



Summary of Representations made on the Regulation 16: Submission version of the Lewes Neighbourhood Development Plan (LNDP)

1. This document provides a summary of the representations, submitted in accordance with Regulation 16 of the Neighbourhood Planning (General) Regulations 2012, to the Lewes Neighbourhood Development Plan (LNDP). This document is produced in compliance with the Neighbourhood Plan (Referendum) Regulations 2012.
2. The South Downs National Park Authority (SDNPA) published the LNDP for consultation from **Monday 11 June to Monday 23 July 2018**, in accordance with Part 5 of the Neighbourhood Planning (General) Regulations 2012. Representations were submitted during the publicity period by 68 respondents. The representations were received from statutory consultees, developers, their agents, other organisations and individuals.
3. Paper copies of the representations can be viewed on request at the South Downs Centre, North Street, Midhurst, West Sussex, GU29 9DH and at Lewes Town Hall, High Street, Lewes, East Sussex, BN7 2QS.
4. Set out below is a summary of the issues raised in the representations. The South Downs National Park Authority Representation can be seen in full on our website.

Reference	Name / Organisation	Date received	Method of submission	Summary of representation
RI.	Dr Kanan Purkayastha, on behalf of the Air Quality & Contaminated Land Team, Lewes District and Eastbourne District Councils	17/07/2018	Email	<ul style="list-style-type: none"> • LNDP should address any unacceptable risk to human health, controlled water and other environmental receptors. • Planning policies and decisions should ensure that the site is suitable for its new use taking account of ground conditions and land instability, including from natural hazards or former activities. Pollution arising from previous uses and any proposals for mitigation including land remediation or impacts on the natural environment arising from that remediation should be taken in to account. After remediation, as a minimum, land should not be capable of being determined as contaminated land under Part IIA of the Environmental Protection Act 1990; and

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				<ul style="list-style-type: none"> • Air quality management areas must be taken into account and other areas where there could be specific requirements or limitations on new development because of air quality. • The potential cumulative impact of a number of smaller developments on air quality as well as the effect of more substantial developments need to be taken into account within LNP. This could be through, for example, identifying measures for offsetting the impact on air quality arising from new development including supporting measures in an air quality action plan or low emissions strategy where applicable. • LNP needs to address sustainable remediation agenda and overall sustainable development issue. • In general LNP, should provide framework to enhance land, air and water quality, enhance pollution prevention and control, including odour, waste and nuisances and minimise exposure to noise pollution.
R2.	Marguerite Oxley, on behalf of the Environment Agency	16/07/2018	Email	<p>Chapter 5</p> <ul style="list-style-type: none"> • Particularly support Objective 8: Natural Environment, Green spaces and Biodiversity and Objective 9: Climate Change. <p>Chapter 6</p> <ul style="list-style-type: none"> • Support policy LE1: Natural Capital • Support policy LE2: Biodiversity <p>Chapter 7</p> <ul style="list-style-type: none"> • Policy H4: The Working Town - Page 52, para 7.25. The first sentence would better read 'In this instance, flood risk areas are defined as the extent of the 2000 inundation or Flood Zones 2 and 3'. We suggest this to ensure clarity and allow for changes in modelling. <p>Chapter 8 - Policy PL1: General Housing Strategy</p> <ul style="list-style-type: none"> - <u>Allocated Housing Sites</u> - General point: appears to be confusion Re: Source Protection Zones. These are designated for the protection of groundwater quality and are <u>different</u> from flood zones (flood risk). Source Protection Zones (SPZ) and other environmental constraints appear to be cited under the Flood Zone heading. For clarity, they should be under a separate heading.

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				<ul style="list-style-type: none"> <li data-bbox="981 212 2210 483">– <u>Policy PLI (2): Land at Astley House and Police Garage (page 68)</u>- Site is in FZ 1. Level 2 SFRA has identified that its access may be at risk of flooding. The Sequential Test states that this site will require a site-based FRA to ensure that flood risk to residents and property is mitigated through the design of the development. If this is what the NDP aims to require, then this should be detailed in the policy wording for this allocation (currently no mention).This site is in SPZ 2 (a sensitive groundwater protection area). Pleased that this is noted and that the policy wording requires groundwater sources to be protected. <li data-bbox="981 507 2210 738">– <u>Policy PLI (3): Land at the Auction Rooms (Page 70)</u> – Majority of site is in FZ 2 (+ very small part in FZ 3). Pleased that Para 6) in the policy provides recommendations for flood risk mitigation. Recommend that any site specific recommendations from the SDNP Level 1 Update and Level 2 SFRA are included in this policy wording as well. Site is located in SPZ 2 however, we would expect to see Reference to this in the policy wording to ensure that protection of groundwater is considered at planning application stage. <li data-bbox="981 762 2210 1034">– <u>Policy PLI (8): Land at Buckwell Court Garage Site (Page 76)</u> –Site is in FZ1. Sequential test identified that this site has risk of flooding when taking into account climate change and elevation. The Sequential Test states that a site-specific FRA required to ensure that the development can remain safe taking into account climate change. We recommend that this should be detailed in the policy wording for this allocation (currently no mention). In addition, we recommend that any site specific recommendations from the SDNP Level 1 Update and Level 2 SFRA are included in this policy wording. <li data-bbox="981 1058 2210 1289">– <u>Policy PLI (21): Land at Kingsley Road Garage Site (Page 78)</u> – Site is in FZ1. However, the Level 2 SFRA has identified that its access may be at risk of flooding. The Sequential Test states that this site will require a site-based FRA to ensure that flood risk to residents and property is mitigated through the design of the development. This should be detailed in the policy wording for this allocation. Site is also located in Source Protection Zone 3 would expect to see reference to this in the policy wording to ensure that groundwater protection is considered at planning application stage. <li data-bbox="981 1313 2210 1385">– <u>Policy PLI (26): Land at Southdowns Road (Page 80)</u> – Site in FZ 2 and 3. We are pleased to see Para 6) in the policy providing recommendations for flood risk mitigation. We recommend that any site

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				<p>specific recommendations from the SDNP Level 1 Update and Level 2 SFRA are included in this policy wording as well.</p> <ul style="list-style-type: none"> <li data-bbox="981 309 2210 619">– <u>Policy PLI (34): Land at Little East Street Car Park, Corner of North Street and East Street (Page 82)</u> – Site is in FZ1. However, the Level 2 SFRA has identified that its access may be at risk of flooding. The Sequential Test states that this site will require a site-based FRA to ensure that flood risk to residents and property is mitigated through the design of the development. If this is what the plan aims to require, then this should be detailed in the policy wording for this allocation. This site is located in Source Protection Zones 2 and 3 (which is referenced in the document), however, we would expect to see reference to this in the policy wording to ensure groundwater protection at planning application stage. <li data-bbox="981 644 2210 874">– <u>Policy PLI (36): Land at Magistrates Court Car Park (Page 86)</u> – Site in FZ 2. We are pleased to see Para 5) in the policy provides recommendations for flood risk mitigation. We recommend that any site specific recommendations from the SDNP Level 1 Update and Level 2 SFRA are included in this policy wording. Site is in Source Protection Zone 2 (which is referenced in the document), however, we would expect to see reference to this in the policy wording to ensure that protection of groundwater is considered at planning application stage. <li data-bbox="981 900 2210 1129">– <u>Policy PLI (39): Land at Former Petrol Filling Station, Malling Street (Page 88)</u> – Site in FZ 2 and 3. We are pleased to see Para 4) in the policy provides recommendations for flood risk mitigation. Site specific recommendations from the SDNP Level 1 Update and Level 2 SFRA should be included in this policy wording. Site is located in SPZ 2 (which is referred in the document), however, we would expect to see this in policy wording to ensure that protection of groundwater is considered at planning application stage. <li data-bbox="981 1155 2210 1353">– <u>Policy PLI (44): Land at Princes Charles Road Garage Site (Page 89)</u> – Site in FZ1, Level 2 SFRA has identified that its access may be at risk of flooding. The Sequential Test states that this site will require a site-based FRA to ensure that flood risk to residents and property is mitigated through the design of the development. If this is what the plan aims to require, then this should be detailed in the policy wording for this allocation (currently no mention).

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				<ul style="list-style-type: none"> <li data-bbox="981 212 2210 403">– <u>Policy PL 1(46): Land at Queens Road Garage Site (Page 92)</u> – site is in FZ1. Level 2 SFRA has identified that its access may be at risk of flooding. The Sequential Test states that this site will require a site-based FRA to ensure that flood risk to residents and property is mitigated through the design of the development. If this is what the plan aims to require, then this should be detailed in the policy wording for this allocation (currently no mention). <li data-bbox="981 427 2210 659">– <u>Policy PL1 (48): Land at Former Ambulance Headquarters (Page 94)</u> – Site is in FZ 2. Pleased to see para 4) in the policy provides recommendations for flood risk mitigation. Any site specific recommendations from the SDNP Level 1 Update and Level 2 SFRA should be included in this policy wording. Site is located in SPZ 2 (referenced in the document), however, we would expect to see reference to this in policy wording to ensure that protection of groundwater is considered at planning application stage. <li data-bbox="981 683 2210 962">– <u>Policy PL1 (52): Land at St Anne’s Crescent (Page 96)</u> – Site is in FZ1. Level 2 SFRA has identified that its access may be at risk of flooding. The Sequential Test states that this site will require a site-based FRA to ensure that flood risk to residents and property is mitigated through the design of the development. If this is what the plan aims to require, then this should be detailed in policy wording for this allocation (currently no mention). This site is within SPZ 1 (referenced in document), however, this should be in the policy wording to ensure that groundwater protection is considered at planning application stage. <li data-bbox="981 986 2210 1058">– <u>Policy PL1 (53): Former St Anne’s School Site (Page 98)</u> – This site is within SPZ 1. We are pleased to see that the protection of groundwater is referenced in the policy – para 6). <li data-bbox="981 1082 2210 1273">– <u>Policy PL1 (57): Land at Lewes Railway Station Car Park (Page 100)</u> –Majority of site is in FZ 2. We are pleased to see Para 8) in the policy provides recommendations for flood risk mitigation. We recommend that any site specific recommendations from the SDNP Level 1 Update and Level 2 SFRA are included in this policy wording. The site is in Source Protection Zone 2. We are pleased to see that the protection of groundwater is Referenced in para 12). <p data-bbox="947 1297 1328 1329">Policy PL3: Flood Resilience</p> <ul style="list-style-type: none"> <li data-bbox="947 1353 1261 1385">• We support this policy

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				<p>Policy PL4: Renewable Energy and the Resource and Energy Efficiency of New Buildings (Page 110 onwards)</p> <ul style="list-style-type: none"> We support para 3) regarding water efficiency measures. However, we recommend that the document references actual water consumption figures to be achieved in line with those proposed within the South Downs National Park Local Plan (i.e. 110 litres per person per day for residential use and BREEAM excellent rating for non-residential use). <p>Chapter 10 - Streets and Spaces Policy SS3 Protection and Enhancement of Green</p> <ul style="list-style-type: none"> Support for para 3) 'New green infrastructure corridors will be sought, to assist with flood protection to add to public enjoyment and health and to create corridors for wildlife'. <p>Draft Policy SS4: River Corridor Strategy (Page 138 onwards)</p> <ul style="list-style-type: none"> There may be a requirement for access for maintenance of flood risk assets. Any works in or near the main River Ouse that could affect Flood Risk or Environment Agency access should be previously agreed following due consultation, as determined by the Environmental Permitting Regulations for Flood Risk Activities. It would be useful to make reference to this in this policy or another appropriate policy in the document. Support for para 7) 'Development immediately adjacent to the river must demonstrate that it will not affect flood risk elsewhere along the corridor' and para 8) 'New developments adjacent to the river must demonstrate that they will not impact on the river's ability to function naturally, and should enhance green infrastructure and wildlife corridors'. <p>Chapter 11 - Projects List Section 11.12: Flood & Drainage Infrastructure Para.</p> <ul style="list-style-type: none"> Support for para 33) 'Contributing to the completion of flood defences along the riverbank where they are not presently planned to be provided'.
R3.	Jane Foot & Tony Downmunt	16/07/2018	Email	<ul style="list-style-type: none"> Strong support to the idea of the Lewes Low Cost Housing proposal. Support for proposal to build houses on St Anne's School site - should be built by the Community Land Trust so that they can be Lewes Affordable and protected from the right to buy.

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				<ul style="list-style-type: none"> Issue: access to the site is to be via Rotten Row. Rotten Row, St Pancras Road, Potters Lane are all narrow and end in blind turns onto busy junctions. Grange Road has a sign saying that no HGVs or Coaches are to use the road. Please ensure practical and safe road access. Suggest use the access road to the lights at Western Road in order to provide a safe access.
R4.	SDNPA	23/07/2018	Email	<ul style="list-style-type: none"> The Submission NDP is clearly written and attractively laid out, illustrated with photographs, diagrams and paintings by local artists. We welcome this innovative way of communicating planning policy themes and making the NDP locally distinctive. Importantly, the NDP addresses the issues that are a priority for Lewes that have been identified from the consultation with the community. These include the need to deliver more low cost housing in the town, making Lewes more sustainable, as well as preserving the working character of the town. It is to be welcomed that there is a healthy supply of sites identified within the settlement boundary to exceed the Local Plan requirement of 220 new dwellings; this is important given the reliance on small sites. <p>Paragraph 1.2</p> <ul style="list-style-type: none"> Add footnote to ‘Lewes District Plan Part 1 Joint Core Strategy’ to say that <u>“Policies SD1 and SD2 of the Lewes Joint Core Strategy have been quashed in so far as they apply to the South Downs National Park.”</u> <p>Paragraph 1.7</p> <ul style="list-style-type: none"> Add text to say <u>“The SDNPA has commissioned new work on air quality, the most recent version of which was published as part of the Submission of the South Downs Local Plan in April 2018 which was published as part of the Pre-Submission Consultation on the South Downs Local Plan in September 2017. The HRA concluded that the development proposed in the South Downs Local Plan (which includes the number of homes proposed in the Lewes NDP) would not, on its own, or in combination with other plans have a an adverse effect on the integrity of the European sites assessed, including Ashdown Forest Special Area of Conservation.” The overarching HRA of the emerging South Downs Local Plan will address this matter and include any necessary measures as appropriate.</u>

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				<p>Neighbourhood Plan Objectives</p> <ul style="list-style-type: none"> For a town with such a long and important history it is surprising that the historic environment doesn't feature in the NDP objectives. While heritage is addressed by several policies within the plan, it is considered that the historic environment should be included in the NDP objectives. 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. 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 where carefully designed. <p>Policy LEI</p> <ul style="list-style-type: none"> Lewes NDP Policy LEI includes reference to a threshold of sites of five houses or more, whereas the SDLP policy relates to all development. We therefore recommend that this threshold is removed. The SDNPA has recently prepared guidance notes on implementing SDLP Policy SD2. We think these would also provide helpful guidance with regards to implementing the Lewes NDP Policy LEI, providing examples of simple interventions within local/urban sites that could help meet the relevant policy criteria, and support or enhance wider ecosystem service function. <p>Supporting text to Policy LEI</p> <ul style="list-style-type: none"> Natural Capital. We suggest it would be useful to consider a tree strategy for the town to set the strategic direction for tree stocks. This is an approach being used by Petersfield Town Council. The SDNPA will work with the local tree officers and community to develop this. <p>Policy HCI: Protection of Existing & new Community Infrastructure.</p> <ul style="list-style-type: none"> Criterion 4 needs to be redrafted to make it clear what it is seeking to protect and where. This part of the policy is seeking to retain local food stores outside the town centre. The term used in the policy 'outside the flood plain' is not normally used in retail policies but instead in relation to flooding issues. Amend policy to say; "Change of use applications for neighbourhood food shops outside the flood plain

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				<p><u>town centre</u> will be resisted.”</p> <p>Supporting text of Policy HC2 - Paragraph 7.12</p> <ul style="list-style-type: none"> It is not clear in the text that this paragraph relates to the North Street Quarter planning application. The first three items in the section on Key Projects & Actions are neither projects nor actions but aspirations or aims. Suggest moving first three items of section on Key Projects & Actions to supporting text. <p>Policy H3(b): Heritage Protection</p> <ul style="list-style-type: none"> Criterion 1 of this policy should refer to avoiding or minimising harm to the significance of heritage assets rather than using the word conservation, in line with the terminology used in National Planning Policy Guidance. There is a concern that this policy seeks to differentiate between an identified ‘core’, delineated on a late Eighteenth Century map and the rest of the Lewes Conservation Area. This has no clear basis. Policy Criterion 5 should be removed to supporting text as this cannot be imposed by a neighbourhood planning policy and is in effect a planning application validation requirement. Move criterion 5 wording to supporting text and use wording for criterion 5 ‘Developers intending to submit proposals affecting heritage assets <u>must describe the impact of the development on the significance of the heritage asset.</u> Amend wording of policy criterion 1 to include: Proposals for development should include sufficient information to demonstrate that the choice of design and use has sought to avoid or minimise harm to the <u>significance</u> conservation of heritage assets. Delete criterion 4 of HC3 (b) as materials are already covered by the LNDP Design Policy PL2. <p>Supporting text of Policy H3 Paragraph 7.3 does not read well and needs additional clarification. In addition, the conservation area boundary is referenced as being located on page 102 of the document, but it is not included here but on page 129.</p> <p>Paragraph 7.23 needs to be clarified. It could be improved if amended to refer to the NDP recognising the importance of Lewes’s industrial heritage and that this needs to be better understood and afforded</p>

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				<p>greater significance in development proposals due to its erosion in more recent times. Suggest reference to that Lewes is covered by an Archaeological Notification Area.</p> <p>Policy HC4 – The Working Town Policy criterion 2 refers to viability of employment sites. Viability needing to be demonstrated by market evidence should be included in the policy or supporting text. Include in policy criterion 2 or supporting text, the need for marketing evidence to support lack of viability.</p> <p>Criterion 5 is poorly worded - Suggest amended to read: <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> <p>Supporting text to Policy HC5 – Sustainable Tourism - Note that no reference is made to the South Downs YHA at Itford close to Southease Station and the Egrets Way which is accessible from the town on foot/bike and by rail (one stop).</p> <p>Supporting text of Policy HC4 - A number of points in Key Projects & Actions are not projects, but aspirations or aims, suggest move bullet points 2, 3, 6 and 7 of section on key projects and actions to supporting text.</p> <p>Policy PL1 – General Housing Strategy - The overall approach of focusing new development within the settlement boundary, and 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> <ul style="list-style-type: none"> • It is not clear in criterion 1 or in the text what is meant by ‘identified small infill sites’. Is this only sites allocated in the NDP, or does it include other sites too? What distinguishes a ‘small’ site from a ‘medium’ or ‘large’ site? More clarity is needed for the policy to be effective and not open to wide interpretation. • Criterion 2 should be qualified to allow for Rural Exception sites. Amend to say: “No greenfield sites outside the settlement boundary should be developed within the plan period, other than the strategic site at Old Malling Farm, if allocated in the South Downs Local Plan <u>and those that meet the criteria for a rural exception site (as outlined in national policy and detailed in the South Downs Local Plan Policy SD29: Rural Exception Sites).</u>” • Criterion 3 also refers to ‘all strategic and infill sites’. Is this simply ‘all sites’? Amend criterion 3 to say; “All strategic and infill sites within this Plan will meet the Local Plan requirement for affordable housing.”

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				<p>This shall include maximising the amount of Lewes Low Cost Housing to meet local housing need, unless proven to be undeliverable.”</p> <ul style="list-style-type: none"> • Concern regarding criterion 5 of this policy which refers to supporting decking above existing car parks. Some car parks are in sensitive locations such as in conservation areas, attractive townscape or where there are open views to surrounding countryside. Delete criterion 5 and merge some of this text with 6 to say “On certain sites <u>and on car parks</u> 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>or decking to provide housing above existing car parks.</u> • Criterion 10 is superfluous as there is a presumption against the re-negotiation of planning obligations as set out in national guidance. Suggest this criterion is removed or moved to supporting text. • Supporting text to Policy PL1. The SDLP timetable has slipped slightly. Therefore we suggest that the second sentence of the first introductory paragraph to this section is amended to say: ‘Late in 2018, it is expected that <u>Once adopted,</u> the South Downs Local Plan will be adopted and hence replace the Joint Core Strategy for those areas of the District within the South Downs National Park.’ <ul style="list-style-type: none"> – <u>Notes on delivery of affordable housing:</u> <ul style="list-style-type: none"> ▪ We question the accuracy of this information and what time period has been used for calculating how many affordable housing units have been delivered in Lewes. Our records show that 34 affordable homes were built in Lewes since 2011. The Recent planning permission at North Street Quarter includes the provision of 165 affordable homes (40%). The statutory self-build register could be mentioned in the supporting text to criterion 9. The note on delivery of affordable housing should be updated. <p>Allocated Housing sites</p> <p>General comments. Garage sites have been put forward by Lewes District Council, as the landowner, for consideration for allocation. We consider that on a few of the small garage sites there are deliverability issues, taking into account 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</p>

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				<p>School site, to the south of County Hall, can deliver greater numbers than identified in the NDP. Please see comments on individual sites. With regards to the above, we recognise that if some of the small garage sites are not developed the NDP will still meet its housing requirement, as the housing provision in the NDP includes a healthy buffer.</p> <ul style="list-style-type: none"> The housing table on page 64 needs a title as does the map on page 66 -67. Whilst the allocation PLI (13) - Land at the Former Wenban Smith Site has been deleted there is still a 'red line' around the site on the map on page 67. This needs to be deleted. <p>PLI (4) & PLI (5) Land at Blois Road -The deliverability of housing at these two sites is 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. Recommend deletion of the allocation of these sites.</p> <p>PLI(8) Land at Buckwell Court, Garage site - This garage site may be more deliverable than the Blois Road but 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 and resolve to overcome the issues of overlook/amenity of adjacent properties.</p> <p>PLI (34) Land at Little East Street Car Park, Corner of North Street and East Street - This is a relatively small site. Can 11 dwellings, parking and amenity space be achieved? We consider 5 or 6 dwellings could be more realistically be delivered here. Amend expected housing numbers for this site from 11 to 6 dwellings.</p> <p>PLI (53) Former St Anne's School Site. We note that criterion 1 refers to the redevelopment of only the brownfield land for approx. 35 housing units. The whole of the site is considered to be a brownfield and this is a large site in a sustainable location. We agree that the mature trees on the site should be retained but there are other open areas that could be developed along with the conversion of the main building. Amend criterion1 to say "Redevelopment of the brownfield land site....."</p> <p>Policy PL2 – Architecture and Design Criterion 2 refers to both the conservation area and the historic core. As mentioned in the comments on HC3 (b,) the differentiation between the historic core as</p>

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				<p>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>Criterion 3, also refers to the historic core and should refer to the conservation area as a whole.</p> <ul style="list-style-type: none"> We suggest some minor amendments to the wording of criterion 4, 5 and 6 for clarity and to meet current planning regulations and advice. Amend first sentence of criterion 4 to say: “Buildings should be orientated to benefit from passive solar heating <u>design and, where consistent with good urban design, active solar collection.</u> Amend criterion 6 to say: “New housing development should meet the <u>Nationally Described Space Standards</u> set out in Technical Housing Standards (2015). Where possible, conversions should also seek to meet this standard.” <p>Amend criterion 7 to say: “Where possible feasible, all new dwellings should meet the <u>Building for Life Standards for disabled living or be capable of being readily adapted Building Regulations Part M4 (2) ‘Accessible and Adaptable Dwellings’ standards and at least a proportion of larger developments should meet the Part M4 (3) ‘Wheelchair User Dwellings’ for disabled living or be capable of being readily adapted to residents’ changing circumstances.</u>”</p> <p>Supporting text to Policy PL2 – Architecture and Design Revisions to paragraph 8.45 of the supporting text are required to support the proposed policy changes to criterion 7 of PL2. Amend paragraph 8.45 to say: “The neighbourhood plan and the town council seek the building of homes <u>according to the Building for Life Standards for disabled living, that meet the building regulations standards for adaptable homes, which are similar to the ‘Lifetime Homes’ standards that they replace</u> to cater for the increasing number of people expected to have a disability in their lifetime and older people envisaged to be living in Lewes over the coming years. An increasing number of new and existing residents in Lewes are wheelchair users and so a proportion of new homes should cater for them by meeting the building regulations standards for wheelchair accessible homes.</p> <p>Design Guidance – Para 8.49 In the section on Locality, we again question the guidance distinction between the historic core and the rest of the conservation area. Suggest amend supporting text.</p> <p>Policy PL4 – Renewable Energy and Resource and Energy Efficiency of Buildings. We recommend amendments to this policy so that it is compatible with the SDLP Policy SD 48: Climate Change</p>

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				<p>and the Sustainable Use of Resources and its relevant standards. Amend to say: Sustainable Renewable Energy Construction and the Resource and Energy Efficiency of New Buildings</p> <ul style="list-style-type: none"> • Recommend the following criteria are amended to say: Developments of new and existing buildings should demonstrate practical features that increase energy efficiency <u>in line with the standards set out in the South Downs Local Plan Policy SD48: Climate Change and the Sustainable use of Resources.</u> Proposals seeking to achieve carbon neutral standards will be supported. • Support will be given to development proposals that incorporate appropriate low carbon on-site power generation <u>subject to good urban design.</u> • The design of new buildings and the redesign of existing buildings should actively promote water efficiency measures to reduce water use. There needs to be particular regard to the specification of fixtures and fittings and how these will affect water efficiency. <u>New and converted dwellings should not exceed predicted internal mains consumption levels above 105 litres/person/day.</u> • The reuse of materials and the use of local and sustainably sourced construction materials will be supported in working towards achieving a carbon neutral local economy. <u>New construction timber should be certified under 'Grown in Britain' accreditation where this is feasible or otherwise FSC certified.</u> <p>Supporting text to Policy PL4 –Paragraph 8.54 is not correct as LPAs can have energy efficiency targets (up to 19% improvement over Building Regulations) as well as low/zero carbon energy generation targets.</p> <ul style="list-style-type: none"> • We do not support paragraph 8.55 with regards to encouraging double glazing in the conservation area. Lewes Conservation Areas are subject to Article 4 Directions including to protect significant historic fenestration as this makes a substantial and valuable contribution to the character and appearance of the conservation areas. Delete paragraphs 8.54 and 8.55. <p>Policy SSI – Historic Streets Criterion I again refers to the historic core. Amend criterion I to refer to the conservation area rather than just the historic core.</p> <p>Policy AMI –Active Travel Networks. The Access and Movement Section and Public Real Strategies are important parts of the Neighbourhood Plan and respond to the community consultation regarding creating as far as possible a car free town centre. A lot of work has been carried out by the Steering group in</p>

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				<p>preparing these sections and associated strategies. Overall the policies align with the SDLP and South Downs Partnership Management Plan.</p> <ul style="list-style-type: none"> • Criterion 3 should be moved to supporting text as strategic sites are covered by the SDLP. The supporting text should make specific reference to the new footpath link that is to be provided from the Old Malling Farm Strategic Site SDLP Policy SD79 along the Old Railway Cutting forming a link to the Cooksbridge to Lewes Riverside path. • Proposed new Railway Cutting route needs to be identified on the Public Realm Strategy maps (i.e. green links, improved cycle network, improved pedestrian routes). <p>Supporting text to Policy AMI - Could be expanded to refer to additional local Countryside Trails and a public bike share scheme.</p> <p>Supporting text to Policy AM3 Bullet points 2 and 3 of key projects and actions duplicates the supporting text to Policy PL1 regarding supporting building above car parks. This needs to be caveated regarding that this approach might not be suitable in sensitive areas. Suggest delete bullet points 2 and 3 in Key Projects and Actions.</p> <p>Policy SS3 – Protection & Enhancement of Green Spaces. We Support this policy and the approach of the two designations of Local Green Spaces and Local Community Spaces.</p> <p>Criterion 1 refers to the Designated Open Spaces Map however the actual map is titled Local Green Spaces and Local Community Spaces. Suggest correct the title and reference the page number of the map.</p> <ul style="list-style-type: none"> • We do not think all designated sites are shown on the Local Spaces and Local Community Spaces Map or that some should have been deleted but this is not reflected in the list that accompanies the Map. Ensure all designated sites are shown on the Local Spaces and Local Community Spaces Map. • The Railway Cutting is proposed as a Local Green Space (21) in the NDP. This could potentially prevent the ability for the Cutting to be used to improve pedestrian and cycle routes between the town and Malling area, which is to be provided as part of the SDLP Strategic housing Policy SD79 - Old Malling Farm. It may be more appropriate for it to be designated a Community Space, or a Green Link. Amend criterion 1 to include the right wording of associated map.

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				Neighbourhood Projects supporting text. We welcome the inclusion of the 'Neighbourhood Projects' section' which sets out the community's ambitions for potential CIL funding as requested in our Pre-submission comments. However, the wording and layout of this section reads as if it is a NDP policy with supporting text. For instance paragraph 11.2 refers to a policy that will act as a hook. We recommend the deletion of this sentence and the heading 'Supporting Text.' Delete second sentence of para 11.2 and heading "Supporting Text" below paragraph 11.3.
R5.	Julia Hathaway	15/07/2018	Email	<ul style="list-style-type: none"> Concerned about access via Rotten Row to the St Anne's School site. Rotten Row and adjacent roads are unsuitable for construction vehicles, while access via County Hall is more appropriate.
R6.	Penny Jones	16/07/2018	Email	<ul style="list-style-type: none"> Welcome proposal to build houses on the St Anne's School site. Concerned about access via Rotten Row to the St Anne's School site. Local residents would welcome consultation on this point. <u>General comments on low cost housing</u> - supports ideas for Lewes Affordable Housing. Encouraged that dwellings at St Anne's site should be built by the Lewes Community Land Trust. Strongest possible support to the idea of the Lewes Low Cost Housing proposal.
R7.	Ann Link	18/07/2018	Email	<ul style="list-style-type: none"> Support for Plan in general and agreement with the ecosystem services approach. Strongly in support of the idea of Lewes Low Cost Housing, and proud that the Plan goes as far as it does. Welcome the mention of emergency housing on p.60, para 8.7, the audit of empty properties, and the idea of decking over car parks. Welcome statement on p.60 on housing: "Applications that include a mixture of housing tenures, built-in energy and water saving methods will be welcomed. Preference will be given to smaller houses, 1, 2 and 3 bed dwellings which should aim for the highest sustainability levels in accordance with current building regulations." Welcome statements 5.12 an 5.13 on p.30 about Environmental Design.

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				<ul style="list-style-type: none"> • Car Parking: Allow for fewer parking places in future as needs change, so that the idea of one at least per dwelling isn't set in stone. • Surface water management (p.107): this mentions new properties, but can anything be done to make existing properties better? Could Community Infrastructure money fund rain gardens and similar works? • Welcome policies on insulation, energy efficiency policies and Design Guidance. • Policy HC4 on p.51 The Working Town- It could mention that businesses generating renewable energy and reusing resources will be favoured. • Policy HC5 - should mention energy use as well as travel. Any building development for tourism should adhere to the design guidance for housing, enhance the positive qualities such as biodiversity in the area e.g. green roofs.
R8.	Gill Bateman	18/07/2018	Email	<ul style="list-style-type: none"> • Support for The former St Anne's site for Housing PLI and the concept of Lewes low cost housing (LLCH). • Advocate that Lewes Community Land Trust is able to purchase this land at a reasonable price and that the community develop the 35 houses as affordable for Lewes young people to rent/buy. • Concern over vehicle access to St Anne's site is difficult /impossible from the A2077 via Antioch St and Rotten Row. • The viability appraisal for any future housing plan would include access to the site - the ESCC large concrete car park together with blocked drains has already created sudden surface flooding. This includes Rotten Row, St Pancras Rd and Grange Rd.
R9.	Chris Smith	15/06/2018	Email	<ul style="list-style-type: none"> • The Neighbourhood Plan requires developers to provide accommodation at rents well below 80% of market rent. This sort of rent is sometimes called affordable but is way beyond the means of most local low paid workers.

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R10.	Christine Tutt, on behalf of Lewes District Churches: HOMELINK	18/07/2018	Email	<ul style="list-style-type: none"> • Lewes District Churches: HOMELINK is a charity, running a rent deposit scheme, based in Lewes Town. We offer an interest-free loan for rent in advance and damage deposit to those who are homeless or threatened with homelessness in Lewes District. In partnership with LDC has facilitated between 66 and 103 tenancies each year since 2014. • Welcome the objectives of the LNDP and in particular objectives 2 (Locally Affordable Housing) and 12 (Flexible Housing for all Generations and Incomes). • Note that the definition and justification for Lewes Low Cost Housing (LLCH) is well set out, and we commend the requirement for 'proof of non-viability' when developers claim that it is not viable to provide such housing. • Welcome point 10 on page 59 where it states that the NP 'does not support downward negotiations of % of affordable homes and LLCH homes after planning permission has been granted'. • Appreciate the clarity of the following statement on page 62, para 8.15: 'The average Lewes household income is just under £30,000. Building societies recommend that the maximum that people should borrow is five times their total household income, making £150,000 the upper limit on a household income of £30,000. It is clear that the gap between house prices and what can be afforded is unbridgeable.' • Commend 'temporary "meanwhile" use of brownfield development sites and small individual sites to create flexible living and working space, making use of modular buildings to ensure that these are affordable, and subject to appropriate controls.'
R11.	Graham Maunders, on behalf of Lewes Community Land Trust	23/07/2018	Email	<ul style="list-style-type: none"> • Broadly support its content • There is a very significant need for more locally affordable housing and strongly support the Plan's encouragement for more provision. • Greater emphasis should be given to fully utilising <i>all</i> public-sector land / buildings – much of which is not referenced to in the Plan (8.2) - as 2 above. If fully utilised this could reduce the Old Malling Farm development requirement. • The Plan (4.9 and 5.11) needs to give more encouragement to fully utilising existing land and buildings in far more creative ways – for example housing over supermarkets.

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				<ul style="list-style-type: none"> • Housing options (4.11) should include land / buildings for renovation / self-build / self finish. • Greater emphasis needs to be given to the importance of <i>balanced and sustainable communities</i> (5.6) – with strong encouragement for 'pepper-potting' locally affordable housing provision on all developments (particularly the strategic sites). • The Plan should encourage new homes to be built to Lifetime Homes design standards. • The Neighbourhood Plan (8.5) (and SDNP and Lewes Council policy) should be encourage community led housing being the first option considered for all locally affordable housing provision. • The retention of locally affordable housing is vital – not just building it. Utilising community organisations such as the Community Land Trust to enable housing to be community owned in perpetuity (outside of the Right to Buy) should be emphasised (8.5). • Greater emphasis could be given to wider community cost / benefit consideration and not simply highest price – as 2. Above (8.11, 8.12, 8.13 and 8.17). • Para (8.16) needs further refinement. Whilst housing associations provide affordable housing aimed at average / below average incomes, new provision is typically at 80% of market rent (in line with the governments definition and their organisation wide policy) and not locally affordable without housing benefit. It is not '<i>the only way forward</i>'. Community Land Trusts are able to establish local rent / sale policy reflecting local incomes which should also be referenced. • The form of ownership is fundamental to ensuring housing remains in perpetuity for community benefit. The asset lock provided by organisations such as Community Land Trusts – typically community benefit societies - are crucial and should be referenced here. Lewes Community Land Trust have developed a local allocations policy which prioritises those who live / work in Lewes. • We fully support locally affordable housing provision – <i>on all sites</i> (including those in public sector ownership) – in the interests of creating / maintaining balanced and sustainable communities and the importance of locally affordable housing to wider social, economic and environmental wellbeing (8.21). • Stronger emphasis should be given to greater effort to deliver much needed locally affordable homes and <i>not</i> accepting commuted sums (8.25).

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				<ul style="list-style-type: none"> Community Land Trusts have been utilised very successfully elsewhere to bring forward small pieces of land for development and should be Referenced here (8.26). Land owners can be more willing to release small plots where the homes are safeguarded for local community benefit in perpetuity through the asset lock provided.
R12.	Gill Short	22/07/18	Email	<ul style="list-style-type: none"> Support for the Neighbourhood plan esp. proposals in for locally affordable housing and workspace. Public buildings have all been sold off and private housing is way beyond people on the average Lewes wage. Private rents are very high and young people have to leave Lewes to find places they can afford. We have a significant number of second homes and commuters. We need truly affordable low cost housing as put forward in the plan. I would be grateful if I could be kept informed about the progress of the consultation.
R13.	Jan Hunter Mark Sawtell Nigel Tarling Jennie Wotherspoon	22/07/2018	Email	<ul style="list-style-type: none"> Support for low cost housing on St Anne's Site Concerned about access to St Anne's site via Rotten Row due to tight corner at the junction with the High Street. Grange Road and other roads feeding into the area like St Pancras Road and Potters Lane are equally narrow and challenging. Access from the north of the site via County Hall to western road would be much safer.
R14.	Kia Makepeace	23/07/2018	Email	<ul style="list-style-type: none"> Support for the Neighbourhood plan esp. proposals in for locally affordable housing. Ideas are not radical enough for managing future increases in traffic. Support for emphasis on the natural environment at the heart of a planning document.
R15.	Kevin Moore	22/07/2018	Email	<ul style="list-style-type: none"> Concern about additional traffic from proposed housing developments. Action must be taken to minimise the number of private cars per household (in accordance with the Government's Walking and Cycling strategy) Object to the proposal to route vehicle Road through the County Hall site/care park and not onto Rotten Row.

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R16.	Dr Charlotte Rae	23/07/2018	email	<ul style="list-style-type: none"> • Support for plan and policy on affordable housing. • Strong support for elements on Lewes Low Cost Housing (LLCH) • Critical for Lewes to have housing development we need, and not the development that prioritises profits. • Disappointed that in 8.22 & 8.23, 5 sites that already have permission, a very paltry indeed 6.7% units are designated as affordable. It is therefore important that Policies PL1 3) and 10) are retained • Developers should be constrained from post-permission renegotiation of affordable unit delivery. • Strongly support the following objectives concerning climate change: Objective 5. Environmental design, Objective 6. Easily moving around, Objective 7. Reduced energy demand Objective 8. Natural environment, green spaces, and biodiversity Objective 9. Climate change
R17.	Cindy Field	23/07/2018	Email	<ul style="list-style-type: none"> • Lack of provision of public services, schools, doctors etc. will leave the existing service providers unable to cope. • Note Intention to limit parking per household and to provide walking and cycling routes but with no indication as to how householders will be persuaded to leave the car at home. Cars will then be driven the short distance into town thus making the cycling and walking routes unpleasant and polluted. • Suggestion that the pavement outside the Court should be strengthened to prevent vehicle damage. Is this an admission that parking on the pavement is acceptable even when it blocks pedestrian access? Parking on the pavement throughout the town is at unacceptable levels.
R18.	Denzil Jones	21/07/2018	Email	<ul style="list-style-type: none"> • • Support for the Plan and proposals for locally affordable housing and workspace. • Social housing has mostly been sold off and the price of private housing has escalated way beyond reach of people on Lewes wages. It is vital that we provide truly affordable low cost housing as put forward in the plan. • I would be grateful if I could be kept informed about the progress of the consultation.

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R19.	Prof Paul Basu	14/06/2018	Email	<ul style="list-style-type: none"> • Strongly support the principles and proposals set out in the Neighbourhood Plan, including the Plan's assessment of the unique characteristics of Lewes, its communities, townscapes and its setting in the wider chalk downland environment. • Support the principles, which are consistent with national policies and advice, and the achievement of sustainable development, for restricting new development to brownfield sites within the existing settlement boundary of the town as identified in the Submission Plan. • Strongly support Policy PL1, which acknowledges the need for low cost housing, but insists on the use of high quality developments in sympathy with the surrounding townscape. • Support policy PL1.2 • I strongly support the policy that 'no greenfield sites outside the settlement boundary should be development within the plan period'. • The Plan could have gone further in identifying specific projects that would enhance biodiversity and environmental sustainability in the countryside surrounding Lewes. It would be good to see policies of 're-greening' and recovery of lost downland landscapes/environments.
R20.	Peter Calliafas	26/06/2018	Email	<ul style="list-style-type: none"> • There should be a policy presumption in favour of developing on brownfield land first. • By 2050, there will be significant water scarcity in the South East, due to extremes of/frequency of weather patterns arising from climate change impact. In the absence of capacity and/or resilience being built, the additional new homes will just add further pressure on a limited and scarce resource • The present congestion and local traffic pollution may lead to health impacts. • What risk impact studies have been undertaken for local services such as Doctors, Hospitals, local schools, etc? • Is there capacity in local waste water treatment works?

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R21.	Jacob Lane, on behalf of Mid Sussex District Council	26/06/2018	Email	<ul style="list-style-type: none"> We have no comments to make on this document at this time.
R22.	Hannah Bevins, Wood, on behalf of National Grid	20/06/2018	Email	<ul style="list-style-type: none"> An assessment has been carried out with respect to National Grid's electricity and gas transmission apparatus which includes high voltage electricity assets and high pressure gas pipelines, and also National Grid Gas Distribution's Intermediate and High Pressure apparatus. National Grid has identified that it has no record of such apparatus within the Neighbourhood Plan area.
R23.	Cllr Ruth O'Keeffe, MBE, on behalf of Lewes Town Council & East Sussex County Council	10/07/2018	Email	<ul style="list-style-type: none"> Great concern that St Mary's Community Centre is on the SDNPA Brownfield site Register despite the fact that it is far from being an unused or abandoned site. The Community Centre is used with weekly groups e.g. Brownies, Rainbows, Guides, Keep fit, Choir and monthly groups like Flower Club, Garden Club and rehearsal space for a Musical Theatre and Concert Orchestra. Daily there is a Pre-school which has about 25 children under 5 attending. It is a thriving social centre. We urge you to consider removing the listing from the brownfield site register when it is revised, at the earliest opportunity.
R24.	Janet L. Asherson - Bowles	11/07/2018	Email	<ul style="list-style-type: none"> Support the plan in particular the site Houndean Rise (access to Houndean Bottom) as Local Green Spaces & Local Community Spaces. It is an extremely valuable community space.
R25.	Ian Linton, on behalf of the Steering Group for the Lewes Neighbourhood Plan	11/07/2018	Email	<ul style="list-style-type: none"> Over 4 years of work has gone into producing the submission version, primarily by volunteer residents, but also by staff of LTC, SDNPA, statutory consultees and additional contributions by various consultants. The SDNPA consider the Plan to be distinctly "Lewesian" and they support the environmental work, including that for Green Spaces. We as a Steering Group are pleased that our extensive work on meeting the housing requirement of a minimum of 220 homes has been exceeded, and all allocations are on brownfield sites within the settlement boundary of Lewes. Both of these issues received amongst the highest levels of support from the public during our Reg 14 Public Consultation.

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R26.	David Taylor	11/07/2018	Email	<ul style="list-style-type: none"> Regarding the development of new houses - Policy PL1 (46) — Land at Queens Road Garage Site, notice other sites are restricted to one car one property. More parking spaces are needed as part of the development of the site. Development of the Old Malling Farm site will lead to increased congestion on the surrounding roads which are already jammed at rush hour.
R27.	Charlotte Mayall, on behalf of Southern Water	23/07/2018	Email	<ul style="list-style-type: none"> We are pleased to note that all comments on the Pre-Submission version of the plan have been addressed in this Submission version. We therefore have no further comments to make.
R28.	Jane Tremlett	16/07/2018	Email	<ul style="list-style-type: none"> Strong support to the idea of the Lewes Low Cost Housing proposal. Support for St Anne's School site – if built by the Community Land Trust so that they can be Lewes Affordable and protected from the right to buy. Concern for access to the site (construction and residents) via Rotten Row. Rethink the access road to the lights at Western Road in order to provide a safe access.
R29.	Sue Fleming, on behalf of Alexander Fleming Design Julia Waterlow	16/07/2018	Email	<ul style="list-style-type: none"> Support for Lewes NDP
R30.	Graham Glenn, on behalf of East Sussex Council (as a landowner)	17/07/2018	Letter	<ul style="list-style-type: none"> Site PL1(53) Former St Anne's Site, Rotton Row. Reference is made in the summary sheet to 35 units as per ESCC Option 1. This option has now become obsolete as further masterplanning work has progressed on this site. Reference is also made to access from Rotten Row, however this is not the only access option available to support development. ESCC continues to review master planning options and is considering wider transport access could enable huger density development through a mix of Rotten Row and St Anne's Crescent to the north. Height of buildings will need to reflect local

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				<p>surroundings (land levels, the conservation area and set against the backdrop of the extant 7-8 County Hall building to the immediate north). Consideration of unit numbers (flats and houses) up to 65 may yet be feasible by using alternate access points, subject to any part of the site being required for continued operational use by the County Council.</p> <ul style="list-style-type: none"> • Restoration and reuse of the former rectory on site will be sought as part of a wider development – Whilst noting the desire to restore part of the building, there is no specific heritage value attached so any scheme brought forward within any brief should review and consider the opportunity rather than commit to same. Reuse of the building suggested may not be possible if unit/room sizes cannot meet technical housing standards. • Opportunity to regenerate a discussed site with excellent potential to improve townscape including restoration of flint wall to the south of the site – Stabilisation for the flint wall is part of ongoing project work, approved by SDNP • Site has good access to local facilities and provision should be made for easy access from the site on foot and by bicycle to these areas. Noted: other than this is part of normal site design work anyway • Development proposals must ensure future access to existing sewerage and water supply infrastructure for maintenance and upsizing purposes. • The development must ensure that groundwater sources are protected, to the satisfaction of the Environment Agency – Any scheme would need to provide its own Plan as part of Policy so there is no need to add a specific requirement already covered by process. • The development should sit within the woodland and low rise. Mature trees, some with TPOs will be protected. Site has variant levels and sites against the backdrop of the 7-8 storey County Hall complex. Heights of new buildings can utilise variant site levels within Design options, whilst ensuring widest protection. TPO trees are noted and full arboricultural reports on condition and safety will be part of any planning process. • The site has been identified as one that may be vulnerable to flooding. Therefore, housing to be located outside localised areas of potential surface water of groundwater flood risk. Access to the site and internal site access roads to be designed to be compatible with potential surface water of

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				<p>groundwater flood risk. There is not record of specific flooding but any scheme brought forward would be subject to surface water management plan.</p> <ul style="list-style-type: none"> • A transport statement will be required to be submitted with any planning application, which considers access from Rotten Row in an appropriate manner. The access arrangements onto Rotten Row and its junction with the A2077 need particular assessment. Access to site is possible from both Rotten Row and/or via St Anne's Crescent. In either case appropriate transport assessments would be part of planning process and able to reflect on the sites previous use as a special school.
R31.	Alec Fuggle, on behalf of Regeneration Team, Lewes & Eastbourne District Councils	18/07/2018	Email	<p>Regeneration Comments – Lewes Neighbourhood Plan</p> <ul style="list-style-type: none"> • General Comments Lewes District Council's Regeneration team supports Lewes NDP Objectives, especially facilitating sustainable economic development. Also recognise the need for affordable housing in Lewes. • Policy HC4 Strongly support. There are more up-to-date reports on employment in Lewes District than "Step Ahead" report. The most recent report of relevance is the Employment Land Review Update 2012. We would request that this is used to inform this policy. • Policy HC5 Pleased that Tourism is recognised within the Lewes NDP. The cycle path will have great benefits for Lewes, Newhaven and the linking villages and will help to retain and encourage inward investment in Lewes District. • Policy PLI (3) – Land at the Auction Rooms Whilst we appreciate that the loss of the auction rooms may be necessary we would like to see appropriate consideration given to the potential for a mixed-use development in order to retain some economic benefit on the site.

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R32.	Richard Franklin, on behalf of Highways England	18/07/2018	Email	<ul style="list-style-type: none"> We note that Lewes Joint Core Strategy and emerging South Downs Local Plan identify that 220 (+10%) new homes should be planned through Lewes NDP, and that the sites identified by the Lewes NDP comprise 295 dwellings. Highways England is content with allocations outlined in the Lewes NDP. However, if further allocations come forward above stated figures, further assessment of impact on A27 junctions may need to be undertaken, and Highways England requests that it is kept informed of further sites for consideration of whether there would be a cumulative impact on the Strategic Road Network.
R33.	Robert Cheesman, on behalf of the Friends of Lewes Society	19/07/2018	Email	<p>This version of the Lewes NDP is improved and the Society supports its overall thrust. However there are aspects where it considers it is too aspirational and lacks either evidence or justification for what is proposed. In addition it laments the backward look that is evident in some parts of it.</p> <p>Specific comments</p> <ul style="list-style-type: none"> The Society is particularly concerned that insufficient emphasis is given to the two conservation areas within the town. The 1799 map, whilst useful detracts from the status of the conservation areas and could lead to confusion. There is a need to refer to the conservation areas in the preamble alongside the reference to the listed buildings on page 19 and by including their delineation in the map on pages 20/21. In subsequent parts of the Plan the references to the historic core or centre should be replaced by references to the conservation areas. The Society considers that the Plan should support and encourage modern business to provide employment in Lewes. It suggests that policies should be included that seek to promote Lewes as a place where new businesses should be encouraged to locate to and where existing businesses are given support to succeed. The Plan would also benefit by having a glossary. Page 17 - 2.11 – Direct train from Lewes to Ashford has now been discontinued and no reference is made to the Seaford line. It would be better to describe the 4 railway lines radiating from Lewes as going to London, Brighton, Hastings and Seaford.

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				<ul style="list-style-type: none"> • Page 31 – 5.21 – Para 10 – Reference to an improved bus station would be sufficient since a location for a combined transport hub has already been found to be impractical. • Page 44 – 7.12 – 3rd para of supporting text – This implies that the planning permission for SDNP/15/01146 does not suit the needs of the community. This is a view held by certain sections of the community with which we disagree. We do not consider that the NDP should be used as a vehicle for partial views and thus recommend that the words after “re-examining the existing consent” to the end of that sentence should be deleted. • Page 45 – 7.14 – The words “is not widely supported” should be deleted as there are only some views that a single new medical hub from 2021 is not widely supported. • Page 50 – 7.21 – The words “are included in Historic England’s listed buildings of historic merit” should be changed to “are included in the statutory list of buildings of special architectural or historic interest” so as to comply with the legislation. • Page 50 – 1st key point – We need to be convinced that there is justification for establishing a local list? • Page 53 – Policy HC5 para 2 – This needs extending to providing parking for tourist coaches. • Page 54 – Key projects 4th bullet point - We see no need for a separate blue plaque scheme in addition to the Town Council/Friends of Lewes grey plaque scheme as it could lead to confusion. • Pages 72 & 74 – These two sites (PLI (4) & PLI (5)) should also maximise the opportunity to provide townscape improvements to Kingsley Road as well as Blois Road as is the case with sites PLI (8) and PLI (21). • Page 106 – Tradition – Why distinguish between the historic centre, or conservation areas, and elsewhere? The para would be fine without these distinctions. • Page 121 – Arrival into the town from Offham and then via either Nevill Road or Offham Road ought to be mentioned on this page. • Page 122 – 10.11 – This para implies that one is entering the National Park when passing through one of the Lewes gateways. This is not so as the National Park boundary is not at these points and so the

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				<p>implication should be removed. In addition the two Egrets Way points beside the Civic Amenity Site in Ham Lane and Kingston Road as well as the continuation of Landport Road towards Offham could be included here.</p> <ul style="list-style-type: none"> • Page 135 – The Reference to St Michael's Churchyard (No 55) needs to be more explicit as there are 2 St Michael's Churches in Lewes. • Pages 140 & 141 – Note 10 – The electricity sub-station and Environment Agency building do not block the route but simply the fence around them as mentioned in para 3 of the left hand side of the policy supporting text on page 139. <ul style="list-style-type: none"> – <u>Comment on the Basic Conditions statement</u> <p>Page 8 – Right hand side para 1 – This implies that the HC policies are included simply to protect employment in the town centre. This implication should be removed.</p>
R34.	Ann Link, on behalf of Transition Town Lewes	20/07/2018	Email	<ul style="list-style-type: none"> • Transition Town Lewes welcomes the Lewes Neighbourhood Plan. It is a great credit to all who worked so hard to develop it. • TTL strongly supports the twelve objectives on page 28. Plan acknowledges dependence on the surrounding land, air, water and biodiversity for its physical, economic and mental wellbeing. Biodiversity and the ecosystem design approach fully integrated into the Plan, e.g. in the consideration of every potential housing site. • We welcome the Lewes Low Cost Housing.
R35.	Rebecca Pearson, on behalf of Natural England	21/07/2018	Email	<p>Natural England welcomes this Plan. In particular Policy L1 regarding Natural Capital and links to Ecosystems Services. We welcome provision for Biodiversity Net Gain in Policy L2. We again advise that LE2 is not clearly echoed in the Design Guidance and that this needs to be addressed. The Plan clearly complements the emerging SDNPA Local Plan and has great potential to embed strategic Green Infrastructure. We note and welcome that the plan recognises the need to seek cross-boundary landscape-scale delivery.</p>

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				<ul style="list-style-type: none"> • Objectives <ul style="list-style-type: none"> – Objective 5 Environmental Design - We support this objective – Objective 6 Easily Moving Around - We strongly support this objective and advise that this could form part of a Green Infrastructure network through the town. – Objective 8 Natural Environment Green Spaces and Biodiversity. Support and advise that this could form part of a Green Infrastructure network and linked to Objective 6. – We advise that the term <i>character</i> is one which is more frequently used for landscape and that this objective should seek for development to provide biodiversity net gain to compliment Policy L2. We further advise that green spaces should incorporate wildlife habitats for local people to enjoy. • Neighbourhood Plan Policies <ul style="list-style-type: none"> – Policy LE1 - We strongly support this policy – Policy LE2 - We fully support the requirement to demonstrate biodiversity net gain in this policy. – We support text which advocates the creation of linkages and wildlife corridors through the town. We note and welcome that it cites the National Park Local Plan Strategic Policy SD12 and how the Neighbourhood Plan policy will compliment this Local Plan Policy. We support that net gain should be incorporated on site, but if this is demonstrably not possible, across the town area. We further welcome the inclusion of landscape-scale planning for biodiversity. Again this could be linked to a multifunctional GI strategy for the town, which incorporates cycle routes, walking routes, educational opportunities, and wildlife corridors. – We advise that the use of wildflowers and native planting throughout the town would act as key stepping stones and bee-lines for biodiversity throughout the town and onto the surrounding countryside. – With regard to brownfield sites we advise that these can contain key habitat for biodiversity which should be noted here. I refer you to our letter of Jun17 which also advises this.

Reference	Name / Organisation	Date received	Method of submission	Summary of representation
				<ul style="list-style-type: none"> <li data-bbox="981 212 2210 403">– The Plan should give appropriate weight to the roles performed by the area’s soils. These should be valued as a finite multi-functional resource and take account of the impact on land and soil resources and the wide range of vital functions (ecosystem services) they provide in line with para 17 of the NPPF, for example to: <i>Safeguard the long term capability of best and most versatile agricultural land (Grades 1, 2 and 3a in the Agricultural Land Classification) as a resource for the future.</i> <li data-bbox="981 427 2210 659">– Policy PL1 - We question the designation of this site as <i>brownfield</i>, as the site includes a number of mature trees and greenfield areas. We note that the existing value of the site for natural capital has been identified and we advise that the existing biodiversity value of the site will also need to be carefully assessed in order to achieve net gain. We note that this site may also be vulnerable to flooding and advise that SuDs may be appropriate here. If well-designed they can also enhance ecosystems services and provide wildlife habitats. <li data-bbox="981 683 1211 715">• Design Guidance <li data-bbox="981 738 2210 810">• Green Space - green space should not be limited to amenity provision but also provide key opportunities for the incorporation of biodiversity and stepping stones for wildlife through the town <li data-bbox="981 834 2210 1066">• Biodiversity - We note with concern that this guidance does not compliment the provision for net gain in policy L2. It lacks this policy’s robustness and we advise that for the avoidance of doubt, the design guidance echoes this strong policy and is revised accordingly. We advise that this guidance does not provide for biodiversity net gain, it provides guidance for developments to provide evidence that the development <i>will not to lead to a loss of biodiversity</i>. We advise that this is insufficient if the plan is to achieve the strong requirements of Policy L2. <li data-bbox="981 1090 2210 1281">• PL3 Flood Resilience - We strongly support this which provides for the challenges of climate-change driven flooding. We support the provision of permeable infrastructure and the incorporation of SuDS into all new developments and public realm improvements. This provides key mitigation and benefits including flood amelioration, reduced runoff, reduce water pollution, opportunities for wildlife and biodiversity and further potential for inclusion in a Green Infrastructure network. <li data-bbox="981 1305 2210 1377">• PL4 – Renewable Energy and Efficiency of New Buildings - We welcome this policy as these are key considerations for climate change planning.

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				<ul style="list-style-type: none"> • AM1 - We support this policy to reduce emissions, increasing cycle routes and supporting movement of those with mobility issues allows more people to access natural green. This again could for part of the local Green Infrastructure Network. We advise that these should link up to residential communities if they are to be effective. • AM3 - We advise that making improvements to air quality, reducing congestion, supporting electric vehicles and the car club network all help reduce emissions and air pollution in line with the NPPF's aims. • SS1 - historic streets: We welcome this policy, by protecting these aspects in line with the NPPF (109. 114. 115.) • SS2 - We advise that access to green space has multiple benefits to wildlife and people such as health and wellbeing and education these areas should be valued as a key resource for the town. <p>Public realm strategies:</p> <ul style="list-style-type: none"> • We strongly support the concept of providing countryside gateways which are valuable components of Green Infrastructure and could link with an improved cycle network. Traffic calmed streets; reducing vehicular traffic will help reduce emissions and air pollution Animated river corridor; strengthening sense of engagement with the river Ouse will increase its value as green/ blue infrastructure in line with the NPPF (114.) and for providing opportunities for recreation and health and wellbeing benefits. <p>SS3 protection and enhancement of green spaces.</p> <ul style="list-style-type: none"> • Protecting local green spaces ensures that their GI value, for people, wildlife and ecological network is maintained. • SS3 3- Support this policy incorporating green spaces and habitat corridors into a multifunctional GI network. • SS3 4 - we support policies which require an increase in biodiversity, increase the GI. We advise that SS3 4 should also include that outdoor space should be designed to maintain/improve ecological networks and care should be taken to incorporate corridors for wildlife (hedgehogs for example) through housing developments.

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				<ul style="list-style-type: none"> • SS3 5 - We welcome this section which requires landscape quality to be enhanced in any development • SS3 6 - We support the protection of wildlife corridors and priority habitats from development, Priority Habitats and Species are of particular importance and are included in the England Biodiversity List published under section 41 of the Natural Environment and Rural Communities Act 2006. This also contributes to natural capital value, Green Infrastructure and ecological networks. • SS3 7- supporting community food production provides natural capital and can contribute towards overall biodiversity if pesticide use is discouraged. • SS4 River Corridor Strategy - We note this policy and advise that improving accessibility around and to the river allows great potential for health and wellbeing, recreational and educational benefits. It also recognises the potential for this area to enhance the town's Green Infrastructure. We support the provision for ensuring developments will not affect flood risk along the corridor and will not impact the river's natural function. This is of key importance. • Neighbourhood projects - We note and support projects for improvements for pedestrians and cycle networks. These need to link to new and existing residential areas if they are to be effective in reducing private vehicle use and thus reducing emissions and air pollution in the town. Again these can form strong components of a multifunctional Green Infrastructure network.
R36.	Megan Pashley, on behalf of Gladman Developments Ltd.	23/07/2018	Email	<ul style="list-style-type: none"> • Gladman requests to be added to the Council's consultation database and to be kept informed on the progress of the emerging neighbourhood plan. • The PPG makes clear that neighbourhood plans should not contain policies restricting housing development in settlements or preventing other settlements from being expanded. It is with that in mind that Gladman has reservations regarding the LNP's ability to meet basic condition (a) and (d). • Policy LE1 Natural Capital & Policy LE2 Biodiversity - state that proposals for development will be required to demonstrate a net gain in natural capital and biodiversity. Policy LE2 states that if significant harm to biodiversity results from development, the planning permission should be refused. Para 113 of the NPPF refers to the need for criteria-based policies in relation to proposals affecting protected wildlife or geodiversity sites or landscape areas, and that protection should be

Reference	Name / Organisation	Date received	Method of submission	Summary of representation
				<p>commensurate with their status which gives appropriate weight to their importance and contributions to wider networks. As currently drafted, Gladman do not believe this policy fully aligns with the Framework. The policy fails to make a distinction and recognise that there are two separate balancing exercises which need to be undertaken for national and local designated sites and their settings. We therefore suggest that the policy is revisited to ensure that it is consistent with the approach set out within the Framework.</p> <ul style="list-style-type: none"> • Policy HC3 (a) states that development proposals that obscure or result in the loss of the positive characteristic of significant views will be resisted. We submit that new development can often be located in areas without eroding the views considered to be important to the local community and can be appropriately designed to take into consideration the wider landscape features of a surrounding area to provide new vistas and views. In addition, as set out in case law, to be valued, a view would need to have some form of physical attribute. This policy must allow a decision maker to come to a view as to whether particular locations contains physical attributes that would ‘take it out of the ordinary’ rather than selecting views which may not have any landscape significance and are based solely on community support. • Policy PLI General Housing Strategy - states that no greenfield sites outside the settlement boundary, outside of the proposed Malling Farm allocation, should be developed in the plan period. Whilst Gladman recognise the special circumstances that exist in relation to Lewes’ location in the South Downs National Park, we consider the above unnecessarily restrictive and as such do not consider that in its current form the policy responds positively to the needs of the wider area. Gladman do not consider the use of settlement boundaries to be an effective response to future development proposals if they would act to preclude the delivery of otherwise sustainable development opportunities, as indicated in the policy. The Framework is clear that development which is sustainable should go ahead without delay. The use of settlement limits to arbitrarily restrict suitable development from coming forward on the edge of settlements does not accord with the positive approach to growth required by the Framework and is contrary to basic condition (a). Beyond, this, Gladman consider it necessary that the policy recognises, that within the plan period, it may be necessary for greenfield development, outside the settlement boundary, to come forward to assist


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				with meeting local housing needs. As such, we recommend that sufficient flexibility is established in the policy so as to ensure that the plan can adjust to any local changes.
R37.	Dr Jennifer Chibnall	23/07/2018	Email	<ul style="list-style-type: none"> • Support for the Lewes Low Cost Housing policy. • 2.1 <i>Housing</i> -; There is nothing for sale in Lewes under £200,000 except retirement flats. New houses are now low density to avoid the requirement for affordable housing. Lewes DC are committed to providing properly affordable housing and we worked with them on this. They are investigating modular and other alternatives and we arranged with Zedfactory to provide Zedpod designs for two of the LDC sites, which they selected, from those in our Plan. • 1 <i>Heritage</i>; Objective 13 concerning heritage was inadvertently omitted in the submission version of the Plan; Lewes is special because of its history, its distinctive streetscapes and over 500 Listed buildings. Reference needs to be made to objective 13 in the table in Appendix 1 in relation to HC1, HC3, HC4, HC5, PL2 and SSI. • 3.2 - Some of the documents establishing heritage concerns are not very readily available - links to these could be provided in an Appendix to the Plan. The County Archaeologist provided us with the Historic Urban Character Assessment report by Roland B, Harris which can be found in part in https://www.lewes-eastbourne.gov.uk/resources/assets/inline/full/0/259656.pdf https://www.lewes-eastbourne.gov.uk/resources/assets/inline/full/0/259662.pdf which includes a map of the HUCA's. https://www.leweseastbourne.gov.uk/_resources/assets/inline/full/0/259654.pdf • A map of the conservation areas might also be usefully included. • 4.1 - <i>Local Consultees</i>; In consultation with the National Park a list of local organisations which it is recommended that developers consult to make the process of assessing the heritage concerns of any site easier for everyone should has been provided. • 4.2 I would suggest that there should be a similar list of local environmentalists and wildlife experts to advise as there is of local heritage experts as very local knowledge is important in maintaining and improving biodiversity. If school projects could be involved this would surely be of help in establishing the ecosystem approach.

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				<ul style="list-style-type: none"> • 5.1 <i>North Street</i>; Historic England drew our attention to the threat to the industrial heritage of Lewes. There is reference in our Plan to the Local Plan policy on the North Street strategic site. There has been considerable delay on this development - Changes to the permission may indeed therefore prove necessary. • 5.2 - We understand that while the Plan cannot allocate housing on strategic sites other policies do apply, in this case most especially those preserving heritage and providing ecosystem services and sustainability. The error in the HUCA report concerning the dating of the Phoenix buildings led to the inadvertent threat to the nineteenth century floor foundry building with its timber roof with cast iron joints, where so much of the railway and seaside cast iron and steel work of the region was made. The early steel framed buildings on the site were also manufactured by Everys and are suitable for re-use as housing or workspace. • 6.1 - <i>Historic Core</i>; There was also some question in earlier stages about our distinction between the historic core and the wider conservation area. We felt that in the wider conservation area it was acceptable to introduce more modern buildings, as has indeed been permitted, whose scale in particular would damage the medieval and Georgian core. The town is not homogenous. The North Street industrial area for example would be suitable to be developed in a very different manner respecting its existing industrial texture and in time we hope might thus become a 'destination' for visitors just as the historic core now is.
R38.	Elizabeth Thomas	23/07/2018	Email	<ul style="list-style-type: none"> • Fully support the Neighbourhood Plan - The comments below refer to some small omissions: • Introduction - On page 8, no mention is made of the fact that from the beginning an early parameter was set that settlement boundary should remain unchanged. Only if sufficient land could not be found, could any sites outside the boundary be brought back for consideration. However, sufficient land was found and the boundary remains unchanged from the one defined by Lewes District Council. • Page 10, para 1.20 - There were 13 objectives not 12 - the Heritage and History objective seems to have been missed off in transferring the final edit to the consultant. <p>Lewes and Our History</p> <ul style="list-style-type: none"> • Page 18, para 2.16 - The sentence at the end re bonfire societies was moved in the final edit to the

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				<p>end of para 2.18. The reference at the end of para 2.16 should have been deleted.</p> <ul style="list-style-type: none"> • Page 19, para 2.24 - Reference to Listed buildings should have a cross referenced to an appendix of Listed Buildings in order to inform developers. • Page 20, List - It should be noted that the reference to the Sussex Downs College (not Southdown College) should now be to the “East Sussex College Group”. • The number 16 should be either centred or duplicated further south to link to the undeveloped land between Houndean and the Nevill estate to better represent the protected Lewes Battlefield. <p>Neighbourhood Plan Objectives</p> <ul style="list-style-type: none"> • Page 28 - After final edit, the objective, relating to “the unique, historical geographical and cultural heritage” has gone missing. The protection of the historic heritage should be reinstated together with relevant cross references to it, as in the tables beginning on page 149. • Objective 13 should be added seeking the: "<u>13. Protection of the historic environment</u>" • Page 31 - text should be reinstated: "<u>The Historic fabric of Lewes will be protected and enhanced from harmful development and neglect. The historic core will continue to be a tourism destination and Lewes will continue to be a place where people choose to visit.</u>" <p>Lewes: Our Environment</p> <ul style="list-style-type: none"> • Page 36 - Policy LE2, 1. There is no Reference to the need for developers to assess the <i>current</i> biodiversity of the site in the policy text although the assumption in the policy and supporting text re biodiversity gain implies this. Inserting "<u>Developers will assess the current biodiversity of their sites and...</u>" at the beginning of the policy would make the assumption requirement clear. <p>Heritage and Community</p> <ul style="list-style-type: none"> • Page 41 - Policy HCI (3) was edited to make it clear in para 3 that any loss of community facilities should be provided “elsewhere <u>in the neighbourhood</u>". This qualification has gone missing in the final edit. The supporting text on: page 42, para 7.2 reinforces the need for local replacement but is not in the current version of the policy itself.

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				<ul style="list-style-type: none"> • Page 42, para 7.5 line 12 - delete “for changing children” - that is not the purpose of a nursery but the purpose for which the original WC was used! Final line: it would be helpful to replace “reaching’ with ‘using’ to more accurately refer to the use of the Egrets Way. • Page 44. The reference in the policy - former para 3 to North Street has been removed in a late edit which leaves the supporting text in para 7.12 unclear to readers. To make it clearer the first sentence should read “If for some reason the current development proposal <u>for North Street</u> does not proceed” • Page 50 – the two Conservation Areas and extensions of the Lewes Conservation Area, should be an appendix in the document. In para 7.21, the correct reference should be to "The Historic England 'Register of Historic Parks and Gardens of special historic interest in England', established in 1983, currently identifies over 1,600 sites assessed to be of particular significance. “There are none within the Neighbourhood Plan Area that have been so defined to date. • In para 7.23, it would be helpful to add “(HUCA)” after the full title once it is used as an abbreviation in the housing summary sheet References. • Page 55 - AQMAs could be defined on a map or a cross reference made to the most up to date map. <p>Good Places for Living (Housing)</p> <ul style="list-style-type: none"> • Policy PL1 saw a late redrafting when “where deliverable” was inserted. This was not part of the policy as drafted originally. It should be balanced in the policy itself with a list of other alternatives, e.g. transferring land in lieu of the affordable housing sought, - or a statement that any permission will be conditioned to ensure an affordable housing provider has been signed up to deliver the affordable housing, including LLCH. • Page 57, policy PL1, para 3. In the supporting text reference is made to a preference for 1, 2 and three bed dwellings (para 8.6) but this is not reflected in the policy. Inserting “<u>Preference will be given to smaller housing units that is 1, 2 and 3 bedroom dwellings.</u>” would guide developers to

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				<p>the sort of housing needed as opposed to 'saleable' in the town.</p> <ul style="list-style-type: none"> • In the footnotes to PLI, it would be helpful to add that "<u>Where a developer is unable to deliver LLCH, land may be given in lieu of LLCH units to housing association, housing co-operatives or community land trusts to provide such housing where developers consider that they cannot deliver housing that is affordable on local salaries, see para 8.5.</u>" NB the opening sentence of the para Refers to 'small builders'. This would be better phrased as 'smaller building firms' since the stature of the builders is not in question! • Under the 'Key projects and actions' the question of decking was <u>above</u> existing car parks. The wording "over" lead to confusion with the public who thought that implied a loss of parking. • Page 62, para 8.16, Reference can now be made to the approved Supplementary Planning Document "<u>Lewes District Affordable Housing SPD, approved by cabinet on 2nd July 2018 for adoption by the full council on 16th July 2018.</u>" It highlights gap between local incomes and housing cost/price. • Page 63, a table separating sites already granted planning permission for the newly identified sites was deleted as a late change and a combined table inserted. However, the deleted table high lit the scale of the problem in trying to provide affordable housing in Lewes. This needs to be finalised as planning permission had not then been granted for the conversion of the office accommodation to housing. Para 8.22 was altered to refer to affordable housing on the magistrates' car park site. It was our understanding that the final permission only secured a commuted sum towards housing, but no affordable housing on site. See also PLI (26) where final number of housing units should be inserted. • Para 8.28. It should be noted that "<u>all the identified sites lie within the settlement boundary, as required by the Town Council at the outset of the plan drafting.</u>" <p>Appendices</p> <ul style="list-style-type: none"> • It would be helpful to identify the two Conservation Areas and list buildings identified by Historic England in Lewes and Ancient Monuments, including extent of the Lewes Battlefield and HUCA areas. • Regarding biodiversity, it would be helpful to include a map of extant TPOs and adjacent SSSIs.

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R39.	P. Rowntree, on behalf of the Lewes Community Land Trust	23/07/2018	Email	<ul style="list-style-type: none"> • I urge the use of Lewes Community Land Trust as a fit-for –purpose vehicle for delivering the social housing that Lewes so badly needs. Community Land Trusts have been utilised very successfully elsewhere to bring forward small pieces of land for development as well as providing larger scale social housing provision in urban settings. • The cost of land is a crucial factor in achieving locally affordable housing – particularly given the reduction in the levels of government grant available. In this respect, publicly owned land / buildings provide the principle opportunities and should be highlighted in the Plan. • There are significant land / buildings owned by the public sector e.g. St Anne’s School Site - which should be utilised to provide essential locally affordable housing. Public authorities should be urged through the Plan to give greater consideration to Social value, not just interpreting ‘best value’ in monetary terms.
R40.	Vivien Halas	23/07/2018	Email	<ul style="list-style-type: none"> • Concern about the additional vehicle traffic from proposed housing developments. A reduction in vehicle movements in the town is needed particularly during rush hour as these make it very dangerous for people to walk or cycle. Action needs to be taken to minimise the number of private cars per household. The proposal is likely to mean more “rat running” through back streets. This development should provide for vehicle access to Western Road through the County Hall site/care park and not onto Rotten Row. • Example here is what happened this morning from huge trucks coming out of Saint Pancras Road when they should not. This kind of thing happens frequently. 

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R41.	Louis Blair	23/07/2018	Email	<ul style="list-style-type: none"> • It is an excellent and very thorough report, I would add a few comments. • Strongly support the Plan's encouragement for more locally affordable housing. • There are significant land/buildings owned by the public sector e.g. St Anne's School Site - which should be utilised to provide essential locally affordable housing. • The cost of land is a crucial factor in achieving locally affordable - publicly owned land / buildings provide the principal opportunities and should be highlighted in the Plan. • Para 3.4 - Provision for one day events such as Bonfire should be irrelevant in the context of a Neighbourhood Plan . • Para 7.5 - Under used public WCs outside the Town Centre may be a luxury at a time when such publicly owned land could be used to provide much needed affordable housing. • Para 7.9 - The garage adjacent to the bus station is both underused and an eyesore and should be considered as a potential Development Site. • Policy PL1 – 2 – Options other than Lewes Low Cost Housing should be considered as they will still meet the needs of much of the local community. A menu of options will be helpful to often "Hidden" households ineligible for social housing and priced out of home ownership and the PRS. • Policy PL 4 – No mention is made of the possible CHP plants on larger developments. • The Plan (4.9 and 5.11) needs to give more encouragement to fully utilising existing land and buildings in far more creative ways – for example housing over supermarkets. • Housing options (4.11) should include land / buildings for renovation / self-build / self- finish. • Greater emphasis needs to be given to the importance of <i>balanced and sustainable communities</i> (5.6) – with strong encouragement for 'pepper-potting' locally affordable housing provision on all developments (particularly the strategic sites) • The Plan should encourage new homes to be built to Lifetime Homes design standards: http://www.lifetimehomes.org.uk/pages/about-us.html (5.24)

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				<ul style="list-style-type: none"> • Greater emphasis should be given to fully utilising <i>all</i> public-sector land / buildings – much of which is not referred to in the Plan (8.2) - as 2 above. If fully utilised this could reduce the Old Malling Farm development requirement. • Fully utilising housing above shops / offices in the centre of town can play an important part in increasing provision, alleviating the need for larger sites and add essential vibrancy to our town centre at night. This needs to be referenced (8.5). • The Neighbourhood Plan (8.5) (and SDNP and LDC policy) should be encourage community led housing being the first option considered for all locally affordable housing provision. • The retention of locally affordable housing is vital – not just building it. Utilising community organisations such as the Community Land Trust to enable housing to be community owned in perpetuity should be emphasised (8.5). • Community Land Trusts are able to establish local rent / sale policy reflecting local incomes which should also be referenced. The asset lock provided by organisations such as Community Land Trusts is fundamental to ensuring housing remains in perpetuity for community benefit. • Stronger emphasis to deliver much needed locally affordable homes and <i>not</i> accepting commuted sums (8.25).
R42.	Kim Dawson, on behalf of the Open Spaces Team, Lewes & Eastbourne District Councils	23/07/2018	Email	<ul style="list-style-type: none"> • Page 23 Para 3.4 - Incorrect name of location for <i>Borough Bonfire Society (est. 1853)</i> and <i>Nevill Juvenile Bonfire Society (est. 1967)</i> correct Motor Road off Nevill Road to ‘Landport Bottom’. • Section 5 - The twelve objectives – all ‘<i>of equal importance</i>’ and based on community consultation includes 8. <i>Natural Environment, Green Spaces & Biodiversity</i> – the Vision Statement (on Page 25) does not reflect this objective and should include environment / biodiversity reference – suggested amendments in red: • “<i>Lewes has a rich and unique historical, geographical, environmental and cultural heritage. ... where business and the arts, alongside biodiversity flourish , quality of people’s lives and the environment matters ...</i>” • Para’s 4.2 – 4.11 – needs to be amended to achieve NPPF <i>No Net Loss, with Net Gains</i> of Biodiversity as underpinned by the NERC Act 2006 and Biodiversity 2020 commitments made by the government.

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				<ul style="list-style-type: none"> • Page 29 Section 4 - Para 5.10 'Efficient Use of Land', inclusive of all references to 'Brownfield Land' in line with Government guidance (as listed), that Brownfield land can have a high ecological value (gov.uk/guidance/natural-environment). • Section 8 - Para 5.18 Natural Environment, Green Spaces & Biodiversity – current wording does not meet with policy / legislation – wording amended so as to comply i.e. '5.18 Development that delivers biodiversity gains, promotes the importance of green areas.....' and '5.19 Biodiversity gains will be achieved through connections..... Practical measures will include urban wildflowers and trees linking to meadows and woodlands on the edge of town alongside inclusion of green roofs and green walls, with the prioritisation of native and local provenance species planting, over the less valuable and cost effective use of non-native ornamental species. Measures should be taken where necessary to prevent a decline in biodiversity and provide robust habitats and ecosystems for future generations.' Add in reference to the protection of current natural resources i.e. Local Nature Reserves / Local Wildlife Sites (SNCI), with the prioritisation of sympathetic neighbouring / adjacent / adjoining development including linking up via Green Infrastructure (GI). • Section 9 Climate Change - 5.20 All new development will be resilient to climate change ... The chalk aquifer which provides Lewes's drinking water must be preserved from pollution and water levels maintained including by 'building' in natural capital / ecosystem services mechanisms. Green spaces, Sustainable Urban Drainage Systems (SUDS), materials and surfaces will help to tackle flood risks by slowing rainwater absorption rates, and help achieve biodiversity gains. • Page 37 Box - How do we build Biodiversity? Current definition is technically incorrect – amend as follows - To build in biodiversity, we need to include and secure areas that for natural habitats and habitat mosaics suitable to support a variety of flora and fauna for the long-term. Including providing connectivity within and between sites to achieve natural migration, dispersal and genetic mixing requirements. • Para's 6.12 & 6.13 Tree Root Protection Areas need to be specifically referenced due to roots being indirectly damaged or destroyed meaning the tree will slowly die - Suggested amendment ... 'Trees (including protection of their Root Protection Areas) should be incorporated into developments as much as possible as part of a wider integrated strategy to enhance biodiversity and to deliver other valuable

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				<p>ecosystems services e.g. air quality, flood risk mitigation, urban heat island effect impacts etc., the setting of Lewes; choice of tree species to be based on a thorough understanding of the specific biodiversity needs of each site, and of well-considered <i>provenance</i> with connectivity of the features paramount to achieving green infrastructure / landscape corridors.</p> <ul style="list-style-type: none"> • Para 6.17 Brownfield sites - As linked to point 4 above, it this should read ‘On sites where biodiversity is currently limited which includes some brownfield and agricultural sites, it is relatively straightforward...’ • No mention of Local Wildlife Sites in whole document – refer to point 5. • Para 10.44 amendment to wording to ‘Introducing new housing and animated edges to the workspaces along the river could help create the active riverside edge that is required and could help to fund other aspects of this river corridor strategy. This should include funding of education about the river and water ecosystems based at Lewes Railway Land Local Nature Reserve; • CIL Para 11.6 Improvements for Pedestrians addition of point 14) Restoration of the Access for All route through Lewes Railway Land which was one of the few truly wheelchair accessible routes in Lewes and the wider area with a countryside feel; and • Policy PL1 (53) — Former St Anne’s School Site There is an allocation of Housing for this site, but the policy fails to recognise the need to undertake appropriate consultation with a number of key stakeholders, including Lewes District Council and those parties already expressing an interest in the site. Lewes District Council has previously been part of a bid to have some of the site allocated as additional burial space as an extension to Lewes Cemetery.
R43.	Nick Hollands	23/07/2018	Email	<ul style="list-style-type: none"> • Support for the plan. I would nevertheless like to make the following points:- • Page 144, Improvements for Cyclists, the text should be reviewed to a less colloquial style and consideration given to potential cyclist improvements along Malling Street between The Spinneys/The Nurseries junction and roundabout at the end of the Cuilfail Tunnel. This is currently a truly scary experience for cyclists. • Secondly, on pages 163 and 167, View 08 is referred to as 'Eastwards' from surrounding hills across the town. I believe this should be 'Westwards'.

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R44.	Martin & Margaret Sheppard	23/07/2018	Email	<p>Policy PL1 (53) St Anne's School Site</p> <ul style="list-style-type: none"> • Para 1-7 are acceptable if housing units are not too high and blend into the surrounding area. • Para 8 is a concern as flooding already occurs from the adjacent County Council site. • Para 9 presents at least two difficulties: (a) Access to the site from Rotten Row is difficult for construction vehicles and for servicing the estate. (b) Access arrangements onto Rotten Row at junction with A2077 are especially difficult as no construction and other large vehicles can get from the A2077 to Rotten Row. • Is access not possible to this site from the north over East Sussex Council land?
R45.	Chris Flavin, on behalf of East Sussex County Council	23/07/2018	Email	<ul style="list-style-type: none"> • 1.2 Vision and key principles are supported, but a number of issues, most raised at Pre-submission version, Reg 14 have not been included. • 1.3 Comments should be read in conjunction with parts of ESCC response dated June 2017, extracts included in Annex 1 for ease of reference. <p>Feedback relating to the Consultation Statement</p> <ul style="list-style-type: none"> • 1.4 Concerns that the Plan doesn't address all the County Council's comments from the pre-submission consultation. <p>2. General Infrastructure</p> <ul style="list-style-type: none"> • Section 11 'Projects List' and Para 11.3: 'Neighbourhood Projects' (page 142-145) • 2.1 Needs to be clearer in communicating that this is not a Planning Policy and that there is no guarantee that the projects will be delivered. Although para 11.3 is not titled as being a policy, it is referred to as a 'Policy' on the previous page (p142), the formatting and text font also makes easy to mistake this for a Policy. We recommend changing the wording, fonts and formatting and moving Section 11 'Projects List' into an Appendix or Annex so that it is clearly separate to the statutory Planning Policies. <p>3. Transport Development Control</p>

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				<ul style="list-style-type: none"> • 3.1 We wish to reiterate the points provided in our previous comments regarding the need for the Plan to be consistent with ESCC Parking standards. To justify a change to this approach we would wish to see some clarification/further rationale on this matter (comments Annex I below). <p>Garage sites</p> <ul style="list-style-type: none"> • 3.2 We reiterate points from our previous comments regarding the need for surveys in order to ensure that the proposed allocations do not give rise to unacceptable parking pressures in their locality. We will require surveys in order to demonstrate the existing levels of usage of the garages (for parking vehicles) which will identify any displaced parking through the loss of garages. Our strong preference would be for such surveys (site specific) to be undertaken at the plan-making stage. As this has not been done, we would wish to see the relevant policies that concern such allocations to include a criteria that requires this information as part of any application. However, it is recognised that satisfying such a criteria may not be possible and this could question the deliverability of the proposed allocations (particularly in planned quantum of residential units). <p>Transport Statements</p> <ul style="list-style-type: none"> • All site allocations should include the need for a Transport Statement. <ul style="list-style-type: none"> – <u>PLI (2) Land at Astley House and Police Garage</u> <p>We previously advised that the sightlines would need to be appropriate to the 30mph speed limit: 2.4m x 43m. The Policy wording is however, non-specific by stating ‘<i>sightlines should be appropriate to context.</i>’</p> – <u>PLI (3) Land at the Auction Rooms</u> <p>Policy does state that redesign of access is needed – but does not address the visibility issue raised in our previous comments. Improvements are required to the existing vehicular and pedestrian</p>

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				<p>accesses to improve the angle/junction radii and visibility – we would request that this is added as policy criteria.</p> <p>– <u>PLI (8) Land at Buckwell Court, Garage Site</u></p> <p>Our previous advice to add a policy criteria which requires the provision of a turning head on the site, has not been taken on board.</p> <p>– <u>PLI (44) Land at Prince Charles Road Garage Site</u></p> <p>In point (5) a comma needs to be inserted after the word “narrow” to emphasise the narrow vehicular access and separate pedestrian issue.</p> <p>– <u>PLI (52) Land at St Anne’s Crescent</u></p> <p>The displacement of the car park is not satisfactorily addressed as it could potentially affect other local surrounding roads and not just St. Anne’s Crescent. We therefore suggest that point 4 states “.....displacement of car parking on surrounding roads.”</p> <p>– <u>PLI (57) Land at Lewes Railway Station Car Park</u></p> <ul style="list-style-type: none"> ▪ The reference to Southover Road being the most likely option for a new site access (footnote 1. on page 100) should be removed. ▪ Criteria 5 of Policy PLI (the requirement to redesign Pinwell Rd junction with Station Rd) should also be removed. Refer back to our previous Reg 14 response (Annex 1 below) ▪ Traffic implications would need assessing and any significant increase in traffic is likely to require improvements to Pinwell Road at its junction with Lansdown Place/Southover Road. ▪ ‘Improve access and egress to the railway station car park’ in Key Projects and Actions under Car Parking Strategy (last para on page 117). This will be challenging and difficult to achieve due to geometry of local road layout and lack of land control in the locality. Therefore the inclusion of this paragraph could give people an unrealistic expectation as to what would be possible to achieve. <p>Transport Strategy</p>

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				<ul style="list-style-type: none"> • Changes recommended in Reg 14 consultation don't appear to have been incorporated into the Submission version. We would therefore like to re-iterate all of the Transport Strategy comments (Annex I below). <ul style="list-style-type: none"> – <u>Policy AM2 'Public Transport Policy' and Policy AM3 'Car Parking Strategy'</u> <ul style="list-style-type: none"> ▪ The wording and the requirements of these two Policies are not considered to be suitable for statutory Neighbourhood Plan Policies. The Town Council should therefore consider changing the Policies to 'Aspirations' or 'Community Aspirations'. ▪ The use of wording such as '<i>new developments.....will be expected to contribute</i>' is not suitable and furthermore, it is not clear as to how exactly they would be expected to contribute. <p>Flood Risk Management</p> <ul style="list-style-type: none"> • As the Lead Local Flood Authority (LLFA) we are concerned over the consistency of policy statements relating to the draft allocated sites. For example, Sustainable Urban Drainage (it is simply Sustainable Drainage) plans are required on some sites but not others, it is not clear why this is. The terminology used in the plan is incorrect which could have been resolved by reviewing the guidance the LLFA offers on the County Council's website. The strategic policy of relevance to this subject area and Neighbourhood Plan (Core Policy 12 of the Lewes District Joint Core Strategy) sets a clear policy for addressing surface water drainage in new developments (particularly criteria 5 of this policy and paragraph 7.111 from the supporting text). However, this does not seem to have been followed through in a consistent manner in the Neighbourhood Plan. • Equally Policy PL3 Flood Resilience is confusing as clauses 1 and 2 appear to expect new development to address town wide issues. <p>Archaeological Heritage</p>

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				<ul style="list-style-type: none"> • Some comments made during Reg 14 consultation have been addressed, but a number of points remain: • Heritage & Community section still makes little mention of archaeological / historical interest of the town. • There is no obvious reference to the East Sussex Historic Environment Record. • Some Allocation sites mention the need for archaeological assessment, we would strongly recommend that such assessments should be carried out at a very early stage (i.e. prior to the submission of an application), so as to clarify the significance of any buried remains that could have a bearing on viability of the developments proposed. We would suggest that this point is emphasised within the plan: <ul style="list-style-type: none"> – <u>Policy PLI (26) — Land at South Downs Road</u>: needs to include an archaeological assessment requirement. – <u>Policy PLI (48) — Land at Former Ambulance Headquarters, Friars Walk</u>: the archaeological assessment should be an early requirement as this site is known to contain buried remains. – <u>Policy PLI (52) — Land at St Anne’s Crescent</u>: an evaluation excavation assessment of this site would be required, not an archaeological watching brief. <p>County Ecologist</p> <ul style="list-style-type: none"> • The natural capital and ecosystems approach taken to the plan is welcomed. However, a number of the recommendations which were made for the Regulation 14 consultation have not been incorporated into the submission version: • The vision statement still makes little/no reference to the rich environmental heritage, as recommended. However, it is recognised in section 6. • The revisions summary table on page 18 states that minor adjustments have been made to Policy LE1 Natural Capital, although it is unclear what these are. The Policy still only requires an assessment of existing and provision of new natural capital for larger sites. Such an assessment should be applied to all sites.

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				<ul style="list-style-type: none"> • Minor adjustments have been made for LE2 Biodiversity but the accompanying text remains unclear. It promotes biodiversity offsetting with no plan of how this will be assessed. It also remains unclear what the parameters are for undesignated sites. No reference is made to the need for Ecological Impact Assessments. • Policy PLI General Housing Strategy - supporting text for point 4 makes no reference to potential biodiversity value of brownfield sites. Currently implies that developments on brownfield sites will be supported provided they meet housing requirements but with no reference to biodiversity. It is widely recognised that brownfield sites can have high biodiversity value. • All applications for housing developments should be informed by an Ecological Impact Assessment. The current version only requires this for PLI (8), (21), (26), (35), (39), (44), (46) and (53). It is noted that the design guide states that all developments should make an assessment of biodiversity. <p>Air Quality</p> <ul style="list-style-type: none"> • No reference to the Air Quality Management Area (AQMA). As in Reg 14 response, the plan needs to acknowledge that part of Lewes town centre is covered by AQMA. Although improving air quality is mentioned in certain policies and proposals within the plan, where relevant, you may wish to identify the need to improve air quality in the AQMA as a driver behind the policy/proposal. <p>Highway (Transport Development Control) Regulation Comments</p> <ul style="list-style-type: none"> • Should planning applications be submitted in pursuant of these allocations, it is likely that we will request further information to be provided that enables us to fully consider the highway implications of the proposals. In this regard, we would suggest that reference is made to the relevant pages of the County Council's website see: https://www.eastsussex.gov.uk/environment/planning/applications/developmentcontrol/tdc-planning-apps/), which provide information on what matters we would wish to see addressed in any applications. • On-site parking provision should be consistent with County Council's Guidance (see: https://www.eastsussex.gov.uk/media/1759/parking_guidance_residential.pdf). On-site parking provision is particularly important, as residents parking permits for on-street parking are not likely to be available

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				<p>in many instances. Many areas where housing allocations are proposed already experience high levels of on-street parking.</p> <ul style="list-style-type: none"> • We note that certain allocations have stated in their policy criteria that “car parking provision limited to one space per household in order to reduce risk of increasing air pollution”. Whilst we support efforts to limit/reduce air pollution, it is not clear why certain sites have this policy criteria, whilst others do not. We wish to see clarification/ further rationale on this matter, including why it is considered appropriate to move away from the Parking Guidance and Calculator. <ul style="list-style-type: none"> – <u>PLI (2) Land at Astley House & Police Garage</u> – 25 residential units is likely to be acceptable. Access should be rationalised in order to provide a single access point to the site. This access will need to be subject to a Road Safety Audit. Sightlines appropriate to the 30mph speed limit of 2.4m x 43m. It is within walking distance of bus stops, services and schools. Offsite pedestrian improvements would be required along the site frontage and immediate area – we would suggest that this is added as a policy criterion. – <u>PLI (3) Land at the Auction Rooms</u> – 11 residential units likely to be acceptable in principle. Improvements are required to the existing vehicular and pedestrian accesses to improve angle/junction radii and visibility – we would request that this is added as a policy criteria. It is within walking distance of many services/facilities and public transport provision. – <u>PLI (4) Land at Blois Road, Garage Site North</u> – Existing site of 31 garages. We will require surveys in order to demonstrate the existing levels of usage of the garages (for parking vehicles), to identify displaced parking through the loss of garages. These surveys will also need to identify the level of trips generated by the current use, against the level from proposed 6 residential units. Until such surveys have been undertaken and provided to the County Council, we are unable to say whether this proposed allocation is acceptable in highway terms. With Blois Road and the adjacent roads already heavily parked we will have concerns over the displacement of any current parking provision. The existing access is substandard in terms of layout, width and no footway connection to Blois Road. The existing gradient of the access would appear to fall far short of the recommended 1 in 9 required on the site. Given this and the surrounding property levels, we consider that it is likely to be difficult

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				<p>to achieve a satisfactory access should it be shown that the level of trips generated by the proposed allocation exceeds the level of trips generated by the existing use.</p> <ul style="list-style-type: none"> <li data-bbox="981 308 2213 820">– <u>PLI (5) Land at Blois Road, Garage Site South</u> - Existing site of 29 garages. We will require surveys to demonstrate the existing levels of usage of the garages (for parking vehicles), to identify displaced parking through the loss of garages. These surveys will also need to identify the level of trips generated by the current use, against the level of vehicular trips arising from the proposed 6 residential units. We are unable to say whether this proposed allocation is acceptable in highway terms without surveys. With Blois Road and the adjacent roads already heavily parked we will have concerns over the displacement of any current parking provision and/or the lack of an appropriate level of on-site parking provision with the proposed development. The existing access is substandard in terms of layout, width and no footway connection to Blois Road. The existing gradient of the access would appear to fall far short of the recommended 1 in 9 required on the site. Given this and the surrounding property levels, we consider that it is likely to be difficult to achieve a satisfactory access should it be shown that the level of trips generated by the proposed allocation exceeds the level of trips generated by the existing use. <li data-bbox="981 847 2213 1118">– <u>PLI (8) Land at Buckwell Court, Garage Site</u> – Site of 14 garages. The same comment made for the sites on Blois Road in terms of the surveys would also apply. The development of this site for housing will require the provision of a turning head within Buckwell Court – this should be made a policy criteria and it may be the case that this requirement impacts upon the potential residential capacity of the site. The site is considered to be in a sustainable location with a bus stop located within walking distance along Waldshut Road. Local amenities, primary schools are also all within suitable walking distance; however secondary schools exceed the ideal walking distance being 2.7km from the site. <li data-bbox="981 1145 2213 1337">– <u>PLI (13) Land at the Former Wenban Smith Site</u> – Given the traffic that could be generated from the existing use of the site and its sustainable location, the allocation is acceptable, subject to design of the access and its road safety audit. Access will not be acceptable direct onto Phoenix Causeway as accesses in this location need to be minimised in order to keep the free flow of traffic into/out of the town. We would suggest that this is made clear in a policy criterion. 10. Appropriate level of

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				<p>parking for the commercial element of the allocation also needs to be considered ideally on site, and may have consequences for the potential development yield.</p> <ul style="list-style-type: none"> - <u>PLI (21) Land at Kingsley Road Garage Site</u> – Site of 17 garages. The same comment made for the sites on Blois Road, in terms of surveys, would also apply in this instance. A single shared access serving the site would be preferable. Sightlines for access appear to be available. The site has good proximity to bus stops, however pedestrian improvements are required to link to the bus stops and footway opposite – this should be made a policy criteria. - <u>PLI (26) Land at Southdowns Road</u> – Planning permission under SDNP/15/01303 with s106 in place for 79 dwellings +2182sqm of BI use. Planning application SDNP/17/00387 not yet determined for change of use of 2182sqm of BI use to 24 dwellings. No highway objection to either application and highway works secured, therefore no further comment to make. - <u>PLI (30) Land at Landport Road Garage Site</u> – Existing garage site comprising of 16 garages. The same comment made for the sites on Blois Road, in terms of surveys, would also apply in this instance. A bus stop is within walking distance along with local amenities and primary schools. There are no footways fronting the site and limited highway extent that may preclude the provision of such a footway. However, we would still wish for the provision of a footway along the site frontage to be considered together with a crossing point to link the site to the footway opposite. - <u>PLI (34) Land at Little East Street Car Park, Corner of North Street & East Street</u> – Existing access arrangement is an in access and one out access on the one way system. Consideration would need to be given to the access arrangement and the proposed changes to the highway network in this location with the approved North Street Quarter development. We would also expect consideration to be given to the loss of car parking in this location, with reference to the overall off-street parking need for the town. This would need to factor in the parking provision that will be delivered as part of the North Street development. It may be the case that this evidence demonstrates that this car park is surplus to the needs of the town. - <u>PLI (35) Land at The Lynchets Garage Site</u> –Existing garage site with 20 garages with two access points located via The Lynchets. The same comment made for the sites on Blois Road, in terms of surveys, would also apply in this instance. Suitable access with sightlines appropriate to the 30mph

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				<p>speed limit should be provided. Local services, schools are all within suitable walking distance. Footway across the site frontage is required together with consideration for footway links – this should be made a policy criteria.</p> <ul style="list-style-type: none"> <li data-bbox="981 347 2210 459">– <u>PLI (36) Land at Magistrates Court Car Park, Court Road</u> - Planning permissions under SDNP/16/01618 & SDNP/17/01449 for 9 units with 106 agreement – no highway objection to applications and highway works secured. <li data-bbox="981 539 2210 691">– <u>PLI (39) Land at Former Petrol Filling Station, Malling Street</u> – Planning application SDNP/17/01684 – for 5 units - yet to be determined. Previous applications for more units refused, including on highway grounds. Application likely to be acceptable subject to securing off site highway works and Lewes residents parking permits not being issued to this site. Good location in terms of accessibility. <li data-bbox="981 715 2210 946">– <u>PLI (44) Land at Prince Charles Road Garage Site</u> –Site of 20 garages. Concern is expressed at the substandard access (gradient and width) and the area for turning for both this proposal and remaining garages. In light of this, and in the absence of any information that overcomes these concerns, we consider that the proposed allocation of this site is unsuitable. Consideration may wish to be given to allocating the whole site, although should this be done, the comments made for the sites on Blois Road in terms of surveys would apply. <li data-bbox="981 970 2210 1201">– <u>PLI (46) Land at Queens Road Garage Site</u> – Site of 59 garages. The same comment made for the sites on Blois Road, in terms of surveys. The existing access to the site off Queens Road is substandard in terms of width and pedestrian connectivity. Access improvements would be required, although it is not clear whether there is sufficient land available to achieve this. We would ask that this matter is given further consideration. Local services and schools all within suitable walking distance. <li data-bbox="981 1225 2210 1337">– <u>PLI (48) Former Ambulance HQ, Friars Walk</u> – Site benefits from Prior Approval Planning Permission under SDNP/16/04343 for 18 units with car parking spaces provided on land outside this red site area. No further comment to make.

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				<ul style="list-style-type: none"> <li data-bbox="981 212 2213 323">– <u>PLI (50) Land at Spring Barn Farm, Kingston Road</u> – Planning permission under SDNP/12/02520 for 5 units [net gain of 3 units] allowed on Appeal. No highway objection raised therefore no further highway comment to make. <li data-bbox="981 347 2213 619">– <u>PLI (52) Land at St Anne’s Crescent</u> – Currently a 48 space car park, the loss of these spaces and displacement would need to be addressed before the proposed allocation is made. Until this matter is addressed we are unable to say whether or not the proposed allocation on this site is acceptable in transport terms. Existing central vehicular access onto St Anne’s Crescent is substandard in terms of width and gradient. There is also a separate pedestrian access in north eastern corner onto St Anne’s Crescent. A single shared access point is preferred onto St Anne’s Crescent. Consideration also needs to be given to Public Footpath Lewes 44 which crosses the site. <li data-bbox="981 643 2213 914">– <u>PLI (53) Former St. Anne’s School Site</u> – Existing access from Rotten Row is substandard in terms of width and layout. A short section of Rotten Row is also narrow. The traffic implications onto Rotten Row and its junctions with the A2077 would need assessing and any significant increase in traffic is likely to require improvements to access and potentially Rotten Row. A transport statement would be required to be submitted with any planning application, which suitably addresses these matters. Strongly suggest that these points are mentioned either in the policy criteria for the allocation, or within the supporting text. <li data-bbox="981 938 2213 1297">– <u>PLI (57) Lewes Railway Station Car Park</u> – Currently a car park with access assumed from Pinwell Road. It is not clear if the decked car parking spaces beneath would continue to be used as pay and display spaces or be exclusively for this proposal. Consideration needs to be given to any loss of parking spaces and their displacement. Traffic implications would need assessing and any significant increase in traffic is likely to require improvements to Pinwell Road at its junction with Lansdown Place/Southover Road. Pinwell Road does not form part of the adopted public highway. A transport statement would need to be submitted with any planning application. Site is well located in accessibility terms and well within walking distance of local facilities, bus stops and schools. However, consideration should be given to footway/cycleway links from the site. <p data-bbox="936 1321 1355 1353">Transport Strategy comments</p>

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				<ul style="list-style-type: none"> • Objective 6 – ‘Easily Moving Around’ – We would recommend considering amending the title of this objective to “Transport Movement & Access” • We welcome objectives 1 (Sustainable Communities), 6 (Easily Moving Around) and 10 (Village & Town Connections) which encourage sustainable transport and access including community transport options. • Draft Policy HCI - We are supportive of this policy. We welcome the reference to the inclusion of ‘The existing bus station’ which ‘serves the centre of Lewes’... ‘will be retained until a suitable alternative town centre site can be found offering the same or better undercover waiting facilities’. For an alternative site to the existing bus station to be suitable, it would need to provide excellent accessibility and be acceptable to the bus operators. • Draft Policy HC2 Policy - could be strengthened by including the following amendment to Point 1 (recommended additional text is underlined):- <i>1.) <u>New community services will be supported within the settlement boundary in areas of the town where a need has been identified,</u></i> • Policy HC4 - We would like to suggest cross referencing the need to integrate supporting the economic growth of the town, with supporting transport choice, transport movement and access. In this regard, the policy could be strengthened with the following amendments (additional text underlined) <i>1) <u>The existing employment uses and premises across the plan area will be protected and enhanced during the neighbourhood plan period</u> to support sustainable economic growth in the town and reduce the need for residents to commute to work</i> • Draft Policy HC5 - We support this policy. Encouraging sustainable tourism for pedestrians, cyclists, and bus and rail users is strongly supported. The requirement for travel plans for the campsite and all large scale tourism developments to encourage visitors to travel by sustainable means is welcomed. • The principle of the provision of a car park outside of the town centre connected to a bus route is also welcomed however any proposal would need to demonstrate that it was deliverable, financially viable and would require planning permission from the SDNPA. It will reduce congestion in Lewes town centre, reducing high levels of vehicular emissions, which has been a contributing factor that has led to the establishment of an AQMA in the town centre.

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				<ul style="list-style-type: none"> • We do suggest use the following amendment to point 3) of the policy; <i>Pedestrian and cycle routes to the Downs will be protected</i>, with wayfinding from the railway and bus station. • AM1 -We support this policy which will be in alignment with the emerging ESCC Cycling & Walking Investment Plan. • AM2 -We support this policy. No reference is made to the improvements recently made to Lewes Station including the forecourt area, which has improved facilities for pedestrians, cyclists and bus users at the station. • Page 98 alludes to Electric Vehicle Charging (EVC) points. It is unclear whether reference to the need for additional points is being made as the term 'additional' has not specifically been used. There are existing EVC points at the railway station, and therefore if more points are proposed, this should be made clearer in the text. • AM3 -We support the greater provision of EVC points. We note the principle of a park and ride facility on the outskirts of the town and on a major bus route is proposed in the plan. This is successful where there is limited town centre parking; where car parking pricing discourages accessing town centres by car; where the sites are directly off the main corridors into towns and are of a sufficient size (at least 500 spaces) to make them financially viable. It would need to demonstrate that this was a deliverable as well as also needing planning permission from SDNPA. We would also suggest that part of the consideration would need to be an update to the Lewes Town Parking Study, which was prepared by Lewes District Council. • SSI -In principle, pedestrian routes need to be improved both in terms of accessibility and safety e.g. having footpaths which are wide enough for all user groups however recognise that in the historic streetscape within Lewes that in order to provide the balance for all road users – pedestrians, cyclists, buses and cars – that this is not always going to be achievable. The map on page 102 shows a range of proposed improvements. Whilst we support the principle of new cycle routes, we are unable to comment in detail as to the viability and acceptability of each proposal due to insufficient detail. Town Council's proportion of CIL receipts may be one source of funding that could be utilised.

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				<ul style="list-style-type: none"> • We would be willing to further review this shortly as part of the development of the emerging ESCC Cycling & Walking Investment Plan. • SS4 –Support transport on and alongside the river. A key action for implementing new pedestrian / cycle bridges to the north and south of the town without having to pass through the town centre, is supported. <p>Other Additional Comments and Advice relating to Transport Strategy</p> <ul style="list-style-type: none"> • There is no reference to the East Sussex Local Transport Plan 2011 -2026. The East Sussex Local Transport Plan Implementation Plan 2016 – 2021, page 28 paras 4.33-4.37 outline the approach for Lewes https://new.eastsussex.gov.uk/roadsandtransport/localtransportplan/ltp3/downloadltp3 • No reference is made to the County Council’s emerging Cycling & Walking Investment Plan which will support the policies that seek to improve walking and cycling connections and routes in and around Lewes • ESCC would be happy to work with those implementing the policies of the Neighbourhood Plan in achieving some of the actions where possible.
R46.	Belinda Kennedy	23/07/2018	Email	<ul style="list-style-type: none"> • Good to see that implications of Climate Change have informed some of the practical solutions proposed, e.g. facilitating homeworking solutions (4.3; 4.5; 4.7). • Also - in line with Lewes traditions of independence and mixed housing (2.7; 2.22; 2.24), - supporting self-build opportunities (5.9) at both individual and communal level. • We strongly agree that 'Introducing much more genuinely affordable housing into Lewes is crucial' (8.4) and support your concept of Lewes Low Cost Housing • We request that you ensure the support of the Local Planning Authority for the Lewes NDPs undertakings,(in 8.8) to nurture 'Small scale environmentally sensitive development of individual sites ' and 8.9 'Small scale development in accessible gardens ' • Lewes Plan should acknowledge, as a communal benefit, the role of individual householders in extending their houses, or making suitable garden areas available, e.g. when needed by family members, or work partners.

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R47.	David Cranmer, on behalf of the South Downs National Park Authority	23/07/2018	Email	<ul style="list-style-type: none"> Allocation PL1(3) Land at the Auction Rooms - it appears highly likely these buildings came from the WWI army camp at Seaford and were moved to their current location in the 1920s. One is likely to be the camp chapel. Given this, further heritage investigation should be undertaken before their demolition is agreed in principle (they are currently protected as part of the Conservation Area) and, if it is considered they can be demolished and an allocation made to the site in principle, then at the minimum they should be recorded before they are demolished.
R48.	Robert Lloyd – Sweet, on behalf of Historic England	23/07/2018	Email	<ul style="list-style-type: none"> Historic England do not have any objections to any elements of the plan. Support for innovative policy approaches to sustain or enhance the area’s character and significance of its heritage assets. <ul style="list-style-type: none"> – <u>Policy HC3 Heritage Protection</u> <ul style="list-style-type: none"> ▪ Part a) Heritage Protection of Landscape and Townscape ▪ Support for the specific items identified as contributing to local distinctiveness and identity. Nevertheless, recommend that paragraphs 3) and 4) are revised to state that such harmful developments will be “... resisted and require convincing justifications on the basis of public benefits that could not otherwise be delivered.” In order to promote sustainable development as in the NPPF ▪ Part b) Planning Application Requirements and Heritage Issues ▪ Support for conserving views of the town and policy wording. Nevertheless, in the case of an area with conservation areas and other designated heritage assets of the quality of Lewes’, where the historic environment is so clearly of great importance to the quality of life of local people and the success of local businesses, the bar of public benefit should be set suitably high. It would be helpful to identify whether this policy should apply to all development in the plan area or only development with potential to affect the views identified in Appendix 5? ▪ Para 2) goes beyond the limits of controls by Planning (Listed Buildings and Conservation Areas) Act 1990 or NPPF’s policies with regard to designated heritage assets. We support the direction that development involving demolition of buildings that make either a positive or negative

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				<p>contribution to the character or appearance of the conservation, or aren't an element of its significance (other than as a result of neglect or reversible deterioration) should be promoted as sustainable. As such we recommend the wording is amended to read: "2) <i>The demolition and replacement of buildings in the Conservation Areas will only be supported where the existing structures do not make a positive contribution to the area's character, appearance or significance. This provision does not include buildings which are neglected or have not been properly maintained.</i>"</p> <ul style="list-style-type: none"> ▪ Para 4) provides appropriate guidance for considering development in the historic core. Given the importance of the town's roofscape we particularly support the reference to roof forms. – <u>Policy HC4 The Working Town</u> - Support – <u>Policy HC5 Sustainable Tourism</u> - Support – <u>Policy PLI General Housing Strategy</u> ▪ We recommend a cautionary note to para 7) to read: "7) <i>The splitting of larger homes into self-contained units will be supported. Where subdivision could affect the significance of a listed building or the character or appearance of a conservation area, it must be demonstrated that measures to avoid or minimise harm have been considered, including but not limited to provision for waste and bicycle storage, routing of waste water pipes and additional extraction flues or vents.</i>" ▪ Policy PLI(2) - support ▪ At bullet point 10 - Recommend that policy clarifies that archaeological investigation will be required prior to submission of a planning application and should inform the development of those proposals where findings demonstrate this is necessary. Where a site allocation has been identified as potentially resulting in harm to a heritage asset it is appropriate to demonstrate that plan policy will avoid or minimise conflict between the asset's conservation and any aspect of the scheme proposed in order to promote sustainable development. This is in addition to any general requirement for mitigation of harm to heritage assets required by local plan policy. ▪ Historic England recommend amending bullet point 10 to read: "Due to the identification of potential for remains of archaeological interest in this vicinity (the Spital burials), development proposals should be informed by the findings of an appropriate scheme of archaeological investigation according to a written

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				<p><i>scheme of investigation agreed in writing with the Council's archaeological advisor. Applications should demonstrate that the design and layout of the proposed preserves archaeological remains in situ where possible, giving the greatest priority to any remains of national importance.</i></p> <ul style="list-style-type: none"> ▪ We recommend that a similar approach be set out for paragraph 7) of Policy PLI (34), paragraph 8) of Policy PLI (35), paragraph 6 or Policy PLI (36), paragraph 3 of Policy PLI (44), paragraph 3 of Policy PLI (46), paragraph 6 of Policy PLI (48) and paragraph 5 of Policy PLI (52). Alternatively, given the general high potential for remains of archaeological interest it may be appropriate to introduce a general policy for archaeological investigation to inform development proposals to accompany Policy PLI that will be applied to all site allocations. ▪ Appendix 5: Selected views illustrated and described in the appendix are very helpful
R49.	Imogen Makepeace	23/07/2018	Email	<ul style="list-style-type: none"> • Support for Low Cost Housing idea. Taking income as the starting point of the equation rather than market value is clearly a fairer equation. • Hope that more social housing can also be thrown into the mix. • Support for environmental value at every level of the plan. • The Downs and the special biodiverse habitat of the Chalk grassland gives Lewes a unique character
R50.	Graham & Jo Maunders	23/07/2018	Email	<ul style="list-style-type: none"> • Support the Plan but would like to see additions / amendments to its content: • Importance of affordable housing to the social, economic and environmental wellbeing of the town and its contribution to helping ensure balanced and sustainable communities is understated. • Full utilisation of publicly owned land / buildings is fundamental to the delivery of affordable housing. Land cost is fundamental to achieving locally affordable rents. The Plan should give far more emphasis to using publicly owned assets for community benefit. • The answer to more provision is in utilising existing buildings/land more creatively. Plan should encourage e.g. supermarkets to provide housing in roof space, under used public sector offices should be converted to housing and multi-use of buildings encouraged.

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				<ul style="list-style-type: none"> • The Plan identifies the large sites. It misses an opportunity to encourage land owners to offer land for micro developments. Lewes Community Land Trust could work with local land owners to deliver housing in perpetuity. • Housing options should include land / buildings for renovation / self-build / self- finish. • In our experience balanced and sustainable communities are best achieved through 'pepper-potting' locally affordable housing provision on all developments. This should be a key statement of principle in the Plan. • We fully support the provision of more locally affordable housing as defined (5.7). • The Plan should encourage new homes to be built to Lifetime Homes design standards. • The Neighbourhood Plan (8.5) (and SDNP and Lewes Council policy) should encourage that community led housing is in all instances the first option considered for all locally affordable housing provision in line with best practice. • The paragraph (8.16) needs further refinement. Whilst housing associations provide affordable, new provision is typically at 80% of market rent (in line with the government's definition and their organisation wide policy) and not locally affordable without housing benefit. It is not '<i>the only way forward</i>'. • Community Land Trusts are able to establish local rent / sale policy reflecting and should also be referenced. • It is not simply the allocation policy as implied (8.19) - the form of ownership is fundamental to ensuring housing remains in perpetuity for community benefit. • Stronger emphasis should be given to greater effort to deliver much needed locally affordable homes and <i>not</i> accepting commuted sums (8.25).
R51.	Jane Lee	23/07/2018	Email	<p>Policy SS3 Protection & Enhancement of Green Spaces:</p> <ul style="list-style-type: none"> • It is unclear which areas have been designated as Local Green Spaces:

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				<ul style="list-style-type: none"> The sites listed in Table: Local Green Spaces & Local Community Spaces Criteria differ from the sites identified on Map: Local Green Spaces & Local Community Spaces in support of Policy SS3. Section 10.27 on p.132 states that the initial selection of sites was modified following public consultation. One assumes that the map shows the sites that have been agreed, however this is not stated. This needs to be confirmed. <p>Policy PLI General Housing Strategy:</p> <ul style="list-style-type: none"> The NPPF states that “Planning policies and decisions should aim to ensure that developments... will function well and add to the overall quality of the area...” Sites identified in Landport Estate are among areas where the housing density has reached saturation. Building there will not add to the overall quality of the surrounding areas. Additionally, the roads of Landport Estate are unable to withstand the increased traffic. Landport Estate should be considered holistically, into how some minor additional housing units could be built whilst also considering making it a more pleasant environment for those already living there.
R52.	Amanda Deadman	23/07/2018	Email	<ul style="list-style-type: none"> Support for the Lewes Neighbourhood Plan. Support the Lewes Low Cost Housing initiative. For larger development proposals, e.g. North Street Quarter, an opportunity might exist to revisit this site and introduce smaller, piecemeal housing developments to reflect the changing demands of Lewes and its residents. Support for identifying Lewes' geographic conditions and ecosystem to be worked <u>with</u> rather than overridden.
R53.	Kingsley Roger – Jones, on behalf of Clifford Dan LLP.	23/07/2018	Email	<ul style="list-style-type: none"> Policy PLI 3) - The objective of this policy is clear but its implementation raises many questions Proposed Policy 28 of the South Downs Local Plan requires affordable houses to be provided for schemes of 4 units or more. Financial contributions will be sought on schemes of 3 units or fewer. 50 % affordable is required for 11 units or more. As the objective of Policy PLI 3) is to maximise the number of Lewes Low Cost Housing (LLCH) units the starting point must be that all of the affordable units

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				<p>required under Policy SD 28 should be LLCH units unless the development is "proven to be undeliverable".</p> <ul style="list-style-type: none"> In order to produce a viability appraisal an applicant will need to be provided with the resale and rental values which the SDNPA considers will meet the affordability criteria. Footnote 2 provides an indication of Lewes incomes but this needs to be translated into affordable prices on purchase and affordable rents. Income data will require updating over the plan period. As both the resale values and rental values will inevitably be considerably lower than the price of market housing and 80% of market rents, the reduced income will impact upon viability. If a viability assessment demonstrates that the incidence of LLCH will make the scheme unviable, the assessment will then presumably need to be revisited, the number of LLCH units being reduced until viability is restored, if indeed that is possible. Whilst the aspiration will be widely supported considerably more detail is required as to how it will work in practice. As it stands developer applicants will be faced with considerable uncertainty which may deter schemes from coming forward. This requires particular scrutiny by the Examiner.
R54.	Mary Hill	23/07/18	Email	<p>General points about unsuitability of building on Landport garage sites.</p> <ul style="list-style-type: none"> Landport is a highly densely populated estate with a single access road. Parking is already short on the estate. Further housing, as a result of removing garage space, and tarmac areas in front of garages can only add to the congestion There is likely to be an increase in queuing to leave/enter the estate via the sole exit Kingsley Road exit onto the busy Offham Road, particularly at peak times. A significant proportion of Landport residents are tradespeople who are always going to need vehicles for work to carry tools of their trade etc. <p>Specific points about Blois Road garage sites</p> <ul style="list-style-type: none"> Situated at the foot of an exceptionally steep wooded slope. The site appears to be completely unsuitable for housing, because of its steepness, lack of flat space and lack of natural light. Construction vehicles would have difficulty turning round on the flat area.

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				<ul style="list-style-type: none"> • Children often play in the road here, as it is not a through road. The area in front of the garages currently sometimes serves as another (safer) play area for the children for football etc. and this would be lost. • Most evenings there are between 2 -5 cars parked on the tarmac area in front of the garages. This potential parking place, as well as the garages will be lost.
R55.	Graham Clews	23/07/18	Email	<ul style="list-style-type: none"> • Concerned about proposed housing developments, particularly for car traffic. At the same time as the stick of limiting parking spaces, an improved environment for walking and cycling must be introduced.
R56.	J.M. Swift	23/07/18	Email	<ul style="list-style-type: none"> • Concern about the additional vehicle traffic by the proposed housing developments. • Number of private cars per household should be minimised. Reduce vehicle movements in the town is as it is dangerous for people to walk or cycle (in accordance with the Government's Walking and Cycling strategy) • Objection to the proposal to route vehicle traffic from the Former St Anne's school site into Rotten Row. • Development should access to Western Road through the County Hall site/care park and not onto Rotten Row.
R57.	R. Moore	23/07/18	Email	<ul style="list-style-type: none"> • Support the concept of Lewes Low Cost Housing. • 5.7 - The SDNPA criteria of 50% affordable housing in developments of 11 houses or more (and a sliding scale for developments below this) is welcome. • 5.11 - The acknowledgement of a place for 'meanwhile' housing is also welcome. Although North Street Quarter is outside the scope of the Neighbourhood Plan its use for meanwhile housing could have seen much needed accommodation being provided for the past five years. • 5.15 - I support the creation / maintenance of safe walking and cycling routes within the town and to outlying villages. • 5.16 - I strongly support the requirement for carbon neutral standards. I think that it is inexcusable that all new developments are not required to incorporate pre-installed solar energy capture.

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				<ul style="list-style-type: none"> • 5.18 - Green space and biodiversity - support this requirement. • 5.20 - New developments would need to mitigate rather than manage flood risk. Rising sea levels and turbulent weather are increasingly present risks and we will have to learn to live with (and despise them) rather than hoping that they can always be pushed away. • par7.12 - Support the acknowledgement that a new proposal might be brought forward for the North Street Quarter should the opportunity arise.
R58.	Ian Anderson, Cushman & Wakefield, on behalf of Waitrose Ltd.	23/07/18	Email	<ul style="list-style-type: none"> • Waitrose are key stakeholders in Lewes, being an occupier/operator of the Waitrose foodstore in the town centre, and as a landowner of the Wenban Smith wood yard and freeholder of the NCP car park. • Waitrose and Cushman and Wakefield would welcome additional discussions in this regard to enable ambitions for these sites to be included within the final document, to help futureproof the plan and make it more robust in setting out a strategy for meeting the growth needs of Lewes. <p>Vision of Neighbourhood Plan - notes2:</p> <ul style="list-style-type: none"> • <i>'All future investment and interventions proposed for the plan area need to be assessed against the vision and objectives. Only those proposals that clearly conform should be supported. This is particularly important at the planning application stage, which will remain the means of delivering changes on the ground. Planning applications will be assessed against the vision and objectives. 'We believe that this statement extends beyond S38 (6) of the Act3, which requires development to be made in accordance with a (development) plan, 'unless there are material circumstances'. As a consequence, there needs to be reference to S38(6), to make clear the provisions of the Act and the basis on which the Neighbourhood Plan will be used in the determination of planning applications.</i> <p>The Waitrose and Wenban Smith Sites</p> <ul style="list-style-type: none"> • Waitrose owns its shop in South Street, the former Wenban Smith wood yard site and the NCP car park. These are the most significant development sites of Lewes. It is surprising that any possible future development of any of these sites is not considered in the Plan. This should be addressed. The opportunity which they bring would make the Plan more robust. These sites provide a significant opportunity and have a major contribution to meeting future needs

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				<p>Higher density Housing within the town centre</p> <ul style="list-style-type: none"> • Support for Policy PL1 (8) for higher density housing, subject to this being innovative and well designed. <p>Allocated Housing Sites: is the Wenban Smith Site allocated?</p> <ul style="list-style-type: none"> • The neighbourhood Plan, at pages 66-67, sets out a plan and schedule of ‘brownfield/previously developed’ sites identified as possible housing allocations (extract below). The Majority of these are referenced with a suggested framework for development and policy advice set out. • There appears to be a ‘red line;’ around the former Wenban Smith site but no reference to the site, nor any framework / policy for its development. We would seek clarification on this issue as no discussions have been had on any proposed allocation to date and Waitrose wish to retain flexibility for a range of uses, possibly including residential, on this site. • If the Council are proposing this as an appropriate allocation, then we would suggest an appropriate framework, on a similar basis to those other sites listed, is agreed with Waitrose. We would be happy to suggest a form of works around the proposed development, to align with other policies of the draft plan and to ensure there remains flexibility in the site’s future development. <p>Meeting the needs of the Wider Town Centre</p> <ul style="list-style-type: none"> • There is little guidance or policy on meeting the future needs of retailers. The retail landscape is changing and it is important that the future needs of retailers, is incorporated in the Plan. <p>Protected Views (Appendix 5)</p> <ul style="list-style-type: none"> • Support for Appendix 5 that the views illustrated are selected to show the character of the town and that not exactly everything in them is required to be preserved. • Plate 5 indicates a view of Cliffe Bridge, but whilst focussing on the bridge, does not show the wider context, which includes both the NCP car park site and former Wenban Smith wood yard site. Clearly

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				<p>neither of these elements can be considered to assist the strategic view of Cliffe Bridge and should be noted as detractors to this view in the supporting text.</p> <p>Conclusion</p> <ul style="list-style-type: none"> Cushman and Wakefield are instructed by Waitrose Ltd to make representations to the draft Lewes Neighbourhood Plan. Waitrose are key stakeholders in Lewes, being an occupier/operator of the Waitrose
R59.	Jenny Martin, on behalf of Conservation Team, Lewes and Eastbourne District Councils	23/07/18	Email	<ul style="list-style-type: none"> While we welcome initiatives to enhance the recording of the historic environment through a local list, we would welcome clarity about who compiles it. Then clarity as to what impact it will have in terms of determining planning applications. Similarly, with efforts to improve signage and promotion of events, it would be helpful to discover where funding will come from and what District Council staff commitment will be required to deliver this. We are currently developing a heritage strategy to promote the historic environment at Eastbourne Borough and Lewes District Councils and would welcome the opportunity to discuss how this document might support, underpin and align with some of the deliverables.
R60.	Thea Davis on behalf of the Neighbourhood Planning & Planning Policy Team, Lewes and Eastbourne District Councils	23/07/18	Email	<p>Meeting the basic conditions</p> <ul style="list-style-type: none"> South Downs National Park Authority is currently progressing its Local Plan (SDLP). Once adopted, the SDLP will replace the Lewes Local Plan Part 1: Joint Core Strategy (JCS) for those areas of Lewes District within the South Downs National Park. However, until adopted, the JCS will remain in force. Therefore, our comments here are focussed on considering the general conformity with JCS. References throughout the submission Lewes NDP to the emerging SDLP and that the draft plan mentions less the Lewes District Local Plan Part 1: Joint Core Strategy 2010-2030, despite it being part of the development plan for the area. It is recommended, that if the Lewes District Local Plan Part 1: Joint Core Strategy 2010-2030 is to be referred to just as “the Joint Core Strategy” at any point in the document, a glossary should clarify that the two names refer to the same document (see original document where Lewes DC has noted these references).

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				<ul style="list-style-type: none"> • While the South Downs Local Plan is emerging and is important to the Lewes NDP, it is not an adopted document, nor have the numbers of proposed dwellings been tested at examination. Although it is advisable to detail the requirements of strategic policies in both the JCS and the emerging South Downs Local Plan, it is imperative that a clear distinction is made between the two documents and indeed the relevant policies most significantly because one provides adopted policies for the development plan and neighbourhood area and the other does not. Schedule 4B to the Town and Country Planning Act 1990 as applied to neighbourhood plans by section 38A of the Planning and Compulsory Purchase Act 2004 requires, “...neighbourhood plans to be in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area)”. • The key differences and further information from these two plans and the relevant policies are detailed below: • The JCS and the emerging South Downs Local Plan have different plan periods, which may have implications for housing supply and delivery. • The JCS sets the number of homes to be delivered in Lewes over their respective plan periods to be 875 (disseminated as: 415 at North Street Quarter, 240 at Old Malling Farm and 220 as other planned housing growth). However, due to the quashing of Spatial Policies 1 and 2 for the areas within the South Downs National Park resulting from a judicial review of the JCS3, the numbers set within this policy technically do not apply in Lewes. Nevertheless, Spatial Policies 3 and 4 of the JCS, which allocate development at the North Street Quarter and Old Malling Farm were not quashed and the dwelling numbers still stand. • The figure of 220 for the Neighbourhood Plan technically cannot be required under Spatial Policy 2 of the JCS, due to it having been quashed for areas within the South Downs National Park. 220 is the remaining number of dwellings when the 415 for the North Street Quarter and 240 for Old Malling Farm are deducted from the 875 specified by the SDLP. Therefore, it is recommended that this figure is presented as the target figure in a different way, not under the auspices of Spatial Policy 2 of the JCS. However, further explanation is recommended if the number is drawn from the work behind the emerging SDLP Plan as this document has not been adopted.

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				<ul style="list-style-type: none"> • The emerging SDLP sets the number of dwellings in Lewes over the plan period to be 875 under Policy SD26. As stated, it is Spatial Policy 3 that allocates 415 residential units. Policy SD57 of the SDLP also matches this and allocates 415 dwellings. • In the emerging SDLP, Policy SD79 sets the number of dwellings to be provided at land at Old Malling Farm to be between 220-240. The adopted strategic policy for this site, however, is Spatial Policy 4 of the JCS, which allocates “approximately 240 dwellings” on the site. “Approximately 240 dwellings” and “between 220-240 dwellings” are not considered to have the same meaning. As such, in the discussion about the site in the Lewes Neighbourhood Plan, the wording of the adopted policy in the JCS should be used, not the wording of the emerging untested policy. • ‘Strategic Development Sites’, para 1.17- the JCS forms part of the development plan for the area and provides the strategic policies with which the Lewes Neighbourhood Plan should be in general conformity with. As such, it should be referenced correctly – the emerging SDLP has not been adopted and does not yet form part of the development plan, but should be considered in the development of the Lewes Neighbourhood Plan as it is at an advanced stage. • At the opening of the ‘Vision Statement for Lewes’ chapter (end of para. 4.1), it states the following which should be removed: • “<i>Planning applications will be assessed against the vision and objectives.</i>” Planning applications will be assessed against the local and neighbourhood plan policies. • It is noted that there is no apparent mention of employment space allocation, either with reference to the JCS or the emerging South Downs Local Plan. Even if the Lewes NP does not address this need, it should acknowledge this issue. • LE1 - In the supporting text (para. 6.6), it is stated that Policy LE1 is also in general conformity with “...<i>policy SDNPA Local Plan SD2 points for specific sites in Lewes</i>”. This sentence does not make sense and it should also be made clear that SD2 is not a policy which exists as part of the development plan for the area. As part of an emerging plan, it may yet be subject to alteration or even removal. • HCI- Plan inserts additional provision to Policy HCI with regard to the protection of the Victoria Hospital (6). It appears that a number of representations were made suggesting that the services offered

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				<p>should be protected, but there is no discussion in the Consultation Statement about how these representations have been attended to. Nevertheless, the new criterion of HCI would appear to have been inserted in response. However, Lewes District Council is not opposed to the inclusion of this point.</p> <ul style="list-style-type: none"> • HC2 - Para. 7.12 states, “If for some reason the current development proposal does not proceed and/or the planning application (ref. SDNP 15/01146) granted by the SDNPA expires, the opportunity should be taken for re-examining the existing consent and readapting it to better suit the needs of the community”. It is recommended that the word ‘better’ is omitted and the word ‘best’ included instead, as this document should not include comment on schemes granted planning permission etc. • Although the following (excerpt from para. 7.13) is not included in policy text, it does appear in the supporting text for the policy. It is considered that this would be better placed in the ‘Neighbourhood Projects’ section of the plan, not within the policy section: “The Plan will support proposals for the wider use of Lewes Town Hall for a diversity of groups, art exhibitions, craft fairs and the investment in improved entertainment facilities, e.g. acoustic improvements for concerts and musical events. The plan supports new provision of health care facilities additional to those already available at the Victoria Hospital.” • HC3 (b) - Criterion 1) requires the following: “Archaeological or historic assets below or above ground, should be conserved in a manner appropriate to their significance.” This element of the policy may be a little vague to be appropriately utilised. • Criterion 2) is likely to conflict with existing policies and NPPF. Development could be limited unnecessarily. • Criterion 3) may limit the deliverability and potentially conflict with the specific requirements of higher level policies controlling and informing development on strategic sites. If what is actually being referred to here are the sites in the Lewes Neighbourhood Plan, this should be clear. • No explanation as to what “local conservation bodies” are, nor possible for Council to enforce such a requirement. • Criterion 5) is considered to be too onerous an action to carry out for all proposed developments affecting heritage assets and would potentially restrict a reasonable level of development. It also appears

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				<p>to be guidance and is not worded like a planning policy to be used in deciding a planning application and may be better placed elsewhere in the document with more detailed explanation.</p> <ul style="list-style-type: none"> • Para. 7.22 indicates findings in background documents which do not appear to have influenced the heritage policies at all. • HC4 - Advisable to clarify in criterion 2) what “clear evidence” would be required in this scenario. The term “clear evidence” is likely to be difficult for a planning officer to use when making a recommendation and could potentially be easily challenged at appeal if used in a refusal of planning permission. This criterion is therefore not considered to be consistent enough with Core Policy 4 of the JCS. • The second sentence of criterion 3) is considered to be inconsistent with the JCS, especially Core Policy 4. In addition, there is no explanation as to what “larger-scale developments” are. • Criterion 5) will not assist in the planning decision-making process. In addition, although the ongoing use and viability of heritage assets is supported, this criterion may be at odds with itself in supporting economic use (in what may be private buildings) and an assumption that there is a visitor economy attributed to all heritage assets. • PLI Criterion 2) states “No greenfield sites outside the settlement boundary should be developed within the plan period (other than the strategic site at Old Malling Farm if allocated in the South Downs Local Plan).” The Old Malling Farm site has a strategic allocation already in Spatial Policy 4. As such, the specific development of the site is already covered by policy in the development plan. The wording of this criterion should be changed to acknowledge this allocation if it is indeed necessary to mention it here. • Criteria 5) and 6) make no mention of the acceptability of such development in relation to residential amenity and should be reworded. • It is recommended that criterion 7) makes meaningful mention of current local and national guidance on space standards to ensure adequate residential amenity for future occupiers. • The scenario presented in criterion 10) is unlikely to be controllable by the planning system if planning permission has already been granted for a development.

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				<ul style="list-style-type: none"> • PL1 (2) - criterion 4) may be discordant with ESCC guidance with regard to parking requirements for new dwellings and as such may indirectly conflict with policies of the JCS. • Criterion 8) may not be relevant if unrelated highway/pedestrian improvements are carried out for other reasons that development of the site. It is recommended that this is reworded to guide decision-makers towards relevant Highway Authority guidance or comments made on a specific planning application. • PL1 (3) - Careful consideration should be given to the use of the word “overshadow” in criterion 2). Casting a shadow on adjacent homes is not the same as reducing the level of natural light into habitable rooms of adjacent homes, which would be far more detrimental. • PL1 (34) - Criterion 5) may be difficult to implement if no work has yet commenced on another development. • PL1 (35) -Criterion 9) relies upon the speed limit for the road remaining at 30mph. It is recommended that if reference is to be made to the likely speed of traffic, that this is reworded to avoid specific details about the highway, such as a particular speed limit. • PL1 (46) - Criterion 5) makes reference to the 20mph zone. It is recommended that specific reference to the speed limit is removed and if required, more general reference to the road included instead. • PL1 (48) - Criterion 5) may be discordant with ESCC guidance with regard to parking requirements for new dwellings and as such may indirectly conflict with policies of the JCS. • PL2 - Not clear what is meant by “Lewesian” built environment and this should be qualified in some way, as the term may be too colloquial to be used effectively in a planning policy. • Criterion 4) may prove too onerous for all schemes. • PL3 - There are other means of flood mitigation than the use of permeable paving. Criterion 2) may create conflict with schemes putting forward other means of flood mitigation and water attenuation. • AMI Criterion 3) references “strategic housing sites”. It is not clear whether this is stated in relation to the housing sites in the Lewes Neighbourhood Plan or strategic sites in the adopted (JCS).

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				<ul style="list-style-type: none"> • AM2 - The Lewes Neighbourhood Plan is unlikely to deliver what this policy seeks to do. These issues are covered by legislation outside of planning legislation and are implemented on a strategic level, not at Neighbourhood Plan level <p>Existing Affordable Housing Policy</p> <ul style="list-style-type: none"> • The draft Lewes Neighbourhood Plan states ‘the SDNPA seeks 50% of dwellings on all sites to be affordable.’ As previously mentioned the Joint Core Strategy is the development plan in place. Core Policy 1 sets out the amount of affordable. The Draft Lewes NDP should be amended to reflect these changes. <p>Affordability</p> <ul style="list-style-type: none"> • Lewes Low Cost Housing concept is generally consistent with the strategic policies of the JCS if adopted and put into practice. <p>Developments</p> <ul style="list-style-type: none"> • Focus on relatively small development sites may hinder the ability to generate affordable housing, as the Planning Practice Guidance restricts the ability of authorities to seek affordable housing contributions to relatively larger developments. <p>Site selection</p> <ul style="list-style-type: none"> • The approach is supported. Development is generally considered acceptable within the settlement boundary as per retained saved policy CT1 of the Lewes District Local Plan 2003.
R61.	Romey Sawtell, on behalf of Grange Road Residents	23/07/18	Email	<ul style="list-style-type: none"> • Resident and joint chair of the Grange Road Residents Association • Support for low cost housing on St Anne’s School Site and for Community Land trust to build them • Concerned about access to St Anne’s site via Rotten Row due to tight corner at the junction with the High Street. Grange Road and other roads feeding into the area like St Pancras Road and Potters Lane

Reference	Name / Organisation	Date received	Method of submission	Summary of representation
				<p>are equally narrow and challenging. Grange Road also a key section of cycle route to avoid heavy traffic and already has a sign saying no HGVS or Coaches as road is too narrow.</p> <ul style="list-style-type: none"> • Access from the north of the site via County Hall to western road would be much safer. • The GRRRA has not had the opportunity to discuss the draft Neighbourhood Plan, but would welcome the chance to discuss the offered Transport Proposals linked to St Annes School site in more detail. • Finally, we have noted the proposals to rework the pavements on Grange Road (p144). We would welcome the opportunity to discuss this along with the currently suspended Virgin plans to lay high speed broadband.
R62.	Mrs M. A. W. Blake - Dyke	31/07/18	Letter	<ul style="list-style-type: none"> • Opposed to development at Malling Farm because of the pressure it will put on the Deanery Conservation Area and the loss of the Green Corridor into the centre of Lewes. Referring to the my observations on the Appraisal and Management Plan of October 2015 sent to Mr Scammell on 43th February (dated 28th January 2016) particularly the opening two paragraphs. I own the field surrounding the church at South Malling OS no 2506. From my observations on page 4 points 4.21, 5.3 and 5.7 I still consider a boundary fence (chain link and 8 ft. high) should be erected along my boundary to protect the Deanery conservation area. • I note that 220 houses plus 10% can be met within the settlement boundary. Parking is a problem in Lewes therefore no house should be built unless provision is made for parking. If parking is on the ground floor, this would cover the flooding problem. • South East has a water shortage problem. No house should be built without provision for collection of grey and rain water. • Support for preserving the skyline. • Support for keeping the bus station centrally located.