

Lewes Neighbourhood Development Plan

Answers from Lewes Town Council to Examiner's Clarification Note (2)

19th October 2018

A. Proposed Housing Sites

B. Policy SS3 Local Green Spaces/Local Community Spaces

A. Proposed Housing Sites

The various garage court sites: Are the sites deliverable and viable within the Plan period?

Answer: The garage sites are held on the Lewes District Council's (LDC) Housing Revenue Account and can only be used to meet local housing need. LDC has put them forward for development and in accordance with government policy and will work with local providers e.g. the Lewes Community Land Trust.

Is there an active plan for their (garage sites) marketing and disposal?

Answer: See previous response, above.

Policy PL1 2

On what basis is criterion 4 on car parking specific to this site as opposed to other housing sites?

Answer: The wording regarding parking in PL1(3) would be adequate. There is already an over subscription for local on-street parking in this area. Therefore, it was agreed that, being an island site, these houses would be provided with on-site parking.

Furthermore, the SEA findings recommended that certain sites should have a particular car parking to accommodation ratio depending on their distance from the town centre. This too informed the policy wording in the submission plan.

Policy PL1 4/5

I looked at these proposed sites in detail on my visit. Has any detailed assessment been undertaken of their impact on the amenity of nearby residential properties due to the significant difference in levels?

Answer: Detailed plans for these HRA sites have not been developed yet. This issue is familiar to Lewes given the topography of the town. It was also mentioned as an issue in PL1(4) 3). Replacing the final "same" here with "existing housing" might clarify the point?

How many of the garages on each of the two sites are currently let?

Answer: 18 out of a total of 64 garages on both sites (28%)

Has any assessment been made of the impact of the proposed additional dwellings in Blois Road on the safety of the road network and general access arrangements?

Answer: This would be a matter of consideration as plans are developed for the planning application stage.

Policy PL1 34

Are 11 houses deliverable on this site? Is the proposed delivery related to the proposed undercroft car parking?

Answer: The site was originally a high-density development with terraced 4-storey houses and it was considered that a development of a similar density (comprising flats or duplex/maisonettes) could be developed over the parking spaces.

Is undercroft parking compatible with the potential archaeological importance of the site?

Answer: The site slopes steeply and it was envisaged that the slope would enable undercroft parking without significant further excavation. However, it would be necessary to carry out an archaeological investigation because the site is within a notification area.

Criterion 5 implies a degree of reliance on other development taking place. Was this the intention?

Could site 34 be developed independently without any reference to the North Street development?

Answer: "No" to the first and "Yes" to the second. The latest plans for the North Street Quarter development show only a notional boundary but no works affecting this site.

Policy PL1 53

I looked at this proposed site in detail on my visit. To what extent has the production of the Plan sought to work collaboratively with the County Council's ambitions for the redevelopment of the site?

Answer: Earlier this year ESCC commissioned independent consultants to identify all possible development options for this site including sale. These options are currently being reviewed and assessed by ESCC. The Steering Group has been in regular contact with ESCC for several years, both in person and via correspondence, to keep abreast of progress on this site.

In the first criterion what is meant by the 'brownfield land'?

Answer: LTC were advised that ESCC (and indeed SDNPA) consider the whole site as "brownfield land".

Am I correct in assuming that criterion 9 is setting out the Plan's requirements if access from Rotten Row is the preferred option rather than directly proposing Rotten Row as the means of access?

Answer: Yes

In any event is access/egress to and from Rotten Row technically possible due to levels and highway width/capacity issues?

Answer: Rotten Row could form a good pedestrian and cycle access as it was used for many for school traffic and may therefore be technically possible. An alternative access may be an option via land owned by ESCC to the north of the site.

Policy PL1 57

I looked at this proposed site in detail on my visit. I understand the implications of the first two criteria. I can see that development on this site would serve the dual purpose of retaining the existing car parking spaces whilst delivering new dwellings in a sustainable location. Nevertheless, has the viability of the proposal been tested?

Answer: The proposed scheme of housing over the car park is supported by Network Rail. The issue with the site was the unsatisfactory access to the car park and possible flooding at ground level but it was considered that the housing would have new access from the north from higher ground levels and not from Pinwell Lane. As far as we are aware, no detailed proposal has yet been produced at which point viability could be assessed.

All Housing Sites

Do you have any specific comments (on a site-by-site basis) on the representations made by the County Council Transport Control and Highway teams on pages 47-48 and 51-56 respectively within the summary of representations produced by the National Park Authority?

Answer: We appreciate the advice provided and recognise that many of the sites allocated have issues, but we consider these are matters best investigated and reviewed once individual planning applications are made. Detailed design exercises undertaken as part of the planning process will reveal the most appropriate site by site response to the issues identified in the policies.

The approach taken was that the Lewes Neighbourhood Plan sets the framework, intention and/or guidance for each site but also allows enough flexibility for a creative response from a good design team later in the process.

It should also be noted that the Lewes Neighbourhood Plan is keen to ensure the most efficient use of land within the urban area to meet its housing needs and reduce reliance on the private car. The housing sites including in the submission plan reflect these two aims.

Once this detail has been resolved I am minded to incorporate the appropriate level of detail into the component site specific policies (as set out in my first note). Any additional comments would be appreciated on my thinking at this stage.

Answer: See the response above. We look forward to these sites being brought forward for consideration, and we are content to leave this point to your further consideration.

B. Policy SS3 Local Green Spaces/Local Community Spaces

The Plan's distinction between Local Green Spaces (LGS) and Local Community Spaces (LCS) is particularly innovative. It avoids the application of the potentially restrictive LGS regime on open spaces where a degree of built development is likely or planned to sustain its use/longer term viability.

Nonetheless a few detailed queries arise as follows:

LGS 50 Baxter's Field

Has the number simply been lost on the map on the overlay between pages 136/137?

Answer: It is on the map, see the web site.

LGS 21 Malling Old Railway Line

Do you have any comments on the SDNPA's views on the ability of the land to offer improved pedestrian and cycle access?

Answer: We favour that use, which would be in line with an original idea of the Plan that the now strategic housing site at Old Malling Farm should be an exemplary carbon neutral development as it is a greenfield site. This would also fit with Policy AM1(1).

Would such activities be compatible with LGS designation? Alternatively, would the site be better identified as LCS?

Answer: We agree, and the table and map should be altered to suit.