

Lewes Neighbourhood Development Plan

Lewes Town Council Comments on Submission Representations from Statutory Bodies

8th October 2018

Organisation	Main Issues in the Representation	Lewes Town Council Comments
<p>Dr Kanan Purkayastha, on behalf of the Air Quality & Contaminated Land Team, Lewes District and Eastbourne District Councils</p>	<p>LNDP should address any unacceptable risk to human health, controlled water and other environmental receptors.</p> <p>Planning policies and decisions should ensure sites are suitable for new use taking account of ground conditions and land instability, including from natural hazards or former activities.</p> <p>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.</p> <p>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.</p>	<p>It is considered that the LNDP addresses these issues in respect of its Ecosystems Services policy and in Chapter 9 Access and Movement and no change is required in respect of these representations. Where pollution issues affecting proposed site, allocations have been identified such as land contamination or potential pollution to groundwater sources, appropriate policy criteria have been included to address these issues.</p>

Organisation	Main Issues in the Representation	Lewes Town Council Comments
<p>Marguerite Oxley, on behalf of the Environment Agency</p>	<p>Chapter 7 - Policy H4: The Working Town - Page 52, paragraph 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>	<p>Lewes Town Council wants to keep reference to the 2000 flood inundation as it was an important local event. It still resonates with local people. Neighbourhood plans need to connect with community concerns in a meaningful way and reference to the 2000 flood helps do that. Reference to Flood Zones 2 and 3 can be added but should not replace reference to the 2000 flood event.</p>
	<p>Chapter 8 - Policy PL1: General Housing Strategy Allocated Housing Sites - 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 (FZ) heading. For clarity, they should be under a separate heading.</p>	<p>Accept recommended change to wording of Policy PL1.</p>
	<p>Policy PL1 (2): Land at Astley House and Police Garage (page 68) - 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.</p>	<p>Accept recommended change to wording of Policy PL1 (2).</p>

Organisation	Main Issues in the Representation	Lewes Town Council Comments
	<p>Policy PL1 (3): Land at the Auction Rooms (page 70) – Majority of site is in FZ 2 (+ very small part in FZ 3). Pleased that paragraph 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.</p>	Accept recommended change to wording of Policy PL1 (3).
	<p>Policy PL1 (8): Land at Buckwell Court Garage Site (page 76) –Site is in FZ 1. 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.</p>	Accept recommended change to wording of Policy PL1 (8).
	<p>Policy PL1 (21): Land at Kingsley Road Garage Site (page 78) – Site is in FZ 1. 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 SPZ 3 would expect to see reference to this in the policy wording to ensure that groundwater protection is considered at planning application stage.</p>	Accept recommended change to wording of Policy PL1 (21).
	<p>Policy PL1 (26): Land at Southdowns Road (page 80) – Site in FZ 2 and 3. We are pleased to see paragraph 6) in the policy providing 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 as well.</p>	Accept recommended change to wording of Policy PL1 (26).

Organisation	Main Issues in the Representation	Lewes Town Council Comments
	<p>Policy PL1 (34): Land at Little East Street Car Park, Corner of North Street and East Street (page 82) – Site is in FZ 1. 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 SPZ 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.</p>	Accept recommended change to wording of Policy PL1 (34).
	<p>Policy PL1 (36): Land at Magistrates Court Car Park (page 86) – Site in FZ 2. We are pleased to see paragraph 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 SPZ 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.</p>	Accept recommended change to wording of Policy PL1 (36).
	<p>Policy PL1 (39): Land at Former Petrol Filling Station, Malling Street (page 88) – Site in FZ 2 and 3. We are pleased to see paragraph 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.</p>	Accept recommended change to wording of Policy PL1 (39).
	<p>Policy PL1 (44): Land at Princes Charles Road Garage Site (page 89) – Site 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 plan aims to require, then this should be detailed in the policy wording for this allocation (currently no mention).</p>	Accept recommended change to wording of Policy PL1 (44).

Organisation	Main Issues in the Representation	Lewes Town Council Comments
	<p>Policy PL1 (46): Land at Queens Road Garage Site (page 92) – 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 plan aims to require, then this should be detailed in the policy wording for this allocation (currently no mention).</p>	<p>Accept recommended change to wording of Policy PL1 (46).</p>
	<p>Policy PL1 (48): Land at Former Ambulance Headquarters (page 94)– Site is in FZ 2. Pleased to see paragraph 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.</p>	<p>Accept recommended change to wording of Policy PL1 (48).</p>
	<p>Policy PL1 (52): Land at St Anne’s Crescent (page 96) – 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 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.</p>	<p>Accept recommended change to wording of Policy PL1 (52).</p>
	<p>Policy PL1 (57): Land at Lewes Railway Station Car Park (page 100) –Majority of site is in FZ 2. We are pleased to see paragraph 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 SPZ 2. We are pleased to see that the protection of groundwater is referenced in paragraph 12).</p>	<p>Accept recommended change to wording of Policy PL1 (57).</p>

Organisation	Main Issues in the Representation	Lewes Town Council Comments
	<p>Policy PL4: Renewable Energy and the Resource and Energy Efficiency of New Buildings (Page 110 onwards)</p> <p>We support paragraph 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 BREEM excellent rating for non-residential use).</p>	<p>Accept recommended change to wording of Policy PL4.</p>
	<p>Policy SS4: River Corridor Strategy (Page 138 onwards)</p> <p>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.</p>	<p>Accept recommended change to wording of Policy SS4.</p>
<p>South Downs National Park Authority</p>	<p>Paragraph 1.2 - 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>	<p>Accept change to para 1.2.</p>
	<p>Paragraph 1.7 - 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 an adverse effect on the integrity of the European sites assessed, including Ashdown Forest Special Area of Conservation."</u> The overarching HRA of the emerging South Downs Local Plan will address this matter and include any necessary measures as appropriate.</p>	<p>Accept change to para 1.7.</p>

Organisation	Main Issues in the Representation	Lewes Town Council Comments
	<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>Accept change to include historic environment into the objectives. The concept of 12 objectives has been established early on in the Lewes neighbourhood plan process and we do not wish to extend these to 13 objectives. We therefore would wish for this objective to be included as part of Obj. 8 Natural and Historic Environment, Green Spaces & Biodiversity) and refers to the "Protection and Enhancement of the Historic Urban Environment".</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>Accept change to wording of Obj. 3. Need for flexible buildings. This was referred to in the Design Workshop references in Design Forum final slideshow, page 12 and 13).</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>Accept change to wording of Obj. 4.</p>

Organisation	Main Issues in the Representation	Lewes Town Council Comments
	<p>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. 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.</p>	<p>Accept removal of the threshold from Policy LE1.</p>
	<p>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. The SDNPA will work with the local tree officers and community to develop this.</p>	<p>Accept introduction of Tree Strategy. This was mooted at an early stage in the development of the Lewes NDP (see Design Forum, final slideshow, pages 11, 192 and 193) so can be evidenced as community driven.</p>
	<p>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. 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."</p>	<p>To be considered. Reason for this particular wording was to address a concern that in event of another significant flood the town would not have access to daily grocery shopping. Therefore, food shops outside floodplain was a specific request, specific to Lewes circumstances.</p>

Organisation	Main Issues in the Representation	Lewes Town Council Comments
	<p>Supporting text of Policy HC2 - Paragraph 7.12</p> <p>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>	<p>For clarity, include Text that application (ref SDNP/15/01136) refers to North Street Quarter in para 7.12 does refer to the North Street Quarter.</p>
	<p>Policy H3 (b): Heritage Protection</p> <p>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.</p>	<p>Agree first three paras. in projects and actions can move to supporting text. Accept suggested change to criterion 1 of Policy H3 (b).</p>

Organisation	Main Issues in the Representation	Lewes Town Council Comments
	<p>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.</p>	<p>The difference between “the historic core” and “wider” area was suggested by steering group membership – This refers to the Lewes Town Map of 1799 shown in Appendix 4 of the NDP. Conservation areas should be plural as there are two.</p> <p>The current conservation area designations do not distinguish between the historic core of Lewes and the more recent expansion areas. Hence this terminology being used in the plan.</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. Move criterion 5 wording to supporting text and use wording for criterion 5: <u>“Developers intending to submit proposals affecting heritage assets must describe the impact of the development on the significance of the heritage asset”.</u></p>	<p>The aim of this criterion was to ensure applicants seek the best local advice which does not always happen. If a planning application is submitted and the applicants have not consulted one of more of the local groups listed, then the application can be considered to be not compliant with Policy H3 (b) (5) – why is this not possible to enforce through policy?</p>

Organisation	Main Issues in the Representation	Lewes Town Council Comments
	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 significance conservation of heritage assets.	Accept suggested change to criterion 1 of Policy H3 (b).
	Delete criterion 4 of HC3 (b) as materials are already covered by the LNDP Design Policy PL2.	Retain criterion 4 of H3(b) as Lewes NDP wishes to include reference to use of materials in relation to conservation matters as well as general design matters.
	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.	Agree para. 7.3 does not read well and requires revision. Page number reference to be corrected.
	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. Suggest reference to that Lewes is covered by an Archaeological Notification Area.	Accept need to clarify para. 7.23.
	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.	Accept need to include demonstration of viability of employment in criterion 2.
	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"	Accept suggested wording.

Organisation	Main Issues in the Representation	Lewes Town Council Comments
	<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>	Accept suggested wording.
	<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>	Potential rewording to make them more specific could allow them to be retained as actions or projects.
	<p>Policy PL1: General Housing Strategy</p> <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>	“Identified small infill sites is only those allocated in the plan. Suggest a swap of “identified” for “allocated”. Small is under 10 units, as per national definition. To be added.
	<p>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>”</p>	Accept requirement for inclusion of Rural Exception Sites and amended wording.
	<p>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. This shall include maximising the amount of Lewes Low Cost Housing to meet local housing need, unless proven to be undeliverable.”</p>	Accept change suggested to wording of Criterion 3.

Organisation	Main Issues in the Representation	Lewes Town Council Comments
	<p>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>.</p>	<p>Accept change suggested to wording of Criterion 5.</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>Suggest this criterion is retained. While the NPPF has a presumption against, can the LNDP not express support for that presumption also?</p>
	<p>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.'</p>	<p>Accept change to supporting text of Policy PL1.</p>
	<p><u>Notes on delivery of affordable housing</u> - 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>	<p>Noted.</p>

Organisation	Main Issues in the Representation	Lewes Town Council Comments
	<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 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>	<p>If the sites identified have demonstrated that they can accommodate garages – by definition requiring access by car – then the site can also support habitable buildings using a similar footprint with vehicular access. Suggest sites are retained as allocations.</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>Noted – map to be corrected and updated.</p>
	<p>PL1 (4) & PL1 (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>Suggest sites are retained as allocations and additional supporting text added to site allocation to encourage innovative design that responds to these challenges.</p>
	<p>PL1(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>Suggest sites are retained as allocations and additional supporting text added to site allocation to encourage innovative design that responds to these challenges.</p>

Organisation	Main Issues in the Representation	Lewes Town Council Comments
	<p>PL1 (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>Can probably achieve 11 dwellings in a high-density scheme, with taller buildings (e.g. 3-4 story town houses). What is anticipated here is single occupancy flats with no associated parking for these dwellings. Wording to that effect can be added.</p>
	<p>PL1 (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 criterion 1 to say “Redevelopment of the <u>brownfield land site</u>.....”</p>	<p>Accept changes to this policy. Is there a suggestion for a new higher number above 35? Accept changes to wording, as suggested.</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 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>Accept changes to wording, as suggested. Noted that conservation areas should be plural, as Lewes has two. The current conservation area designations do not distinguish between the historic core of Lewes and the more recent expansion areas. Hence this terminology being used in the plan.</p>
	<p>Criterion 3 also refers to the historic core and should refer to the conservation area as a whole.</p>	<p>Accept changes to wording, as suggested. Noted that conservation areas should be plural, as Lewes has two.</p>

Organisation	Main Issues in the Representation	Lewes Town Council Comments
	<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. Amend first sentence of criterion 4 to say: “Buildings should be orientated to benefit from passive solar heating design and, where consistent with good urban design, active solar collection. 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 possible, conversions should also seek to meet this standard.”</p>	<p>Accept changes to wording, as suggested.</p>
	<p>Amend criterion 7 to say: “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’ standards and at least a proportion of larger developments should meet the Part M4 (3) ‘Wheelchair User Dwellings’</u> for disabled living or be capable of being readily adapted <u>to residents’ changing circumstances.</u>”</p>	<p>Accept changes to wording, as suggested.</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 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>	<p>Generally, accept changes to wording, as suggested but wish to keep section beginning, “... <i>an increasing number of new and existing residents in Lewes are wheelchair users...</i>” as this is an important local issue that makes the neighbourhood plan distinctive.</p>
	<p>Design Guidance – Paragraph 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 amending supporting text.</p>	<p>This refers to the Lewes Town Map of 1799 shown in Appendix 4 of the NDP. Conservation areas, plural.</p>

Organisation	Main Issues in the Representation	Lewes Town Council Comments
	<p>Policy PL4: Renewable Energy and Resource and Energy Efficiency of Building</p> <p>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. Amend to say: <u>Sustainable Renewable Energy Construction and the Resource and Energy Efficiency of New Buildings</u></p>	<p>Accept changes to wording, as suggested.</p>
	<p>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.</p>	<p>Accept changes to wording, as suggested.</p>
	<p>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>Accept changes to wording, as suggested.</p>
	<p>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 110 litres/person/day</u>.</p>	<p>Accept changes to wording, as suggested.</p>
	<p>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>	<p>Accept changes to wording, as suggested.</p>
	<p>Supporting text to Policy PL4</p> <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>Is this correct?</p>

Organisation	Main Issues in the Representation	Lewes Town Council Comments
	<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. Delete paragraphs 8.54 and 8.55.</p>	<p>A member of the steering group was insistent on the inclusion of double-glazing being specifically included in the wording of the plan. Concern was that heritage matters were unnecessarily leading to thermally inefficient buildings.</p>
	<p>Policy SS1 – Historic Streets criterion 1 again refers to the historic core. Amend criterion 1 to refer to the conservation area rather than just the historic core.</p>	<p>This refers to the Lewes Town Map of 1799 shown in Appendix 4 of the NDP. Conservation areas, plural.</p>
	<p>Policy AM1 – 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 preparing these sections and associated strategies. Overall the policies align with the SDLP and South Downs Partnership Management Plan.</p>	<p>Noted.</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>Noted.</p>
	<p>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>	<p>Noted.</p>
	<p>Supporting text to Policy AM1 - Could be expanded to refer to additional local Countryside Trails and a public bike share scheme.</p>	<p>Noted.</p>

Organisation	Main Issues in the Representation	Lewes Town Council Comments
	<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>Noted.</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>Noted.</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>	<p>Accept changes to wording, as suggested. Title of map will be updated and reworded.</p>

	<p>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.</p>	<p>This has now been checked and the Map is correct, but the table needs updating. Due to an editing error, the following listed in the table were rejected for inclusion following the re-submission consultation.</p> <ul style="list-style-type: none"> • 13 Landport Farm Field No. 1 • 14 Landport Farm Field No. 2 • 26 Footpath parallel to Mayhew Way • 33 Cliffe Bonfire Society Site • 40 Cockshut Road Field • 54 Westgate Street / New Road / Paddock Lane • 55 St Michael's Churchyard • 12a Landport to Offham Bridleway is not shown on the Map as it falls outside the boundaries of the area shown on the Map. An inset to the Map for this will need to be provided
--	--	---

Organisation	Main Issues in the Representation	Lewes Town Council Comments
	<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. Amend criterion 1 to include the right wording of associated map.</p> <p>Neighbourhood Projects supporting text - 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 paragraph 11.2 and heading "Supporting Text" below paragraph 11.3.</p>	<p>Agree Railway Cutting Space to become Community Space rather than Local Green Space.</p> <p>Accept changes to wording in para 11.2 and 11.3, as suggested.</p>
Graham Glenn, on behalf of East Sussex Council (as a landowner)	<p>PL1(53): Former St Anne's Site, Rotten Row - 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> <p>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.</p>	Noted the potential to include new higher figure in the plan., but this is a change in earlier advice from ESCC which is included in the present LNP.
Alec Fuggle, on behalf of Regeneration	Policy HC4 - The most recent report of relevance is the Employment Land Review Update 2012. We would request that this is used to inform this policy.	Noted, but outside the scope of this LNP.

Organisation	Main Issues in the Representation	Lewes Town Council Comments
<p>Team, Lewes & Eastbourne District Councils</p>	<p>Policy PL1 (3): Land at the Auction Rooms - 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.</p>	<p>Question: Will including reference to mixed-use will impact on viability and number of residential units? The NDP has not allocated any employment sites as this has been addressed on the SDLP as stated in the introduction to the NDP (para. 1.8)</p>
<p>Richard Franklin, on behalf of Highways England</p>	<p>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.</p>	<p>Noted.</p>
<p>Rebecca Pearson, on behalf of Natural England</p>	<p>Policy LE2 is not clearly echoed in the Design Guidance and that this needs to be addressed.</p>	<p>Design guide is aimed at site specific response, not site selection criteria.</p>
	<p>Objective 8: Natural Environment Green Spaces and Biodiversity - 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</p>	<p>Noted – consideration that Obj. 8 is updated.</p>
	<p>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.</p>	<p>Noted – but how should the plan respond to this?</p>

Organisation	Main Issues in the Representation	Lewes Town Council Comments
	<p>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.</p>	<p>Noted but LE1 and LE2 are considered to address with this effectively.</p>
	<p>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 paragraph 17 of the NPPF, for <i>example to: 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></p>	<p>Noted – but where in the plan should soil protection be referred to?</p>
	<p>Policy PL1(53) - 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 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.</p>	<p>SDNPA advises that the entirety of the site is technically brownfield. There are several Tree Protection Orders in place.</p>
	<p>Design Guidance, 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</p>	<p>Noted.</p>
	<p>Design Guidance, 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.</p>	<p>Biodiversity is a key design guidance optic in para 8.49 and it is not clear more needs to be done here. The design guidance is aimed at influencing how allocated sites should be built out, not at site selection issues.</p>

Organisation	Main Issues in the Representation	Lewes Town Council Comments
	<p>SS3 4 - 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.</p>	Noted.
	<p>SS3 7- Supporting community food production provides natural capital and can contribute towards overall biodiversity if pesticide use is discouraged.</p>	Noted – Is this a request that only pesticide free farming should be encouraged by the plan?
	<p>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.</p>	Noted – Not clear if any change/revision is needed.
<p>Kim Dawson, on behalf of the Open Spaces Team, Lewes & Eastbourne District Councils</p>	<p>Page 23 Paragraph 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'.</p>	Accept suggested change to wording.
	<p>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 (following part of table, below)</p>	Noted.
	<p><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></p>	Noted.
	<p>Paragraphs 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.</p>	Noted.

Organisation	Main Issues in the Representation	Lewes Town Council Comments
	<p>Page 29 Section 4 - Paragraph 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).</p>	Noted.
	<p>Section 8 - Paragraph 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).</p>	Noted.
	<p>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.</p>	Noted.
	<p>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.</p>	Brownfield land is prioritised in the Lewes NDP for low cost housing, not ecological value.

Organisation	Main Issues in the Representation	Lewes Town Council Comments
	<p>Paragraphs 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 ...'<i>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 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 provenance with connectivity of the features paramount to achieving green infrastructure / landscape corridors.</i></p>	No comment. Leave to examiner to decide.
	<p>Paragraph 6.17 Brownfield sites - As linked to point 4 above, it this should read '<i>On sites where biodiversity is currently limited which includes some brownfield and agricultural sites, it is relatively straightforward...</i>'</p>	No comment. Leave to examiner to decide.
	No mention of Local Wildlife Sites in whole document – refer to point 5.	No comment. Leave to examiner to decide.
	<p>Paragraph 10.44 amendment to wording to '<i>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;</i></p>	No comment. Leave to examiner to decide.
	<p>CIL Paragraph 11.6 Improvements for Pedestrians addition of point 14) <i>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;</i></p>	Agree this could be added to the CIL list.
	<p>Policy PL1 (53): Former St Anne's School Site - 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.</p>	We understand this is no longer required.

Organisation	Main Issues in the Representation	Lewes Town Council Comments
Chris Flavin, on behalf of East Sussex County Council	<p>Feedback relating to the Consultation Statement – Concerns that the Plan doesn't address all the County Council's comments from the pre-submission consultation.</p> <p>General Infrastructure, Section 11 'Projects List' and Paragraph 11.3: 'Neighbourhood Projects' (page 142-145) 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. 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>	<p>Noted.</p> <p>Accept changes to wording, as suggested.</p>
	<p>Transport Development Control – 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.</p>	<p>Neighbourhood plans need to conform with strategic planning policies – are parking standards strategic planning policies? Are there specific areas in the plan that contradict parking standards?</p>
	<p>Garage sites – 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 criterion that requires this information as part of any application. However, it is recognised that satisfying such a criterion may not be possible and this could question the deliverability of the proposed allocations (particularly in planned quantum of residential units).</p>	<p>Any loss of car parking spaces may help deliver other aspects of the plan objectives and vision. No overriding reasons in transport terms why these garage sites cannot come forward.</p>
	<p>Transport Statements All site allocations should include the need for a Transport Statement.</p>	<p>Such transport statements do not appear to be necessary for a neighbourhood plan to require.</p>

Organisation	Main Issues in the Representation	Lewes Town Council Comments
	<p>PL1 (2): Land at Astley House and Police Garage - 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>	<p>Prescriptive dimensions too detailed for planning policy – a matter for design discussion at planning application stage. These dimensions prejudge a design/layout that has yet to be developed.</p>
	<p>PL1 (3) Land at the Auction Rooms - 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 accesses to improve the angle/junction radii and visibility – we would request that this is added as policy criteria.</p>	<p>In a highly urban context, increased visibility and radii can be damaging to historic townscape and are often unnecessary due to the very low speeds. A detailed matter for the planning application stage.</p>
	<p>PL1 (8) Land at Buckwell Court, Garage Site - 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>This requirement prejudices a design/layout that has yet to be developed and may be workable without a turning head.</p>
	<p>PL1 (44) Land at Prince Charles Road Garage Site - 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>Noted.</p>

Organisation	Main Issues in the Representation	Lewes Town Council Comments
	<p>PL1 (52) Land at St Anne's Crescent - 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>Noted. The car parking will not be displaced as far as possible, as an undercroft car par will be provided, along with remaining external parking.</p>
	<p>PL1 (57) Land at Lewes Railway Station Car Park The reference to Southover Road being the most likely option for a new site access (footnote 1. on page 100) should be removed.</p>	<p>Noted. Not agreed as the only alternative is Pinwell Road, very narrow and quite steep.</p>
	<p>PL1 (57) Land at Lewes Railway Station Car Park Criteria 5 of Policy PL1 (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)</p>	<p>As above.</p>
	<p>PL1 (57) Land at Lewes Railway Station Car Park 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.</p>	<p>Agree that whole subject of access will have to be addressed at the planning application stage, which is why we highlighted these issues above.</p>
	<p>PL1 (57) Land at Lewes Railway Station Car Park 'Improve access and egress to the railway station car park' in Key Projects and Actions under Car Parking Strategy (last paragraph 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>	<p>As above.</p>

Organisation	Main Issues in the Representation	Lewes Town Council Comments
	<p>Transport Strategy - 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.</p>	Noted.
	<p>Policy AM2: 'Public Transport Policy' and Policy AM3: 'Car Parking Strategy' 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'.</p>	Noted.
	<p>Policy AM2: 'Public Transport Policy' and Policy AM3: 'Car Parking Strategy' 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>	<p>"Contribute" through their design contributions on site or through financial contributions off site. Wording can be clarified.</p>
	<p>Flood Risk Management 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.</p>	<p>Advice from the SEA and the SDNPA's Level 2 SFRA determined which sites required SUDs as a planning requirement and which did not. EA is responsible for this. All references to flood risk / mitigation to be assessed in light of EA comments (see earlier).</p>

Organisation	Main Issues in the Representation	Lewes Town Council Comments
	<p>Flood Risk Management Equally Policy PL3 Flood Resilience is confusing as clauses 1 and 2 appear to expect new development to address town wide issues.</p> <p>Archaeological Heritage 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.</p>	<p>Advice from the SEA and the SDNPA's Level 2 SFRA determined which sites required SUDs as a planning requirement and which did not. EA is responsible for this. All references to flood risk / mitigation to be assessed in light of EA comments (see earlier).</p> <p>Noted.</p>
Archaeology on behalf of East Sussex County Council	<p>Archaeological Heritage Some comments made during Reg 14 consultation have been addressed, but a number of points remain: There is no obvious reference to the East Sussex Historic Environment Record.</p>	Noted.
	<p>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 (follows):</p>	Noted.
	<p>Policy PL1 (26): Land at South Downs Road - Needs to include an archaeological assessment requirement.</p>	Is an archaeological assessment needed for a closed landfill site?
	<p>Policy PL1 (48): Land at Former Ambulance Headquarters, Friars Walk - The archaeological assessment should be an early requirement as this site is known to contain buried remains.</p>	This is a conversion of an office building to flats, so unlikely that ground works will be required.

Organisation	Main Issues in the Representation	Lewes Town Council Comments
	<p>Policy PL1 (52): Land at St Anne’s Crescent - An evaluation excavation assessment of this site would be required, not an archaeological watching brief.</p> <p>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:</p> <p>The vision statement still makes little/no reference to the rich environmental heritage, as recommended. However, it is recognised in section 6.</p>	<p>Noted.</p> <p>Vision Statement reflects the priorities and wishes of the Steering Group, informed by public consultation.</p>
<p>County Ecologist on behalf of East Sussex County Council</p>	<p>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.</p> <p>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.</p> <p>Policy PL1: 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.</p> <p>All applications for housing developments should be informed by an Ecological Impact Assessment. The current version only requires this for PL1 (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>	<p>It was considered too onerous to apply this to all sites so only larger sites are referenced but this can be reconsidered.</p> <p>Noted.</p> <p>Low cost affordable housing is a key aim of the Lewes NDP and brownfield sites are a key to securing this.</p> <p>The SEA advised on which sites this should apply to and which would be exempt.</p>

Organisation	Main Issues in the Representation	Lewes Town Council Comments
	<p>Highway (Transport Development Control) Regulation 14 Comments</p> <p>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:</p> <p>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.</p>	Noted but already included.
Highways Comments	<p>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 in many instances. Many areas where housing allocations are proposed already experience high levels of on-street parking.</p> <p>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.</p> <p>PL1 (2): Land at Astley House & Police Garage – 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.</p>	<p>The SEA advised on the "one car" parking policy and to which site this should be applied to and which should be exempt.</p> <p>Prescriptive dimensions too detailed for planning policy – a matter for design discussion at planning application stage. These dimensions prejudge a design/layout that has yet to be developed.</p>

Organisation	Main Issues in the Representation	Lewes Town Council Comments
	<p>PL1 (3): Land at the Auction Rooms – 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 criterion. It is within walking distance of many services/facilities and public transport provision.</p>	<p>In a tight urban situation <i>wider</i> radii and <i>increased</i> visibility are often not appropriate on townscape and heritage grounds. Prescriptive dimensions too detailed for planning policy – a matter for design discussion at planning application stage.</p>
	<p>PL1 (4): Land at Blois Road, Garage Site North – 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 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>	<p>Not clear on what grounds is a survey of garage occupation required? Displacement of car parking in return for new low-cost housing meets the aims and objectives of the Lewes NDP. Continued efforts to accommodate the car do not. [This comment applies to all other garage sites].</p> <p>“Substandard” – how is this defined?</p>

Organisation	Main Issues in the Representation	Lewes Town Council Comments
	<p>PL1 (5): Land at Blois Road, Garage Site South- 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.</p>	<p>Not clear on what grounds is a survey of garage occupation required? Displacement of car parking in return for new low-cost housing meets the aims and objectives of the Lewes NDP. Continued efforts to accommodate the car do not. [This comment applies to all other garage sites].</p> <p>“Substandard” – how is this defined?</p>
	<p>PL1 (8): Land at Buckwell Court, Garage Site – 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.</p>	<p>Note on LDC garage usage: The Steering Group obtained rental data from LDC, which on average showed only around 50% rented. Anecdotal evidence suggests that the majority of this usage is household storage. Site visits indicated very little vehicular movement let alone usage. Therefore, it was considered that traffic surveys would be of no value. New houses on these sites could have parking underneath.</p>

Organisation	Main Issues in the Representation	Lewes Town Council Comments
	<p>PL1 (13): Land at the Former Wenban Smith Site – 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 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>	Deleted from LNP as part of the SDNPA Local Plan
	<p>PL1 (21): Land at Kingsley Road Garage Site – 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 criterion.</p>	Deleted from this version of the LNP as outside the settlement area.
	<p>PL1 (26): Land at Southdowns Road – Planning permission under SDNP/15/01303 with s106 in place for 79 dwellings +2182sqm of B1 use. Planning application SDNP/17/00387 not yet determined for change of use of 2182sqm of B1 use to 24 dwellings. No highway objection to either application and highway works secured, therefore no further comment to make.</p>	Noted.
	<p>PL1 (30): Land at Landport Road Garage Site – 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.</p>	Footway requirement noted.

Organisation	Main Issues in the Representation	Lewes Town Council Comments
	<p>PL1 (34): Land at Little East Street Car Park, Corner of North Street & East Street – 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.</p>	
	<p>PL1 (35): Land at The Lynchets Garage Site – 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 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 criterion.</p>	Noted.
	<p>PL1 (36): Land at Magistrates Court Car Park, Court Road - Planning permissions under SDNP/16/01618 & SDNP/17/01449 for 9 units with 106 agreement – no highway objection to applications and highway works secured.</p>	Noted.
	<p>PL1 (39): Land at Former Petrol Filling Station, Malling Street – 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.</p>	Noted.

Organisation	Main Issues in the Representation	Lewes Town Council Comments
	<p>PL1 (44): Land at Prince Charles Road Garage Site – 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.</p>	<p>Out of date version being considered here as whole garage site is considered for allocation but earlier was subject to a drafting error.</p>
	<p>PL1 (46): Land at Queens Road Garage Site – 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.</p>	<p>Noted.</p>
	<p>PL1 (52): Land at St Anne’s Crescent – 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 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.</p>	<p>Car parking could be retained under the proposed new building. There could even be a second level of car parking, but this would be the subject of a detailed planning application.</p>
	<p>PL1 (53): Former St. Anne’s School Site – 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.</p>	<p>Noted.</p>

Organisation	Main Issues in the Representation	Lewes Town Council Comments
	<p>PL1 (57): Lewes Railway Station Car Park – 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>	Noted.
	<p>Transport Strategy comments</p> <p>Objective 6: ‘Easily Moving Around’ – We would recommend considering amending the title of this objective to “Transport Movement & Access”.</p>	Noted but more inclusive language was deliberately chosen. “Transport Movement & Access” implies motorised transport only.
	<p>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></p>	Noted.
	<p>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) 1) <i>The <u>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></p>	Noted.

Organisation	Main Issues in the Representation	Lewes Town Council Comments
	<p>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.</p>	<p>Noted.</p>
	<p>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.</p>	<p>A park-and-ride scheme was included earlier and well supported but was eventually deleted as not deliverable due to the absence of suitable car parks on the edge of town but within the settlement area.</p>
	<p>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.</p>	<p>Noted.</p>
	<p>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.</p>	<p>Noted. Should this ref. to improvement go in the supporting text?</p>
	<p>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.</p>	<p>Noted.</p>

Organisation	Main Issues in the Representation	Lewes Town Council Comments
	<p>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.</p>	Noted.
	<p>SS1 - 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. We would be willing to further review this shortly as part of the development of the emerging ESCC Cycling & Walking Investment Plan.</p>	Noted.
	<p>Other Additional Comments and Advice relating to Transport Strategy</p> <p>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 paragraphs 4.33-4.37 outline the approach for Lewes: https://new.eastsussex.gov.uk/roadsandtransport/localtransportplan/ltp3/downloadltp3</p>	Noted.
	<p>Other Additional Comments and Advice relating to Transport Strategy</p> <p>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.</p>	Noted.

Organisation	Main Issues in the Representation	Lewes Town Council Comments
	<p>Policy HC3: Heritage Protection</p> <p>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</p>	Noted.
Robert Lloyd – Sweet, on behalf of Historic England	<p>Part b) Planning Application Requirements and Heritage Issues - 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?</p>	Noted.
	<p>Paragraph 2) We recommend the wording is amended to read: <i>"2) 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>	Noted.
	<p>Policy PL1: General Housing Strategy</p> <p>We recommend a cautionary note to paragraph 7) to read: <i>"7) 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></p>	Noted.

Organisation	Main Issues in the Representation	Lewes Town Council Comments
	<p>Policy PL1(2) At bullet point 10 - Historic England recommend amending bullet point 10 to read: <i>“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 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>	Noted.
	<p>We recommend that a similar approach be set out for paragraph 7) of Policy PL1 (34), paragraph 8) of Policy PL1 (35), paragraph 6 or Policy PL1 (36), paragraph 3 of Policy PL1 (44), paragraph 3 of Policy PL1 (46), paragraph 6 of Policy PL1 (48) and paragraph 5 of Policy PL1 (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 PL1 that will be applied to all site allocations.</p>	Noted.
<p>Jenny Martin, on behalf of Conservation Team, Lewes and Eastbourne District</p>	<p>While we welcome initiatives to enhance the recording of the historic environment through a local list, we would welcome clarity about who compiles it.</p>	Noted.

<p>Thea Davis on behalf of the Neighbourhood Planning & Planning Policy Team, Lewes and Eastbourne District Councils</p>	<p>General Conformity with Development Plan</p> <p>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 19901 as applied to neighbourhood plans by section 38A of the Planning and Compulsory Purchase Act 20042 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)”.</p> <ul style="list-style-type: none"> ▪ 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 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. 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. ▪ 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. <p>In the emerging SDLP, Policy SD79 sets the number of dwellings to be provided at land at Old Mallig 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.</p>	<p>SDNPA (the relevant local planning authority) consider that the current text contained in the Lewes Neighbourhood Plan very clearly and correctly explains this relationship and how the housing requirement has been derived. No change in this respect is necessary with regards to this issue.</p>
---	---	--

Organisation	Main Issues in the Representation	Lewes Town Council Comments
	<ul style="list-style-type: none"> ▪ At the opening of the 'Vision Statement for Lewes' chapter (end of paragraph 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. 	Planning applications will be assessed against policy <u>and</u> vision and objectives.
	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.	Plan does not address new employment land. See paragraph 1.8.
	LE1 - In the supporting text (paragraph 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.	Noted.
	HC1 - Plan inserts additional provision to Policy HC1 with regard to the protection of the Victoria Hospital (6). It appears that a number of representations were made suggesting that the services offered 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 HC1 would appear to have been inserted in response. However, Lewes District Council is not opposed to the inclusion of this point.	Noted.
	HC2 - Paragraph 7.12 states, " <i>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</i> ". 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.	Noted.

Organisation	Main Issues in the Representation	Lewes Town Council Comments
	<p>Although the following (excerpt from paragraph 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: <i>"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."</i></p>	<p>Noted – agreed this could be moved to become an action.</p>
	<p>HC3 (b) - Criterion 1) requires the following: <i>"Archaeological or historic assets below or above ground, should be conserved in a manner appropriate to their significance."</i> This element of the policy may be a little vague to be appropriately utilised.</p>	<p>Noted – advice from Historic England will prevail here.</p>
	<p>Criterion 2) is likely to conflict with existing policies and NPPF. Development could be limited unnecessarily.</p>	<p>Not clear which parts of the NPPF this may conflict with. Seeks to prevent absent landlords allowing a building to fall into disrepair to facilitate demolition.</p>
	<p>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.</p>	<p>This refers to the strategic sites that are not included in the neighbourhood plan but are in the SDNPA Local Plan.</p>
	<p>No explanation as to what "local conservation bodies" are, nor possible for Council to enforce such a requirement.</p>	<p>Local conservation bodies are listed by name in the policy itself.</p>

Organisation	Main Issues in the Representation	Lewes Town Council Comments
	<p>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 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>	<p>Consistent advice has been that Lewes has a fine heritage that needs protecting so a series of “onerous” requirements seems reasonable compared to other less heritage-focused places.</p>
	<p>Paragraph 7.22 indicates findings in background documents which do not appear to have influenced the heritage policies at all.</p>	<p>Noted.</p>
	<p>HC4 - Advisable to clarify in criterion 2) what “clear evidence” would be required in this scenario. This criterion is therefore not considered to be consistent enough with Core Policy 4 of the JCS.</p>	<p>Examples of clear evidence (e.g. open book viability assessments) can be added to the policy for clarification.</p>
	<p>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.</p>	<p>The Lewes plan is considered to be in general conformity with the JCS. Large-scale is in line with the national definition e.g. 10 homes or more.</p>
	<p>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.</p>	<p>Noted.</p>

Organisation	Main Issues in the Representation	Lewes Town Council Comments
	<p>PL1 criterion 2) states <i>“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).”</i> 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.</p>	<p>Noted – text can be updated to remove “if” and reflect current allocation reality.</p>
	<p>Criteria 5) and 6) make no mention of the acceptability of such development in relation to residential amenity and should be reworded.</p>	<p>It is considered this is already covered by the whole plan policies.</p>
	<p>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.</p>	<p>Space standards are referred to elsewhere in the plan, but this can also be added to this section.</p>
	<p>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.</p>	<p>This may help control resubmitted planning applications?</p>
	<p>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.</p>	<p>Parking should be controlled at a local level – the Lewes NDP seeks to maximise low cost housing over the maintenance of car parking levels. Maintaining car parking levels also runs counter to international carbon reduction targets, air quality targets, health and well-being targets etc.</p>

Organisation	Main Issues in the Representation	Lewes Town Council Comments
	<p>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.</p>	<p>Noted.</p>
	<p>PL1 (3) - Criterion 2). Careful consideration should be given to the use of the word “overshadow” in PL1 (3) - 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.</p>	<p>Noted – text can be revised accordingly.</p>
	<p>PL1 (34) - Criterion 5) may be difficult to implement if no work has yet commenced on another development.</p>	<p>Noted – perhaps needs to be reworded to reflect the uncertainty of the situation?</p>
	<p>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.</p>	<p>Noted – the text can be reworded to be “appropriate to the relevant speed limit” or similar. This is assuming the speed limit may be reduced in future, meanwhile...</p>
	<p>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.</p>	<p>.... there is no reason to believe the current 20mph will be increased, so suggest this reference stays as is.</p>
	<p>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.</p>	<p>There should be no need for high parking standards in a town centre.</p>

Organisation	Main Issues in the Representation	Lewes Town Council Comments
	<p>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.</p>	<p>Neighbourhood plans need to be distinctive. The word “Lewesian” is a locally well-known and understood description, therefore it is considered fine to use it in this context.</p>
	<p>Criterion 4) may prove too onerous for all schemes</p>	<p>Possibly but applicants will have to show why they fail to meet Criterion 4 and ask for exemption. It does not seem unreasonable to request these design responses.</p>
	<p>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.</p>	<p>Criterion 2 does not imply that permeable paving is the only means to be used – perhaps needs to be reworded to make this clearer?</p>
	<p>AM1 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).</p>	<p>Strategic sites are the non-neighbourhood plan sites i.e. those in the Local Plan.</p>
	<p>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>	<p>Financial contributions will be sought from developers building in the neighbourhood plan area to support public transport investments. Policy AM2 is necessary to secure those contributions.</p>

Organisation	Main Issues in the Representation	Lewes Town Council Comments
	<p>Existing Affordable Housing Policy - The draft Lewes Neighbourhood Plan states '<i>the SDNPA seeks 50% of dwellings on all sites to be affordable.</i>' 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>	<p>Advice received is that the Lewes NDP is to be in conformity with the adopted plan (JCS) but should have regard for the emerging plan (SDNPA). In this instance, it is preferred to work with the more recent of the two documents.</p>
	<p>Affordability - Lewes Low Cost Housing concept is generally consistent with the strategic policies of the JCS if adopted and put into practice.</p>	<p>In terms of delivery of affordable housing, the Lewes NDP wishes to go further than the SDNPA Local Plan, which is not considered sufficient enough given the "hotspot" Lewes is within the wider national park. Pleased to have support for the Lewes Low Cost concept.</p>
	<p>Developments - 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>	<p>Noted but Lewes does not have any big sites that are 1) available, and 2) have little/no landscape impact.</p>
<p><i>/ ends /</i></p>		