



22nd June 2026

Response to the South Downs Local Plan proposed submission (Regulation 19) May 2026

The Friends of Lewes objections are set out below:

Introduction:

The Friends of Lewes is the civic society for Lewes established in 1952 and aim to keep Lewes the special place that it is. The FoL is a registered charity, entirely run by volunteers with some of its funds used for environmental works and action in the town. It has been actively involved in numerous campaigns and actions leading the successful campaign to have the southern bypass built in preference to the highly damaging 'inner relief' road through the centre of the town, including much of what is now the conservation area. The Society has a membership of over 400 and has several committees including a highly experienced planning committee which examines all the range of applications received on a monthly basis, and makes comments to the SDNPA as appropriate. This approach to the Local Plan has been developed and approved by the executive committee helped by contributions from specialists and its membership.

The Friends of Lewes has been an active respondent to the Local Plan review process and has provided detailed comments setting out its principal concerns, particularly the extent to which the review will have an impact on the historic town of Lewes, in terms of any changes to the proposed planning policies for the area, and the consideration of any proposals for specific sites within Lewes, and particularly within the historic core. Many members attended the town hall drop in event in February 2025 and the FoL also participated in the recent Lewes Futures event at the Town Hall organised by the Lewes Town Council and attended by the chair of the SDNPA and officers. The FoL has continued to be involved in the local plan process organising a flood conference and exhibition attended by over 4300 people. The report from the conference is due for publication in the autumn and will be available at the examination in public. Members have attended multiple meetings related to the ongoing town wide masterplan exercise to inform both the Local Plan and Neighbourhood Plan.

The Friends of Lewes regrets both the SDNPA decision not to allow details of pre-application enquiries into the public domain when they are received and the limited enforcement of planning control in the town. It is considered that these continues to hinder effective delivery of the planning service in the town, compromising its environmental quality and the achievement of the National Park's purposes.

The following comments on the changes to the Local Plan reflect the deep concerns of the Friends of Lewes about some critical issues which need to be addressed urgently. These views represent the very strong objections to the approach set out in the plan amid concerns that it does not respond to the urgency of the threats to, and the impacts on, environmental quality posed by climate change in this part of the National Park.

On the basis that this current review of the South Downs Local Plan is to review policies that seek to be relevant for the next 15 years, that is up to 2040, the Society now considers it essential that the possible impact of climate change is fully taken into account in assessing any planning application.

Indeed, in the Society's initial response to this review, it was advocating that there should be no further house building on the floodplain in Lewes. This approach has since been progressed in more detail, and the Friends of Lewes have now approved a "Policy on Development in the Floodplain", which will be submitted in support of this response.

The principal concern for the Friends of Lewes is the extent to which the review will have an impact on the historic town of Lewes, in terms of any changes to the proposed Planning Policies for the area, and the consideration of any proposals for specific sites within Lewes and particularly within the historic core.

The sections below highlight the policy of the replacement Local Plan (**in bold type**) to which representations relate, the considerations as to its soundness and legal compliance, supported by relevant comments and reasons for the objection, and the changes to the policy which it is considered should be made.

To which part of the Local Plan does this representation relate: -

Strategic Policy SDC2: Development Strategy:

2. Do you consider the Local Plan is Sound?

No.

3. If you consider the Local Plan is unsafe or unsound, please specify why:

The Plan, in its current form, does not indicate that it has given due weight to the townscape capacity of settlements, or the availability of infrastructure to accept the quantity of development proposed. This is necessary to enable the assessment of any development. to protect and enhance the natural, built and historic environment of towns such as Lewes, meeting the needs of the people of the town.

Accordingly, for these reasons the plan is considered to be unsound.

4. Please enter your full statement of objection below:

It is noted that the development strategy is for a level of growth led by landscape capacity, dispersed across the National Park, focusing on settlements which enable occupiers to access day-to-day services and facilities. The strategy requires that development 'is of a scale and nature appropriate to the character and function of the settlement in its landscape context'. There is no mention of 'townscape', which in Lewes is intertwined with the landscape of the surrounding chalk hills. The policy needs to acknowledge The Council for British Archaeology 1965 paper which included Lewes in a list of 51 historic towns which are "so splendid and precious that ultimate responsibility for them should be a national concern".

More recently The Daily Telegraph confirmed in 2024 that Lewes is the best town in the country because of its medieval history, quirky cobbled streets, panoramic views of the South Downs and the beautiful eleventh-century Priory Park.

William Morris described Lewes as being 'set down better than any town in England because of its natural beauty and its historical significance as a market town and a point of cultural and historical interest.

Lewes is considered to be 'the jewel in National Park by the SDNPA'. The level of development must have full regard to the townscape qualities within the context of the adjacent landscape. To do otherwise is indicative of a 'two-tier' park approach, which is unacceptable and inappropriate. In addition, the policy must relate to the availability of the necessary infrastructure. It should not be assumed that towns by their size have the necessary infrastructure. Lewes for instance lacks necessary sewage treatment facilities and a bus interchange for its 1600 services each week.

Changes needed to address the issue.

The Development Strategy is for a level of growth led by landscape capacity, but must also have regard to townscape capacity and should be made more explicit so there is clear understanding of the qualities which are integral to this, set out in the relevant conservation area appraisals and management plans.

It is requested that policy SDC2 is amended to 'The development strategy is for a level of growth led by both the landscape and townscape capacity, dispersed across the National Park, focusing on settlements which enable occupiers to access day-to-day services and facilities within the capacity of available infrastructure. It also allows for more limited growth outside of these settlements to support rural communities and economies.

Strategic Policy SDL 2 Design

2. Do you consider the Local Plan is Sound?

No.

3. If you consider the Local Plan is unsafe or unsound, please specify why: soundness sound

The Plan, in its current form, does not indicate that the plan has given appropriate weight to the townscape aspects of development, including the implications for its height and form. This is necessary to enable the assessment of any development, to protect and enhance the natural, built and historic environment of towns and settlements, meeting and protecting the needs of the people, by maintaining environmental quality. The policy again focuses on being landscape-led, without acknowledging the components of townscape that can contribute to that quality. Accordingly, the plan compromises the ability to achieve sustainable development, and is therefore considered to be unsound.

The plan needs to urgently consider the implications of having no new housing on the floodplain in Lewes, in order to help mitigate the likely impact of climate change by 2040.

4. Please enter your full statement of objection below:

The reference to 'townscape' within this policy, seems somewhat an afterthought. Lewes is intertwined with the landscape of the surrounding chalk hills. The policy needs to acknowledge The Council for British Archaeology 1965 paper which included Lewes in a list of 51 historic towns which are "so splendid and precious that ultimate responsibility for them should be a national concern".

More recently The Daily Telegraph confirmed in 2024 that Lewes is the best town in the country because of its medieval history, quirky cobbled streets, panoramic views of the South Downs and the beautiful eleventh-century Priory Park.

William Morris described Lewes as being ‘set down better than any town in England because of its natural beauty and its historical significance as a market town and a point of cultural and historical interest’.

Lewes is considered to be ‘the jewel in National Park’ by the SDNPA. The level of development must have full regard to the townscape qualities within the context of the adjacent landscape. To do otherwise is indicative of a two-tier park which is unacceptable and inappropriate.

In the case of Lewes, its juxtaposition with the landscape is well established, hence its inclusion within the South Downs National Park in the first place. The policy must give sufficient weight to the townscape within the overall approach to design and in the appreciation of local character. In design terms, the scale of development is key and this should be referenced in the policy.

Changes needed to address the issue

The text should be amended as set out: - Development proposals will only be permitted where they adopt an approach led by the landscape and townscape in which they are set, respecting the local character, through sensitive and high-quality design that enhances the overall character and appearance of the area.

- a) Integrate with, respect the scale of development and sympathetically complement the landscape (including townscape) character by ensuring development proposals are demonstrably informed by an assessment of the landscape and townscape context and capacity;
- b) To propose measures, including no new housing on the floodplain in Lewes, which will help mitigate the likely impact of climate change by 2040.

Strategic Policy SDL7: Listed Buildings

2. Do you consider the Local Plan is Sound?

No.

3. If you consider the Local Plan is unsafe or unsound, please specify why:

The Plan policy SDL7 in its current form does not indicate that it has given due weight to the townscape impacts or the scale of change from development. This is necessary to enable the assessment of any development, to protect and enhance the natural, built and historic environment of towns, such as of Lewes, meeting the needs of the people of the town. The policy again focuses on being landscape-led, without acknowledging the components of townscape that can contribute to that quality, including the implications for its height and form. Accordingly, the plan compromises the ability to achieve sustainable development and environmental objectives, and is therefore considered to be unsound.

Please enter your full statement of objection below:

There is no mention of ‘townscape’ within this policy. Lewes is intertwined with the landscape of the surrounding chalk hills. The policy needs to acknowledge The Council for British Archaeology 1965 paper which included Lewes in a list of 51 historic towns which are “so splendid and precious that ultimate responsibility for them should be a national concern”.

More recently The Daily Telegraph confirmed in 2024 that Lewes is ‘the best town in the country because of its medieval history, quirky cobbled streets, panoramic views of the South Downs and the beautiful 11th-century Priory Park’.

William Morris described Lewes as being 'set down better than any town in England because of its natural beauty and its historical significance as a market town and a point of cultural and historical interest'.

Lewes is considered to be 'the jewel in National Park' by the SDNPA and contains over 500 listed buildings. Development must have full regard to the impact on listed buildings and particularly the overall townscape qualities within the context of the adjacent landscape. To do otherwise is indicative of a two-tier park approach, which is unacceptable and inappropriate.

In the case of Lewes, its juxtaposition with the landscape is well established, hence its inclusion within the South Downs National Park. The policy must give sufficient weight to the townscape within the overall approach to protecting listed buildings. In design terms, the scale of development is key and this should be referenced in the policy.

Changes needed to address the issue by altering subsection a)

- a) They preserve and enhance the significance of the listed buildings and their settings by demonstrating that the townscape, including changes in scale or form of development, do not harm local distinctiveness and the wider landscape character, or result in the loss of historic fabric and detail of significance, including internal features, floor plans or the integrity of the rooms or recording.
- b) To take appropriate measures to ensure that listed buildings are not subject to flooding in the future due to climate change.

Strategic Policy SDL8: Conservation Areas

2. Do you consider the Local Plan is Sound?

No.

3. If you consider the Local Plan is unsafe or unsound, please specify why: The Plan policy SDL8, in its current form, does not indicate that it has given due weight to the townscape impacts or the scale of change from development. This is necessary to enable the assessment of any development, to protect and enhance the natural, built and historic environment of towns, such as of Lewes, and to meet the needs of the people of the town. Accordingly, the plan compromises the ability to achieve sustainable development and environmental objectives, and is therefore considered to be unsound.

4. Please enter your full statement of objection below:

As the purpose of the policy is to set out more detailed criteria for development proposals within or affecting conservation areas, there should be sufficient information to support an informed assessment which includes reference to the many aspects identified, but these must include the relationship to the established townscape and the scale of buildings, in addition to all the other aspects already included.

Additionally, there must be regard to the full impacts of development proposals, albeit if only temporary, in cases where planning permission is seen fit to be granted for the demolition of buildings or structures within conservation areas. There must be regard to the potential impact of hoardings and other works in the period between consent being granted and the eventual implementation and completion of the approved consent. Lewes is currently blighted by a number of temporary hoardings and partially demolished buildings which harm environmental quality and are considered highly detrimental to the visitor experience and harm the vitality of the town.

Through legal agreements, the existing use of land or buildings should be extended to ensure sites remain active and useable up until the date when a contract for redevelopment is signed.

Changes needed to address the issue: -

Element 2) of the policy should have an addition as follows: -

c) The continued use of a building or land should be provided for, in a sympathetic manner, up until the commencement of redevelopment works so that harm to the appearance and character of the conservation area is minimised.

Strategic Policy SDWI: Protection of the Water Environment

2. Do you consider the Local Plan is Sound?

No.

3. If you consider the Local Plan is unsafe or unsound, please specify why: The plan ignores the current high levels of pollution within the River Ouse and its catchment, and proposes more development which will add to the number of foul discharges and exacerbate an already serious water pollution issue affecting the health of a river with consequent impacts on the wellbeing of the community and its use for recreation purposes plus its wildlife value. In doing so the plan fails to protect and enhance the natural environment and does not support healthy communities.

4. Please enter your full statement of objection below:

The River Ouse is more vital to the people of Sussex than many realise. It is a main source of drinking water and accepts discharges of treated effluent from major wastewater treatment works at Uckfield, Plumpton, Barcombe and Cooksbridge, as well as providing the more visible leisure activities. At Lewes itself and south of Lewes there are significant discharges into the River Ouse and its tributaries such as Glynde Reach. Given that the River Ouse is tidal from Newhaven to Barcombe Mills this has a detrimental impact on water quality within a large part of the River Ouse.

It is, therefore, not only the impact of the flooding of polluted waters which needs to be taken into account, but the impacts on water quality of all the rivers in the catchment. One of the aims of the plan rightly supports the necessary physical, social and green and blue infrastructure to meet people's current and future needs and infrastructure to be built at the right time to serve our communities' needs for water and transport.

The River Ouse at Lewes is suffering from unacceptable pollution by discharges of untreated sewage. Figures from the Environment Agency, show that in 2023, Southern Water's Ham Lane (Lewes) Sewage Pumping Station discharged raw sewage into the river Ouse 243 times, lasting a total of 4830.64 hours. This figure represents the second highest number of spills in the entire Southern Water operational area which covers a large area of the South East of England.

The Ham Lane waste water works in Lewes operates a storage facility which collects waste water from the town and then pumps it to Newhaven for treatment before discharge to the English Channel. In 2024 there were 259 spills with a total duration of 4824 hours. Given that there are 8760 hours in a year this means that for more than 50% of the year spills are taking place with either untreated or partially treated foul water being discharged into the River Ouse.

Beyond Lewes other works are discharging into the Ouse or its tributaries. Ditchling WWTW discharged 2653 hours on 158 occasions.

This is unacceptable and unnecessary and is due to the inadequacy of the existing sewerage infrastructure and the inability of the Ham Lane facility to store sufficient quantities of effluent, before onward pumping to Newhaven. This is having a significant impact on water quality and urgent steps are required to address this to protect the wildlife in our rivers and to ensure safe recreational use. The FoL expects urgent measures to be introduced to upgrade sewage treatment facilities to tertiary level of treatment within the upper Ouse catchment and to significantly increase capacity, so they are not overwhelmed at times of even modest storms.

Lewes, like many historic towns, has an old and outdated sewerage system. Sewage pipes leak, leading to both pollution from those discharges but also allowing groundwater to infiltrate and add excess water, thus overloading the sewerage systems. It is essential that all new development has an independent sewerage and water supply capacity check, to ensure that the capacity to supply drinking water and handle the increase in wastewater, will be in place before occupancy.

Water companies are profit-driven, and on the evidence of past performance are happy to accept the additional income generated by new buildings with little concern for the consequences of unauthorised discharges that result from accepting greater flows that the Water Waste Treatment Works (WWTW) can handle so this assessment should be carried out by an independent body.

The local plan policy should establish the design capacity of all Sewerage Treatment Works within the plan area, with independent checking of water company data at the outset. This is particularly important in terms of the Newhaven Waste Water Treatment Works which also treats the sewage flows from Lewes by a pipeline from the former Ham Lane Lewes works site. Work to correct this would pass forward considerably higher flows, leading to pressures on the Newhaven Sewage Treatment Works and the pipeline pumping stations.

It is also important to ensure that any further development in Lewes, Ringmer, Plumpton Green and villages in the surrounding districts do not add to surface water run-off, or overwhelm the capacity of existing sewerage infrastructure. New large housing developments which seal the surface of land with impermeable structures and roads must be minimised. Any that do take place must have adequate compensatory arrangements to ensure that no additional flows are released, even during extreme weather events, and certainly do not add to the flow within the foul water infrastructure pipework. Whilst much of these developments are outside the area of the SDNP, it is essential that their impact is considered, together with the accumulative impacts of developments inside the SDNP Area.

Until such time as adequate capacity exists for the current flows, it is considered essential and prudent to place an embargo on new development within the town's catchment to the Ham Lane facility until this unsatisfactory level of unauthorised discharges in the area is addressed.

Changes needed to address the issue

There must be an explicit policy that prevents new development within the River Ouse catchment of the National Park from being undertaken until there is sufficient capacity to handle the existing foul water flows and there by ensure that the Water Framework Directive is adhered to.

Amend the wording to 3)

Development proposals will only be permitted where they can fully demonstrate adequate wastewater treatment provision, including: a) no surface water from new or the existing development will be discharged to the public foul or combined sewer system; b) that foul water from new and existing development will only be discharged to the public foul sewer. Alternatives will only be considered if it is demonstrated that all options for connection to the public foul sewer have been explored and that such connection is not possible; c) development is phased to align with the delivery and operation of new or improved wastewater infrastructure where this is required.

The Society therefore strongly recommends that there should be no consideration of planning applications for new housing until the necessary measures have been carried out and adequate capacity exists to treat existing and additional sewage to tertiary levels.

Strategic Policy SDW3: Sustainable Drainage

2. Do you consider the Local Plan is Sound?

No.

3. If you consider the Local Plan is unsafe or unsound, please specify why: The plan proposes more development which will add to surface water run-off, increasing the vulnerability of land and buildings to pluvial flooding events. There is a need to fully understand and address the reasons that give rise to these impacts and ensure the appropriate response is delivered in a timely manner to protect the health and welfare of communities, and to protect and enhance the natural environment to meet NPPF and National Park sustainability objectives.

4. Please enter your full statement of objection below:

The Environment Agency published an update in February 2025 to their National Flood Risk Assessment Report. By 2050, more than 1 in 4 homes in England will be at risk of flooding, or coastal erosion, up from 1 in 6 in the previous 2018 report. The majority of these extra properties are at risk of surface water flooding, where the drainage infrastructure is no longer able to cope with the intense rainfall. The Environment Agency has released an updated flood risk map for England. It shows the risk of flooding by rivers, the sea, from surface water runoff and groundwater for both now and in the longer term. The risk of flooding by surface water appears to have increased in Lewes for the period 2040-2060, whereas the risk of flooding from rivers and the sea has remained similar to that on the previous flood risk maps, which were last updated in 2019. It should be noted that longer-term (more than 35 years), the risk of climate change increasing all forms of flood risk remains extremely high.

The FoL is still waiting to find out when the government will enact the requirement for all new development to provide Sustainable Drainage Systems (SuDS) as required by Schedule 3 of the 2010 Flood and Water Management Act. This is the long-awaited SuDS long term maintenance measure that requires all development to be built with sustainable drainage systems which reduce the amount of surface water runoff and flooding, something that will be increasingly necessary as further climate change brings even higher intensities of rainfall and flooding.

All new developments must provide SuDS suitable to the proposal and its location, unless there is clear evidence that this would be inappropriate. SuDS must be designed with reference to the latest East Sussex County Council's guidance. Where possible, the drainage system should be multifunctional and be incorporated into the Green and Blue Infrastructure Network and must also preserve natural water flow and flood routing. It is noted that successive governments have failed to implement Schedule 3 of the Flood and Water Management Act 2010.

It should also be noted that any SuDS scheme will only operate if the local water table is sufficiently low to enable adequate provision for rain water run-off to be accommodated, which is rarely the case in Lewes.

The requirements for sustainable drainage must be a prerequisite to planning permission, given the increased pressures on the environment that existing, and future climate change brings. With acknowledged water shortages in this part of the country the inclusion of multi-functional drainage systems should be required in all new development embracing the harvesting of rainwater, so the collected water can be used for gardens, toilets, and washing machines.

Heavy rain often results in excessive runoff flooding streets, exacerbated by many of the historic buildings draining directly onto pavements and the public highway.

Additionally, because of the sensitivity of the catchment area and known problems within Lewes, (such as the Nevill Estate), the SDNP should introduce an Article 4 Direction to bring all garden sealing developments within control to avoid additional water runoff.

It is also considered that urgent steps are required to reduce surface water flows at times of storms. The existing permitted development provisions are clearly failing to achieve this and whilst the sealing of front gardens and other areas may no longer be 'permitted development', the simple inclusion of a drainage channel across the frontage is not sufficient to evidentially contain surface water flows within curtilages.

There is no requirement within the permitted development provisions to require a drainage channel with detailed calculations of permeability and containment. In this context it is considered that there is a need to impose an Article 4 Direction across the town to ensure that such sealing of land requires planning permission, providing an opportunity to ensure that surface water run off does not take place from existing or new development in storm conditions. Extensions to existing properties should require the upgrading of a whole property's drainage to reduce the rate and volume of flows.

Experience in Lewes has shown that the sealing of substantial areas of driveway and gardens can be undertaken without the need for planning permission provided a drainage channel is incorporated into the design. This channel does not have to be connected to a soakaway or any other form of drain, so its effectiveness is negligible in most cases. Often such drains are connected to the sewage system, so the reality is that the sealing leads to greater surface water flows to streets and ultimately to the lower parts of the developed area. At times of high rain fall there are several streets in Lewes which regularly become impassable, including Nevill Road, Station Road, Winterbourne and Landport Road. Clearly, the situation will only worsen and action must be taken urgently to control this form of development. The only way to do this is to remove the relevant permitted development provision through an Article 4 Direction.

Changes needed to address the issue

Policy SDW3 should be expanded to provide for the life-time maintenance of SuDs schemes to ensure their effectiveness throughout the life of each development. Water harvesting should be a requirement for all new development to make use of what is becoming a precious resource.

An additional element must be added to the policy to allow the authority to initiate and impose an Article 4 Direction, either across the whole park or specific areas such as the town of Lewes to address the weakness within the permitted development rights to remove the ability to seal gardens and driveways.

Policy SDHI: Housing Supply

2. Do you consider the Local Plan is Sound?

No.

3. If you consider the Local Plan is unsafe or unsound, please specify why:

The plan pays insufficient attention to the housing situation in the town where few new housing developments are being built out, despite the existence of planning permissions. This, together with the failure to deliver the expected number of affordable homes is having a significant negative effect on the wellbeing of the local community in conflict with objectives in both the NPPF and for the National Park. Consequently, the plan fails to build a strong economy with much land and buildings being unused, and little progress with the provision of necessary infrastructure.

4. Please enter your full statement of objection below;

An overarching assessment of the current situation in Lewes highlights that whilst there are many sites allocated for residential development, few have actually been developed, despite what is seen as a buoyant housing market and high private rents. The reasons behind this must be considered as it applies to both brownfield and greenfield sites, both within and outside the floodplain.

There are many sites with planning permissions where development has not substantially commenced: Old Malling Farm; Garden Street PLI B (3) and Court Road PLI B (36) former Magistrates' car park. South Down Park in South Downs Way PLI B (26) is partially built out and work only recently commenced on the completion of the final half of the development. This uncertainty has, with no action from the SDNPA, led to developers placing hoarding or fencing around sites without consent at multiple locations: - St Annes School PLI B (53); Astley House, Spital Road PLI B (2); Garden Street PLI B (3); the Eastgate Bus station. Together with the South Down Park, South Downs Way PLI B (26) hoarding, it is causing cumulative harm to the appearance of the town and to the conservation area, which must be addressed. The identification of more housing sites will simply add to the environmental harm to the detriment of the conservation area and the setting of listed buildings. Only the legal letting of full binding building contracts should allow the erection of hoardings and the commencement of demolition works pursuant to the implementation of developments.

The FoL support development that provides genuinely affordable housing, particularly social rented housing, that meets the needs of local communities in perpetuity, especially for key workers. We are keen to explore innovative ways of increasing the delivery of such housing which seemingly should be based on local wages rather than the market value of nearby housing. including through community-led development and exception site.

The overall local objective of the review would appear to be to allocate as many dwellings as possible within Lewes, irrespective of whether they can be accommodated in a satisfactory manner within the local road network, and whether the local infrastructure is capable of coping with a large number of additional developments.

To simply add additional sites would undermine the key intentions of the Local Plan to make the best use of land and enhance environmental quality. Whether it is due to the availability of land outside the SDNP, such as Ringmer, or whether developers are seeking to increase land value is unclear, but in either case there must be a better understanding and a tighter link between the allocation of sites and their build out.

This is directly relevant to the delivery of key policies such as SDI Sustainable Development where the cultural heritage of the town is being compromised. The scale of development being proposed can only worsen water quality with no additional capacity to contain the high rate of untreated sewage to the River Ouse.

Changes needed to address the issue

To review the housing supply figure for Lewes in the light of a better understanding of the local delivery issues and the adverse environmental impact currently experienced.

Policy SDH5: Affordable Homes

Do you consider the Local Plan is Sound?

No.

If you consider the Local Plan is unsafe or unsound, please specify why:

The National Park Authority is required to pay due regard to its duty to seek to foster the economic and social well-being of the local communities within the National Park. It is vital that the characteristics of the population within the National Park do not slide irreversibly towards an aged population with unaffordable homes or homes which are unsuitable for families. Lewes has already experienced the closure of 3 primary schools, which indicates that the current housing policy is not delivering for the future needs of the town. Accordingly, the reduction in affordable housing conflicts with the SDNP's duty to foster the economic and social well-being of local communities within the SDNP, and therefore this policy is considered to be unsound.

4. Please enter your full statement of objection below:

It is vital that the characteristics of the population within the National Park, and especially within its largest town, do not slide irreversibly towards an aged population with unaffordable homes or homes which are unsuitable for child rearing. It is vital that the existing policy requirement of 50% is not reduced as planned in this policy change. It is appreciated that the 50% affordable threshold was hard fought but was previously accepted through the rigours of the Local Plan approval process. The need for affordable housing remains of critical importance to the town. No sound reason is given to reduce the level to 40% or the 30% figure in paragraph 1a) i.

A further concern and possible repercussion of the housing situation in Lewes would seem to be the failure of the South Downs Local Plan to deliver the required 50% of affordable housing on development sites. Again, the reasons for this situation must be understood and corrective action included in the redrafted policies of the Plan. It appears that developers are able to circumnavigate the requirement to deliver genuinely affordable housing by choosing to acquire sites at inflated prices. It is considered vital to address this aspect so that truly affordable housing can be provided, and that the town of Lewes retains an economically balanced population, and importantly many key workers. At the same time, policies should be introduced to prevent second homes/holiday homes unbalancing the housing situation.

The Local Plan needs to consider how it defines the bedrooms within housing, making it clear that a 3-bed house means one double bed and a single bed for a child, not three ensuite luxury double bedrooms. To address this, it is suggested that not only is there clearer reference to a 3-person house or a 4- person house (i.e., one double and two singles) but also a square metre limit (set out in a mini table) with 120 square metres being appropriate for a small 2 up, 2 down house. Alternatively, the other way of delivering affordable housing would be take the same approach as Brighton and Hove Council so; if developers cannot provide the affordable house, a percentage of

the site should be provided in lieu to enable the South Downs NPA's own social housing provider to undertake that provision.

The South Downs National Park Housing and Economic Development Needs Assessment (Sept 23) indicates that, in order to maintain the existing level of economically active population, 276 dwellings per annum would need to be delivered across the SDNP area. The level of affordable need (370 per annum) suggests the Authority should maximise the delivery of such housing at every opportunity. The determination of recent planning applications in Lewes has done nothing to address this situation. The FoL is deeply concerned that young families are being priced out of housing in the town, which is a significant factor in the closure of four primary schools (three in the town and one in the Ouse Valley at Rodmell).

We note that National Park Authorities need to take into account the 2010 Vision & Circular which sets out national policy in respect of National Parks. In this, the Government is clear that action by National Park Authorities should focus on fostering and maintaining thriving rural economies and supporting the delivery of affordable housing. The 2010 Circular recognises that properties in or near National Parks often command higher house prices than surrounding areas, but jobs in their local economies can be low paid.

The 2010 Circular clearly sets out that National Park Authorities have an important role to play in the delivery of affordable housing, and states that, "Through their Local Development Frameworks they should include policies that pro-actively respond to local housing needs". Paragraph 78 states that "The Government recognises that the National Parks are not suitable locations for unrestricted housing and does not therefore provide general housing targets for such areas.

Changes needed to address the issue

Affordable housing requirements should remain at the 50% level whether on greenfield or brownfield sites.

Strategic Policy SDT4: Parking Provision.

Do you consider the Local Plan is Sound?

No.

If you consider the Local Plan is unsafe or unsound, please specify why:

The National Park Authority is required to pay due regard to its duty to seek to foster the economic and social well-being of the local communities within the National Park. It is vital in this context, that the function of existing car parks is fully understood, and the basis upon which their importance or otherwise is determined. There must be some understanding that there is a level of existing car parking provision to maintain the vitality and function of towns and villages. Accordingly, reductions in car parking can therefore be harmful and conflict with the SDNP's duty to foster the economic and social well-being of local communities within the SDNP. Therefore, as drafted the policy is considered to be unsound.

4. Please enter your full statement of objection below:

This policy lacks clarity in terms of its assessment of existing car parks. There is no clear distinction of the requirements for the *provision for parking at new developments, with the provision for new (or replacement) public parking*. Within Lewes the approaches to parking in the town, and indeed modal movements, is fragmented with no underlying strategy evident or coordination between the

various authorities. The Lewes Town Council commissioned a movement strategy for the town which has identified the need for an overarching parking assessment. Provision must be made for those that are less mobile, and tourists who make an important contribution to the economy of towns, and indeed other areas.

Recent planning permissions and allocations supported by the SDNPA have resulted in the commitment to lose 212 public car parking spaces and over 100 more are earmarked for removal with the Eastgate Wharf development proposals and the redevelopment of the Little East Street car park for housing. Existing car parks have had spaces set aside for electric charging which are rarely fully used and therefore fewer spaces are available to meet the general use. The town's parking situation will become much more difficult with the consequence being more vehicles circulating the medieval streets looking for that empty space and unauthorised parking on pavements or within the carriageway. All this contradicts the stated concern in the adopted 2019 South Downs Local Plan where an under-provision of car parking in the town was identified.

Furthermore, within Zone B of the town's existing controlled parking zone, the Phoenix Development plans to privatise streets, which will involve the loss of on-street public car parking in North Street and Phoenix Place, as well as the provision of turning places in North Street and Brook Street. Additionally, the identified extension of controlled parking within Landport or Malling proposed in relation to the Human Nature application will simply move parking demand somewhere else, without addressing the issue of need.

The consequences are all too visible within the town's conservation area. Vehicle parking on pavements damages the slabs making them uneven, and discourages their use by pedestrians and therefore the very modal shift the wider transport objectives of policies SDT1 and SDT2 seek.

Much greater clarity is required and broader consideration of the impacts to allow this matter to be thoroughly considered. It should be informed by the movement strategy for the town and the parking assessment.

There is also the need to strengthen the provision of charging points for Electric Vehicles (EVs). There is an upcoming problem with charging EVs in historic town centres like Lewes, especially within conservation areas. There should be a recognition that the number of EVs will grow in the next few years, and drivers who live in the centre of Lewes (and similar places) will need to be accommodated.

A policy is required to recognise the need for much more on-street public charging of EVs (at affordable rates) and the safe passage of charge cables between vehicles and properties, where owners without driveways can park on-street adjacent to their homes. A design code should be developed to facilitate best practice in heritage design of charging posts and cable channels.

Changes needed to address the issue:

The policy must address the parking needs of towns and settlements and especially in situations where development is proposing the loss or reduction of car parking. In particular it must set out a basis for determining 'an appropriate level of public car parking provision' which is referenced in some of the site-specific allocations.

SDA I North Street Quarter: Comprising Phoenix Area (A); Former Bus Station (B); and Eastgate Wharf (C)

2. Do you consider the Local Plan is Sound?

No.

3. If you consider the Local Plan is unsafe or unsound, please specify why:

In respect of the North Street strategic land allocation the planning process has undermined the delivery of development, by creating unrealistic and undeliverable development within an area that is has significant constraints to housing because of its location within an active flood plain and on highly contaminated land where there is a high-water table. The uncertainty has lasted some 20 years resulting in economic decline, lack of vibrancy and a very poor environmental quality across the SDI allocation, in conflict with the overarching objectives for sustainable development within the NPPF. A different community led approach is now required to remove the uncertainty and harm.

4. Please enter your full statement of objection below:

Lewes has a history of extreme flooding from the River Ouse, with major floods in 2000, 1960, 1938, 1911 and every 30 - 40 years back until records began in the 17th century. Whilst the Environment Agency has undertaken the construction of flood defences with £3.3million having been spent between 2005 and 2010, much of the town, particularly on the western bank of the Ouse is no better prepared now than it was in 2000 and the flood protection walls on much of the town centre eastern side will provide no greater protection than they did in 2000 when they were overtopped..

We have been advised that we should think of flood events as 'a once in 100 years' event, but the Lewes floods of 1938 and 1960, and 2000 and beyond, show that there is a greater frequency which must be acknowledged and respected. Flood walls were built, and river embankments were raised after all of these previous major flood events, yet every time Lewes flooded again. Climate change is bringing more frequent and intense rainfall, which will increase in the future. This adds pressure to the conveyance capabilities of the River Ouse. Rising sea levels at Newhaven further increase the river's heights (the Ouse is tidal up to Barcombe Mills), limiting the flow capacity through Lewes, thus increasing flood risk.

Over 600 homes and 300 businesses were flooded in 2000 with a damages bill of £118 million, which now equates to £220+ million at 2025 prices. Since the 2000 floods, 600 new properties have been built in the Lewes flood plain. A further 800+ properties in the North Street, Bus Station and Eastgate Wharf (Wenban Smith) developments are situated within the flood plain. These will extend the floodplain from that experienced in 2000.

In 2020, despite these increased risks, the Lewes Flood Action Group was disbanded by Lewes District Council, reducing the local resilience and preparedness for flooding. September 2024 saw record rainfalls in many parts of the country, with Central and South East England having over 300% of expected averages. Derby, which had recently designed and completed flood defences, saw its new flood walls overwhelmed with extensive property flooding.

The Government agreed in 2012 that it would not fund flood defences for new house building in flood plains so it is understood that at least £15million will be required if new flood defences are to be built around the Phoenix Quarter. In addition, banks and other financial institutions apply much higher interest rates for home loans in such flood risk locations situations. These factors therefore

act to undermine the prospect of delivering affordable homes which will be both uninsurable and require a larger budget. Both the direct and indirect cost of site development can be expected to be high. It is these factors along with the need to decontaminate the site and find a solution to site drainage within an area where there is a high-water table that impact on viability and explain why the Santon scheme and now Human Nature appear to have stalled.

Despite some higher flood walls, Lewes will flood again bringing untold devastation and costs. It is no longer sustainable to continue in this way and the Friends of Lewes call for no more residential development in the flood plains to the River Ouse in this part of Lewes and elsewhere. The Society advocates that, given both the speed and magnitude of the impact of climate change, there should be no further house building proposed within the flood plain in Lewes.

Appendix I sets out the Friends of Lewes agreed Policy on Development in the Floodplain.

It is considered that the North Street quarter, comprising site A, should not be used for conventional residential building. The need to evacuate and temporarily rehouse such a large population in time of flood is unreasonable and potentially life-threatening, having regard to the speed and mass of flood events that are charged by climate change. Moreover, the proposed redevelopment by Santon has not commenced beyond some building demolition and the Human Nature's quest for 685 homes has stalled with some 28 months having elapsed since the committee determination and no sight of a legal agreement and the issue of a planning permission, let alone sufficient funds to progress any site development.

It should also be noted that since this site was acquired by Human Nature, there is now a greater awareness of the likely impact of climate change by 2040, and the scale of flood defences that are likely to be required. Furthermore, in the longer term there may be a need to increase the height of these flood defences, which would be difficult to achieve with the current scheme.

Accordingly, as per FoL comments and objections to planning applications, it is not considered that the use of this site for conventional housing is appropriate or reasonable given the very high susceptibility to flooding. The high-density housing proposed in the Human Nature application remains unapproved and has shown that it has not been able to respect and enhance the character of the town's conservation area or protect the landscape setting within the National Park.

Accordingly, the site should remain as an employment area and this should be reflected in the overarching criteria in the Local Plan. It is considered that there is an opportunity for a visionary economic strategy for the town focussed on revitalising the Phoenix Industrial area. This would help rebalance the town that is becoming predominantly residential and create an employment base to attract a new generation of younger Lewesians to push forward the town economy too. This will give confidence to investment and a renewed focus on local jobs and business opportunities which are considered more adaptable in times of flood and easier to rebuild.

Given the current lack of progress of the Human Nature scheme, it would now seem to be prudent to consider other options, possibly either short term or temporary, in order to make use of this important site.

Retaining business and workspace units within employment use, would address the current malaise of empty units while owners wait on residential value or with hope of converting to low paid chain retail. Too many buildings and spaces in the town are speculated on for residential development and left dormant for years as a result. All of these could and previously did support creative industries and a range of businesses. The Phoenix Quarter should revert to the existing

employment uses providing an essential employment focus for the town, preventing the continuing and unsustainable exodus to surrounding villages and rural locations such as Bridge Farm, Barcombe Mills and other Ouse valley villages.

To enable the town of Lewes to successfully adapt to meet future challenges its approach to transport is key. There is agreement that the medieval streets are unsuited to modern vehicles and that an alternative to the private car must be found. Public transport is key to this yet the SDNPA have seen it fit to downgrade our bus interchange to 5 proposed stands either side of the busiest road in the town with 21,000 vehicle movements daily across Phoenix Causeway. There is no designated crossing between the stands on the north and south sides. 370+ children use Lewes buses for school and college. This is plainly unsafe at a number of levels and an accident waiting to happen, especially as the 30mph speed limits are often exceeded because of the generous width to the road. Visually, it will be highly detrimental first impression for visitors to the town from the easterly direction.

The bus station relocation depends on both the Human Nature Scheme and the Generator Group scheme being progressed, which now seems unlikely, so it must revert to its former location until any better option comes forward.

In this respect it is suggested that there needs to be a comprehensive review of the traffic flows within the town centre in order to cater for the likely levels of traffic generated by possible developments on not only Site A, but also Site B and Site C. Indeed, there has been no such review since the construction of the Phoenix Causeway in the 1970's when the existing town traffic management arrangements was introduced as a 'temporary measure'.

The key objective of any review should be to significantly reduce the speed of traffic on the Phoenix Causeway, to perhaps under 20mph, in order to create a suitable environment for a town centre that would enable pedestrians, cyclists and vehicles to interact in a safe environment, including the reinstatement of the bus interchange within the town centre. One of the most dangerous crossing points in the town is at the junction of Eastgate with East Street where pedestrians have to judge the intentions of speeding traffic from Phoenix Causeway to determine if it is safe to cross the streets.

We object to the Lewes Bus Station, comprising Site B, being referred to as the 'former bus station' as to many Lewes people, this is still their only bus station and it has not been replaced. Many are looking to reinstate it.

A vision-led approach to transport set out in Policy SDT1 must look to sustainably reuse buildings rather than starting from scratch. The current bus station location is popular and delivers transport solutions both in terms of allowing safe and comfortable use of buses particularly to those marginalised in society such as the elderly disabled and those with children.

Lewes requires a bus interchange as previously specified in the current Local Plan, but relocated outside of the town centre in the new draft. Currently bus services from the town connect 56 towns and villages in East and West Sussex and Kent; and many hamlets enroute. There are 1600+ bus journeys through the town in a week, making the town the largest transport interchange within the National Park. Midhurst by comparison has just over 600 services per week. In recent years services have been expanded to link Eastbourne, Heathfield and Hailsham. Lewes is a centre where most of the services start/terminate and is therefore the location for layover and also timing stops requiring additional space for buses, currently in multiple locations, often in breach of the on-street parking restrictions.

The current arrangement, and that proposed by the SDNPA, is simply not fit for purpose, and in no way is it comparable to the facility that has been lost. It reduces ease of movement due to its fragmentation and inaccessibility, with numerous, separate bus stops serving different parts of the town and the rural areas beyond. It is unattractive and confusing and has had a negative impact on the retail environment of School Hill and Eastgate.

An interchange is required to achieve safety, coherence and ease of movement. Draft SDNP Local Plan proposals have no certainty, being linked to development projects that have not been implemented or even granted planning permission. The former bus station is still available with the planning consent still not being progressed towards implementation since being granted in April 2025. It is situated in a town centre location with 83msq of covered waiting area and indoor waiting areas for passengers, along with staff facilities and a café. It is all that modern attractive bus interchanges require. In addition, it has the capacity for future growth and layover space for buses with time to wait between the end of a route and the start of the return journey. The former bus stop at the front of the building would provide for foreign tourist coaches with a left-hand drive. None of this is available at present and is not accounted for in the policy SDA1.

The Lewes Bus Station has never been demonstrated to be no longer needed, neither has there been any proposal to replace it with infrastructure of equivalent or better quality so planning policy should aim to retain and reinstate it. The garage could be used for multiple purposes including a mobility hub with bicycle storage, service and electric charging facilities. It is also suitable for a variety of community facilities including a health centre, job centre and a replacement for the lost Nutty Wizard café (youth hub).

The Eastgate bus station is the only suitable town centre site that can provide a safe and flexible off-street location that would function as a bus station within the Lewes Town Centre. The form and scale of the proposed Generator Group redevelopment associated with 35 units will be detrimental to the character of the conservation area and harmful to the setting of adjacent listed buildings, requiring the removal of the site from the town of Lewes Conservation Area.

Changes needed to address the issue: -

Any new development within the Phoenix Area A site should provide: -

- a) Appropriate flood mitigation measures consistent with employment uses.
- b) Measures to protect and enhance the River Ouse in terms of its riparian character and water quality;
- c) Arrangements to facilitate the reuse of buildings for employment uses where possible with any new build reflecting the existing character of the area and its proximity to the Conservation Area;
- d) Delivery of improved access direct onto Phoenix Causeway protecting as many of the trees within the Phoenix Causeway Tree Preservation Order as possible and those within the remainder of site which provide valuable tree cover.
- e) Support the retention of the bus station at its established town centre site in Eastgate where there is an interchange facility along with generous outdoor and enclosed waiting space with associated facilities including public toilets;
- f) Include roundabout access at the eastern end of Eastgate street and at the Waitrose exit from Eastgate wharf to facilitate ease of access and egress of buses to the local road network, to avoid the need for other traffic to unnecessarily circulate around the town's medieval streets and potentially through the partially pedestrianised Cliffe High Street.
- g) Facilitate the retention of the necessary town centre public car parks and tourist coach parking facilities.

h) Delivery of a riverside shared foot/cycle route from Phoenix Place to beneath Phoenix Causeway to provide an additional pedestrian and cycling route to the rest of the town through to Willeys Bridge, subject to the rehousing of the occupant of the riverside 'shanty house'.

Area B Lewes Bus station Shall remain as a bus station with the garage being converted or redeveloped to other uses which are compatible with a functioning bus interchange.

Area C: Eastgate Wharf

Any proposal will need to demonstrate that:

- a) It retains an equivalent level of public car parking provision reflecting the existing 72 spaces and 18 spaces for Waitrose staff along with the need to preserve the vitality and accessibility of the retail centre of the town.
- b) Provides for direct two-way egress and access onto Phoenix Causeway to avoid the need for vehicular traffic to circulate through the medieval streets and residential areas as well as the potential rat running of Cliffe High Street.
- c) Provides a town square that can accommodate the weekly fairs, farmers' market as well as the community events and a performance space (with electrical connections and stage), necessary reconfiguration or reprovision of the existing food supermarket and its ancillary facilities to enable this development.
- d) Given that the site is wholly within the flood plain with the existing flood defences providing important protection to this part of the town, any development of the site must increase the height of flood defences to match those on the eastern bank of the river.
- e) Incorporates a riverside shared foot/cycle route along the western bank of the River Ouse beneath Phoenix Causeway to extend the town's riverside focus and contribute to its character and quality, thus providing additional pedestrian and cycling routes to link the site to the North Street Quarter, Malling and the rest of the town.
- f) The scale and mass of development must respect and enhance the character of the town and protect the setting within the National Park and the adjacent Conservation Area. The layout of any development shall retain important views of the river and the distinguished listed Harvey's Brewery buildings.

SDA2 Land at Old Malling Farm, Lewes

The society wishes to reserve its position on this development given that planning permission has been granted and that a developer has taken active steps to discharge all the relevant conditions and looks likely to implement it before the September 2026 deadline. As things stand the formal requirement for a ramped pedestrian and cycle way access at the southern end of the site does not appear to be proposed. If this is not delivered it will fundamentally change the prospect of modal shift necessitating a full review of the allocation.

Changes needed to address the issue: -

Element 6 of the policy should make clear that the ramped access for pedestrians and cyclists should be provided from the site to the disused railway line at its southern end.

Six Suitably designed ramped access for pedestrians and cyclists should be provided from the southern end of the site to the disused railway line adjacent to the site, and be available from the occupation of the 1st home.

SDA4: County Hall, St Annes Crescent

2. Do you consider the Local Plan is Sound?

No.

3. If you consider the Local Plan is unsafe or unsound, please specify why:

The allocation is not considered to be sustainable or in the interests of good planning, being proposed in advance of any clarity on how the future office use may evolve pending the outcome of the new mayoral arrangements and the location of central administrative offices. In the interests of good planning the two adjacent sites, earmarked for development in the Neighbourhood Plan should be added to the site so that a comprehensive plan for the site can take place.

4. Please enter your full statement of objection below:

In the absence of any clarity on the likely office use within the campus and therefore the extent of demolition, conversion or redevelopment works the Society is not able to come to a view on this option. An element of the allocation has recently been the subject of a planning application for a new dwelling in the rear garden of 55 St. Anne's Crescent (SDNP/19/03062/FUL) which was refused by the National Park on policy grounds as recently as 2019.

The SDNPA refusal decision (dated 20th August 2019) stated clearly that refusal was on the basis that the proposed dwelling *'would appear disruptive and incongruous within the surrounding verdant environment, and would cause unacceptable harm towards the landscape character through the removing of garden land that currently contributes to the verdant character and appearance of the surrounding conservation area'*. *'Furthermore, the use of the site access would introduce an increase in activity that would be harmful towards the amenities and the tranquillity of the adjacent cemetery.'* *The proposal was deemed to conflict with policies SD1, SD4, SD5, SD7 and SD15 of the South Downs National Park Local Plan and Para.120 of the Revised National Planning Policy Framework.*" There has been no change of circumstances which alter this conclusion, and therefore would expect this decision to carry significant weight in determining the appropriateness of development within the allocated area.

However, it is clear that the number of possible dwellings that may be able to be accommodated on this wider site. This will depend to a great extent on the number of existing structures that are retained. This will also determine the possible footprint of built development and its form. Phasing of development is likely to be key to enable any development in an orderly manner protecting the amenities of the area and co existing uses.

In any event, the Society considers that all future vehicular access to the site should be via the two-way section at the eastern end of St Anne's Crescent, which currently serves County Hall, and the plan amended accordingly. There should be no access from Rotten Row because of the inadequate and narrow roads in this part of the town. The existing car park provides important parking for the town especially in the evenings and weekends/public holidays and should be protected.

SDA5 East Sussex College, Mountfield Road, Lewes

2. Do you consider the Local Plan is Sound?

No.

3. If you consider the Local Plan is unsafe or unsound, please specify why:

The allocation is not considered to be sustainable or in the interests of good planning, being proposed in advance of any clarity on how the college intend to redevelop or extend the built arrangement of their site to meet future higher education needs. It is equally unclear if the most sustainable strategy is one which reuses or adapts the existing education buildings to the south of Mountfield Road, having regard to their embodied carbon. Indeed, it precedes any such planning application which would identify the quantum and form of development in Mountfield Road together with the likely impacts. The traffic element of the proposals relies upon untested assumptions unsupported by empirical traffic assessment, and without thorough appreciation of the site constraints, including the retention of important trees and the extent of the River Ouse Flood plain. Accordingly, the proposal in principle is unsound and unreasonable. It is inconsistent with the Local Plan's core strategic objectives regarding health, sustainable transport, and nature recovery.

The allocation compromises the future sports and recreation needs of the town and therefore doesn't protect or take account of the wellbeing and health of the community, and is not positively prepared. Furthermore, this particular policy has not shown it is the most appropriate strategy when considered against reasonable alternatives, backed by a robust and proportionate evidence base.

4. Please enter your full statement of objection below

This allocation remains premature in the light of the intended proposal by the East Sussex College to redevelop and extend the campus. It is unclear as things stand whether such development of a whole or part of the campus is acceptable and what the consequences will be of additional facilities in terms of pedestrian and vehicular traffic. Both, the established college campus and the land to the south include mature trees, many protected by Tree Preservation Orders. It is unclear if there is sufficient space to develop the site without safeguarding their future as well as meeting the nationally agreed biodiversity targets.

The Society is already concerned about the existing high levels of vehicular and pedestrian traffic using Mountfield Road, particularly at the beginning and end of the academic day. The existing pedestrian and traffic arrangements in Mountfield Road are already sub-standard with inherent safety issues. Increases in vehicular traffic are totally unacceptable because it compromises the safety of cyclists and pedestrians. The suggestion that a traffic free use can be introduced is entirely unrealistic. Today's society depends on vehicular access to deliver goods and services and with self-driving cars and taxis on the horizon it is too simplistic to plan for no vehicles.

The Society therefore does not currently consider there is indeed any scope to increase these levels of traffic in order to serve any additional development, especially as Mountfield Road is the only vehicular access serving this part of Lewes. The existing car parks at the college are well-used and also service the Leisure Centre users when there are Athletic Club meetings and also football matches at Lewes FC.

Mountfield Road is a cul de sac which because of the need to have on street parking is reduced to single lane at its busiest point, adjacent to the Lewes Football Club ground which is enclosed by a listed flint wall. Mountfield Road already serves the Job Centre, extensive offices, the main secondary school with 1165 11-16-year pupils on the role, Lewes Leisure Centre, Lewes Athletic

Club, Priory Chapel and business uses. Mountfield Road provides the only access to Ham Lane which is well used by vehicles in connection with the Rookery all-weather 3G pitch and the grassed pitches both to the east and west. The pitches are used extensively by schools and the community as well as the multiple men's and women's football teams. The road serves the Household waste recycling centre, the waste water treatment works, community and business use, Lewes army cadet HQ, Lewes scouts, guides and cubs centre, as well as the Lewes Men's Shed and the operational bases of two Lewes bonfire societies. There is currently no car parking available to service the extensive number of pitches, including the Rookery 3G pitch. Ham Lane also provides access to Egrets Way cycle path and Lewes Railway Land nature reserve. With no pedestrian refuge for its entire length there are already conflicts with vehicle users. The use of Ham Lane has raised safety issues for emergency service vehicles and the use of the waste water treatment works when excess effluent had to be tankered from the site by HGVs.

The eastern part of the allocation is an amenity space linked to the occupants of the adjacent student flats. It is also within the floodplain and flooded in 2000, as did the southern part of the suggested allocation adjacent to Ham Lane.

Priory School have recently signed a landmark deal with Lewes Cooperative Learning Partnership that guarantees Lewes FC Juniors access to the Priory School fields for Sunday football matches and other scheduled training and events. The agreement marks a significant step forward for junior football in Lewes and allows all 21 Lewes FC Juniors teams to compete on the pitches, a major achievement for grassroots football in the town.

This also lays the groundwork for the next major project: a new club and school pavilion at Priory School fields and the Rookery 3G pitch on Ham Lane. This facility will serve Priory School, East Sussex College, Lewes FC, and all Lewes Football Foundation teams, ensuring top-quality playing and training environment. At the same time, Lewes Athletic Club and Lewes FC are to put together a bid to utilise the area to the south of the East Sussex College buildings and Ham Lane for an indoor training facility with associated car parking. This will complement the existing uses and avoid the chaos which is currently caused by vehicles parking on Ham Lane and the surrounding area.

Any allocation therefore needs to await the determination of the East Sussex College redevelopment and should also have regard to the underuse of the former tax office/job centre to the west and the redundant listed signal box to the north. In any case a ramped access should be provided over the railway to provide better cycling and pedestrian facilities.

Changes needed to address the issue: -

Delete the allocation as premature and not justified or robustly thought through.

SDA6: Springman House and Ambulance Station, North Street / Lancaster Street

2. Do you consider the Local Plan is Sound?

No.

3. If you consider the Local Plan is unsafe or unsound, please specify why:

The allocation is not considered to be sustainable or in the interests of good planning, being proposed in advance of any clarity on how or where the existing Ambulance station use is to be

relocated and also whether this is a suitable site for a relocated Fire Station, which is currently located in an inappropriate site within the flood plain.

4. Please enter your full statement of objection below:

It is noted that the boundaries of the site have now been amended to exclude the police station and public car park and is now focussed on Springman House and the Ambulance Station, which remains in use.

Previously, there had been consideration of providing a “blue light hub” on this site, which would have included providing a new fire station to replace the existing fire station on the North Street Quarter Site. This proposal would seem to still have merit and decisions on the site should clarify the current position in the interests of good planning and providing allocations for key infrastructure. The town has still to deliver a replacement health hub and this location should also be fully explored for that purpose before any redevelopment option is taken forward. Springman House has the benefit of being a town centre location not in a flood zone. It may be adaptable for a new use and has the benefit of some public car parking.

The site was acquired by the District Council in 2017 but has been vacant and unused since. The District Council have not advanced plans for its reuse and it is important that the embodied carbon of the buildings is used, if at all possible, whilst its future is determined.

Changes needed to address the issue: -

Proposals for ‘meanwhile uses’ to take place on the site before the allocation is implemented will be supported in principle provided that they: a) Provide opportunities for local employment and support the local economy; and b) Are temporary in nature and will not prejudice the implementation of the main allocation.

This concludes the comments of the Friends of Lewes.

Ruth

Ruth O’Keeffe
Chair of Friends of Lewes

Roger

Roger Maskew
Vice Chair of Friends of Lewes
and Chair of the Planning Committee

Attached Document

Appendix I: Friends of Lewes agreed Policy on Development in the Floodplain.