

The submitted version of the Lewes Neighbourhood Plan

This version is only slightly different from the version dated March 2018 on which comments were prepared for further consideration when this submitted version appeared. It benefits from having had a paragraph numbering system introduced and many of the Society's minor comments have been incorporated. Changes worth noting are:-

- a) There has been an addition to the text on Lewes Low Cost housing in pages 57 and 58 to which I do not consider the Society needs to comment.
- b) There have been some changes in policy SS3 which make it clearer.
- c) A minor addition on page 143 is to add the surfacing of footpath 51 from South Downs Road to Spences Lane to the list of projects to improve conditions for pedestrians.
- d) Traffic calming on Malling Hill has been added to the list of projects.
- e) A new appendix 6, covering local green and community spaces, has been added.

Our members are now being asked to send us any views they have on this submission version of the Neighbourhood Plan and these can be considered at the July EC meeting which is just prior to the date when formal comments need to be submitted to the NPA. Unless there comments persuade us that further amendments are required my recommendation is that the comments below should be out formal submission.

Robert Cheesman.

14 June 2018

FRIENDS OF LEWES

Comments on the formal consultation of the submission Lewes Neighbourhood Plan.

The Friends of Lewes is a civic society affiliated to the national organisation, Civic Voice. It has been in existence since 1952 and its principal objective is to conserve the environment in and immediately around the town of Lewes. It examines and comments as necessary on all planning applications affecting this area and also considers and comments on all planning policy documents affecting it too. It has built up a reputation among local authorities and other public bodies of taking a professional approach whilst accepting that Lewes needs to retain its character and remain thriving and economically viable town adapting to change as the years progress.

The draft Neighbourhood Plan is now much improved from earlier drafts and the Society supports its overall thrust. However there are aspects where it considers it is too aspirational and lacks either evidence or justification for what is proposed. In addition it laments the backward look that is evident in some parts of it.

Specific comments

1. The Society is particularly concerned that insufficient emphasis is given to the two conservation areas within the town which are formal planning designations and have management plans approved by the National Park Authority. Whilst it has no objection to a 1799 map being included in the Plan to show the extent of the town at that time reliance on it as a way of defining the historic core detracts from the status of the conservation areas and could lead to confusion in the future. There is a need to refer to the conservation areas in the preamble possibly alongside the reference to the many listed buildings on page 19 and by including their delineation in the map on pages 20/21. In subsequent parts of the Plan the

references to the historic core or centre should be replaced by references to the conservation areas.

2. The Society considers that the Plan should support and encourage modern business to provide employment in Lewes. It suggests that policies should be included that seek to promote Lewes as a place where new businesses should be encouraged to locate to and where existing businesses are given support to succeed. This will enable a greater number of local people to live and work in the town.
3. The Plan would also benefit by having a glossary.
4. Page 17 - 2.11 – As the direct train service from Lewes to Ashford has now been discontinued and no reference is made to the Seaford line it would be better to describe the 4 railway lines radiating from Lewes as going to London, Brighton, Hastings and Seaford.
5. Page 31 – 5.21 – Para 10 – Reference to having an improved bus station would be sufficient since a location for a combined transport hub has already been found to be impractical.
6. Page 44 – 7.12 – 3rd para of supporting text – This implies that the planning permission for SDNP/15/01146 does not suit the needs of the community. This is a view held by certain sections of the community with which we disagree. We do not consider that the Neighbourhood Plan should be used as a vehicle for partial views and thus recommend that the words after “re-examining the existing consent” to the end of that sentence should be deleted.
7. Page 45 – 7.14 – Left hand side. The words “is not widely supported” should be deleted as there are only some views that a single new medical hub from 2021 is not widely supported.
8. Page 50 – 7.21 – The words “are included in Historic England’s listed buildings of historic merit” should be changed to “are included in the statutory list of buildings of special architectural or historic interest” so as to comply with the legislation.
9. Page 50 – 1st key point – We need to be convinced that there is justification for establishing a local list?
10. Page 53 – Policy HC5 para 2 – This needs extending to providing parking for tourist coaches.
11. Page 54 – Key projects 4th bullet point.- We see no need for a separate blue plaque scheme in addition to the Town Council/Friends of Lewes grey plaque scheme as it could lead to confusion.
12. Pages 72 & 74 – These two sites (PL1(4) & PL1(5)) should also maximise the opportunity to provide townscape improvements to Kingsley Road as well as Blois Road as is the case with sites PL1(8) and PL1(21).
13. Page 106 – Tradition – Why distinguish between the historic centre, or conservation areas, and elsewhere? The paragraph would be fine without these distinctions.
14. Page 121 – Arrival into the town from Offham and then via either Nevill Road or Offham Road ought to be mentioned on this page.

15. Page 122 – 10.11 – this paragraph implies that one is entering the National Park when passing through one of the Lewes gateways. This is not so as the National Park boundary is not at these points and so the implication should be removed. In addition the two Egrets Way points beside the Civic Amenity Site in Ham Lane and Kingston Road as well as the continuation of Landport Road towards Offham could be included here.
16. Page 135 – The reference to St Michael's Churchyard (No 55) needs to be more explicit as there are 2 St Michael's Churches in Lewes.
17. Pages 140 & 141 – Note 10 – The electricity sub-station and Environment Agency building do not block the route but simply the fence around them as mentioned in para 3 of the left hand side of the policy supporting text on page 139.

Comment on the Basic Conditions statement

Page 8 – Right hand side para 1 – This implies that the HC policies are included simply to protect employment in the town centre. This implication should be removed.

July 2018