

SDNP/23/02973/FUL: Former Bus Station Eastgate Street: Demolition of existing buildings and construction of mixed use development comprising 3 houses (Class C3), 32 self-contained flats (Class C3) and 198m2 of ground floor commercial space (Class E), with associated access alterations, landscaping and parking.

The Friends of Lewes strongly object to this application and has come to the following conclusions:-

Section 'A': Summary:-

- (a) Lewes does not need any further commercial development in the town centre that is likely to remain vacant, given the large number of current vacant commercial properties in the Town Centre precinct, School Hill, the High Street and generally throughout the town.
- (b) Lewes does not need any dwellings to be built at this location prior to the longer term flood risks being fully assessed and the necessary flood protection measures implemented.
- (c) Lewes needs more 'affordable' dwellings, rather than costly flatted development.
- (d) Lewes deserves to have good quality architecture, at an appropriate scale, to be provided at this important location within the Conservation Area, which does not harm its character or setting.
- (e) Lewes deserves to have a well-designed bespoke bus station within the town centre in order to encourage both residents and visitors to make greater use of the local bus services.
- (f) The best location for such a bespoke bus station would be on the existing bus station site in Eastgate Street as an integral part of an agreed "Transport / Travel Plan" for Lewes.
- (g) Lewes needs to have significant environmental improvements made to the Phoenix Causeway in order to improve both its appearance and amenity as an appropriate 'entrance' to the historic town, including retaining the trees within the Tree Preservation Orders.
- (h) The Society therefore recommends that the determination of this current application should be deferred until the above objectives have been achieved.
- (i) The development fails to conserve and enhance the existing townscape and remains in conflict with policies SD4, SD5, SD12, SD13, SD15, and SD57 of the South Downs Local Plan 2014-33, policies HC3 A, HC3 B, PL1 A and PL2 of the Lewes Neighbourhood Plan 2015-33, the National Planning Policy Framework and the English National Parks and the Broads: UK Government Vision and Circular 2010.

Section 'B' Overall Assessment:-

- (1) The Society considers that the most outstanding issue relating to the future use of this site is the provision of suitable alternative bus related facilities incorporating bus stops, stop over spaces for buses for drivers' breaks, waiting facilities for bus passengers, including shelters, refreshments and convenient toilets.
- (2) The Society is aware of the location of the range of possible alternative bus facilities that were originally proposed by the Generator Group, in support of the previous planning application for this site, none of which were considered acceptable.

(3) The Society is also aware of the apparent current preference for possibly providing future bus facilities immediately adjacent to the Phoenix Causeway, on land owned by East Sussex County Council, which is still being assessed. However, this suggestion raises the following concerns:-

- (a) In the short term, this location would be remote from the centre of Lewes, where the 'key' shops and other facilities, including restaurants are located.
- (b) The location of several bus stops along both sides of Phoenix Causeway would appear to involve the widening of the existing highway, which would surely raise a number of safety concerns both for the elderly and unaccompanied school children.
- (c) There is serious concern about the adverse environmental impact that the location of bus stops on both the northern and southern side of the Phoenix Causeway involving the felling of most of the existing trees, the majority of which are covered by Tree Preservation Orders.
- (d) Furthermore, given the emphasis of 'Landscape principles' that has been embodied in the South Downs Local Plan, the removal of a large number of trees to the west of the Phoenix Causeway Bridge and the introduction of significant 'visual clutter' associated with the proposed bus stops and stationary buses will be 'visually detrimental' at a key entrance to Lewes Town Centre.
- (e) Bus stops located along Phoenix Causeway would also frustrate any potential 'Townscape' benefits that could be achieved at this important 'Gateway to Lewes'. In order to achieve any significant environmental improvements, it is considered essential to reduce the width of the existing highway as well as introducing other measures to radically reduce the speed of all traffic for the benefit of both cyclists and pedestrians.
- (f) Although the outcome of the current planning application by Human Nature for the Phoenix Project is still awaited, the highway improvements mentioned above could greatly assist with the integration of this future development with the existing town centre.
- (g) In any event, this planning application by Human Nature for the whole of the site is for 'outline' consent, with only a 'detailed' component relating to a 'temporary access' from Phoenix Causeway for construction purposes.
- (h) At this stage in the planning process, it is understood that Human Nature have given no confirmation as to when this part of the Phoenix Project fronting Phoenix Causeway is likely to be built.

(4) With reference to the 'Planning Statement' submitted in support of this current Planning Application by the Generator Group, further details suggest that the cost of providing bus stops along the Phoenix Causeway should be divided between The Generator Group, as the developer of the Eastgate Street site, Human Nature, as the developers of the Phoenix Project, and a future developer of the Waitrose / Wenban Smith site.

(5) This 'Planning Statement', (reference page 23), also refers to the planning report on the original planning application, which states that, and I quote "Paragraph 7.8 of the planning committee report also adds that a reason for refusal for the redevelopment of the bus station until new bus facilities are provided could not be sustained. Officers have therefore stated that an appropriate financial contribution towards the bus reprovision (to be secured via a Section 106 legal agreement) which will be pooled with contributions from other sites within the allocation is the appropriate method of complying with Policy SD57".

(6) The Society has some serious concerns about the adoption of this process by the SDNPA and would like to raise the following issues for further consideration:-

- (a) Why should other developers and particularly Human Nature have to contribute to a problem that has been solely created by the Generator Group displacing the bus interchange facility?
- (b) Progress on the three sites is proceeding in different time scales, and with the uncertainty over the Human Nature proposals and the absence of any progress on the possible redevelopment of the Waitrose / Wenban Smith site, the final delivery using the SDNPA financial model is considered to be a distant dream.
- (c) There is therefore a severe risk that the paucity of the £21,235 donation suggested by the Generator Group will result in no new bus facilities being built for several years, if ever, with their contribution failing to even cover the £145,000 spent by the County Council on the 'temporary' School Hill bus stops.
- (d) Furthermore, there is still an outstanding need to agree an overall "Transport / Travel Plan" for Lewes, which should include the provision of a suitable site for a bus station.
- (e) The Society therefore recommends that the determination of this application should be deferred until the location of an alternative "bespoke bus station" has not only been agreed but provided within the town centre of Lewes.
- (f) The 'temporary' bus stops at the bottom of School Hill are totally unacceptable in terms of their visual impact within the Conservation Area, the significant reduction in air quality produced by the proliferation of buses at this location, and an adverse impact on businesses in the vicinity. For these reasons, these bus stops need to be removed at the earliest opportunity.
- (g) In this context, the Society suggests that a much better location for bus station would be on the existing Eastgate Street site, even if it were to be on a temporary basis, pending an agreement on a long term solution when the participation of the future developer of the Waitrose / Wenban Smith could also prove to be crucial.

(7) With specific reference to the content of the amended scheme now proposed by the Generator Group, the Society would like to make the following comments:-

- (a) It should be noted that there is currently a significant number of commercial properties that have recently become vacant within Lewes, particularly in the Precinct, School Hill, the High Street and throughout the town. This would seem to suggest that there is currently no need to provide any additional commercial property within the town centre that is also likely to remain vacant.
- (b) The Society considers that the Flood Risk Assessment submitted by the Generator Group is not fit for purpose. It uses an out-of-date flood model and fails to include the latest rainfall projections (published in March 2023), or long-term sea level rise for levels of the tidal River Ouse at Lewes. It also gives a false impression that new river defences have been provided on the western embankment between the Phoenix Causeway and Cliffe bridges. No such defences have been provided and the bus station site remains unsuitable for housing as it is at risk of flooding with a repeat of the October 2000 flood event.
- (c) The Society also notes that there is no provision for 'affordable housing' in this application, which would be contrary to local planning policies.
- (d) As such, the Society considers that this revised planning application has little to offer Lewes.

(e) In addition, the Society has been very concerned about the appearance of the perimeter hoardings around the bus station that were erected without planning permission by the Generator Group in order to prevent buses using the site. The Society is also aware that the retrospective planning application has now been granted temporary permission for six months, however the Society would welcome the removal of these perimeter hoardings at the earliest opportunity.

(8) With specific reference to the appearance of this amended scheme proposed by the Generator Group, the Society objects to the application because it considers that the quality of the architecture proposed falls well short of what is required at this significant town centre location, with many of the architectural features being rather alien to Lewes, and makes the following comments in support of its objection:-

(a) The size of this proposal has only been marginally reduced in relation to the previous application (SDNP/22/02197/FUL) and in this respect the weight of the FoL's previous comments are still relevant.

(b) It is appreciated that the massing of the building as seen from Eastgate Street has been marginally reduced, but overall, the bulk and the scale of the proposals are still unacceptable and remain harmful to the character of this part of the conservation area and the setting of the adjacent listed buildings. There seems to be little change to the East Street elevation with no account being taken of the way the buildings step down the hill or preserve the key views of the town from the downs.

(c) As such, it is considered that the scheme will still overwhelm the surrounding townscape and would be an inappropriate and incongruous design solution for this particular location.

(d) The building would fit in better if the punctuating gabled bays with the false flat 'chimney' appearance were removed, and the overall scale of the elevations reduced so that they were less dominant and the height limited to three storeys, with possibly one further storey set back on part of the elevation.

(e) The flat roofed middle part of the Eastgate Street elevation, together with the wide range of materials proposed on this elevation are considered to be too 'fussy' and inappropriate for this location. Furthermore, the appearance of the cantilevered balconies is not only especially poor and utilitarian in appearance, but also from a private amenity perspective is not ideal in having balconies serving different flats abutting each other, if one is serving a bedroom and the other a sitting room.

(f) In contrast to most residential facades in the town centre, which are 'passive' other than for the opening of windows, these balconies would lead to an 'active' façade once plant pots, bikes, washing and other personal belongings have been placed on them, which are considered to be visually unacceptable and a discordant feature at this important location, and better suited to rear elevations.

(g) The least successful design aspect of this Eastgate Street façade is the way in which the smaller standing seam link building transitions with the clothes shop to the south with the proposed brick gabled ended form, clashing into this very unsuccessfully.