbing and/or trailing species of recognised wildlife value.
4. The applicant is hereby reminded of the Control of Asbestos Regulations 2012 when carrying out demolition and other works associated with the development hereby permitted. For more information, please visit [Managing and working with asbestos](#).
5. Due to the close proximity of the proposed development to Network Rail's land and the operational railway, Network Rail requests the applicant / developer engages Network Rail's Asset Protection and Optimisation (ASPRO) team prior to works commencing. The applicant / developer may be required to enter into an Asset Protection Agreement to get the required

resource and expertise on-board to enable approval of detailed works. The applicant / developer should use the Asset Protection Customer Experience (ACE) system found on [Network Rail's Asset Protection website](#).

The developer must ensure that their proposal, both during construction and after completion does not:

- Encroach onto Network Rail land
 - Affect the safety, operation or integrity of the company's railway and its infrastructure
 - Undermine its support zone
 - Damage the company's infrastructure
 - Place additional load on cuttings
 - Adversely affect any railway land or structure
 - Over-sail or encroach upon the airspace of any Network Rail land
 - Cause to obstruct or interfere with any works or proposed works or Network Rail development both now and in the future.
6. The CL:AIRE Definition of Waste: Development Industry Code of Practice (version 2) provides operators with a framework for determining whether or not excavated material arising from site during remediation and/or land development works is waste or has ceased to be waste. Under the Code of Practice:
- Excavated materials that are recovered via a treatment operation can be reused on-site providing they are treated to a standard such that they are fit for purpose and unlikely to cause pollution
 - Treated materials can be transferred between sites as part of a hub and cluster project
 - Some naturally occurring clean material can be transferred directly between sites
- Developers should ensure that all contaminated materials are adequately characterised both chemically and physically, and that the permitting status of any proposed on-site operations are clear. If in doubt, the Environment Agency should be contacted for advice at an early stage to avoid any delays. Contaminated soil that is (or must be) disposed of is waste. Therefore, its handling, transport, treatment and disposal are subject to waste management legislation, which includes:
- Duty of Care Regulations 1991
 - Hazardous Waste (England and Wales) Regulations 2005
 - Environmental Permitting (England and Wales) Regulations 2016
 - The Waste (England and Wales) Regulations 2011
7. The developer will need to make a formal application to Southern Water for a connection to the public sewer.
8. The Environmental Permitting (England and Wales) Regulations 2016 requires a Flood Risk Activity Permit to be obtained for any activities which will take place on or within 8 metres of a flood defence structure or culvert. For further guidance, please visit <https://www.gov.uk/guidance/flood-risk-activitiesenvironmental-permits> The Applicant should note that a permit is separate to and in addition to any planning permission granted. The granting of planning permission does not necessarily lead to the granting of a permit.
9. Due to the availability of and demand for on-street parking in the vicinity of the site the applicant should be made aware that on-street parking permits are not likely to be issued for this site. The applicant should be aware that in accordance with Article 23 of the Lewes

Parking Order dated 28th December 2007, residents of this development are unlikely to be eligible for on-street parking permits.

10. The ESCC Highway Authority's requirements, including a deed of covenant, will need to be secured through a Section 278 Legal Agreement between the applicant and East Sussex County Council. The applicant is requested to contact the Transport Development Planning Team transportdevelopmentplanning@eastsussex.gov.uk to commence this process. The applicant is advised that it is an offence to undertake any works within the highway prior to the agreement being in place.
11. In accordance with the UK's Green Roof Code of Best Practice (GRO, 2023) it is recommended that a minimum spacing between photovoltaic panels of 750mm (preferably 1000mm) is provided to ensure sufficient light/space for the biodiverse green roof beneath it and to ensure the targeted condition of 'good' in the Statutory Biodiversity Metric / Biodiversity Gain Plan can be delivered long-term.
12. Any supporting structures for green walls should be fixed c. 200mm off façades to increase air flow and space for the plants to grow, but also to increase the habitat opportunity for nesting bird species. Where possible, the planting specification should include a high percentage of native and/or non-native climbing and/or trailing species of recognised wildlife value.
13. Based on the information available, this permission will require the approval of a Biodiversity Gain Plan by the local planning authority before development is begun because none of the statutory exemptions or transitional arrangements are considered to apply.

The effect of paragraph 13 of Schedule 7A of the Town and Country Planning Act 1990 is that planning permission granted for the development is deemed to have been granted subject to the condition ("the biodiversity condition") that development may not begin unless:

- i) A Biodiversity Gain Plan has been submitted to the planning authority, and
- ii) The planning authority has approved the plan.
- iii) The planning authority is the South Downs National Park Authority.

There are statutory exemptions and transitional arrangements which mean that the biodiversity gain condition does not always apply. These can be found in the legislation.

14. The Biodiversity Gain Plan must relate to development for which planning permission is granted, and specify the following matters:
 - i) Information about the steps taken or to be taken to minimise the adverse effect of the development on biodiversity,
 - ii) The pre-development biodiversity value of the onsite habitat,
 - iii) The post-development biodiversity value of the onsite habitat,
 - iv) Any registered offsite biodiversity gain allocated to the development and the biodiversity value of that gain in relation to the development,
 - v) Any biodiversity credits purchased for the development.

Commencing development which is subject to the biodiversity gain condition without an approved Biodiversity Gain Plan could result in enforcement action for breach of planning control.

15. Under Section 93G of the Town and Country Planning Act 1990 (as amended), this decision notice informs you that a 'commencement notice' must be served on the Local Planning Authority - subsections (2) and (3) are set out below:
 - (2) Before the development is begun, the person proposing to carry it out must give a notice (a "commencement notice") to the local planning authority specifying the date on which the person expects the development to be begun.
 - (3) Once a person has given a commencement notice, the person—

- may give a further commencement notice substituting a new date for the date previously given, and
- must do so if the development is not commenced on the date previously given.

The notice should be provided to the Local Planning Authority a minimum of seven (7) days before the development commences.

Failure to provide the commencement notice could lead to the Local Planning Authority serving notice on them to require information to be provided, and if that is not provided within 21 days, they will be guilty of an offence, as below:

(5) Where it appears to the local planning authority that a person has failed to comply with the requirements of subsection (2) or (3)(b), they may serve a notice on any relevant person requiring the relevant person to give the authority such of the information prescribed under subsection (4)(a) as the notice may specify.

(7) A person on whom a notice under subsection (5) is served is guilty of an offence if they fail to give the information required by the notice within the period of 21 days beginning with the day on which it was served.

(9) A person guilty of an offence under subsection (7) is liable on summary conviction to a fine not exceeding level 3 on the standard scale.

TIM SLANEY

Director of Planning

South Downs National Park Authority

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Appendices	1 – Information concerning consideration of applications before committee 2 – Appeal Decision 3 – Pre-application advice
SDNPA Consultees	Director of Planning, Legal Services
Background Documents	All planning application plans, supporting documents, consultations and third party responses National Planning Policy Framework (2024) South Downs Local Plan (2014-33) Lewes Neighbourhood Plan (2015-33) Lewes Conservation Area Appraisal and Management Plan (2023) Lewes District Refuse & Recycling Guidance for Developers (2017) South Downs National Park Partnership Management Plan (2020-25) SDNPA Corporate Plan (2020-25) SDNPA Affordable Housing SPD (July 2020)

[SDNPA Biodiversity TAN \(Jan 2025\)](#)

[SDNPA Dark Skies TAN \(May 2021\)](#)

[SDNPA Design Guide SPD \(July 2022\)](#)

[SDNPA Ecosystem Services TAN](#)

[SDNPA Parking SPD \(Apr 2021\)](#)

[SDNPA Sustainable Construction SPD \(Aug 2020\)](#)