

## FRIENDS OF LEWES

The Friends of Lewes Society is the civic society for Lewes which was founded over 60 years ago and has about 450 members. It welcomes the opportunity to comment on the Lewes Neighbourhood Plan Draft Planning Policies Consultation Report. The Society is pleased that the plan has progressed to the stage where draft policies have been published and are open to comment.

It supports the principles behind the Vision Statement but suggests it needs to recognise that the needs of businesses and tourism should also be supported. Amending the Vision Statement to read “..... integrates the needs of people, *businesses*, *tourism* and nature” would meet this need.

In the section on Neighbourhood Plan Objectives the Society considers that the role of Lewes as a market town that serves the wider community outside the town should be given greater recognition and support. In particular, it proposes the objectives should include reference to:

- supporting local shops and businesses
- encouraging the provision of employment
- promoting local tourism
- improving traffic management
- promoting flood mitigation in accordance with the River Ouse Catchment Flood Management Plan
- planning for an ageing population with an increasing need for single occupancy homes
- promoting sufficient health care provision and recognising the importance of the Lewes Victoria Hospital

The Society broadly supports draft Policy SS01 Historic Streets and suggests reference should be made to the existing Conservation Areas in Lewes and the role of the Conservation Area Management Plans that relate to them. It notes the view in this section that limiting the times for delivery vehicles to enter the town centre will result in better public spaces. The Society considers that the needs of shops and business in Lewes should be supported to encourage residents to shop locally rather than in other towns. It suggests a balance is needed to ensure commercial premises are not disadvantaged by over restrictive practices and the plan recognises that the historic and geographic nature of the town may prevent alternative delivery methods.

The Society supports the principles of draft Policy SS02 Social and Civic Spaces and draft Policy SS03 River Corridor Strategy.

The Society does not support draft Policy AM01 Active Travel Networks as drafted as it considers it is too narrow in scope. The policy focuses on walking and cycling and fails to recognise the need to improve traffic management within the town to accommodate cars and commercial vehicles. Lewes is an important market town which requires good road infrastructure to serve communities that may not be served by public transport. It suggests

that the needs of the disabled and an ageing population will not be met by policies that focus on making the town centre as car-free as possible. The Society agrees that signs and access infrastructure across Lewes need improving, particularly with respect to car parking.

The Society supports the principles of draft policy AM02 Public Transport Strategy.

The Society supports the principles of draft policy AM03 Car Parking Strategy and the rationalisation of surface car parks across the town. It agrees that the release of some surface car parks would provide an opportunity for Brownfield high density housing development. However, the Society considers that the plan should ensure that adequate provision is made for car parks within walking distance of the town centre; any potential sites being identified in the next stage of the plan.

The Society accepts the need for more housing in Lewes, including affordable and social housing. It strongly believes the development of Brownfield sites should be exhausted before new Greenfield sites are promoted. It objects to both draft Policy PL01 Brownfield & Infill Housing Allocations and draft Policy PL02 Greenfield Housing Allocations as drafted since it considers a single policy is required which lays down the principle that Brownfield sites in Lewes should be exhausted before any Greenfield site is developed. It does not agree with the principle in policy PL01 that includes a limit on the number of houses to be developed per site. Each site should be considered on its merits to maximise affordable housing.

Whilst the Society agrees with the underlying aims of draft policy PL02 to focus the development on Brownfield and infill sites, it strongly objects to the proposed allocation of Greenfield sites in the plan. A major weakness of the plan is its lack of recognition that Lewes sits within the South Downs National Park (SDNP) and the need for the Neighbourhood Plan to demonstrate that it contributes to national park purposes and the achievement of sustainable development. In the context of the SDNP Preferred Options Local Plan, the Society considers the site allocation at Old Mallin Farm, sites north west of Kingston Road, and sites north and west of Houndean are contrary to Strategic Policies SD5: Landscape Character, SD7: Safeguarding Views and SD9: Dark Night Skies. Its objection is founded on the absence of any evidence that demonstrates such development would be sustainable and meet the aim of the National Park to preserve and enhance the natural and cultural heritage of the area. These same objections apply to the inclusion of these sites in the draft neighbourhood plan and by doing so it would fail the basic condition of contributing to the achievement of sustainable development which is necessary if it is to proceed to referendum.

The Society supports the principles of draft Policy PL03 Architecture & Design and has no objection to the principles of draft Policy HC01 Protection of Existing Community Facilities.

The Society supports the principles of draft policy HC02 New Services and Facilities. However, further consideration needs to be given to the proposal that the St Anne's school could be a new alternative to existing community facilities. The Society considers this site could also be allocated for housing, including affordable and social housing and an extension to the cemetery.

The Society has no objection to the principles of draft policy HC03 Heritage Protection, which should apply to all heritage assets, provided the criteria for any heritage assets identified includes those listed by Historic England. It looks forward to considering the assets that are identified for a local listing.

The Society supports the need for draft policy HC04 regarding the Working Town. However, it objects to the current draft policy which is based on the views of one organisation with a specific interest in redeveloping the North Street Quarter. Furthermore this draft policy is not in general conformity with the strategic policies contained in the Lewes District Council/South Downs National Park Local Plan Joint Core Strategy, currently under public examination and it therefore questions whether a specific policy for North Street Quarter should be included particularly when the National Park Authority have recently given approval to a development there. The Society considers the focus of the plan on the industrial past to be misplaced and the Neighbourhood Plan should support and encourage modern business to provide employment in the town. It proposes that a broader policy should be adopted which seeks to promote Lewes as a place where businesses should be encouraged to locate to and where existing businesses are given support to succeed. This will enable a greater number of local people to live and work in the town. In addition, the policy should promote development in the town centre that continues to attract a wider range of independent shops.

The Society assumes that subsequent drafts will explain how this Neighbourhood Plan relates to other planning policy documents relating to Lewes, whether extant or currently in draft.

Friends of Lewes  
December 2015