



For the attention of Nicola Martin, Case Officer, South Downs National Park

20th March 2024

Dear Nicola

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 198 m² of ground floor commercial space (Class E), with associated access alterations, landscaping and parking. (Amended Plans and additional documents).

Please refer to the Friends of Lewes strong objection to this planning application, dated the 15th August 2023.

The Friends of Lewes would like to maintain their strong objection to this proposal for the following reasons:

(1) **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.** As a consequence, the development conflicts with the National Parks purposes and duty “To conserve and enhance the natural beauty, wildlife and cultural heritage, and to foster the social and economic wellbeing of its communities”.

(2) **The ‘key’ outstanding concern of the urgent need to provide suitable bus interchange facilities for the centre of Lewes, following the closure of the former Lewes Bus Station, has not yet been achieved.**

(3) The proposal to provide 3 bus stops along the north side of the Phoenix Causeway, as part of the Human Nature’s proposed redevelopment of the North Street Quarter, is not considered to be an acceptable location as it is too remote from the town centre and cannot provide a safe or attractive replacement, straddling as it does the town’s busiest road.

(4) To date, Human Nature’s planning application has not been granted planning permission.

(5) Even if planning permission were to be granted, as yet there is no indication of any timescale for implementing the proposed redevelopment.

(6) Therefore, any provision of bus stops along the north side of Phoenix Causeway should be considered to be long term, and in any event is not deliverable in the short term.

(7) Furthermore, it is understood that the possibility of providing any bus stops on the south edge of Phoenix Causeway would be difficult to achieve as the ground is unstable.

(8) The Society would therefore recommend that this application should be refused and that further consideration be given to reusing this site as a bus station.

(9) The Society has considered the submitted amendments to this scheme, and whilst the reduction in the mass and heights of small parts of the proposed development are to be welcomed, they are at best ‘minimal’ and have little effect in reducing the overall visual impact and harm of this inappropriate development to the historic core of the conservation area and the setting of adjacent listed buildings.

(10) The proposed development and comments of key officer fail to make reference to the SDNPA's consultation, and subsequent adoption, of the Lewes Conservation Area Appraisal and Management Plan (CAAMP), which was approved on 12th October 2023.

(11) This document was very comprehensive, defining and recording the special interest of the Lewes Conservation Area, and analysing the characteristics that make it special, as well as setting out a plan for managing change in order to ensure its ongoing protection and enhancement. The fine urban grain referred to in paragraph 4.104, and the importance of views (paragraph 4.128), have not been considered and therefore the proposals have failed to have regard to the full impacts of this development on this part of the Conservation Area and its considerable heritage assets. The loss of views of the Downs and Martyrs Memorial from East Street and Albion Street will be particularly harmful.

(12) The CAAMP confirms that 'there has been a loss of the historic urban grain due to oversized modern developments' being allowed (para 5.5), and identifies a number of 'Detracting Areas' areas and buildings that presently have a detrimental impact on the special interest of the Conservation Area. One such example is given as St Thomas's Court adjacent to the listed church. Given that the Generator Groups proposal is larger and higher than the adjacent listed Eastgate Baptist church development, the apparent support for the Generator Group development by the SDNPA's Design and Conservation officers would suggest that the important lessons from the past have not been learnt and are to be repeated, but in this case in the historic core at the gateway to the town with greater detriment.

(13) the Society considers it unacceptable that that the objectives of "protecting and enhancing" the Lewes Conservation Area have not been applied to this very large and inappropriate proposal by the Generator Group, at such a sensitive location within the Town Centre of Lewes.

(14) The Society is also aware that the former Wenban Smith Timber Yard and adjacent car park, which is located close to the former bus station, now referred to as "Eastgate Wharf", is currently being considered for redevelopment as a mixture of flats and houses by Cayuga Homes. This site will have a need for access and egress from Phoenix Causeway, requiring a change to the traffic junctions on Phoenix Causeway, so that it avoids the need for all traffic to circulate through the conservation area.

(15) The Society would therefore recommend that there should be an urgent comprehensive planning review of all three of these important town centre sites, namely this former bus station, Eastgate Wharf and the North Street Quarter proposals, as they specifically relate to the Phoenix Causeway. With particular regard to any future access arrangements that may be required for the redevelopment of Eastgate Wharf, there could be an adverse impact on the current proposals for access to the North Street Quarter site.

(16) In this context, the Society strongly recommends that the current Planning Application by the Generator Group should be refused.

Your sincerely,

Ruth

Ruth O'Keeffe
Chair, Friends of Lewes

Roger

Roger Maskew
Vice Chair, Friends of Lewes

cc Vanessa Rowlands, South Downs National Park
Daniel Stewart-Roberts, South Downs National Park