

SDNPA response to Lewes Submission (Regulation 16) Neighbourhood Development Plan

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

Ref	Comment	SDNPA Recommendation to Examiner
	General Comments	
N/A	<p>The progression of the Lewes Neighbourhood Development Plan (LNDP) to Submission stage is an important milestone, the result of a considerable amount of hard work by the steering group on behalf of the Town Council.</p> <p>The 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.</p> <p>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.</p> <p>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> <p>The NDP is also innovative in its approach to protecting the environment by including policies on natural capital and ecosystem design responses for allocated sites.</p> <p>Most of the comments raised by the SDNPA at this stage relate to changes to wording of policies to make them more precise and usable for development management purposes and so that the Plan complies with national and local planning policy and help meet basic conditions tests for Examination.</p>	N/A
Paragraph 1.2	While recognising that the High Court ruling relating to the Lewes Joint Core Strategy (JCS) is mentioned further on in this section, it would be clearer if this introductory paragraph included a footnote to say that 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 (SDNP).	Include a 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> "
Paragraph 1.7	It would be useful for readers of the NDP if the conclusion of the most recent work on	Include additional text to say "The SDNPA has

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	<p>the Habitats Regulations Assessment (HRA) of the SDLP was referred to in this paragraph.</p>	<p>commissioned new work on air quality, <u>the most recent version of which was published as part of the Submission of the South Downs Local Plan in April 2018</u> 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.</p>
<p>Neighbourhood Plan Objectives.</p>	<p>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.</p> <p>Objective 3 could mention 'flexible' space; robust building typologies that can adapt to change for businesses that evolve over time, and need to adapt to different employment genres and associated needs.</p> <p>Objective 4 needs to take into account the impact ground floor car parking with accommodation above can have on the streetscene and that this will only be suitable for certain sites and where carefully designed.</p>	<p>Include the historic environment in the NDP objectives.</p> <p>Amend objectives 3 and 4 to include additional text.</p>
<p>Policy LE1 – Natural Capital</p>	<p>We welcome the pioneering policy on Natural Capital in the NDP, which is a thread that runs through the plan, woven into the policy criteria for the site allocations. This policy is generally compatible with SDLP Policy SD2; Ecosystems Services. However, the Lewes NDP Policy LE1 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.</p>	<p>Amend criterion 1 to say “For larger sites (i.e. sites of 5 houses or more) d <u>Development</u> proposals should include a detailed assessment of the existing natural capital and the scope to provide a net gain in natural capital.”</p>

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	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 LE1, 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.	Recommend that reference is made in the policy/supporting text to ways of implementing this policy at a local level utilising the advice provided in the SDNPA's 'Ecosystem Services and Householder Planning Applications' and 'Ecosystem Services Technical Advice Note (non-householder)' Guidance Notes.
Supporting text to Policy LE1 – 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.	Include reference in supporting text to developing a tree strategy to set the strategic direction for tree stocks. The SDNPA will work with the local tree officers and community to develop this.
Policy HC1 – Protection of Existing & new Community Infrastructure	Criterion 4 needs to be redrafted to make it clear what it is seeking to protect and where. We think, from reading the supporting text that 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 <u>town centre</u> will be resisted."
Supporting text of Policy HC2	Paragraph 7.12 - 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 in relation to specific parts of the town. The text should be amended to reflect this and placed under policy supporting text.	Include new text to clarify that this paragraph relates to the North Street Quarter or remove this paragraph. Move first three items of section on Key Projects & Actions to supporting text.
Policy H3(b) – Heritage Protection	We are pleased that this policy has been revised from an earlier draft to include advice from Historic England, the County Archaeologist and SDNPA's Historic buildings officer. Some additional amendments would further improve these policies. Policy HC3 (b) – 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. The conservation area boundaries were drawn and approved with some care at designation and reviewed through the fairly recent Conservation Area Appraisals in 2007	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 NDP Design Policy PL2. Move criterion 5 wording to supporting text and instead use the following wording for policy

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	<p>and 2015. The potential for differential application of policies within the defined historic core and the rest of the Lewes Conservation areas therefore has no clear basis.</p> <p>For instance policy criterion 4 of HC3 (b) makes special provision for the historic core as opposed to the whole of the Lewes Conservation Area or the Malling Deanery Conservation Area. This criterion in any case repeats Design Policy PL2.</p> <p>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. We suggest that the policy criterion instead refers to developers describing the impact of their proposals on the significance of heritage assets.</p>	<p>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>'</p>
Supporting text of Policy H3	<p>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 greater significance in development proposals due to its erosion in more recent times.</p> <p>It would be useful if there was mention in this section that Lewes is covered by an Archaeological Notification Area.</p>	<p>Amend first paragraph for clarity. Reference page 129 as showing the conservation area boundaries.</p> <p>Amend paragraph 7.23 to as suggested in the comment section.</p> <p>Reference to Lewes being covered by an Archaeological Notification Area should be included in this section.</p>
Policy HC4 – The Working Town	<p>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.</p> <p>Criterion 5 is poorly worded and it is not clear what it is seeking to achieve. We recommend it is re-worded.</p>	<p>Include in policy criterion 2 or supporting text, the need for marketing evidence to support lack of viability.</p> <p>Criterion 5 should be 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>
Supporting text to Policy HC5 – Sustainable Tourism	<p>Note that no reference is made to the YHA at Southease which is arguably accessible from the town on foot/bike and by rail (one stop).</p>	<p>Include reference to YHA at Southease near Lewes.</p>
Supporting text of Policy HC4	<p>A number of the bullet points in the section on Key Projects & Actions are not projects, but aspirations or aims, and instead should be identified as supporting text.</p>	<p>Move bullet points 2, 3, 6 and 7 of section on key projects and actions to supporting text.</p>

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Policy PL1 – General Housing Strategy	<p>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> <p>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.</p> <p>Criterion 2 should be qualified to allow for Rural Exception sites.</p> <p>We are pleased that criterion 3 covering Lewes Low Cost Housing (LLCH) has been re-drafted so that it cross references SDLP Policy SD28: Affordable Housing. Criteria 4 and the supporting text to SDLP Policy 28 allow for the tenure mix of affordable housing to reflect local circumstances and need, provided this is supported by evidence.</p> <p>Criterion 3 also refers to ‘all strategic and infill sites’. Is this simply ‘all sites’? If there are sites to which this does not apply, this should be clearly stated in the policy. Otherwise the policy should just refer to ‘all sites’.</p> <p>We have some concerns 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. We recommend this criterion is deleted and some of its text merged with policy criterion 6.</p> <p>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.</p>	<p>Amend Criterion 1 to include a definition of what constitutes a small identified site, for instance developments of 5 or less dwellings.</p> <p>Amend criterion 2 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>”</p> <p>Amend criterion 3 to say; “All strategic and infill sites within this Plan will meet the Local Plan requirement for affordable housing. This shall include maximising the amount of Lewes Low Cost Housing to meet local housing need, unless proven to be undeliverable.”</p> <p>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>”</p> <p>Move policy criterion 10 to supporting text.</p>
Supporting text to Policy PL1	<p>The SDLP timetable has slipped slightly. Therefore we suggest that the second sentence of the first introductory paragraph to this section is amended.</p>	<p>Amend second sentence of paragraph to say: Late in 2018, it is expected that <u>Once adopted</u>, the</p>

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	<p>It is to be welcomed that there is a healthy supply of sites identified within the settlement boundary to exceed the requirement of 220 by 34%; this is important given the reliance on small sites.</p> <p>SDNPA welcomes the approach of encouraging a mix of housing tenures, and energy efficient homes and self-build initiatives.</p> <p><u>Notes on delivery of affordable housing:</u></p> <p>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%).</p> <p>The statutory self-build register could be mentioned in the supporting text to criterion 9.</p>	<p>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.</p> <p>The note on delivery of affordable housing should be updated.</p>
Allocated Housing sites		
General comments	<p>We appreciate that the garage sites have been put forward by Lewes District Council, as the landowner, for consideration for allocation. We have visited the sites and 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 School site, to the south of County Hall, can deliver greater numbers than identified in the NDP. Please see comments on individual sites.</p> <p>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> <p>The housing table on page 64 needs a title as does the map on page 66 -67. Whilst the allocation PL1 (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>	<p>A revision to the allocations of some of the small garage sites may be required.</p> <p>Include title for housing table on page 64 and for the map on page 66.</p> <p>Delete red site boundary showing the Wenban Smith Site on map on page 6</p>
PL1(4) & PL1(5) Land at Blois Road	<p>The deliverability of housing at these two sites is considered to be problematic. Access to the sites is very steep and it is questioned whether there is sufficient space to allow for vehicle turning and in turn whether sufficient amenity space can be provided. There are also likely to be overlooking issues onto existing properties and issues with trees.</p>	<p>Delete the allocation of these sites.</p>

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PL1(8) Land at Buckwell Court, Garage site	Given the double garage depth of this site and open land surrounding it, the redevelopment of this garage site may be more deliverable than the Blois Road garage sites. However, this is a challenging site, due to the poor layout and orientation of the existing houses. A new development would need to knit into the existing fabric of development, provide a turning head, front the public realm, make the most of opportunities to views but resolve to overcome the issues of overlook/amenity of adjacent properties.	To be noted.
PL1(34) Land at Little East Street Car Park, Corner of North Street and East Street	This is a relatively small site and it is questioned whether the expected number of dwellings (11) and associated parking and amenity space can be achieved. We consider that more realistically 5 or 6 dwellings could be delivered here. Development at this site will impact on views to Malling Down. However, it is appreciated that there was a former terrace here before the site was bombed in WW2. In addition views are kinetic and travelling around the corner the Downs quickly come back into view.	Amend expected housing numbers for this site from 11 to 6 dwellings.
PL1(53) Former St Anne's School Site	Our comments made at the Pre-submission stage have largely been taken into account in this version of the plan and the policy criteria now include the requirement for a design brief to be prepared for this site. We note that policy criterion 1 of this policy refers to the redevelopment of only the brownfield land for approx. 35 housing units. We do not think this is helpful as the whole of the site is considered to be a brownfield site in planning terms. In addition this is a large site in a sustainable location that has been derelict for a number of years. 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 <u>site</u>"
Policy PL2 – Architecture and Design	<p>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 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> <p>We suggest some minor amendments to the wording of criterion 4, 5 and 6 for clarity and to meet current planning regulations and advice.</p>	<p>Remove the policy distinction between historic core and the rest of conservation area in criteria 2 and 3.</p> <p>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></p> <p>Amend criterion 6 to say: "New housing development should meet the <u>Nationally Described</u> Space Standards set out in Technical Housing Standards (2015). Where</p>

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		<p>possible, conversions should also seek to meet this standard.”</p> <p>Amend criterion 7 to say:</p> <p>“Where possible feasible, all new dwellings should meet the Building for Life Standards for disabled living or be capable of being readily adapted <u>Building Regulations Part M4 (2) ‘Accessible and Adaptable Dwellings’</u> 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 <u>to residents’ changing circumstances.</u>”</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.	<p>Amend paragraph 8.45 to say:</p> <p>“The neighbourhood plan and the town council seek the building of homes 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 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>
Design Guidance – Para 8.49	<p>In the section on Locality, we again question the guidance distinction between the historic core and the rest of the conservation area.</p> <p>The section on Evolve is more of a strategic planning principle rather than design guidance.</p>	Amend supporting text.

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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 and the Sustainable Use of Resources and its relevant standards.	<p>The title of this policy should be amended to say: <u>Sustainable Renewable Energy Construction and the Resource and Energy Efficiency of New Buildings</u></p> <p>Recommend the following criteria are amended to say:</p> <p>1) 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.</p> <p>2) Support will be given to development proposals that incorporate appropriate low carbon on-site power generation <u>subject to good urban design</u>.</p> <p>3) 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></p> <p>4) 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>

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Supporting text to Policy PL4 – Renewable Energy and Resource and Energy Efficiency of Buildings	<p>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> <p>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.</p>	Delete paragraphs 8.54 and 8.55.
Policy SS1 – Historic Streets	Criterion 1 again refers to the historic core. We advise that the policy should refer to the whole of the Lewes Conservation Area.	Amend criterion 1 to refer to the conservation area rather than just the historic core.
Policy AM1 – Active Travel Networks	<p>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 preparing these sections and associated strategies. Overall the policies align with the SDLP and South Downs Partnership Management Plan.</p> <p>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.</p> <p>In addition, the proposed new Railway Cutting route needs to be highlighted on the Public Realm Strategy maps (i.e. green links, improved cycle network, improved pedestrian routes).</p>	<p>Criterion 3 to be moved to supporting text and include reference to the new route way that is to be provided from Old Malling Farm Strategic Site SDLP Policy SD79 along the old Railway Cutting forming a link to the Cooksbridge to Lewes Riverside path.</p> <p>The new link along the railway cutting to be identified on the Public Realm Strategy maps (i.e. green links, improved cycle network, improved pedestrian routes).</p>
Supporting text to Policy AM1	Suggest supporting text could be expanded to refer to examples of local “Countryside Trails” including Egrets Way, South Downs Way, Ouse Valley Way, Malling Downs and the Cooksbridge to Lewes path referred to below. Also under this policy the text could include public bike share scheme to facilitate better active travel.	Include reference to additional local Countryside Trails and a public bike share scheme.
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. As explained in the comments in this section this needs to be caveated regarding that this approach might not be suitable in sensitive areas.	Delete bullet points 2 and 3 in Key Projects and Actions.
Policy SS1 – Streets and	We strongly support the proposed public realm enhancements for safer and more attractive environment for pedestrians and cycling and walking.	To Note.

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Spaces		
Policy SS3 – Protection & Enhancement of Green Spaces	<p>We welcome this policy and the well documented evidence that has been prepared to support it. The two different designations in this policy i.e. Local Green Spaces and Local Community Spaces were introduced on advice from the SDNPA as this approach has been used elsewhere in other Neighbourhood Plans that have passed examination, where some appropriate, additional development may be required in the future for certain types of open space. The designation as Local Green Space precludes all development apart from exceptional circumstances. The Local Community Space designation covers those open spaces that are special to the community but where some development, associated with existing structures, may be necessary or works are needed to maintain its future viability or use. Open spaces that fall into this category are churchyards, sports or school playing fields with associated pavilions etc.</p> <p>Criterion 1 refers to the Designated Open Spaces Map however the actual map is titled Local Green Spaces and Local Community Spaces. For clarity it would be better if the correct title was used in this policy and the actual page number of the map referenced.</p> <p>We do not think all designated sites are shown on the Local Spaces and Local Community Spaces Map.</p> <p>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.</p>	<p>Amend criterion 1 to include the right wording of associated map.</p> <p>Ensure all designated sites are shown on the Local Spaces and Local Community Spaces Map.</p> <p>Change designation of Local Green Space (21) - Railway Cutting to a Local Community Space.</p>
Neighbourhood Projects supporting text	<p>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.'</p>	<p>Delete second sentence of para 11.2 and heading "Supporting Text" below paragraph 11.3.</p>

