

## THE FRIENDS OF LEWES RESPONSE TO THE PHOENIX PLANNING APPLICATION

**SDNP/23/00526/OUT: Hybrid planning application for the redevelopment of the North Street Industrial Estate and Springman House, North Street, Lewes for a residential-led, mixed use development: North Street Industrial Estate and 8 North Street (formerly Springman House).**

Seeking full planning permission for Phase 1 and parts of phase 2, being the demolition of existing buildings, construction of flood defences, highways improvement works including three new bus lay-bys off Phoenix Causeway, and a temporary construction access ramp from Phoenix Causeway to serve a temporary construction and manufacturing yard; and the erection of buildings up to 5 storeys comprising 44 dwellings (Class C3) (Referred to as buildings 1A, 1B and 1C forming part of phase 2) and

Seeking outline planning permission for parts of Phase 2 and phase 3, being the demolition of existing buildings, construction of flood defences; erection of buildings up to 6 storeys for a further 656 dwellings (Class C); up to 3,279sm of business, employment and flexible workspace (Class E (c), E (g) and (sui generis), medical and health services (Class E(e)), hotel (Class C1), creative and community space (sui generis), leisure uses (Class E(d)), restaurant (Class E(b)) tap room/bar (sui generis), retail (Class E(a)), a day nursery (Class E(f)); energy centre (sui generis); ambulance station (sui generis); construction and later removal and temporary car parking and construction access ramp, construction of permanent vehicular access from Phoenix Causeway into a co-mobility services hub (sui generis); containing 313 parking spaces; and associated highway improvements; realignment of North Street and Phoenix Place; a recycling and re-use (sui generis); construction of a new footbridge over the River Ouse and a riverside pedestrian walkway; creation of areas of public realm. Provision of infrastructure and associated landscaping with details relating to access, layout and scale for approval and details relating to appearance and landscaping reserved for subsequent approval.

### THE FRIENDS OF LEWES CONCLUSIONS ON THE PHOENIX PLANNING APPLICATION: -

**This response from the Friends of Lewes is a combination of 4 areas of support, 6 areas of objection and 2 specific requests regarding the development, as follows:-**

- (1) The Society **supports** the Outline Planning Application in principle, as it re-establishes the development potential for the provision of much needed housing on this important brownfield town centre site.
- (2) The Society **supports** the Detailed Planning Application for the Flood Defences for the whole site.
- (3) The Society **supports** the Detailed Planning Application for part of the Housing Development on the most northern part of the site.
- (4) The Society **supports** the Detailed Planning Application for Temporary Access to the site, subject to the relocation of the access point so that all the TPO trees are retained.

(5) The Society **objects** to the removal of the existing trees fronting Phoenix Causeway that are subject to the two existing Tree Preservation Orders.

(6) The Society **objects** to the suggested provision of three new bus lay-bys on the northern side of the Phoenix Causeway in the absence of an agreed Travel Plan for Lewes Town Centre, together with the failure to provide replacement tourist coach park spaces, and as such are considered to be premature.

(7) The Society **objects** to the proposed construction of both the large scale 'Mobility Hub' and the tall 'Foreshore Apartments' fronting the Phoenix Causeway, as the scale and massing are considered to be totally inappropriate at such a significant location at the entrance to the historic town of Lewes, harming the setting of the conservation area. Furthermore, the Society notes that this south eastern part of the site is likely to be the last part of the development to be constructed and therefore considers that there would be an opportunity for the applicant to reconsider the overall design of this part of the development.

(8) The Society **objects** to the location of the proposed Health Hub at its remote location in Spring Gardens and would strongly recommend that its provision should be re-considered on the Springman House site where there is an opportunity to sustainably reuse an existing building. This would have the advantage of being more accessible and have the potential to be provided in a much shorter timescale, as the site is located on higher ground above the flood plain and would therefore not have to wait for the construction of the necessary flood defences. Alternatively, the health hub should revert to the previous location on Phoenix Causeway where there is direct access to public transport.

(9) The Society **objects** to the proposed access arrangements, including the pedestrian and cycle facilities across Phoenix Causeway. These proposals fail to bring forward comprehensive highway proposals that are necessary to avoid additional traffic circulating around the conservation area and gyratory system and the safe movement of cyclists and pedestrians through Eastgate are considered to be both premature and inappropriate at this highly trafficked location. It is considered essential that further traffic related measures need to be agreed with the County Council, as the Highway Authority, for the wider area. In particular, there are no specific amended provisions for cyclists in Eastgate Street, which is currently one way only.

(10) The Society **objects** to the lack of plans to integrate the development with the rest of Lewes and to reduce traffic circulating through the Conservation Area. The single entrance and exit for vehicles accessing the mobility hub is likely to increase the volume of traffic using the one-way network via East Street compared to that which currently exists. Greater integration with the wider area could be achieved with a link to Lancaster Street for vehicles exiting the development wishing to go north towards Haywards Heath.

(11) The Society would like to see more specific evidence that the loss of the 212 public car parking spaces will be adequately replaced within the development so that the impacts on the commercial and retail vitality of the town are not harmed.

(12) The Society requests that the phasing of the mobility hub and Thomas Paine Bridge are included in an early phase so that these elements are available to secure the vital modal shift identified in the application.

## **THE FRIENDS OF LEWES ASSESSMENT OF THE PHOENIX PLANNING APPLICATION:-**

### **Section 'A'; Introduction:-**

- (1) The Friends of Lewes is the local Civic Society for Lewes and has nearly 400 members. Members have given their views on the North Street redevelopment proposals, with some supporting and some objecting to the development details. The Society continues to assess the submitted information, along with any new information, but raises a number of concerns on behalf of its members to the SDNPA.
- (2) The Society is most anxious to see the opportunity for progress on this former industrial site, which has been an 'eyesore' for a number of years. As such, the Phoenix Project is welcomed as a real opportunity to provide change on this significant riverside location close to the centre of Lewes.
- (3) It is appreciated that this important brownfield site offers the rare opportunity to provide a large number of dwellings and other building uses within a high density neighbourhood, which will prioritise the use of the space available for pedestrians and cyclists in a largely car free environment.
- (4) As such, "the Phoenix will provide accommodation that reflects the genuine housing need of Lewes. This means a high number of one or two bedroom homes, particularly aimed at young people, young families, and older people who are looking to downsize."
- (5) It is appreciated that sustainability and climate change are both major 'drivers' in the design and implementation of this ambitious and imaginative project, with the extensive use of wood and other sustainable building materials to be used throughout the construction process. Once completed, it is hoped that this development may act as an 'exemplar' for high density and sustainable housing developments.
- (6) Since Human Nature acquired this North Street Quarter site in 2020, the Friends of Lewes have been in contact with various members of the design team and have been involved in a series of meetings to discuss the project as the design has evolved. During this period, the Society has repeatedly stressed the need to fully integrate the development proposals with the existing town centre located so close to the development site boundary.
- (7) There is a considerable amount of information to assess on both the Human Nature website and the SDNP website, and as a consequence the Society requested an extension to the deadline for comments, (which has now been extended until the 26<sup>th</sup> May), in order to be able to fully evaluate the extensive extent of the background information provided.
- (8) In assessing the supporting information for the planning applications, the content is very professional, and includes an extensive array of background documents addressing the very large range of topics that need to be considered.

### **Section 'B'; The Hybrid Planning Application submitted by Human Nature.**

- (1) The submission of this Hybrid Planning Application, together with the very complex and extraordinary long project description, was considered to be both confusing making it difficult to distinguish between the various components. There is a need for a clear schedule clarifying the relevant plans that will define any consent that may be granted.
- (2) As you are aware, an Outline Planning Application can be submitted as a simple 'red line' around a site, together with a description of the specific uses proposed for that particular site. In this

context, the applicant would be seeking planning permission in order to establish that the 'principle' of the proposed development would be acceptable.

(3) On more complex schemes, such as this Phoenix Project, Human Nature have provided more details of what is being proposed together with extensive supporting information, as detailed on their website, including a lengthy 'Design and Access Statement'. The objective is still to seek support in principle for the scheme, irrespective of any timescale for its full implementation.

(4) In terms of the likely timescale, once 'outline planning' has been granted for the principle of development, the Society appreciates that nothing can be actually be implemented on site until 'detailed schemes' for each specific phase have been granted.

(5) With regard to this 'hybrid' application, Human Nature has provided a great deal of information, together with numerous and extensive supporting documents, which may have given the impression to interested parties that the implementation of the entire site is imminent, when realistically much of the development will not be carried out for a number of years, as each phase or specific area of the development has to be progressed in more detail as a basis for submitting for 'detailed planning consent'. In practical terms therefore there is more time available for specific matters of outstanding concern to be addressed in the longer term, albeit this can only be within the scope of the outline granted in terms of the quantum of development specified.

#### **Section 'C'; The Outline Planning Application / Masterplan.**

(1) The outline planning application relates to the whole site, with the future proposals being illustrated by the 'Masterplan' and parameter plans. These indicate principally high density housing on the northern part of the site with a range of uses and facilities located in the central part of the site, which will make significant contributions to creating a new neighbourhood, including a new bridge across the River Ouse with further housing proposed along the river frontage. Facing Phoenix Causeway will be located a mobility hub which will effectively act as a link between the existing traffic system in Lewes and the predominantly low traffic pedestrian friendly environment proposed within the new development.

(2) The Society considers that this design approach should be commended for its innovative pedestrian-led layout that prioritises the creation of an attractive living environment with streets and spaces that generally integrate well with the urban and riverside context. Overall, it will be a refreshing departure to the ubiquitous car-dominated developments that have become the norm outside inner cities.

(3) In terms of 'sustainability', this design approach would optimise the potential of this crucial central brownfield site and generate the potential for a large number of residents that will help to support not only a new neighbourhood but also the existing town centre businesses and facilities, which should help regenerate the town centre and reduce the need for travel.

(4) Furthermore with the omission of parking from the majority of the site, the higher density can be achieved. This offers the opportunity to create a tight-knit street pattern, benefitting from strong building enclosure, which would be more synonymous with pre-20<sup>th</sup> century townscapes, such as the centre of Lewes, when settlements were designed principally for walking rather than driving.

(5) With specific reference to the Masterplan, it is appreciated that the most northern part of the site, (between the River Ouse and the Pells area), offers the greatest opportunity to provide a range

of high density housing developments. It is however suggested that the links between the proposed housing and the adjacent Pells Area could be significantly improved.

(6) The 'central area' of the Masterplan, (between the River Ouse and Phoenix Place / North Street), indicates the retention of several of the existing buildings to be converted for communal / public use and to include the construction of the new "Thomas Paine Bridge" across the River Ouse, which is to be welcomed as a 'key' feature that will help to integrate the proposed development with the existing town.

(7) However, it is noted that the retention of so many of the existing buildings does limit the space available and therefore limits the development potential of the most significant part of the site. Although it is appreciated that the retention of some 'key' components of the original industrial activities on the site, for example the Foundry Yards is to be welcomed.

(8) However, the major flaw of the Masterplan is that it proposes locating a combination of a tall block of residential development together with the majority of the car parking in an adjacent 'Mobility Hub', (which is effectively a multi-storey car park), at the most prominent part of the development facing Phoenix Causeway. As a suitable entrance to the existing historic town centre of Lewes, this part of the Masterplan is considered to be unacceptable.

(9) It is therefore suggested that further consideration needs to be given to siting and modelling of the façade to the mobility hub preserving a larger 'threshold area' between the building and the proposed widened Phoenix Causeway in order to be able to retain the TPO trees and provide the necessary landscaping, with sufficient space and soil to accommodate a variety of large trees, at this important location in order to maintain the green entrance to the town. This may incorporate single aspect apartments facing the Phoenix Causeway frontage, in order to enable a more open and articulated frontage façade to be provided to this large building.

(10) Furthermore, it is not clear from the submitted information when the Thomas Paine Bridge, raised belvedere and 'key' pedestrian and cycle links will be provided. These would be a significant feature in linking the proposed development with the surrounding areas and as such help to integrate the Phoenix Project with the existing town.

(11) The combination of some of the elements that form part of the 'Outline Planning Application' are difficult to distinguish from the three 'Detailed Planning Applications' and in some cases do not seem to relate to the anticipated time scales for the later phases of the project. As such, it is proving difficult to assess the likely overall environmental impacts of each of the phases.

(12) Given the range of challenges and extended timescale for the implementation of the proposed development of this site, it would be reasonable to expect that the project will be likely to change as it evolves and lessons are learned. As such, the Society would hope that a mechanism could be established, based around the current Masterplan, which would enable some acceptable elements of flexibility within this very ambitious and large scale project.

(13) It is worth noting that most of the Society's discussions to date with Human Nature have related to the 'Outline' aspects of the Planning Submission rather than the more specific considerations of the 'Detailed' aspects of the project.

(14) To date, it had been understood that any planning application within a conservation area required a 'Detailed Planning Application' in order to fully assess the likely environmental impact on the specific heritage assets. It is therefore considered that the following heritage assets will require further assessment, alongside archaeological considerations identified by an accompanying

Archaeological Desk-Based Assessment, as the current assessment within the Planning Application is not based on an accurate understanding of the precise position, height, arrangement and elevational treatment sufficient to make the necessary assessments.

Items of historic interest to be further assessed. :-

- Lewes Conservation Area
- The Malling Deanery Conservation Area
- The Green Wall
- The Lewes Castle Complex
- The Walls of St John sub Castro
- Listed Buildings in Little East Street, Waterloo Place and Lancaster Street
- The Riverside Wall
- The Walls of the Old Naval Prison and
- Surviving elements of the former Phoenix Foundry

### **Section 'D'; The Detailed Planning Application for Flood Defences.**

(1) The Society does not, in general, support development on the floodplain and in a time of 'climate crisis' considers that the risk of flooding in the longer term is likely to increase, particularly with predicted rises in the sea level and with greater run off from new development areas within the Ouse catchment to the north. However in terms of this specific proposal, there would be wider benefits of developing this crucially important town centre brownfield site to the overall benefit of Lewes. As such, the Society considers it vital that adequate measures are incorporated into the proposed flood defences to take account of likely future flood predictions in order to outweigh this particular concern.

(2) Prior to the submission of the planning applications, there had been no detailed discussions of how the flood defences were going to be achieved or the extent of demolition of the existing industrial buildings that would be required in Phase 1 of the project. (Although this information has now been included in the 'Design and Access Statement').

(3) The Society appreciates that all of the flood defences would have to be completed prior to construction of any of the other buildings proposed in later phases of the project.

(4) It is appreciated that there are a number of technical challenges to providing the flood defences on this site, and in this respect it is understood that it may take up to two years, or possibly longer to complete the necessary flood defences.

(5) Responsibilities for maintaining and operating the proposed flood gates need to be clearly established, regardless of ownership, and is a matter that Human Nature needs to carefully address, together with the necessary maintenance arrangements in the longer term for the proposed Sustainable Drainage Systems (SuDS) and the adequate provision for surface water run-off. It is anticipated that both these measures will be the subject of planning conditions.

(6) It is anticipated that construction noise will be extensive issue during this project as the Flood Defences include the installation of nearly a kilometre of sheet piling followed by piling for building foundations that are likely to be driven through made up ground. Although these operations are unavoidable, the Society would like to see a planning condition restricting site activities to reasonable hours to ensure some reprieve for residents in adjacent areas.

## **Section 'E'; The Detailed Planning Application for Housing Development.**

(1) In accordance with the planning application description this detailed application refers to “the erection of buildings up to 5 storeys comprising 44 dwellings (Class C3) (Referred to as buildings 1A, 1B, and forming part of phase 2)”

(2) The first time that any of the architectural details of the proposed 44 dwelling units on this northern part of the site, close to Willeys Bridge, were publicly revealed for the first time was at the formal presentation of the proposed ‘hybrid’ planning application at the Depot Cinema in Lewes on the 27<sup>th</sup> January 2023.

(2) Indeed, this presentation by Ash Saluka Architects, the architects designing this part of the project, was impressive and gave a good indication of how high density housing was going to be achieved as an integral part of the overall Phoenix development. As such, the construction of this part of the development, which would incorporate extensive sustainable construction techniques, would effectively act as a ‘pilot study’ for the whole site. It is understood that the construction of these dwellings will incorporate both structural wooden timbers from Europe and the use of Cross Laminated Timber Cassettes, (CLT), for the wall and floor panels, which will utilise locally sourced timber.

(3) In design terms, the change in articulation and the variety of heights incorporated in this quite complex design helps to integrate the various components into an organic and interesting design that effectively reduces the visual bulk of this 4 /5 storey building. The design incorporating setbacks in the upper storeys of some of the units and the extensive use of balconies to provide further visual interest, is welcomed.

(4) However, it should be noted that Human Nature intend to commission a wide variety of architectural practices to work across the site so that housing developments in subsequent phases are likely to result in quite different designs and appearance. As such, this proposal should not be seen as setting a ‘precedent’ for the remainder of the development.

## **Section 'F'; The Detailed Planning Application for Temporary Access.**

(1) It is noted that the detailed part of Planning Application specifies the construction of a temporary construction access ramp from Phoenix Causeway to serve a temporary construction and manufacturing yard, which in principle is to be welcomed. Indeed, the Society has been emphasizing the need for all construction traffic to avoid circulating through the Conservation Area in order to access the site via North Street. However, the Society considers that the position and arrangement of the access must allow the retention of the TPO trees to ensure a satisfactory environment.

(2) Full planning permission is also being sought to include “highways improvement works including three new bus lay-bys off Phoenix Causeway” It is understood that this will include the felling of all the trees adjacent to the Phoenix Causeway, many of which are subject to TPOs. This proposal is considered to be both unnecessary and premature as the full re-development of this part of the site is unlikely to be re-developed for a number of years, given the large scale of this very complex and ambitious project.

(3) With specific reference to the provision of three new bus lay-bys off Phoenix Causeway, there must be transparency on whether this is intended to comprise a new bus interchange and if so where other stops are to be located. In the absence of an agreed Travel Plan for Lewes, the Society

considers this proposal to be premature. There are also other issues associated with this proposal, including the lack of any bus stops on the south side of Phoenix Causeway; the difficulty of passengers with a mobility problem of safely reaching this location and safety issues from the creation of 5 lanes, and the lack of any facilities until a much later phase of the development.

(4) As matters stand it is not considered that this is a satisfactory location for an interchange, as it creates an expanse of paved area and involves the loss of TPO trees. The bus interchange prevents the formation of the necessary traffic light controlled junction from the Wenban Smith/ Eastgate site onto the Phoenix Causeway therefore exacerbating the harm and traffic pollution from unnecessary vehicular movements into the conservation area and towns gyratory system.

### **Section 'G'; Planning Policies.**

(1) Generally, the Society considers that plans meet Strategic Site Policy SD57 of the South Downs Local Plan. However, policy SD57 requires:

- *3.(b) It facilitates improved linkages across Phoenix Causeway and Eastgate Street and a better balance between the use of the private car and other modes of transport, in order to enable the safe flow of pedestrians and the improved integration of the area to the north of Phoenix Causeway with the wider town centre;*

(2) The location of the proposed Mobility Hub will unfortunately not help to relieve the existing traffic problems in the centre of Lewes and in particular existing traffic circulating through the Conservation Area.

(3) Whilst the proposed development plans to give priority to pedestrians and cyclists, the single entrance for vehicles from both the east and west into the Mobility Hub, together with the only exit to the east, does not facilitate improved linkages with the rest of Lewes, as it is likely to make them worse, in contrast to the extant Santon scheme. In particular, integration with the wider area will not be achieved as there is no proposed link to Lancaster Street for vehicles exiting the development heading north on the western side of the river. Vehicular traffic entering and leaving the Mobility Hub is likely to have a negative impact on the volume of traffic using the one-way network via East Street compared to that which currently exists.

- *3.(d) It respects and enhances the character of the town and achieves a high standard of design, recognising the high quality built environment, on and within the vicinity of the site, and the site's setting within the National Park and adjacent to a Conservation Area;*

(4) The Society sees little evidence of the development seeking to integrate with the town, other than the proposed cycle path and the new footbridge across the River Ouse, both of which may not be constructed until the remainder of the proposed development has been completed. As such, the proposed project is effectively a standalone cul-de-sac development with little integration with the existing historic town of Lewes.

(5) It is appreciated that the proposed environment would be of high quality and aimed at a specific lifestyle, which is accepted. However, the massing on the southern side of the development through the Mobility Hub and Foreshore Apartments is too high and presents a solid visual barrier to the remainder of the development site, and one which does not respect the townscape quality of the centre of Lewes. This is in stark contrast to the extant Santon scheme which integrated public buildings into the edge of the development and provided a new access to the site which drew the eye into the development and opened up more distant views.



- 3.(h) *It provides an appropriate level of public car parking provision;*

(6) The existing Wharf and Brook Street car parks provide some 212 parking spaces that are likely to be lost before the Mobility Hub is constructed. These car parks provide essential parking to existing Lewes residents who do not have parking facilities outside their homes within the town centre. In addition, these spaces provide car parking for a large number of employees who work in the town. Given the phasing of the development, conditions should be imposed to ensure that the existing number of parking spaces is maintained via the retention of existing car parks or temporary alternatives until the Mobility Hub is in operation. Furthermore, the Mobility Hub would seem to offer very limited potential for shoppers wishing to visit the town in the longer term.

(7) Similarly, 3 coach parking spaces have been removed from the site. These have a critical role to play with regard to tourists visiting Lewes, and again no indication as to where they might be replaced. It is considered that this issue is very important in maintaining levels of visitors to the town and their spending input into High Street shops and cafes. Indeed, coach parking provision is another issue that should be incorporated in a town wide Travel Plan.

- 3. (m) *It incorporates sustainable surface water management systems, and*

(8) The proposed SuDS measures are fully supported. However, maintenance arrangements for the systems installed need to be ensured in perpetuity as they will not be adopted by the statutory sewerage undertaker. If granted, conditions should define how that will be achieved.

#### **Section 'H'; Concerns:-**

(1) It is worth noting that the Society needs to take into consideration not only the specific proposals within the Phoenix Project, but the impact that these proposals may have on the town of Lewes in the wider context. As such, many of the following comments relate to both the overall setting as well as the development site.

(2) Although there is specific reference for the need to integrate the Phoenix with the existing town of Lewes, from an 'Urban Design' perspective, there appears to be little evidence of any significant efforts to physically integrate the proposed development with the adjacent town centre of Lewes, and as such the project appears to have been effectively developed as a 'stand alone' entity.

(3) Furthermore, the planning application for this complex and ambitious project has been submitted on the basis of the whole scheme being completed as shown, with the various building components contributing to this very dense neighbourhood concept. In reality, this complex project is very likely to change as it evolves and when completed could be significantly different, requiring further planning permissions.

(4) The Society would like to suggest that each phase of the project needs to be assessed separately in terms of its environmental impact, including traffic generation. For example, the proposed 'Mobility Hub', which will be crucial in moderating the amount of traffic using the site in the longer term, is likely to be one of the last buildings to be constructed. So what is expected to happen during the duration of the construction period which may take up to 10 years to complete?

(5) The Society would also like to suggest that there needs to be a tangible benefit to Lewes in each phase of the development, for example improving the appearance of river frontage should be addressed sooner rather than later.

(6) In this context, the south eastern corner of the development site is considered to be a priority in terms of the need to physically improve the relationship of the site to both the river frontage and to the Phoenix Causeway and the Society recommends that this should be considered a priority.

(7) Indeed, if the integration of these proposals with the existing built form of Lewes is considered to be significant, the provision of the proposed pedestrian / cycle link between Malling Fields and Phoenix Causeway should be considered a priority in the implementation of the development in order to establish a 'tangible' benefit to the wider community. The construction of the Thomas Paine Bridge across the River Ouse which would link with the proposed elevated 'Belvedere' walkway and then continue to link with the Phoenix Causeway. As such, it is considered to be an essential component of the development, which would greatly assist the integration of this project with the centre of Lewes, and it is considered that its provision should be the subject of a specific planning condition.

(8) With specific reference to the Outline Planning Application, of particular concern to the Society is the proposed location of the Health Hub, which is considered to be both too remote and difficult to access for patients. The health hub should be accessible by car and provision made for patients who are accompanied by carers. The proposal for 6 disabled parking spaces is supported but there needs to be more than just one 'drop off' point. Blue badge status only applies to a very small number of patients. Most patients are simply unwell and temporarily incapacitated and they cannot be simply dropped off, neither can children. Current surgeries have car parks or on street parking adjacent. Unwell patients cannot be expected to park in the Mobility Hub and get public transport to get to the Health Hub. The merging of all GP services into Foundry Healthcare means there will be no alternative GP service in Lewes for those that cannot access North Street.

(9) Whilst those that opt to live in the development will have made a positive choice to accept the pedestrian/bicycle regime it should not be imposed on visitors to the Health Hub. Short term parking should be provided and if it cannot be provided, an alternative site should be considered. Indeed, the Society considers that as a public building the Health Hub should be located on a more prominent site in the centre of Lewes and would recommend that further consideration should be made to providing this facility on no.8 North Street, the former Springman House site and adjacent ambulance station. A further benefit of locating the Health Hub on this higher ground would be that construction of the Health Hub could commence much sooner, as it would not have to wait for the flood defences to be completed. It also has an existing public car park next door. Furthermore, the Society considers that such an important public facility should not be located within the existing flood plain, which may be at increased risk in the future.

(10) Indeed, it is suggested that consideration should be given to assess whether Springman House itself could be retained and converted to accommodate the Health Hub and extended if necessary. As such, this approach would avoid any demolition and adverse environmental impact and effectively 're-purpose' an existing building within a much shorter timescale.

(11) With specific reference to timescales that have been included in Human Nature's Design and Access Statement, Phase 1 of the proposed development is scheduled to take place between July 2024 and September 2027, with Phase 2 between February 2026 and November 2032. This timescale would suggest that construction of the Health Hub is unlikely to commence for another 3 years at the earliest.