



Mr Alex Bateman
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Our Ref: SDNP/22/03728/PRE
Contact Officer: Stella New
Tel. No.: 01730 819216

1 March 2023

Dear Mr Alex Bateman

PRE-APPLICATION ADVICE

Applicant Name: Mr Damian Frizzell
Proposal: Redevelopment of 'former auction rooms' into ten residential units
Site Address: Garden Street Auction Rooms, Garden Street, Lewes, East Sussex, BN7 1TJ

Thank you for your correspondence received 2 August 2022 seeking pre-application advice.

Executive Summary

The site is allocated through policy PL1 B(3) of the Lewes Neighbourhood Plan for an 'expected 11 dwellings', and residential development is therefore acceptable in principle providing it meets the requirements of PL1 B(3) and other relevant local plan policies, including those relating to affordable housing provision.

The site is highly constrained due to a number of factors, including heritage designations, floor risk and noise and contamination, and any scheme taken forwards will need to avoid harmful impacts upon protected views. The Design Review Panel and officers have assisted you over a period of time in exploring what an optimum layout, form and quantum of development would be, and it is likely that a flatted development with shared open and covered ground floor public space will be the most efficient option in terms of land use. The sustainable construction aspirations of the scheme are particularly welcomed.

Further refinements are now required to the layout, materiality and in particular the height/bulk/form of the scheme to ensure the proposal will meet the requirements of PL1 B(3) and the relevant local plan policies, including SD28 and PL1 A. This is likely to require a reduction in quantum to below 17 units.

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

South Downs National Park Authority, South Downs Centre, Midhurst, GU29 9DH
Tel: 01730 814810 Email: planning@southdowns.gov.uk

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Planning Policy

This section outlines policies which are pertinent to the proposals. A comprehensive list of policies is included at Appendix 1 of this advice and the Local Plan should be read as a whole.

The Development Plan for which any proposals would currently be assessed against are the South Downs Local Plan (SDLP) and the Lewes Neighbourhood Plan (LDP). The relevant policies of the Lewes Neighbourhood plan are:

- o Policy LE1 Natural Capital
- o Policy LE2 Biodiversity
- o Policy HC3 A Heritage Protection of Landscape and Townscape
- o Policy HC3 B Planning Application Requirements and Heritage Issues
- o Policy PL1 A General Housing Strategy
- o Policy PL1 B (Site 3) Housing Allocations
- o Policy PL2 Architecture & Design
- o Policy PL3 Flood Resilience
- o Policy PL4 Renewable Energy and the Resource and Energy Efficiency of New Buildings
- o Policy AM1 Active Travel Networks
- o Policy AM3 Car Parking Strategy
- o Policy SS1 Historic Streets
- o Policy SS3 Protection & Enhancement of Green Spaces

Both the National Planning Policy Framework (NPPF) and the National Planning Practice Guidance (NPPG) are material planning considerations. Government policy relating to National Parks is set out in English National Parks and the Broads: UK Government Vision and Circular 2010 National Planning Policy Framework 2019. The Circular and NPPF confirm that National Parks have the highest status of protection and the NPPF states at paragraph 172 that great weight should be given to conserving landscape and scenic beauty in the national parks and that the conservation of wildlife and cultural heritage are important considerations and should also be given great weight in National Parks.

Planning Assessment

Site Description and Planning History

This small 0.15ha brownfield site is currently occupied by 2No empty warehouse building with a lawful B8 storage/distribution use, and allocated for an "expected 11 dwellings" under PL1 B(3) of the Lewes NDP.

The site falls within Lewes Conservation Area, and the locality is predominantly residential in character with a close grain. The site is sunken down below Garden Street to the west, and Southover Road to the north, with the railway line and Lewes Station platform running along the north-eastern boundary. The Grange gardens to the west is a designated local green space. The site is understood to have historically been a water mill and later a physic garden.

The site is further constrained for the following reasons:

- o It is located primarily within flood zone 2, with a winterbourne stream (statutory main river) understood to run underground along the southern boundary and a storm drain that runs east-west in the lower part of the site
- o It falls within Water Source Protection Zones 2 and 3 and a principal aquifer
- o Potential contamination from previous uses
- o Lewes Railway Station (the platform) is grade II listed
- o Network Rail require a 2m standoff between their boundary and any buildings to allow future maintenance without entering railway land or airspace

Previous planning history pertaining to the site includes the following:

LW/94/1678 Internal alterations to form toilet facilities and the construction of a new foul drain. Approved 13.02.1995

LW/83/1007 Listed Building Application to demolish storage building and Planning Permission to erect new storage building. Approved 12.07.1983

LW/07/0059 Demolition of existing shed buildings used as auction rooms. Withdrawn 07.03.2007

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/13/04916/FUL Removal of corrugated iron wall cladding and replacing with sweet chestnut rain screen cladding and insulation. Approved 19.12.2013

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

Principle of Development

The site is allocated for an "expected 11 dwellings" under PL1 B(3) of the Lewes NDP. Residential development of the site is therefore acceptable in principle, subject to the requirements of PL1B and the relevant local plan policies. Extant permission currently exists for 10 dwellings (allowed at appeal), dated 6 April 2021 comprising 4No 2 bedroom split-level apartments, 2No 3 bedroom houses and 4No four bedroom houses.

Proposal

The current proposal has evolved during the pre-application process and is now for a flatted scheme of 17 1-3 bedroom dwellings arranged. The living accommodation would be arranged over three storeys, with car parking at the ground floor level.

The submitted information sets out the aspiration for the development to be zero carbon, achieved through the use of cross laminated timber construction on pile foundations to reduce embodied carbon and use of pv panels.

Design, Landscape and Heritage Impacts

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 174 and 176 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.

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. Further guidance on what is considered to be good contextual design can be found in the adopted SDNPA Design Guide SPD (The Design Guide, Supplementary Planning Document southdowns.gov.uk) and online here Landscape-led Design - South Downs National Park Authority

Policy PL1 B(3) also sets out the following site specific design criteria:

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;
2. Massing should not disrupt views out toward the chalk ridge on the other side of town beyond the Ouse river;
 3. Site has good access to local facilities and services and provision should be made for easy access from the site on foot and by bicycle to these areas;
 4. Be informed by a site specific flood risk assessment;
 5. Noise from railway line and contamination/air quality will need to be assessed and mitigated
 6. Redesign of existing vehicular and pedestrian accesses

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. Policy HC3A also seeks to protect the historic character and form of streetscape, and the roofscape of the Conservation Area from within the town and in the countryside setting. Developments that include the palette of materials identified in the relevant Lewes Conservation Area Appraisal will be supported.

Any development proposal should be accompanied by a detailed Heritage Statement and Landscape and Visual Impact Assessment, providing landscape evidence that has demonstrably informed the layout, scale, form, massing, height and materiality of the proposal.

The proposal has had considerable input from DRP, and this response should be read alongside their comments as well as the in depth response from the Design and Historic Building officers.

Officers share the panel's concerns about the height, bulk and mass of the building, and the interruption of protected views out to the downland beyond. There are also important elements of landscape evidence that needs to be factored in to the design and its evolution, including the grain of development, views of the Downs from Southover Road and St Martin's Lane, and views from Priory Street and the Railway Station (and bridge) all of which are key, and currently impacted by the proposals. It will also be important to factor in the setting of the grade 2 listed platform along the eastern boundary, and the development's relationship with the heritage asset.

The height and scale of the proposed building blocks protected long distance views of the cliffs and the Downs from St Martin's Lane and Southover Road, and when viewed from the south east the massing of the building appears starkly contrary to the characteristic small scale stepped roofs from the railway level up to the Castle. The scale of the 'blocks' or 'modules' that conform the building are also disproportionately large in relation to the size of houses behind. Although materials could assist in reducing the perceived mass, they cannot restore views and you are strongly encouraged to address this issue prior to submission.

The following should be considered before submitting final plans, and if not incorporated should be justified in the Design and Access Statement:

- o Exploring how to break the building mass and lower heights to avoid obscuring protected views;
- o Following the settlement pattern of either Southover Road (mix of narrow front defensible spaces between road and buildings) or Garden Street (frontages directly adjacent to and addressing the road) either of which would allow some flexibility to the design;
- o Exploring dwelling typologies that provide a direct pedestrian access to the street to activate the frontage;
- o Ensuring the relationship with the grade 2 listed railway is not abrupt or visually harmful;
- o Ensuring materials are locally appropriate in colour and type;
- o Any green roofs to be native species not sedum (which has very limited biodiversity value);
- o Reusing the existing access point
- o Narrowing the access to slow traffic and address the road hierarchy
- o Clearer/shorter/wider accesses to the flats
- o How rainwater harvesting would practicably function
- o Cycle parking that is conveniently located and easy to use
- o Arranging openings to avoid direct overlooking of neighbouring private spaces, and¹³²

- o increasing openings in the northern elevation;
- o Daylight to the light well, and dual aspect for all units if feasible;
- o Given what appear to be negative impacts arising from the height/bulk/mass of the building, it is questioned whether 17 units can be successfully delivered. Whilst the Authority would encourage the efficient and sustainable use of land, this cannot be at the expense of landscape impacts, given the landscape designation.

The Historic Buildings officer has also drawn attention to the 2007 Lewes Conservation Area Appraisal which is currently under review, and provides guidance for new development within the Southover character area. Materials within this part of the conservation area are varied, but predominantly red and grey brick, mathematical tiles, handmade clay tiles and natural slate. The use of brick slips or vertical timber cladding would not be acceptable within the conservation area.

Historic England have advised that you are able to apply for pre-application advice directly to e-seast@HistoricEngland.org.uk.

Housing Provision

As part of the evidence base for the South Downs Local Plan, the SDNPA carried out a Housing and Economic Development Needs Assessment in 2017 for the wider National Park Area, which identified the need for the following broad mix of market housing, as reflected by policy SD27:

- o 1 bedroom dwellings: at least 10%
- o 2 bedroom dwellings: at least 40%
- o 3 bedroom dwellings: at least 40%
- o 4+ bedroom dwellings: up to 10%

In terms of affordable housing provision, Policy SD28 'Affordable Homes' requires sites with gross capacity to provide 10 dwellings to provide 4 affordable homes, at least two of which should be rented affordable. Social rental tenures are the most affordable in the National Park to those in greatest need, and should be prioritised over other forms of rented tenure.

Policy PL1 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;' or, more specifically, housing that is 'available for rent or purchase at the median local income (currently GBP23,000 per person or GBP30,000 per household).' Reference is also made to the provision of a variety of dwelling sizes and tenures, and innovative financing and designs to provide low cost home ownership and rent, including shared ownership. The SDNPA Affordable Housing Supplementary Planning Document (SPD) recommends that in Lewes, rented affordable dwellings should be provided at a rent level based on income rather than market rents, to reflect the aims of LLCH policy PL1A. Any discounted market housing should be capped at a level which is 5 times the average Lewes household income.

The need for affordable housing in the National Park and Lewes is acute. The English National Parks and the Broads UK Government Vision and Circular (2010) states that a priority outcome is for new housing in National Parks to be focused on meeting affordable housing requirements. National Parks also have a statutory duty to foster the economic and social well-being of the local community in pursuit of these purposes, which extends to the provision of affordable homes.

The allowed scheme is a 'statement' form of development of contemporary design with extensive glazing. The associated construction costs were assessed by a quantity surveyor and found to be too high to allow provision of affordable housing. The Inspector found that the design of the proposal was acceptable, and the lack of viability therefore justified due to the economics of the design. It is therefore important to recognise that the lack of affordable housing is justified due to the particular set of circumstances relating to the allowed scheme.

There was significant local objection to the allowed scheme due to the lack of any affordable housing, and it is important to bear in mind that this site has been allocated specifically to meet local housing need, as set out by PL1 A, 1) which states "proposals for the residential development of the allocated infill sites in Policy PL1 B will be supported subject to the following

criteria: they meet local housing need" and "where appropriate, they meet development plan requirements for the provision of affordable housing to include maximising the amount of Lewes Low Cost Housing unless Lewes Low Cost Housing is proven to be undeliverable."

The design of any alternative scheme should take into account at an early stage the requirement to provide affordable homes, including an element of Lewes Low Cost Housing. The delivery of affordable homes should not be impeded by the construction costs associated with a high-end design focusing on the delivery of executive style homes.

There may be some flexibility in the provision of a greater number of larger market dwellings to assist the delivery of affordable homes, however this would need to be justified, and is in any case difficult on this small and highly constrained site. Further information is available in the SDNPA Affordable Housing Supplementary Planning Document Adopted Affordable Housing SPD - South Downs National Park Authority

In summary, to accord with SD27 and PL1 A, a 17 dwelling scheme should therefore provide:

- o 9No affordable homes, an element of which should be LLCH;
- o 8No market dwellings

The affordable homes should also be 75% affordable rental tenure, and be clearly marked on the plans. Provision of any less than 9No affordable homes would need to be robustly justified with a viability statement. This would be reviewed by a third party specialist, the cost of which would be borne by the Applicant.

Sustainable Construction

Policies SD48, PL2 and PL4 require the design of new development to address climate change mitigation through the on-site use of zero/low carbon technologies, sustainable design and construction, and low carbon materials. The supporting text of PL1B notes that the site offers potential to improve ecosystem services and green infrastructure through including trees, small gardens, green walls or roofs, pollinator friendly planting, water butts and SuDS.

Further information is available in the SDNPA Sustainable Construction Supplementary Planning Document Adopted Sustainable Construction SPD - South Downs National Park Authority

The aspiration for the development to be zero carbon is welcomed. This would be achieved through the use of cross laminated timber construction on pile foundations to reduce embodied carbon, the use of pv panels and roof and vertical planting. We would also encourage you to consider materials that have a low embodied energy, low general environmental impacts and includes materials that are locally sourced, reused and recycled.

Ecology and Green Infrastructure

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.

Paragraph 174 of the Framework states that planning decisions should recognise the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services, including the economic and other benefits of trees and woodland; and minimise impacts on and provide net gains for biodiversity. Further information is available in the SDNPA Ecosystem Services TAN Core-07-Ecosystem-Services-Technical-Advice-Note-non-householder.pdf (southdowns.gov.uk)

The Authority's ecologist has advised that the redesigned scheme offers good opportunities for Biodiversity Net Gain (BNG) through the provision of biodiverse green roofs (calcareous grassland and ecologically enhanced brown roofs,) planted terraces, communal garden and new

landscape corridors. The green roofs will require a slightly deeper substrate (80-150mm) to support natural vegetation rather than sedum blankets, which should be avoided.

The use of calcareous chalk grassland species is supported providing they can be sustainably sourced and the soils/substrate will sustain these plants longterm. Soil testing to establish the soil type would be helpful to carry out before the planting plan is finalised.

Where green walls (with climbing plants) are to be used the supporting structure should be fixed c.200mm off any facade to increase air flow and provide habitat opportunity for nesting bird species. The use of integrated nesting bricks is encouraged, particularly for swifts, at least one per residential unit.

Any application should be supported by an ecological impact assessment of the proposed development, assessing the likely impacts of the scheme on biodiversity and recommending appropriate mitigation, compensation and enhancement

Any formal application should also be informed by an Ecological Impact Assessment (EclA) of the proposed development, assessing the likely impacts of the scheme on biodiversity and recommending appropriate mitigation, compensation and enhancement made in accordance with CIEEM guidance. Enhancements should aim to strengthen connectivity between existing habitats and provide biodiversity net gain. The assessment should include a data search from the Sussex Biodiversity Record Centre, and surveys should be carried out in accordance with national best practice guidance and Natural England's standing advice. Cumulative and in combination effects of this development with other local developments/plans/projects should also be considered. This should be supported by the Defra Biodiversity Metric indicating how a minimum 10% BNG will be achieved, in accordance with the National Park's Technical Advice Note on BNG, which is due to become a statutory requirement by November 2023.

Dark Night Skies

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

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 spill.

Further measures to further reduce harmful lightspill, for example using low transmission glazing, sensitive lighting and automated blackout blinds would also be appropriate here, and may be secured via an appropriately worded condition attached to any planning permission.

Flood Risk, Drainage and the Water Environment

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. Policy PL1 B(3) also requires the site to be informed by a site specific flood risk assessment.

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.

The application site falls primarily within flood zone 2 (approx. 88% of the site) with a small portion along the southern boundary of the site located within flood zone 3 (approx. 2% of the site). The site is also located within two Groundwater Source Protection Zones and an area of major groundwater vulnerability due to the underlying aquifer. From the LLFA responses ¹³⁵

received during the previous application, there is also a Winterbourne Stream crossing beneath the site, and groundwater on site is less than 3m below ground level which is likely to make infiltration unfeasible.

A Sequential Test Report (May 2018) was undertaken to support the preparation of the Lewes Neighbourhood Plan which concluded there were no alternative available sites located within Flood Zones 1 or 2 and would meet the objectives of the Lewes Neighbourhood Plan. Site specific flood risk assessments would therefore be required, and accordingly PL1 B (3) requires the design of the site to be informed by a site specific assessment. Further information and recommendations for a site specific FRA, and the suitability and design of SuDS is available in the Lewes District Strategic Flood Risk Assessment Level 1 Update and Level 2.

The allowed scheme includes the discharge of runoff into a culvert along the southern boundary of the development; however this is a piped solution and the least favourable in terms of the sustainable drainage hierarchy. Given the drainage constraints on site, it is particularly important to provide as many capture at source solutions as feasible, including green roofs, rainwater gardens and water butts in order to deal with surface water on site as far as possible. If feasible, the open space could be design to allow eventual flooding.

The Environment Agency have advised that a Flood Risk Assessment should be submitted with any planning application incorporating 'Product 4' flood data available from SSDEnquiries@environment-agency.gov.uk. Any proposed works or structures, in, under, over or within 8 metres of the main river will require a permit from us under the Environmental Permitting (England and Wales) Regulations 2016. The EA provide a charged advice service should you want further advice prior to submitting a planning application

The LLFA have advised that given the site is brownfield, development runoff should be reduced to as close as practicable to greenfield runoff rates, with a minimum betterment of 50% from existing runoff rates for all events. The drainage system will be required to manage all rainfall events up to and including the 1 in 100 year plus 45% allowance for climate change rainfall events. If connection to an existing surface water sewer is proposed, the principle of the connection will need to be agreed with Southern Water prior to submission, and the condition of existing connections investigated and improved as appropriate. SuDS techniques should follow the Management Train approach outlined in CIRIA C753 'The SuDS Manual'.

Southern Water have further advised that the design of the proposed basements and on site drainage system should consider the possibility of surcharging within the public sewerage system in order to provide adequate protection to basements from the risk of flooding. Where surface water is being considered for discharge to our network, the hierarchy for surface water reflected in part H3 of the Building Regulations should be followed (see also The SuDS Manual):

- o Reuse
- o Infiltration
- o Watercourse
- o Storm Sewer
- o Combined Sewer

Access and Parking

Policies SD19, SD22, AM1 and AM3 seek to promote sustainable modes of transport including electric vehicles; and a level of parking provision that is appropriate to the site's needs and proximity to facilities and services, and of a location, scale and design that reflects its context.

Policies SD21 and AM1 seek to promote the safety and amenity of all road users, and prioritise and support existing safe, direct, walking and cycling routes. 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.

The ESCC Highway Authority have advised that any application would need to be supported by details of:

- o Existing and proposed trip rates supported by TRICS outputs and site selection methodology;
- o A Stage 1 Road Safety Audit;
- o A 'Transport Report', including location of key services, availability of sustainable modes of transport and existing/future vehicular traffic generation;
- o A Parking Strategy, including provision of parking and cycle storage;
- o Appropriate on site vehicle turning to cater for the largest refuse vehicle of 12 metres in length with appropriate vehicle tracking;
- o Suitable vehicle, pedestrian and cycle access, to include sufficient width, gradient and visibility splays (2.4m x 70m)

The amount of parking required will depend on the number of units and housing mix. Further information is available in the SDNPA Parking Supplementary Planning Document Adopted Parking SPD - South Downs National Park Authority which includes a parking calculator - this would indicate 21 parking spaces to support 17 dwellings. However given the sustainable location of the site and proximity to the train station, we would encourage you to minimise parking and focus on promoting sustainable means of transport.

Noise and Contamination

Policy SD54 supports proposals where levels of air, noise and other pollutants do not have a significant negative affect on people and the natural environment now or in the foreseeable future, taking into account cumulative impacts and any mitigation. PL1B3) requires the noise from railway line and contamination/air quality to be assessed and mitigated.

Other matters

The proposal would trigger the requirement for a Community Infrastructure Levy contribution to help deliver infrastructure to support development in the area. The site falls within Zone 2, which is charged at a levy of £200 per sqm. Affordable dwellings are exempt from CIL charges. More information about CIL may be found here CIL & S106 Rates - South Downs National Park Authority)

Any formal application will need to be supported by:

- o Arboricultural Impact Assessment, Arboricultural Method Statement and Tree Protection Plan;
- o Archaeological Survey;
- o Ecological Impact Assessment and Defra Biodiversity Metric demonstrating how a minimum 10% BNG will be achieved;
- o FRA including Surface Water Management Plan and Infiltration testing to BRE365 standard and groundwater monitoring between November and April;
- o LVIA;
- o Land Contamination Survey;
- o NDSS Space Standards

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

Consultations

The following consultation responses have been provided and should be read alongside this response: Design, Ecology, ESCC Highways, Local Lead Flood Authority, Environment Agency, Southern Water and Lewes Town Council. You should also refer to the notes from the DRP.

If you pursue a formal planning application please note that the requirements of the South Downs National Park Authority Local Validation List will apply with regard to the information required to be submitted. Further information is available at

<https://www.southdowns.gov.uk/planning/making-an-application/local-validation-list/> .

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

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

Yours sincerely,

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

Appendix

National Park Purposes

The two statutory purposes of the SDNP designation are:

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

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

Partnership Management Plan

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

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

- Partnership Management Plan Policy 1
- Partnership Management Plan Policy 3
- Partnership Management Plan Policy 9
- Partnership Management Plan Policy 25
- Partnership Management Plan Policy 37
- Partnership Management Plan Policy 39
- Partnership Management Plan Policy 50

National Planning Policy Framework (NPPF) and Circular 2010

Government policy relating to National Parks is set out in English National Parks and the Broads: UK Government Vision and Circular 2010 and The National Planning Policy Framework (NPPF) which was issued on 24 July 2018. The Circular and NPPF confirm that National Parks have the highest status of protection, and the NPPF states at paragraph 172 that great weight should be given to conserving and enhancing landscape and scenic beauty in national parks and that the conservation and enhancement of wildlife and cultural heritage are also important considerations and should be given great weight in National Parks.

Development Plan

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

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

- Core Policy SD1 - Sustainable Development
- Core Policy SD2 - Ecosystems Services

- Strategic Policy SD4 - Landscape Character
- Strategic Policy SD5 - Design
- Strategic Policy SD6 - Safeguarding Views
- Strategic Policy SD8 - Dark Night Skies
- Strategic Policy SD9 - Biodiversity and Geodiversity
- Development Management Policy SD11 - Trees, Woodland and Hedgerows
- Strategic Policy SD12 - Historic Environment
- Development Management Policy SD16 - Archaeology
- Strategic Policy SD19 - Transport and Accessibility
- Strategic Policy SD20 - Walking, Cycling and Equestrian Routes
- Development Management Policy SD21 - Public Realm, Highway Design and Public Art
- Development Management Policy SD22 - Parking Provision
- Strategic Policy SD25 - Development Strategy
- Strategic Policy SD26 - Supply of Homes
- Strategic Policy SD27 - Mix of Homes
- Strategic Policy SD28 - Affordable Homes
- Development Management Policy SD46 - Provision and Protection of Open Space, Sport and Recreational Facilities and Burial grounds / Cemeteries
- Development Management Policy SD50 - Sustainable Drainage Systems
- Development Management Policy SD51 - Renewable Energy

Other plans considered

- Lewes Neighbourhood Plan

End of Document