

**Agenda Item 13**  
**Report PC25/26-08**

Report to	<b>Planning Committee</b>
Date	<b>10 July 2025</b>
By	<b>Director of Planning</b>
Local Authority	<b>Lewes District Council</b>
Application Number	<b>SDNP/24/03587/FUL</b>
Applicant	<b>Mr Simon Burton – Lewes District Council</b>
Application	<b>Demolition of garages and erection of 6 x affordable dwellings to rent.</b>
Address	<b>Garage Compound, Queens Road, Lewes, East Sussex</b>

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**Recommendation:**

- I. That the planning application be refused for the reasons set out in paragraph 9.2 of this report.**
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## Site Location Map



## **Executive Summary**

The application is for the development of a site allocated in the Lewes Neighbourhood Plan for 6 affordable dwellings (policy PL1B).

The principle of delivering much needed affordable housing is strongly supported and a key part of our Local Plan policy drive, and the National Park's duty. Nevertheless, the siting, layout and form of the proposed scheme results in a significantly unsympathetic sense of place which is dominated by vehicle movement, inward looking development and does not contribute positively to the character of the surrounding area. This would be contrary to policies SD5 and SD21 of the South Downs Local Plan in particular.

Along with other concerns regarding highway safety and parking provision, the benefits of the scheme do not outweigh the negative effects of the development as proposed. The application is therefore recommended for refusal.

### **1. Site Description**

- 1.1 The application relates to an existing local authority-owned garage site, approximately 1300 square metres in area, which has been allocated for residential development in the Lewes Neighbourhood Plan (LNP). The site contains 41 single storey, flat roof garages in two rows facing each other on either side of the compound. The garage compound continues to the west of the site under the ownership of Sussex Police, which comprises a further 16 garages.
- 1.2 The site is accessed from a narrow 22m long drive between a 2-storey block of flats and a pair of semi-detached dwellings, on Queens Road. This access also serves the garages in the ownership of Sussex Police beyond the site boundary.
- 1.3 The site is located along the Ouse Valley Side, as defined by the South Downs Integrated Landscape Character Assessment (SDILCA) and is on the northern edge of the South Malling Estate on the northern edge of Lewes Town.
- 1.4 In front of the application site (to the south) is a line of 2-storey dwellings and block of flats. This row of housing continues to the east of the application site, on the opposite side of the site access. Further to the west is the Sussex Police and Fire Service Headquarters. Immediately to the north of the application site is a belt of woodland, which is subject to a Tree Preservation Order. The land drops steeply down to a rill located along the flood plain.
- 1.5 The site lies approximately 1km from Lewes Town Centre, within easy walking distance.

### **2. Relevant Planning History**

- 2.1 No relevant planning history; there have been no applications relating to the site subsequent to the designation of the National Park.

### **3. Proposal**

- 3.1 This application has come forward as one of eleven sites across Lewes District, of which seven are in the South Downs National Park (SDNP), to provide circa 37 affordable housing units on 'underutilised garage sites'. The sites will deliver a range of homes, including 1 no. – 3 no. bed houses and bungalows, meeting the needs of households currently in housing need across Lewes District.
- 3.2 This application is seeking planning approval for 6 no. 1-bed dwellings, which would be offered as affordable homes for either Social or Affordable rent by Lewes District Council. Each unit would be spread across 2-storeys, with private outdoor space to the rear. The units will be constructed as 2 terraces of 3 units, facing in towards each other, with a shared amenity space in between. The units themselves comprise 58sqm of floorspace, each. The units would comprise a steeply pitched roof slope, with a dormer on their front elevation and small parapet, behind which is a flat roof with photovoltaic (PV) panels. To facilitate the development, all garage buildings within the application site will be demolished (the 16

garages to the west of the site, in the ownership of Sussex Police would remain).

- 3.3 Access would be retained from Queens Road and resurfaced to provide a shared access – the footpath being demarcated with a different material. The vehicular access would then continue to run along the southern boundary of the site, moving further from this boundary as it progressed, before veering northwards at the end of the private amenity space serving the western block of proposed dwellings. This is proposed to provide continued access to the remaining garages to the west, with a layby extending into the amenity space between the dwellings.
- 3.4 Six unallocated parking spaces would be provided in a parking court in the northeastern corner of the site, at the top of the existing driveway. All spaces would provide electric vehicle (EV) charging. The rear boundaries of the proposed eastern terrace runs adjacent to the parking area, marked by a native hedgerow and 1.8m high gates. A bin collection point is also proposed in this space.
- 3.5 Cycle storage is proposed in the central shared amenity space, to serve all 3 dwellings.
- 3.6 The dwellings would be constructed using a volumetric modular construction (VMC) method – in this instance once the substructure has been installed on the site (e.g. piles / footings) the modules are transported to site, assembled and clad with brick slips and metal cladding – the metal cladding also representing the roof material. Windows and doors are proposed to be recycled UPVC units.
- 3.7 The ground floor windows on the front elevations, facing the central amenity spaces, will be fitted with louvres, to provide some privacy. The southern units of the terraces will include a small, secondary window to provide outlook to the driveway.

#### 4. Consultations

##### 4.1 Archaeology (ESCC) – No Objection subject to conditions

Conditions requiring the submission of a written scheme of investigation and for the record of such investigation to be provided.

##### 4.2 Design Officer – Objection.

The location of the access point and root protection zones make this site challenging, therefore any development for this number of units on the site is likely to result in some level of compromise. It remains considered that the proposed public realm is too compromised currently. The layout and boundary treatments and lack of soft landscaping would result in a poor-quality appearance and experience of arrival that lacks passive overlooking.

If linear East-West development is not possible it remains recommended that an alternative arrangement should be explored using flats (maximum 2 storey for this context) to enable development that fronts both the parking and access route through the site. This would improve passive surveillance, the perception of safety and the experience of the public realm. This would not need to result in any additional maintenance burden if the first floor flat was accessed via its own self-contained staircase behind a front door at street level, rather than a communal entrance.

##### 4.3 Environment Agency – No Objection subject to conditions

Conditions requiring steps to be taken in the event of discovery of previously unidentified contamination and SuDs.

##### 4.4 Fire and Rescue Service (ESCC) – Comment

At this stage East Sussex Fire Authority have no comment to be made regarding this application however, comment will be made in due course during formal consultation with the relevant Building Control in accordance with procedural guidance and Building

Regulations.

Officer Note: earlier comments from the Fire and Rescue Service identified inadequate access for fire appliances on to the site. The applicant has sought to overcome this with the provision of a sprinkler system within the dwellings.

**4.5 Lewes Town Council – Comment.**

Concerns about access to the site for emergency services need to be considered and access for privately owned garages. Lewes Town Council were positive about the good use of the site.

**4.6 Local Highway Authority (ESCC) – Objection (based on original proposals – further comments awaited on current plans).**

The proposal would lead to increased traffic hazards on Queens Road, due to the substandard access arrangement, making it contrary to paragraph 114 of the NPPF.

Officer Note: No changes have been made to the access in the most recent amendments, other than the relocation of the bin collection point.

**4.7 Southern Water – No objection.**

**4.8 Sustainable Construction – Comments**

There is concern that the use of direct electricity for space heating based on a SAP 10 assessment may result in affordability issues for the occupants. Further details are required and the strategy for the use of substituted, re-used, recycled or other green materials, the location of internal recycling bins and how the dwellings are designed to reduce overheating risk. In the event permission is granted, these matters could be secured by condition.

**5. Representations**

**5.1** 12 objections were received when the scheme was first received and a further objection following receipt of the amended plans. The comments are summarised below. Where multiple comments have been received from a single party during a consultation round, these have been counted as one representation.

**5.2 Objections**

- Insufficient parking on site leading to further obstruction on Queens Road.
- Increased risk to safety of pedestrians and other road users.
- Loss of trees to the north of the application site.
- Impact of construction traffic on residents.
- Insufficient access being provided to remaining garage users.
- Impact on bank stability.
- Turning for shared access path unsuitable for vehicles.
- Effect on residential amenity, including views.
- Parking spaces are not correct size, according to ESCC standards.

**5.3** A number of third parties have raised concerns regarding current private rights of access granted to them by Lewes District Council over the years. The proposed development would severely impede these access rights both in terms of the route and the size of vehicles that could use the proposed shared access path. Officers have raised this matter with the applicant. Ultimately, these private rights carry little weight in the consideration of the planning application. In the event, however, that a planning permission were granted, these private rights of access would not be overridden and the development could not commence

until such time as the matter had been resolved between all the third parties involved. As this is a civil matter, we have informed the applicant and it is their responsibility to resolve prior to the commencement of development.

5.4 Friends of Lewes

Friends of Lewes support the proposed scheme in principle, both in design terms and because it would add to Lewes' housing stock, especially if they maximise the opportunity to provide much-needed affordable housing.

**6. Planning Policy**

6.1 Most Relevant Sections of the National Planning Policy Framework:

- Section 2 – Achieving sustainable development
- Section 5 – Delivering a sufficient supply of homes
- Section 8: Promoting healthy and safe communities
- Section 9: Promoting sustainable transport
- Section 12 – Achieving well-designed places
- Section 14: Meeting the challenge of climate change, flooding and coastal change
- Section 15 – Conserving and enhancing the natural environment

6.2 Most relevant Policies of the Adopted South Downs Local Plan (2014-2033) (A full list of relevant policies and applicable legislation can be found in Appendix 1):

- SD5: Design
- SD21: Public Realm, Highway Authority
- SD22: Parking Provision
- SD25: Development Strategy
- SD28: Affordable Homes

6.3 The South Downs Local Plan is undergoing a period of review and the First Publication (Regulation 18 Consultation) was undertaken between 20 January – 17 March 2025. This is the first publication of the Local Plan Review and therefore can only be attributed very little weight. As it progresses through the adoption process, it will gain more weight for the purposes of decision making.

6.4 Most Relevant Policies of the Adopted Lewes Neighbourhood Development Plan (A full list of other relevant policies and applicable legislation can be found in Appendix 1):

- PL1B – Allocated Sites
- PL2 – Architecture and Design
- PL4 – Renewable Energy and the Resource and Energy Efficiency of New Buildings

6.5 Other Relevant Policy Documents (including Supplementary Planning Documents and Technical Advice Notes):

- Design Guide SPD
- Parking for Residential and Non-Residential Development SPD
- Sustainable Construction SPD
- Biodiversity Net Gain TAN
- Dark Skies TAN

- Ecosystem Services TAN

#### 6.6 Relevant Policies of the South Downs Management Plan (2020 – 2025)

- Partnership Management Plan Policy 1 (Landscape)
- Partnership Management Plan Policy 3 (Dark Skies)
- Partnership Management Plan Policy 25 (Water Efficiency)
- Partnership Management Plan Policy 37 (Active Travel)
- Partnership Management Plan Policy 39 (Vehicle Parking)
- Partnership Management Plan Policy 40 (Transport)
- Partnership Management Plan Policy 48 (Towns and Villages)
- Partnership Management Plan Policy 50 (Housing)

### 7. **Planning Assessment**

7.1 This application is seeking full planning approval for the development of the Queens Road garage site. Therefore, the main issues for consideration are:

- Principle of development
- Affordable Housing / Housing Mix
- Sustainable construction and Net Zero
- Design and landscape
- Highways and Parking
- Ecology and biodiversity net gain (BNG)
- Drainage

#### Principle of Development

7.2 The application site is allocated in the Lewes Neighbourhood Plan (LNP) for 6 dwellings (Policy PL1B). The principle of residential development on this site is therefore acceptable subject to compliance with the Development Plan as a whole and material planning considerations.

#### Affordable Housing / Housing Mix

7.3 In accordance with South Downs Local Plan (SDLP) policy SD28, the site is required to provide 2 affordable homes. The proposal is for all the units to be secured as affordable or social rented housing, which goes beyond the minimum required and is welcomed as this supports the National Park Duty and the provisions of the 2010 Circular (see Appendix 1). Considered in isolation, the application site does not demonstrate a policy compliant housing mix, however given the constraints of the site and the wider provision of affordable homes across the multiple sites outlined in Section 3 of this report, such deviation is considered acceptable. The provision of 100% affordable homes on a site allocated in the LNP is given significant weight.

7.4 The LNP requires a proportion of any affordable housing being provided to be delivered as 'Lewes Low Cost Homes' (LLCH). The ability to provide LLCH will depend, among other things, on the tenure of affordable housing being proposed and land ownership; as the land is owned by Lewes District Council, if the units were to be provided as Social Rented units, these would belong to the Lewes District's Housing Revenue Account and could not be redefined as anything but Social Rented units. The application is currently not clear on the type of affordable housing being proposed i.e. Affordable or Social Rent. This would need to

be clarified and secured as part of a S106 Agreement in the event planning permission were granted.

#### Sustainable Construction and Achieving Net Zero

- 7.5 Policies SD48, PL2 and PL4 require the design of new development to address climate change mitigation through the on-site use of zero/low carbon technologies, sustainable design and construction and low carbon materials. Proposals must achieve an additional 19% carbon reduction above Part L and a total mains consumption of no more than 110 litres per person per day.
- 7.6 The proposed development has demonstrated an 81.41% reduction in CO<sub>2</sub> emissions for residential use over the notional building case for the development. Whilst normally UPVC windows and doors would be discouraged, these are prevalent within the local context, and it is noted that the units comprise ~75% recycled materials. The scheme also proposes a PV array on the roofs as well as a hot water heat pump per dwelling.
- 7.7 Water fittings within the units will ensure a water consumption target of 105 litres, per person per day is achieved.
- 7.8 It is considered that the proposal would meet the requirements of SD48 from the SDLP and policy PL4 from the LNP.

#### Design and Landscape

- 7.9 There has been little change to the site layout since the original submission, other than minor amendments to the bin collection point and changes to the ground floor fenestration. Officers had previously raised significant concerns regarding the layout and form of the proposed development.
- 7.10 The appearance of the dwellings is boxy and with a deep floor plan. In many circumstances this may not be an issue but in this case it is especially noticeable due to the orientation of the proposed dwellings, which present their side elevation along the access route. Combined with the restricted width of the site, this creates a bulky and dominant feature, harmful to the character and amenity of the area.
- 7.11 The proposed inward-looking arrangement of dwellings creates a small, isolated enclave which does not relate well to the pattern of local development and fails to feel integrated into its context. This is contrary to SD5 and the key design principles in the Design Guide SPD. Opportunities to integrate the existing TPO area to the north are limited, with bin storage, cycle storage and parking areas abutting the protected area. The views down the existing access from Queens Road provide no visual clues to the presence of housing, as no housing would be visible. This exacerbates the isolation of the development from the wider area.
- 7.12 Whilst it is noted that the site is heavily constrained in width, it would be preferable for some built form to form a terminus point with the access route, or for the proposed dwellings to face the access route, rather than being presented with rear gardens when entering the site. Users of the access under the proposed scheme would be first presented with the parking area, a bin collection point and a hedgerow. This results in a 'back-of-house' feeling that would also contribute to the impression of an exclusionary design. A freestanding sign is indicated on the site layout plan and in artist impressions, however this does not result in a satisfactory, welcoming public realm. An access route then runs along the southern boundary of the site, residents and visitors (who would be parking to the rear and walking to their property) would need to use this route. In addition, this route would be used by the occupiers of the garages to the west of the site, which are in separate ownership and are to be retained.
- 7.13 Legibility and surveillance of both the parking and access route is therefore of critical importance for safety and amenity reasons. Whilst a side window has been added to plot



no's. 1 and 6, the small size of these windows will not sufficiently alleviate this issue, nor significantly improve the perception of safety. The inclusion of wall lighting on the elevation adjacent to the access is welcomed – and somewhat necessary – however this does not alleviate the remainder of this largely unlit, narrow route of approximately 50m from Queens Road to the first front door, with limited options for surveillance. The layout results in an expanse of publicly accessible space, which must be used by residents and visitors on foot due to the layout of the proposal, which fails to provide opportunities to reduce crime and disorder, contrary to the Design Guide SPD.

- 7.14 There is no loss of privacy for the occupiers of the existing properties on Queens Road, through the development of this site. Minor alterations to the living room windows of the proposed dwellings, which face onto the communal amenity area, have been made to include louvres. This will reduce potential loss of privacy for the residents of the new dwellings and would be acceptable.
- 7.15 All dwellings are provided with private gardens of varying scales – the largest being 55 square metres (sqm), the smallest approximately 20sqm. Most include a grassed area and/or tree; however none provide storage within the garden for either maintenance purposes or for cycle storage. Instead, the latter is provided in a communal cycle store in the central shared amenity space. All but one of the units has direct access to the garden space as presented and so it would be preferable to provide these facilities on plot. If all other aspects of the scheme were acceptable, this could be resolved by condition but may require adjustments to the proposed layout.
- 7.16 A communal bin store for the westernmost units is proposed, against the northern boundary of the shared amenity space. This is an improvement on the original scheme but would still require residents having to move bins approximately 40m in order for them to be collected.
- 7.17 In summary, as a result of the following factors:
  - Inward looking development, with no relationship to surroundings,
  - Access leading to parking area and rear elevations,
  - Deep elevations with limited relief,
  - Insufficient parking arrangements (see below), and
  - Long stretches of footpaths/shared surface with little or no passive surveillance, this cumulatively results in a wholly inadequate public realm and potential harm to future occupiers. As a result of the public safety concerns, officers have been led to the conclusion that the quantum of development in the form proposed cannot achieve a quality scheme that satisfactorily complies with the relevant policies of the SDLP and LNP.

#### Highways and Parking

- 7.18 During the Lewes Neighbourhood Plan consultation, ESCC as Local Highway Authority (LHA) raised concerns regarding suitability of the access arrangements, advising it was substandard in terms of width and pedestrian connectivity. Whilst it is noted that this is an existing, active access point, the change in use has the potential to lead to different behaviours for both drivers and pedestrians. The allocation policy in the made LNP (PL1 B) includes a site-specific criteria, requiring “access improvements for vehicles and pedestrians”.
- 7.19 The LHA have sustained their objection to the proposal, advising that because the access is now serving more than one dwelling, typically a shared access should measure 5.5m minimum. The existing access offers a width of 3.7m and there is no opportunity to increase the width. Whilst the applicant contends that the proposed shared surface arrangements are sufficient to address these concerns, officers consider this would have only a minimal

impact on the perceived dominance of vehicular movement. In combination with the parking court at the head of the access, the proposals do little to actively demonstrate that this is a shared space where pedestrians should have priority.

- 7.20 The requirement to retain access through the site to the remaining garages further complicates the safety of pedestrians and users of mobility aids. The juxtaposition of the access along the southern boundary with the shared amenity space and this being the pedestrian access to the westernmost dwellings fails to demonstrate a safe, attractive or legible experience for users. It also leads to the space appearing to being vehicle-dominated, which would be contrary to policy SD21.
- 7.21 11 of the 41 garages are currently leased, with at least one showing signs of frequent use (based on the applicant's Transport Statement and Officer Site Visits). Access to the rear gardens of Queens Road also appear frequently used, although it is unclear if these benefit from any private rights themselves. The loss of these garages has been accepted in principle through the Neighbourhood Plan allocation. Given the low use of the garages proposed for demolition as part of the proposal, the loss of garages is unlikely to have an adverse effect on the amenity of the surrounding area.
- 7.22 As referred to in Section 5 above, third party representations have advised that the proposal would provide insufficient access for the larger vehicles which may need access to the remaining garages, as well as the loss of the private rights of access afforded them. While officers have advised the applicant of these representations, these are private matters which carry little weight in the consideration of the application. Ultimately, and in the event planning permission were granted, there is a risk the scheme could not be constructed until such time as the issues relating to these private access rights have been resolved.
- 7.23 A total of 6 unallocated parking spaces are proposed, all of which would support electric vehicle (EV) charging. This is above the number of spaces recommended by the Parking Calculator in the SDNPA Parking SPD, which advises 4 unallocated spaces should be provided on site, given the close proximity to the town centre and that the spaces would be open for public use. Lewes Town Council have suggested including car club spaces or a cycle hub as part of the wider provision of the housing on the existing garage sites. These are encouraged by the NPPF however officers note this is a commercial decision for the applicant.
- 7.24 The layout and size of some of the parking spaces is of concern and it is considered that it has not been adequately demonstrated that all spaces are capable of use, nor that they meet the adopted parking standards. Standard parking spaces are required to measure 5m in length by 2.5m in width, with a further 0.5m to be added on either or both sides if there is a wall/fence adjacent (in accordance with the SDNPA Parking SPD). In the case of the northernmost space, which adjoins the existing tree line, no additional space is provided. A solid boundary is not shown on the plan, although it is expected that something will be required, given the gradient of the land sloping down beyond the trees. None of the proposed spaces provide additional capacity to enable disabled parking.
- 7.25 Furthermore, whilst tracking has been provided for the access drive, it does not appear that if cars were parked in all spaces, it would be possible to adequately manoeuvre out of the dedicated spaces. Tracking has also not been provided for larger vehicles such as delivery vans, which are likely to access the site and require turning space. Therefore, the proposed layout fails to provide parking that serves the needs of the development, which is not in accordance with the SDNPA Parking Standards. The lack of usability of some of the spaces and the poor layout overall fails to be accessible and inclusive for all, which could also impact on safety. This is therefore contrary to policies SD5, SD21 and SD22 of the SDLP.

Ecology and Biodiversity Net Gain

- 7.26 The application is entirely hard surfaced and with flat-roofed, pre-cast concrete garage units.

The Preliminary Ecology Appraisal (PEA) undertaken to support the application confirms there is little of ecological value within the site boundaries. A preliminary bat survey was also conducted, which confirms that both within the site and in the trees immediately adjacent there is negligible suitability to support roosting bats. The surrounding habitat was considered to have some potential for birds and badgers and so mitigation is recommended. This could be conditioned in the event the proposal was considered acceptable.

- 7.27 Overall, three statutory designated sites of nature conservation importance were identified within the zone of influence as part of the PEA. These were Lewes Downs SSSI (and associated SAC), located 500m east of the Site and Offham Marshes SSSI located 950m west of the Site. However, given the distance between the Site and the identified statutory designated sites, and the size of the Site and nature of the proposed development, adverse effects upon the statutory designated sites and their qualifying criteria for designation are not considered likely.
- 7.28 The proposed development will generate a substantial increase in habitat units for biodiversity net gain onsite, which meets the minimum requirements of policy SD9 of the SDLP and statutory BNG. This would be through the provision of areas of mixed scrub and planting of 3 native trees within the site boundary, the principle of which is welcomed. This could be conditioned in the event the proposal was considered acceptable.
- 7.29 The proposal therefore meets the requirements of policies SD9, SD10 and SD45 of the SDLP.

#### Drainage

- 7.30 The site is in Flood Zone 1 and unlikely to be at risk of fluvial or tidal flooding. Precautionary measures are proposed against potential overland flow and surface water risk, including the raising of finished floor levels to at least 150mm above surrounding ground floor levels.
- 7.31 The accompanying Flood Risk and Drainage Strategy indicates that without infiltration and groundwater level testing, it is likely that below-ground attenuation tank(s) will be required, likely located in the parking area. The existing tarmacked garage compound would be resurfaced in part with permeable paving. There is also an opportunity to include minor rainwater harvesting benefits, although these are not currently shown on plans. Overall, it is considered there would be an improvement in surface water management from the existing arrangements. As such the proposal would comply with policies SD49 and SD50 of the SDLP.

#### Planning Balance

- 7.32 The applicant has suggested that the SDNPA cannot demonstrate a 5-year housing land supply (HLS) and that it does not have an up-to-date Local Plan. Therefore, in accordance with paragraph 11 of the NPPF, any adverse impacts of the development would have to “significantly and demonstrably outweigh the benefits,” when assessed against the NPPF as a whole if the scheme were to be refused. The SDNPA’s latest Annual Monitoring Report (AMR) states that a 5-year HLS has been achieved (5.9 years), therefore this is the wrong test of the NPPF to apply. In any event, a National Park is one of the ‘protected areas’ listed in paragraph 11 of the NPPF which means the test would be different to that outlined in the applicant’s planning statement.
- 7.33 The scheme would provide 6 units of affordable housing on an allocated site, which is given significant positive weight. The site is well served by local facilities and close enough to the town centre to provide most other day-to-day requirements. The principle of modular housing in this context is also considered acceptable and the materials proposed for the dwellings are broadly supported (subject to final details).
- 7.34 The inward facing layout and deep elevations facing on the public realm with limited relief result in a development unsympathetic to its setting that fails to create a successful sense of

place through its relationship to adjoining buildings and spaces. The failure of the public realm is intensified by long stretches of footpaths with no active or passive surveillance, which does not achieve or improve perceptions of safety and are not inclusive or accessible to all. This is given significant negative weight.

- 7.35 There remains an outstanding objection from the LHA, concerning the adequacy of the access route. The access and routes through the site give the perception of a vehicle-dominated space, which fails to provide a safe highway, legible and attractive experience for users. Without amendment, these matters also attract significant negative weight.
- 7.36 On balance, whilst the proposal would provide much-needed affordable housing, it would also lead to a development that fails to demonstrate a design that is appropriate and sympathetic to its setting in terms of height, massing, orientation and elevational detailing. The site layout would also fail to protect the safety and amenity of all users nor would it provide a legible and attractive space for residents and visitors. In this instance, the benefits of bringing forward the proposed scheme are not outweighed by the harm caused by the development.

## **8. Conclusion**

- 8.1 The proposal would provide affordable housing on an allocated site within the settlement boundary of Lewes and would therefore accord with policy SD25 of the SDLP and PL1B of the LNP.
- 8.2 The proposal causes significant adverse effects by virtue of its layout and scale that fails to ensure the development makes a positive contribution to the character and appearance of the area and would not avoid harmful impact on future residents of the site. Further it would not provide appropriate access or legible routes for vehicles and pedestrians, nor would it provide appropriate parking facilities. As such, the proposal would be contrary to policies SD5, SD21 and SD22 of the SDLP.
- 8.3 Without the completion of a Section 106 Agreement, the proposed development would not secure the necessary affordable housing requirements and would also be contrary to policies SD28 of the SDLP.
- 8.4 On the basis of the above assessment, it is recommended that the application be refused.

## **9. Recommendation and Conditions**

- 9.1 It is recommended to refuse planning permission for the reasons set out in paragraph 9.2.

### **9.2 Reasons for Refusal**

- 1. The proposed development, particularly the cumulative effect of the proposed layout, siting, scale, form and urban design, would result in an unsympathetic, illegible site and would not represent a high-quality design. The proposal would fail to achieve a safe, inclusive public realm with limited passive surveillance and therefore does not deliver appropriate amenity space for residents. For these reasons, the proposed development is contrary to policies SD1, SD5 and SD21 of the South Downs Local Plan 2014-2033, PL1 and PL2 of the Lewes Neighbourhood Plan 2015-2033, the National Planning Policy Framework 2024, the First Purpose of the National Park, the English National Parks and the Broads: UK Government Vision and Circular 2010, and policies 1, 39 and 48 of the South Downs Partnership Management Plan 2020-2025.
- 2. Insufficient information has been provided to demonstrate that the proposed development could provide safe access and egress to the site for both vehicles, pedestrians and those requiring other wheeled methods of transport. The proposed site layout fails to provide parking that serves the needs of the development both in respect of usability and manoeuvrability. For these reasons the development would be contrary to policies SD21 and SD22 of the South Downs Local Plan 2014-2033, the

Design Guide Supplementary Planning Document July 2022 and the Parking for Residential and Non-Residential Development Supplementary Planning Document.

3. In the absence of a completed Section 106 Legal Agreement securing the necessary provision of affordable housing, the proposal would be contrary to policies SD28 of the South Downs Local Plan 2014-2033, the National Planning Policy Framework 2024 and the Purposes of a National Park.

**TIM SLANEY**

**Director of Planning**

**South Downs National Park Authority**

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Appendices: Appendix I - Information concerning consideration of applications before committee.

Background Documents: [All application plans, supporting documents, consultation and third party responses for SDNP/24/03587/FUL](#)

[Lewes Neighbourhood Development Plan](#)

[South Downs Local Plan 2019](#)

[Supplementary Planning Documents and Technical Advice Notes](#)

