



**PLEASE REFER TO THE SOCIETY'S PREVIOUS SUBMISSION, DATED THE 17<sup>TH</sup> MAY 2023**

**THE FRIENDS OF LEWES CONCLUSIONS ON THE SPECIFIC AMENDMENTS TO THE PHOENIX PLANNING APPLICATION:-**

**The Society's previous submission highlighted a number of concerns that it considered essential to be considered in further detail. Having studied the amendments to the original planning proposals, the Friends of Lewes continue to have strong objections to many aspects of the planning application and is disappointed that a number of our concerns have not been adequately addressed.**

**As a consequence, the Friends of Lewes now object to this proposal for the following reasons:-**

- (1) In the wide range of amendments that have been made to this proposal by the applicant, the emphasis appears to have been focused on adjustments to the detailing of the individual 'parcels' of development or the relationship of individual 'blocks' within these parcels, rather than addressing the need to ensure that this significant development fully integrates within both its immediate setting and the rest of Lewes.
- (2) The Society considers that it is essential that a scheme of this size integrates well with its immediate surroundings. In this respect, both the 'edge' of the development and the provision of any 'key' links with the surrounding built form, are considered to be essential items in achieving a successful addition to Lewes.
- (3) In terms of an important 'edge' that needs to be considered carefully, and in some detail, is the relationship of the proposed development to Phoenix Causeway. The Society has had a long standing concern about the location of the proposed 'Mobility Hub', effectively a multi-storey car park, and its likely physical appearance directly fronting the Phoenix Causeway and how this structure could make a 'positive impact' at this important location at the entrance to Lewes, which the applicant has yet to address.
- (4) The Society therefore objects to the proposed 'Mobility Hub' directly fronting Phoenix Causeway as the scale and massing are considered to be totally inappropriate at such a sensitive location at the entrance to the historic town. Furthermore, the Society considers that this building needs to be set back and screened from view. It would also be desirable to have other buildings at this location in order to provide a more 'lively' frontage as a basis for providing high quality public realm in this area.
- (5) As a consequence, the Society objects to size and orientation of parcels 9 & 10 on the 'parameter plan', which would constrain further consideration of a successful interface between the proposed buildings and the Phoenix Causeway frontage, as a basis for achieving a high quality of public realm on this part of the site.

(6) A further concern along this significant 'edge' is the suggested location of three bus stops on the north side of Phoenix Causeway. In this context, the Society objects to the failure of the application to provide a suitable replacement bus station for Lewes within the existing town centre contrary to paragraph 3(j) of Strategic Site Policy SD57 of the South Downs Local Plan. The proposal for three new bus lay-bys on the northern side of the Phoenix Causeway, does not meet this policy requirement and would represent a poor quality and inappropriate development at the eastern gateway to the town.

(8) The Society objects to the overall design of the development proposed adjacent to Phoenix Causeway as it fails to respect and enhance the character of the town and does not deliver a high standard of design or recognise the high quality built environment within the vicinity of the site adjacent to the Conservation Area. In this respect, the design is contrary to paragraph 3(d) of Strategic Site Policy SD57 of the South Downs Local Plan.

(9) As part of achieving the above objective, the Society objects to the removal of any of the existing trees fronting the northern side of Phoenix Causeway, that are subject to the two existing Tree Preservation Orders.

(10) The Society objects to the proposed access arrangements for pedestrians and cyclists to and from the proposed development, having not only to cross Phoenix Causeway, but also to rely on the use of Eastgate Street, which is currently only one way. In this respect the proposals fail to demonstrate that paragraph 3(b) of Strategic Site Policy SD57 of the South Downs Local Plan has been met. In this context, it is suggested that the applicant needs engage with East Sussex County Council, as the local Highway Authority, to assess the possible impact of this proposal on the wider street network.

(11) In terms of providing a 'key' link, (referred to in paragraph 2 above), of integrating the proposed development with the existing built form to the north of the River Ouse, it is considered essential that the proposed "Thomas Paine Bridge" be provided at an early stage in the development of this site, rather than at a late stage, in order to promote an improved link for both pedestrians and cyclists, and to encourage the 'modal shift' of relying on the use of cars for shopping.

(12) The Society considers that the proposed development will have an unacceptable impact on both the town and its wider landscape setting within the South Downs National Park, whose Local Plan is seeking to achieve "landscape" led initiatives in relation to the implementation of new developments.

(13) Furthermore, the Society considers that the development proposals could materially harm several heritage assets and the conservation area. Upon the limited information available, the proposals are not shown to be landscape led, or by their scale and form, or to be able to sustain the character and appearance of the Lewes Conservation Area, both protecting views and its interaction with the surrounding downland.

(14) Although the Society supports the principle of moving the health centre from North Street, it does not support the proposed new location on the floodplain. Although the planned flood defences will reduce the risk of flooding, it will not be eliminated and its new position next to the River Ouse will remain vulnerable to flooding. As the health centre will be the sole primary health care facility serving Lewes, the Society suggests that it would be considered imprudent for it to be located where there is any risk of flooding and that it should therefore be built on higher ground.

(15) In the wider context, the Society continues to support the Detailed Planning Application for the flood defences whilst not, in general, supporting 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 of the town.

(16) The Society considers it vital that adequate measures are incorporated into the proposed flood defences to take account of the likely future flood predictions in order to outweigh these concerns. In this respect it is noted that the H++ sea level rise allowance, which can be used to assess flood risk from a high impact change scenario, has not been considered relevant to the site, as the Project is not considered to be a "new settlement or significant urban extension".

(17) The Society continues to support the Detailed Planning Application for part of the housing development on the northern part of the site, but is concerned about the excessive height of the edge of the development fronting the open country on the most north-western part of the site.

(18) The Society continues to support the Detailed Planning Application for Temporary Access to the site, subject to its alignment being between the two Tree Preservation Orders, in order to limit the felling of any trees to a minimum.

(19) Furthermore, the Society objects to the proposed removal of all the existing trees fronting the northern side of the Phoenix Causeway, which are identified as being in good condition, and included in the two existing Tree Preservation Orders. A detailed plan is required, illustrating the position of all the trees and their root spread, in order to confirm whether there is a need for any specific trees be felled in their entirety. Having regard to the SDNPA's failure to give proper consideration to the impacts of the Santon development on these trees, and given the Hillside and Pilkington planning case law, the Society does not accept that the Santon development establishes any precedent for any of these trees to be removed.