

**SDNPA response to Lewes Pre-Submission Neighbourhood Development Plan**

All references to emerging South Downs Local Plan policies relate to the Preferred Options rather than any subsequent revision (unless specified). All text to be added is underlined, all deleted text is ~~struck through~~.

Ref	Comment	SDNPA Recommendation to Lewes Town Council
General Comments		
N/A	<p>We commend the Neighbourhood Planning Group in preparing such a comprehensive and innovative plan that covers a large area with a diverse character.</p> <p>The progression of the Lewes Neighbourhood Development Plan (LNDP) to Pre-Submission stage is an important milestone, the result of a considerable amount of hard work by the steering group on behalf of the Town Council.</p> <p>The Lewes NDP group should be congratulated on preparing a distinctly ‘Lewesian’ Neighbourhood Plan. The Pre-Submission draft addresses issues that have clearly been identified as a priority for Lewes including the need for low cost housing as well as preserving the working character of the town. The draft plan is also innovative in its approach to protecting the environment by including policies on natural capital and ecosystem design responses for allocated sites.</p>	N/A
General	<p>Throughout the document it would be helpful to include paragraph numbering.</p> <p>Any typos we have identified will be communicated under separate cover.</p>	Include paragraph numbering and amend typos.
Introduction	<p>This refers to the ‘South Downs National Park Joint Core Strategy’ which as a result of the implications of the High Court ruling and the quashing of policies SP1 and 2 of the JCS, now needs to be amended to refer to Lewes District Local Plan Part 1 Joint Core Strategy. This is referred to in more detail in the section on general conformity with the local planning policy below.</p>	Amend text to state: The neighbourhood plan has been informed by the strategic policies in the Lewes District Local Plan Part 1 Joint Core Strategy.
Community Infrastructure Levy	<p>There is no mention in the NDP of the Community Infrastructure Levy (CIL), or a list of how CIL money collected from development in the area might be prioritised, or indeed what projects within the area that might be considered for funding. Given that</p>	Amend text to include CIL along with a list of projects in order of priority that could be funded.

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	<p>Lewes could potentially be receiving a relatively substantial chunk of CIL money once the Plan is made, it is strongly advised that consideration to this is set out in the NDP.</p> <p>We suggest that there are potentially a number of suitable projects that would be eligible for CIL set out in the topic chapters under key projects and actions, including the Public Realm Strategy.</p> <p>The Wisborough Green NDP is a good example of how consideration has been given to various projects and how they might be funded, as well as how these might be prioritised by the Council (see the community action plan towards the end of the document).</p>	
<p>General conformity with local planning policy</p>	<p>The Neighbourhood Planning Regulations state that a NDP must be in general conformity with the strategic policies contained in the Development Plan for the area. Therefore, it is a requirement that the LNDP is in general conformity with the Lewes District Local Plan Part 1: Joint Core Strategy. The Lewes District Joint Core Strategy covers that part of the National Park within Lewes District including Lewes Town. It was adopted by the National Park Authority (NPA) on 23 June 2016. A legal challenge made by Wealden District, and a subsequent High Court ruling resulted in the quashing of policies SP1 and SP2 of the JCS in regard to the National Park. Policy SP1 sets the overall development requirements for the district and SP2 sets the housing requirement of 220 net additional units in Lewes Town. The judicial review centred on the methodology for the Habitat Regulations Assessment (HRA) in regard to measuring traffic movements through Ashdown Forest, which is a Special Area of Conservation (SAC).</p> <p>It has been decided by the Secretary of State for Communities and Local Government and the National Park Authority (NPA) not to appeal the decision. Advice subsequently received from the Planning Inspectorate and DCLG is that the issue should not slow down the preparation of the Local Plan or any neighbourhood development plans (NDP) being prepared in Lewes District namely Lewes Town and Ditchling.</p> <p>The NPA will work with our HRA consultants over the next few weeks on further traffic modelling for the HRA, this should identify what the level of impact on the Ashdown Forest is from this level of development and whether / what mitigation is required. The NPA will do all the necessary HRA work for the NDP groups affected by the judgement</p>	<p>Amend text to include wording provided by SDNPA relating to conformity with local planning.</p> <p>Amend text relating to housing numbers:</p> <ul style="list-style-type: none"> <li>- 835 new homes to be provided over the plan period of 2015 to <del>2033</del><u>2030</u></li> <li>- Another <del>200</del><u>220-240</u> new homes will be at Old Malling Farm (Spatial Policy 4 – Lewes Joint Core Strategy).</li> </ul>

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	<p>and will continue to work in supporting Lewes in the progression of their neighbourhood development plan and responding to the implications of this judgment.</p> <p>The strategic planning context therefore for the Lewes NDP is the adopted Lewes District Local Plan Part 1 Joint Core Strategy minus policies SPI and SP2. The emerging strategic policy context is provided by the emerging South Downs Local Plan, which is scheduled to be published for Pre-Submission consultation in September 2017. This carries forward the housing target for Lewes. Further work on the HRA and its appropriate assessment will provide further clarity on this requirement in regard to in combination traffic movements through Ashdown Forest.</p> <p>The SDNPA can provide appropriate text in relation to this matter for inclusion in the document.</p> <p>There are some inaccuracies relating plan period and number of new homes at Old Malling Farm.</p>	
Lewes & Our History	<p>We suggest that this section also refers to the dramatic and dynamic topography of Lewes which is clearly important to the distinctive character of the town, influencing how the town has developed, and the opportunities and challenges the town now faces in accommodating new development. The recent history of significant flooding in Lewes could also be referenced in this section, as this effects much of the town within the flood plain, and will also impact any future development.</p>	<p>Consider including information in this section on topography and flooding.</p>
Profile of Lewes	<p>The draft plan is missing a profile of Lewes today. This should include details of the local population, housing market trends and economic data such as number of jobs and which sectors predominate in the town. It would also be useful to have information on commuting trends both into and out of the town. While some topics such as housing affordability are covered in greater detail later on the plan, there is no upfront summary of the key characteristics and trends which the neighbourhood plan is seeking to address. It may also be useful to include a Strengths, Weaknesses, Opportunities and Threats analysis of the town.</p>	<p>Include short profile of Lewes today.</p>
Visions of Our Town	<p>Paintings by local artists have been used to illustrate some of the themes and policies in the neighbourhood plan. We welcome this innovative way of communicating planning policy themes to the community.</p>	

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Features, Facilities & Boundary Lines	<p>As a general point about all maps included in the plan, it would be a lot easier to orientate around these maps if they were presented on an OS Base.</p> <p>This map should also show the Conservation Areas.</p> <p>There are many more facilities within Lewes which are not shown on this map, do the facilities shown have any particular significance? Consider including other key facilities such as schools, GP practices and community centres.</p> <p>The reference to the appendix should be corrected to refer to Appendix 4.</p>	<p>Show maps on an OS basemap.</p> <p>Include conservation areas on map.</p> <p>Include other key community facilities.</p> <p>Include correct appendix reference.</p>
Lewes Bonfire Tradition	<p>This section would sit better later in the plan, most likely with the section on protecting green spaces.</p>	<p>Move text to later in the plan.</p>
Vision Statement for Lewes	<p>We are pleased that the vision statement is locally specific to Lewes, however it is unclear whether the vision statements on page 24 and 25 are meant to correspond to the proceeding vision statement on page 23. Currently there appear to be multiple vision statements included in the plan.</p>	<p>Clarify the vision statements.</p>
Neighbourhood Plan Objectives.	<p>For a town with such a long and important history it is surprising that the historic environment doesn't feature in the neighbourhood plan objectives. While heritage is addressed by several policies within the plan, it is considered that the historic environment should be given greater prominence in the neighbourhood plan objectives.</p> <p>Objective 3 could mention 'flexible' space; robust building typologies that can adapt to change for businesses that evolve over time, and need to adapt to different employment genres and associated needs.</p> <p>Objective 4 needs to take into account the impact ground floor car parking with accommodation above can have on the streetscene and that this will only be suitable for certain sites and carefully designed..</p>	<p>Include the historic environment in the neighbourhood plan objectives.</p> <p>Amend objectives 3 and 4 to include additional text.</p>
Objective 2: Locally Affordable Housing	<p>We think it would be far preferable for the LNDP to not refer to the numerical target in the SDLP or for that matter Lewes Joint Core Strategy. Instead, we suggest that the LNDP contains some text that cross-references the emerging SDLP and says the SDLP seeks to provide a significant proportion of affordable homes on all but the smallest of housing sites. The Lewes NDP will reflect this whilst having specific regard to local evidence of housing need.</p>	<p>Amend text to not refer to a numerical target but consider a reference to the emerging SDLP which will seek a significant proportion of affordable homes, without quoting percentages until SDLP has been Examined.</p>

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Policy LE1 Natural Capital	<p>We welcome this pioneering policy in the neighbourhood plan. The emerging South Downs Local Plan has an ecosystems services strategic policy and the neighbourhood plan policy is considered to be in general conformity with this. We recommend some amendments to the policy in order to provide clarity to the decision maker:</p> <p>Policy LE1 Natural Capital</p> <p>1) For larger sites (i.e. sites of 5 houses or more) development proposals should include a detailed assessment of the existing <del>and</del> natural capital <u>and the scope to provide a net gain in natural capital</u></p> <p>Text from the emerging South Downs Local Plan (SDLP) has been included in the supporting text. We would advise against directly repeating text from the emerging SDLP as this is likely to change as the Local Plan goes through consultation and examination in public.</p>	<p>Amend text.</p> <p>Remove text which directly repeats the emerging SDLP.</p> <p>The supporting text also needs clarifying as follows:</p> <p>It is considered that policy LE1 in this neighbourhood plan is in general conformity with the NPPF paragraph 109, as it helps guide <del>potential</del> developers to consider <del>what any potential development</del> <u>the benefits a site provides</u> to Lewes’s people, community, <u>environment</u> and economy, and to <u>enhance design improvements</u> to these benefits <u>onsite</u> <del>at this or other sites or elsewhere</del> across the town as part of any development proposal.</p>
Supporting text to Policy LE1	<p>Additional information could be provided about the importance of tree planting schemes and due regard should be made to finding the most appropriate provenances, not only for the soils, but also for the projected changes to climate. The NDP should refer to ensuring that species diversity is maximised in planting schemes, along with creating linkages between habitats.</p>	<p>Consideration should be given to including further information about importance of tree planting schemes and how these mitigate climate change impacts.</p>
Policy LE2 Biodiversity	<p>It is felt that this policy could be made more locally specific by referring to local priority species, for example swifts and encouraging development to include swift boxes and swift bricks. It would also help to highlight, in the supporting text, local habitats and wildlife special to Lewes, such as the chalk grassland at Malling Down where the Adonis Blue butterfly and glow worms are found. The railway lands are also a biodiverse rich habitat that could be highlighted. Sussex Biodiversity Record Centre can provide details of Biodiversity Action Plan (BAP) species recorded within Lewes and this can be used to inform the requirements of the policy to encourage locally specific biodiversity enhancements.</p>	<p>Make policy more locally specific.</p> <p>Provide details of habitats and wildlife special to Lewes’s biodiversity and veteran trees.</p> <p>Consider removing or replacing text which repeats the emerging SDLP.</p> <p>Include details of local biodiversity improvement projects.</p>

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	<p>The importance of veteran tree and records of these (<a href="http://www.ancient-tree-hunt.org.uk">www.ancient-tree-hunt.org.uk</a>) could also be mentioned to further highlight their significance, and potentially aid their protection for future generations</p> <p>Text from the emerging South Downs Local Plan (SDLP) has been included in the supporting text. We would advise against repeating text from the emerging SDLP as this is likely to change as the Local Plan goes through consultation and examination in public.</p> <p>The SDNPA is exploring the potential to improve the flow and therefore biodiversity of the Winterbourne Stream that runs through Lewes. The project will focus on the section from Winterbourne Hollow, alongside the recreation ground at the foot of the cemetery and then through the Grange Gardens. These sections are canalised concrete and provide little or nothing in terms of biodiversity. The sections could be improved by altering the flow of the water, introducing riffles and gravel to affect the speed of flow. We would welcome acknowledgement of this project within the neighbourhood plan. The SDNPA are also exploring opportunities to improve the condition of Lewes Cemetery (a Local Wildlife Site) by introducing wildflower areas which are cut less frequently than the main cemetery, improving the area for invertebrates and birds, providing nectar sources for pollinators.</p>	
<p>Policy HC2 – New Services and Facilities</p>	<p>While we appreciate the aspiration of policy criteria 2 relating to the retention of the Phoenix Foundry buildings, the planning principles of the redevelopment of North Street Quarter have now been established through the recent granting of planning permission. In addition, this in itself is not a policy that clearly guides the decision maker and is unlikely to stand up to Examination, as it is more of an aspiration. Policy criteria 2 should be therefore removed.</p> <p>Policy criteria 3 is poorly worded and needs to be revised so that it is clear to all what it seeks to achieve. We presume that it is seeking to say that in order to assist with viability at sites, where flood protection is needed that some residential element may be permitted, as part of the provision of new community facilities or services.</p>	<p>Remove criteria 2 from policy.</p> <p>Amend wording of policy criteria 3.</p>
<p>Supporting text of Policy HC2</p>	<p>The first three paragraphs in this section are not projects but are aspirations or aims in relation to specific parts of the town. The text should be amended to reflect this and placed under general supporting text.</p>	<p>Move first three paragraphs of section on key projects and actions to supporting text.</p>

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<p>Policy H3 – Heritage Protection</p>	<p>We are pleased that this policy has been revised from an earlier draft to include advice from Historic England, the County Archaeologist and SDNPA’s Historic buildings officer provided at the recent meeting in March this year. Some additional amendments would further improve these policies.</p> <p>Policy criteria 8 should refer to ‘The <b>low lying</b> and low rise character of the existing historic development at the Cliffe. We note that criteria 7 only identifies the one particular character area of Cliffe. We question whether the distinctive characteristics of other character areas should also be covered.</p> <p>Policy criteria 8 refers to the historic core. There is a concern that this distinction between an identified ‘core’, delineated on a late Eighteenth Century map is not related directly to the character areas identified in the adopted Conservation Area Appraisal. This division may be misconstrued to relegate substantial parts of the Lewes Conservation Area, dating to the entire Nineteenth and early Twentieth Centuries, to a secondary status.</p> <p>Policy criteria 10 should refer to buildings that <b>do not make a positive contribution</b> to the conservation area rather than referring to those that have a harmful impact on the townscape as this phrase more closely aligns with the guidance in the Conservation Area Appraisals for Lewes.</p> <p>Policy criteria 12 should be removed to supporting text and all statutory heritage bodies should be referred to rather than just Lewes District Council.</p> <p>A policy criteria on historic shopfronts specific to Lewes should be considered and the Friends of Lewes Advice notes should assist with this.</p> <p>The policy should also refer to Lewes being covered by an Archaeological Notification Area.</p>	<p>Amend wording of policy criteria 1 to include:</p> <p>Proposals for development should include sufficient information to demonstrate that the choice of design and use has sought to avoid or minimise harm to <del>the conservation of</del> heritage assets, (<u>including those with archaeological or historic interest below ground</u>), <del>that could be affected</del>, in a manner appropriate to their significance.</p> <p>Amend policy criteria 8 to include words low lying and other character areas.</p> <p>Consider removal of reference to historic core in policy criteria 8 and merge criteria 8 and 9 together to cover contextual materials in the conservation area.</p> <p>Policy criteria 9 amend to read:</p> <p>In the Conservation Areas, new development should <del>respect its context</del> <u>protect and enhance the positive characteristics</u> and use the palette of materials that has been defined in the Conservation Area Appraisal.</p> <p>Amend policy criteria 10 to read: The demolition and reconstruction of buildings within the Conservation Area will only be permitted where the existing premises have <del>a harmful impact</del> <u>been identified in the Conservation Area Appraisals as not making a positive contribution to the historic townscape</u>.</p> <p>Move policy criteria 12 to supporting text.</p>

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		<p>Include policy criteria on shopfronts.</p> <p>Refer to Archaeological Notification Area in policy.</p>
Supporting text of Policy H3	<p>The first paragraph needs additional clarification. The Conservation Area boundary is referenced as being located on page 102 of the document, but it is not included. The specific Conservation Area Appraisals should be named.</p> <p>Paragraph 8 needs to be clarified. It could be improved if amended to refer to the Neighbourhood Plan recognising the importance of Lewes’s industrial heritage, where this is located and that this needs to be better understood and afforded greater significance due to its erosion in more recent times.</p> <p>Museum storage for archaeological remains and restoration of Buildings at Risk could be included in the CIL priority list.</p>	<p>Amend first paragraph for clarity. Include Plan showing boundary of Conservation Area in document with page reference and provide names of conservation area appraisals.</p> <p>Amend paragraph 8 to improve its clarity as suggested in the comments section.</p> <p>Refer to the need for museum storage for archaeological remains and repair of Buildings at Risk as potential CIL projects.</p>
Policy HC4 – The Working Town	<p>Policy criteria 3 refers to viability of employment sites. Viability needing to be demonstrated by market evidence should be included in the policy or supporting text.</p> <p>With regards to policy criteria 5, we are not clear why 1990 has been decided as the cut off point for protecting office developments from conversion to residential use. Policy criteria 5 currently conflicts with National Planning Permitted Development Rights and both it and policy criteria 6 would therefore need to be supported by specific local justification and evidence. Criteria 6 would be better sited in the supporting text, as it is not a policy, and instead more of a project or action.</p>	<p>Include in policy criteria 3 or supporting text, the need for marketing evidence to support lack of viability.</p> <p>Further evidence and local justification needed to support policy criteria 5.</p> <p>Policy criteria 6 should be moved to project or action section of supporting text.</p> <p>Policy criteria 7 should include at the end of text <u>of Lewes</u>.</p> <p>There are two criteria 7’s. The last criteria should be amended to read:</p> <p><u>Proposals that provide The enhancement of enhancements to heritage assets for economic purposes that will contribute to the local economy and tourism</u> will be supported.</p>
Supporting text	The supporting text to this policy needs to include further evidence and justification,	Amend policy justification of supporting text to



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of Policy HC4	<p>including why offices built after 1990 have been specifically picked out; what percentage of offices were built after 1990, where they are located in the town; are they predominantly in the floodplain; and has there been a trend in losing such offices?</p> <p>A number of the bullet points in the section on key projects and actions are not projects, but aspirations or aims, and instead should be identified as supporting text.</p>	<p>include additional evidence on offices in Lewes built after 1990.</p> <p>Paragraph 3 of policy justification, second sentence should be amended to include:</p> <p>For example, <u>the plan seeks to</u> increase numbers of smaller scale working spaces.</p> <p>Remove bullet points 1, 2, 3, 6 and 7 of section on key projects and actions to supporting text.</p>
Policy HC5 – Sustainable Tourism	<p>We welcome this policy given the importance of Lewes as a visitor and tourist destination in the National Park.</p> <p>Some additional amendments would further improve this policy.</p>	<p>Amend Criteria 2 to include:</p> <p><u>Support will be given to</u> a set down/pick up point <del>will be provided</del> for tourist buses:</p> <p>Merge criteria 4 and 5 together as these both relate to campsites. Include additional text in criteria 4:</p> <p>A well screened seasonal campsite will be supported, provided it has no adverse impact on the countryside, <del>and</del> supports the local economy <u>and includes measures to encourage sustainable means of travel to the town.</u></p> <p>Amend criteria 6 to include:</p> <p><u>will be required</u> to submit a travel plan.</p>
Supporting text to Policy HC5	<p>We do not think it is totally correct to state that the main reason visitors come to Lewes is because it is in the South Downs National Park. It may be better to say that this one of the reasons and that the Neighbourhood Plan seeks to encourage this further and address the lack of infrastructure and visitor accommodation that is needed to support tourism in the town.</p> <p>To make this section more locally specific it would be helpful to include in the text mention of the key walking routes that connect Lewes to the National Park landscape</p>	<p>Amend text in policy justification to include encouragement of additional tourism infrastructure and visitor accommodation and mention of key walking routes, visitor attractions and locally important food and drink.</p> <p>Amend bullet point 1 in section on key projects and actions to include:</p>

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	<p>including the South Downs Way and other key routes, key attractions such as the Castle, Priory, Anne of Cleves House, timber framed buildings, churches, pubs and locally important food and drink such as Harvey’s beer.</p> <p>A number of the bullet points in the section on key projects and actions are not projects but aspirations or aims and instead should be identified as supporting text.</p>	<p><u>Work with the South Downs National Park Authority and East Sussex County Council to ensure countryside trails and footpaths are to be accessible, legislated have the appropriate byelaws, and are clearly defined, and the rights of way to have assurance of safety are safe.</u></p> <p>Amend bullet point 5 to include:</p> <p><u>Work with the relevant authorities and tourism providers to identify a site and operator for more affordable and accessible visitor accommodation e.g. such as a youth hostel.</u></p> <p>Amend bullet point 6 to remove reference to Lewes as a World Heritage Site.</p>
Good Places for Living	The introductory text to this section will need to be updated to reflect the current status of the Lewes Joint Core Strategy.	Amend introductory text.
Policy PL1 – General Housing Strategy	<p>It is not clear what the difference is between the types of sites described in policy criteria 1 –small infill sites, and those described in criteria 4 – unidentified brownfield sites, apart perhaps from seeking to differentiate between windfall sites and those that are allocated and size of site. Greater clarification is needed.</p> <p>Criteria 3 and 4 refer to the need for affordable housing and Lewes Low Cost Housing. As per our comments on Objective 2, it would be much clearer if both of these criteria simply cross referenced to the strategic affordable housing policy in the SDNPA. Simply saying ‘that sites need to include an element of ‘Lewes Low Cost Housing’ (LLCH) is imprecise, particularly given the lack of a clear definition for LLCH, and therefore may actually reduce the amount and genuine affordability of affordable housing on windfall sites. Lewes Low Cost Housing concept is discussed in more detail below.</p> <p>Some smaller points relate to:</p> <ul style="list-style-type: none"> <li>• Old Mall Farm (OMF) is now 220-240 homes</li> <li>• PL (2) refers to OMF as ‘the strategic site already identified by the Planning</li> </ul>	<p>Clarification is needed to identify the difference in policy terms between policy criteria 1 and 4.</p> <p>Amend text in relation to affordable housing policies to cross reference to South Downs Local Plan including all allocated sites.</p> <p>Amend text to policy criteria 2 relating to Old Mall Farm.</p> <p>Amend text to remove policy criteria 5 and 6 to supporting text.</p>

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	<p>Inspectorate...’ This should more properly read (other than the Old Malling Farm site if allocated in the South Downs Local Plan).</p> <p>Criteria 5 of this policy is a specific project or action and not a general housing strategy policy consideration.</p> <p>The last sentence of criteria 6 is policy justification and should be moved to supporting text.</p>	
<p>Supporting text to Policy PLI</p>	<p>Some revisions to this text are recommended so that the Plan complies with national and local planning policy and meets basic condition test for Examination.</p> <p>It is to be welcomed that there is a healthy supply of sites identified within the settlement boundary to exceed the requirement of 220; this is important given the reliance on small sites.</p> <p>SDNPA welcomes the approach of encouraging a mix of housing tenures and energy efficient homes and self-build initiatives.</p> <p><u>Lewes Low Cost Housing</u></p> <p>SDNPA is supportive of the principle of low cost housing which genuinely meets the needs of local communities (both in Lewes and elsewhere across the National Park where the circumstances are similar).</p> <p>Policy PLI criteria 3 and 4 refer to the provision of Lewes Low Cost Housing on strategic, infill and unidentified brownfield sites, whereas in the supporting text it refers to the provision on all publically owned land. Clarification is needed where it proposed that Lewes Low Cost housing is provided, thresholds etc. In addition, further detail is required on this concept and whether it is consistent with the emerging Local Plan policy on Affordable Housing and is viable with regards to delivery by developers and social housing providers. A number of allocated sites also refer to Lewes Low Cost Housing requiring 100% provision. The last para of page 61 says that 100% will be sought on publicly owned land.</p> <p>We think that the definition of Low Cost Housing is unclear (text box, p56 refers). This gives no certainty to developers and other stakeholders, such as housing associations, simply referring to ‘the maximum cost affordable on the average Lewes salary whether</p>	<p>Revisions to text as set out in comments.</p> <p>Further evidence should be provided to support Policy PLI, Lewes Low Cost Housing approach and relevant site allocations for 100% affordable housing.</p> <p>Amend first paragraph, second sentence to include:</p> <p>The Plan therefore identifies sites for <u>at least</u> 220 houses.</p> <p>Amend paragraph 4 last sentence to remove reference to eco build level 4 and instead say ‘aim for the highest sustainability levels in accordance with building regulations’.</p> <p>Amend text in the section on key projects and actions in relation to the following:</p> <p>The first part of bullet point one is considered to be more of a policy than a project and should be moved to the policy criteria of PLI.</p> <p>The last sentence of this bullet point is a project and should be separated from the first part.</p> <p>Bullet point 2 is also a policy and should be included as a policy criteria of PLI and say <u>on</u></p>

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	<p>for sale or rent.’ SDNPA strongly encourages further elaboration on this, with reference to appropriate evidence. It is perhaps misleading to refer to the Government’s definition of affordable housing as “80% of market price”, given that neither social rented nor shared ownership housing, fall within the Government definition.</p> <p>The approach to applying the Lewes Low Cost Housing requirement to all publicly-owned land, is questionable. This is because it seems to extend beyond what may have been agreed with Lewes District Council with respect to their land holdings. If other public body landowners do not agree to this, these sites may not get delivered. The NDP group will need to ensure that this model is viable with public bodies.</p> <p>In addition, the NDP must have regard to NPPF paragraph 173 regarding viability and deliverability of schemes, so that they are realistic, as well as ambitious, in their policy expectations to ensure that local housing supply is realised.</p> <p>SDNPA therefore encourages the NDP Steering Group to ensure that appropriate evidence of deliverability is in place to support Policy PL1, and relevant site allocations. SDNPA would be happy to share its own evidence supporting the Local Plan policies, once this is complete.</p> <p>Some of the key projects and actions are policies that should be provided in the policy itself or information that should be provided in the supporting text rather than in this section.</p> <p>The term Eco build level 4 is not a term used in the most up to date planning guidance on this topic and specifying targets is not in accordance with national planning policy guidance.</p> <p>The statutory self-build register could be mentioned in the supporting text for criteria 6.</p>	<p><u>certain sites which are not sensitive to landscape or heritage considerations, support will be given, to making best use of evolving and innovative solutions such as modular housing.</u></p> <p>Bullet point 3, 4 and 5 are not projects and should be moved to supporting text.</p> <p>Bullet points 6 and 7 are considered to be policies rather than projects and consideration should be given to moving them to the policy criteria of PL1.</p> <p>The last bullet point repeats that of bullet point 2 and should be deleted.</p>
<b>Allocated Housing sites</b>		
General comments	<p>The Neighbourhood Planning Group should be commended on the work they have undertaken to identify sites.</p> <p>The overall approach of focusing new development within the settlement boundary, and</p>	<p>Ensure loss of some car parking provision is supported by County and District Councils and strategic sustainable transport and car parking</p>

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	<p>on previously developed (brownfield) land, is strongly supported. This is in conformity with Policy SD25 – Development Strategy of the emerging South Downs Local Plan.</p> <p>We also note that quite a few of the allocated sites are car parks and that the loss of these is justified in the NDP in that it will encourage more sustainable travel through greater use of public transport, as well as improving air quality. The NP group will need to ensure that these sites and the loss of some car parking in the town are supported by the County and District Councils and is compatible with the strategic policies for sustainable transport and car parking provision in Lewes. We also understand that the Neighbourhood Planning Group believe some car parking can be retained through development which is decked over car parking at these sites. However, this may not be an appropriate solution for some sites where there are sensitive townscape and urban design considerations.</p> <p>We have visited the sites and consider that on some of the smaller ones there may be some deliverability issues. Whilst efficient use of land within the settlement is commended, site capacities must also take account of practical and contextual realities such as access, parking, provision of sufficient outdoor amenity space, mutual privacy/overlooking with regards existing and new homes, and design and landscape impact (including on trees). In contrast to this we consider that some larger sites, in particular the St Anne’s School site, to the south of County Hall, can deliver greater numbers than identified in the NDP. Please see comments on individual sites.</p> <p>Following this consultation the NP group may need to revise its list of sites and numbers of dwellings that will be realistically delivered. In addition, it is considered that in reality, some sites allocated may fall below the 5 dwelling threshold for allocation sites, and would therefore not count towards the housing provision of 220 for Lewes. These concerns will need to be resolved on a site-by-site basis, and subsequent assessment of how the housing target can be met from the allocated sites.</p> <p>Many of the sites lack specific development management criteria, some of which will be identified following the responses on this consultation from statutory consultees such as the Highways Authority. These criteria will assist landowners with the delivery of the sites as well as mitigating impacts on townscape and landscape.</p>	<p>policies.</p> <p>Following this consultation and analysis of responses, a revision of sites and the numbers they will realistically deliver should be carried out.</p> <p>More site specific development management criteria will need to be developed following consultation with statutory bodies.</p>
Ecosystem Design	Trees in developments- There is not much detail on how existing trees will be	Include further information on trees in

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response in Housing Allocations	<p>incorporated into developments. It would be useful to specify that all developments should pay due regard to BS5837:2012, and ensure that trees worthy of retention are identified and surveyed as part of the developmental planning process, and that any trees that are to be retained on site should be afforded the appropriate protections as set out in the BS.</p> <p>The ‘right’ sort of trees need to be incorporated into developments as much as is possible- working on a basis of a thorough understanding of the specific biodiversity needs of each site, and that any tree planting schemes make use of well-considered provenance and species to enhance the setting of Lewes- but not automatically using tree species that are purely ornamental.</p> <p>Lewes NDP could make greater use of outputs of the Lewes Urban Arboretum project including the data from the i-Tree survey undertaken in 2014.</p>	development.
Housing Site Search	<p>SDNPA supports the allocation of sites to accommodate in excess of the 220 homes over the NDP period for contingency purposes.</p> <p>Base date – The NDP incorrectly states that the base date for meeting the 220 housing requirement is 1st April 2015. The requirement is for the SDLP period 1st April 2014 to 1st April 2033. This is not a problem if there are sufficient permissions in place from 1st April 2014 to 31st March 2015 which, added to the allocations, meet the 220 figure, but this needs to be explained correctly, or simply say that the base date for the NDP is 1st April 2014.</p> <p>The first two sentences of the third paragraph are not clear and need re-phrasing. Need to add a reference and brief explanation of the Strategic Flood Risk Assessment (SFRA 2).</p> <p>Information on how the NP group has been proactive in approaching landowners to find suitable sites should be mentioned in the supporting text as part of the audit trail of site selection.</p> <p>We suggest that the last paragraph is amended in line with our advice above relating to affordable housing and cross referenced to the emerging SDLP, but not including any percentages at this time. This is because, the 50% target (as well as the thresholds for seeking affordable housing) are still undergoing viability testing and are therefore not yet</p>	<p>Amend third paragraph and include reference to SFRA Level 2.</p> <p>Amend text in relation to base date of NDP.</p> <p>Add reference to SFRA 2.</p> <p>Amend text to refer to work NP group has carried out to identify sites.</p> <p>Amend reference to 50% affordable housing target and with respect to 80% market housing, Govt definition, and on approach to publicly owned land (see comments in relation to PL1).</p>

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	<p>confirmed. The supporting text should instead refer to the SDLP and say, at the time of writing, this is still in the process of preparation. The SDLP will include a policy on affordable housing, which will seek to maximise affordable housing provision on all but the smallest housing sites.</p> <p>(See also comments under PLI with respect to 80% market housing &amp; Govt definition, and on approach to publicly owned land.)</p>	
<p>PLI (2) Land at Astley House and Police Garage</p>	<p>The development should address Neville Rd as well as other streets.</p> <p>Boundary treatment (curtilage walls etc.) on the south side of the site should reflect the character of Spital Rd.</p>	<p>Amend policy criteria.</p>
<p>PLI(3) Land at the Auction Rooms</p>	<p>The design of the site should consider its potential visual relationship to PLI (57).</p> <p>Massing of the development should not disrupt views out toward the chalk ridge on the other side of town on the other side of the Ouse river.</p> <p>The frontage should address both Southover Rd and Garden Street.</p> <p>Criteria 6 of this allocation refers to a sequential test. The qualifying body will need to undertake this ahead of submitting the Lewes NDP to the SDNPA. Officers can provide support in doing this. The allocation itself should require site specific flood risk assessment that demonstrates that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, wherever possible, reduce flood risk overall.</p>	<p>Amend policy criteria.</p>
<p>PLI(4) &amp; PLI(5) Land at Blois Road</p>	<p>The deliverability of housing at these two sites is considered to be problematic. Access to the sites is very steep and it is questioned whether there is sufficient space to allow for vehicle turning and in turn whether sufficient amenity space can be provided. There are also likely to be overlooking issues onto existing properties and issues with trees.</p>	<p>Reconsider the allocation of these sites.</p>
<p>PLI(8) Land at Buckwell Court, Garage site</p>	<p>Given the double garage depth of this site and open land surrounding it, the redevelopment of this garage site may be more deliverable. However this is a challenging site, due to the poor layout and orientation of the existing houses. A new development would need to knit into the existing fabric of development, provide a turning head, front the public realm, make the most of opportunities to views but resolve to overcome the issues of overlook/amenity of adjacent properties.</p>	<p>Further work required to demonstrate suitability of site.</p> <p>Further elaboration with reference to appropriate evidence is required for criteria 3 relating to 100% affordable housing.</p>

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<p>PLI(13) Land at the Former Wenban Smith Site</p>	<p>Land at the former Wenban Smith buildings is within the boundary of the strategic allocation for North Street Quarter and Eastgate area as set out by Spatial Policy 3 of the Lewes District Local Plan Part 1, Joint Core Strategy. SP3 supports the development of additional retail provision, along with an enhanced foodstore, on the land to the south of Phoenix Causeway and within the defined town centre boundary.</p> <p>However, it is accepted that this may not be possible due to site constraints, lack of available land, and potential doubts over delivery in this location and location next to existing superstore. It is noted that the planning permission for the North Street Quarter excluded the land to the south of Phoenix Causeway and there appear to be no imminent development proposals for this area.</p> <p>With this in mind PLI(13) is considered to be in general conformity with the strategic policy as it provides for mixed use redevelopment which could include retail/market uses.</p> <p>The site is in a prominent position on the riverfront and views of the site from both the river and the surrounding downs should be carefully considered in the design of any proposal.</p> <p>Criteria 6 of this allocation refers to a sequential test. This will need to be undertaken ahead of submitting the Lewes NDP to the SDNPA. SDNPA Officers can provide support in doing this. The allocation itself should require site specific flood risk assessment that demonstrates that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, wherever possible, reduce flood risk overall.</p> <p>Criteria 2 should make explicit that a public footpath is sought alongside the riverfront.</p>	<p>Ensure policy is flexible enough, and to include retail use, to ensure general conformity with strategic policy.</p> <p>Include additional criteria to take into account views of the site from the Downs and that design should address river frontage.</p> <p>Include requirement for public footpath alongside riverfront.</p> <p>Amend criteria relating to flood risk.</p>
<p>PLI(21) Land at Kingsley Road Garage site</p>	<p>This is a very small site and it is questioned whether the expected number of dwellings (6) and associated parking and amenity space can be achieved. Development is also likely to have an impact on views from Kingsley Road and Offham Road across the Ouse Valley and to Malling Down.</p> <p>Policy criteria 2 refers to Buckwell Court and should be corrected.</p>	<p>Amend text.</p> <p>Further elaboration with reference to appropriate evidence is required for criteria 3 relating to 100% affordable housing.</p>



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PLI(26) Land at Southdowns Road	This site has planning permission granted in spring 2016 for 79no. mixed flats and houses and 2181sqm B1 floorspace. (SDNP/15/01303/FUL). Not yet implemented. In addition there is a current application to replace B1 space as a further 24 flats.	The text should be amended to reflect the current situation.
PLI(30) Land at Landport Road Garage site	Amend criteria (5) to refer to 'nearby' railway line. Remove reference to 'coastal' in criteria (8)	Amend text. Further elaboration with reference to appropriate evidence is required for criteria 3 relating to 100% affordable housing.
PLI(34) Land at Little East Street Car Park, Corner of North Street and East Street	This is a relatively small site and it is questioned whether the expected number of dwellings (11) and associated parking and amenity space can be achieved. Development at this site will impact on views to Malling Down. However, it is appreciated that there was former terrace here before the site was bombed in WW2. In addition views are kinetic and travelling around the corner the Downs quickly come back into view. As part of any development proposals, Actual Visual Representations (AVRs) should be provided to assess impact on views and street scene.	Further work required to demonstrate suitability of site.
PLI(35) Land at Lynchets Garage site	This is a very small site and it is questioned whether the expected number of dwellings (6) and associated parking and amenity space can be achieved. There are also issues with trees to be taken into account.	Further work required to demonstrate suitability of site. Further elaboration with reference to appropriate evidence is required for criteria 3 relating to 100% affordable housing.
PLI (36) Land at Magistrates Court Car Park, Court Road	For some reason, unlike the other sites, there is no reference to the requirement for affordable housing. The planning permission for this site includes the provision of 3 affordable units.	Amend policy criteria for consistency.
PLI(39) Land at Former Petrol Filling Station, Malling Street	Unlike the other sites, there is no reference to the requirement for affordable housing. Criteria 3 of this allocation refers to a sequential and exceptions test in relation to flood risk. The qualifying body will need to undertake this ahead of submitting the Lewes NDP to the SDNPA. Officers can provide support in doing this. The allocation itself should require site specific flood risk assessment that demonstrates that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, wherever possible, reduce flood risk	Amend policy criteria for consistency. Remove criteria 3.

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	overall.	
PLI(44) Land at Princes Charles Road, Garage Site	We question whether the site boundary is correct, as only some of the garages appear to be included. If only a single narrow strip of the site is proposed, similar issues raised with other garage sites would arise.	Check site boundary as there are questions over the deliverability of this site.
PLI(46) Land at Queens Road, Garage site	Given the double garage depth of this site and open land surrounding it, the redevelopment of this garage site may be more deliverable. However criteria 2 of this policy regarding maximising the opportunity to provide views northwards over open countryside, may affect the mature trees.	Further work required to demonstrate suitability of site.
PLI (50) Land at Spring Barn Farm, Kingston Road	This site is in a much more open location than other sites. We appreciate that the site has been included as it reflects an existing permission, granted at appeal. However, we note the site performs badly in the SEA / SA and would question should the existing permission not be implemented would the NDP support this allocation? We also note that the text on ecosystem design response in relation to this site needs to be clarified as the policy states that the site offers limited potential to improve ecosystem services.	Further work required to demonstrate suitability of site.  Ecosystem design response needs further clarification.
PLI(52) Land at St Anne's Crescent	There is a public footpath through this site which will need to either be retained or rerouted.	Include additional criteria regarding the public footpath.
PLI(53) Former St Anne's School Site	This is a large site with obvious potential to contribute towards a number of the neighbourhood plan objectives including delivering locally affordable housing and sustainable communities. A key issue to resolve for any development will be access to the site. It will also be important to protect mature trees many of which are subject to Tree Protection Orders. It is considered that the site could potentially deliver substantially more than 26 dwellings. It is recommended that a Design Brief is prepared for the site and any development proposal should accord with the Brief. The Development Brief would cover key principles of development, layout and design, access, landscape, biodiversity and open space, views from the south as well as other issues relevant to the site such as community use and heritage enhancements.	Prepare a Development Brief for this site allocation and consider greater density of development than 26 dwellings.
PLI(57) Lewes Railway Station Car Park	Saved policy T3 of the Lewes District Local Plan 2003 resists the loss of parking on sites at or near to rail stations. This site allocation should make clear whether the existing station parking will be re-provided as part of the decked development of this site and that this is viable. There is also existing cycle parking provided at the and this should be	Amend text to clarify position on existing station car parking. Seek Highways comments on access to site. Consider potential uses for railway

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	retained or re-provided nearby. Access to the site via Pinwell Road may be problematic. It would be helpful to seek Highways input on this ahead of submitting the neighbourhood plan to the SDNPA. There may also be opportunities to introduce small retail / café / commercial uses in the railway arches at the site.	arches.
Policy PL2 – Architecture and Design	<p>Criteria 2 precludes any use of contemporary materials in the historic centre of Lewes. This has not been the policy approach up to now in Lewes with some very attractive and contextual buildings being developed here which are of a higher quality of design than some pastiche designs. The correct title for ‘Malling’ is Malling Deanery.</p> <p>As stated in the comments on Heritage Protection, the differentiation between the historic core as opposed to the conservation area in general introduces a two tier designation where the whole conservation area may be subject to different levels of scrutiny or protection.</p> <p>It is also felt that owners of properties should have the ability to use appropriate renewable energy measures within the 'historic core'.</p>	<p>Consideration should be given to removing the policy distinction between historic core and the rest of conservation area.</p> <p>Amend text.</p>
Supporting text to Policy PL2	<p>The section on affordability repeats some of the text within the General Housing Strategy section. Consideration of moving and combining this text with that of the Housing section should be considered.</p> <p>The sections on leaving a legacy and space standards are not projects and should be identified as supporting text.</p> <p>Evidence is needed to support the space standards requirement. We question the use of the Rowntree disabled living standards and whether the ‘Buildings for Life’ standards should be referred to instead.</p> <p>In the section on Reduced Energy Demand bullet points 2 and 3 are policies rather than actions.</p>	Amend text.
Design Guidance	<p>This should cover all new developments not just allocations.</p> <p>In the section on Locale, we again question the guidance distinction between the historic core and the rest of the conservation area.</p> <p>The section on Evolve is more of a strategic planning principle rather than design guidance and the section on Affordable is more of a policy. It would be beneficial to add</p>	Amend text.

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	<p>affordable housing design guidance that new housing should be tenure blind for example.</p> <p>A section on secure storage would be useful so that all new development include areas for storage for everyday items such as bicycles, pushchairs, mobility scooters.</p> <p>In addition, secure storage for waste and recycling wheelie bins.</p>	
Supporting text to PL3 Flood Resilience	The key projects and actions in this section are not projects and actions but supporting text.	Amend text to identify key projects and actions as supporting text.
Supporting text to Policy PL4 – Renewable Energy and Resource and Energy Efficiency of Buildings	A number of key actions in this section would sit better as policies.	Amend text to consider re-drafting actions as policies.
<p>Policy SS3 Protection &amp; Enhancement of Green Spaces</p> <p>Designated Green Spaces</p>	<p>Criteria 1 of the policy refers to ‘green spaces’ – it is assumed these are the designated green spaces shown on page 108. It is recommended these are referred to as ‘Local Green Spaces’ in line with the NPPF designation.</p> <p>The neighbourhood plan proposes a considerable number of designated green spaces. It is recognised that Lewes has many important pockets of green space within in the town as well as corridors of green space linking to the surrounding countryside. However, the NPPF makes clear that the Local Green Space designation will not be appropriate for most green areas or open space and that the designation should only be used where the green space is demonstrably special. Bearing this in mind, the neighbourhood plan group are encouraged to ensure they have sufficient evidence and justification to support the designation of all nominated Local Green Spaces.</p> <p>Bonfire sites have been identified for designation, it would be helpful to include the details of the bonfire sites in the justification for specific Local Green Space designations.</p> <p>The designation as Local Green Space precludes all development apart from exceptional</p>	Review list of Local Green Spaces.

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	<p>circumstances. This could present problems for schools playing fields, recreation grounds and other sports and recreation facilities. The neighbourhood plan group may wish to consider an open space designation for such areas which allows for limited forms of development which contribute towards and enhance the open space use of these areas rather than the Local Green Space designation.</p> <p>A number of proposed designations have been split into separate green spaces where they could be considered a single Local Green Space, for example the Ouse Valley flood plain.</p> <p>LGS 7a appears to be missing from the map.</p> <p>Local Green Spaces can only be designated where they are within the Neighbourhood Area.</p> <p>Landport Bottom and the Lewes battlefield (the area within the Neighbourhood Area) appears to have been omitted from the proposed Local Green Spaces.</p>	
Policy AM1 – Active Travel Networks	Suggest Policy criteria 2 states ‘as illustrated on Public Realm Strategy Map’.	Amend policy criteria 2.
Policy AM3 – Car Parking Strategy	Policy criteria 3 requiring a park and ride on the outskirts of the town should include the need for this to be supported by a landscape impact assessment.	Amend policy criteria 3.
Supporting text to Policy AM3	Bullet points 2 and 3 of key projects and actions referring to the plan ‘supporting building above car parks as this makes more efficient use of land’ may be better placed in the supporting text of the General Housing Strategy.	Consideration given to moving bullet points 2 and 3 of projects and actions to section on housing.
Policy SS1 – Streets and Spaces and supporting text	<p>Policy criteria 2 refers to an agreed palette of materials but this is not identified.</p> <p>Mention of heritage trails would be useful in supporting text.</p>	<p>Clarification of policy criteria 2 is needed.</p> <p>Include mention of heritage trails in supporting text.</p>
Policy SS2 - Social and Civic spaces	Criteria 2 is not a policy criteria and should be included in supporting text.	Move policy criteria 2 to supporting text.

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Public Realm Strategy Map	<p>It is not clear what ‘proposed arrival sequence’ means on the Public Realm Strategy Map. It would be useful to know what measures would be needed to implement the strategy and whether these could be potential CIL projects.</p> <p>It would also be useful if cycling networks were shown on the Map with specific reference to Egret’s Way, Ringmer, Kingston and Ouse Valley cycle routes.</p> <p>Consideration should be given to providing greater detail of the proposed public realm improvements within the town centre.</p>	<p>Additional annotation of map.</p> <p>Greater detail provided of town centre public realm improvements.</p>
Policy SS4 – River Corridor Strategy and Action Plan	<p>We are supportive of the desire to ensure the river continues to be a focus for activity but have some concerns that the flood zone is not referred to, which seems at odds with the section on Climate Change, referenced earlier in the document. Providing space for natural river function must also be a priority. We suggest development immediately adjacent to the river must demonstrate that it will not affect flood risk elsewhere along the corridor and that their proposal will not impact on the rivers ability to function naturally.</p> <p>The action plan could also highlight the need for kayak and canoe access point slipways as canoeing is activity that the SDNPA is encouraging along the Ouse.</p>	<p>Include referencing to flood risk and encourage the design/landscape enhancement measures to mitigate this.</p> <p>Additional annotation of map.</p>

