

Lewes District Council  
c/o Eastbourne Borough Council  
Grove Road  
Eastbourne  
East Sussex  
BN21 4UG

***please reply to:***

70 Dynevor Road  
Stoke Newington  
London  
N16 0DX

[localplan@lewes-eastbourne.gov.uk](mailto:localplan@lewes-eastbourne.gov.uk)

[roger.blake@railfuture.org.uk](mailto:roger.blake@railfuture.org.uk)

2024-02-19

Dear Sir / Madam,

## **Towards a Lewes Local Plan – Spatial Strategy and Policy Directions**

Railfuture is Britain's leading, longest-established, independent national voluntary organisation campaigning exclusively for a better railway across a bigger network for passenger and freight users, to support economic (housing and productivity) growth, environmental improvement and better-connected communities.

We seek to influence decision makers at local, regional and national levels to implement pro-rail policies in development and transport planning.

Please find below our response to your public consultation.

Yours faithfully,

Roger Blake BA, MRTPI (Rtd), MTPS  
Railfuture  
Vice-Chair London & South East regional branch  
Director for Infrastructure & Networks, national Board

# Towards a Lewes Local Plan: Spatial Strategy and Policy Directions

Please respond to the consultation by completing the questions below. Return by email to [LocalPlan@lewes-eastbourne.gov.uk](mailto:LocalPlan@lewes-eastbourne.gov.uk) or by post to: Lewes District Council, c/o Eastbourne Town Hall, Grove Road, Eastbourne, BN21 4UG.

## Your Details

### Data Protection and Privacy Notice

For further information about how the council uses your information and your rights, please read our privacy notice [here](#)

Name:

Roger Blake

Organisation (if relevant):

Railfuture Ltd

Agent providing comments on behalf of (if relevant):

Postal Address:

70 Dynevor Road, Stoke Newington, London

Post Code:

N16 0DX

Email Address:

[roger.blake@railfuture.org.uk](mailto:roger.blake@railfuture.org.uk)

What type of stakeholder are you / who are you representing: (place 'x' in against box)

<input type="checkbox"/>	Member of the public (Resident of Lewes District)	<input type="checkbox"/>	Residents Association
<input type="checkbox"/>	Member of the public (Resident elsewhere)	<input checked="" type="checkbox"/>	National group / organisation
<input type="checkbox"/>	Local business / employer	<input type="checkbox"/>	Planning Consultant

	Neighbouring District / Parish Council		Landowner / Developer
	Local group / organisation		Infrastructure / service provider
	Other – please describe:		

## Vision and aims

What are your views on the proposed vision and aims?

Strongly support.

Is there an alternative vision or aims (or parts of) that we should be considering?

Additionally, a vision in which Lewes District is comfortable living with its south-west neighbour and being part of the Greater Brighton economic powerhouse, accommodating growth sustainably in Green and Inclusive ways and creating Great / Beautiful Places to live and work.

## Spatial Strategy

Do you agree that the proposed range identified to determine the housing requirement is the correct approach? If not, please explain why.

Yes.  
For us the number matters less than the location.

Do you think there is an alternative settlement hierarchy that we should consider? If so, what is it?

No.  
Spatial Option 4 is our clear preference, focusing growth on Ringmer and thereby minimising pressures elsewhere around the District.

## Climate Theme

Are there any further policies you would like to see included to respond to Climate Change? Why do you think they should they be included?

No.

Should the new local plan require minimisation of and compensation for the loss of carbon sequestration, and if so, how should off site compensation be addressed?

Not qualified to comment.

### **Natural Environment Theme**

Are there any further policies you would like to see included to protect and enhance our natural environment? Why do you think they should they be included?

No.

Do you think the policy direction for Green and Blue infrastructure is the right one? If not, please identify how it can be changed and why?

Not qualified to comment.

Do you think the policy direction for Biodiversity is the right approach? If not please identify how it can be changed and why?

Not qualified to comment.

Should the local plan consider preparing an urban greening policy which requires a minimum level of greening on a development site?

Not qualified to comment.

### **Homes for Everyone Theme**

Are there any further policies you would like to see included to meet housing needs? Why do you think they should they be included?

Not qualified to comment.

Do you agree with the emphasis on securing two-bedroom homes through new development and retaining smaller homes in the housing stock? If not, please explain why.

Not qualified to comment.

Do you agree with the affordable housing policy direction that is being set in the Affordable Housing policy? If not, please identify how it could be changed.

Not qualified to comment.

Do you agree with prioritising rented affordable tenures over affordable home ownership tenures? If not, please explain why you think different tenure proportions should be sought.

Not qualified to comment.

Can you identify specific sites that could accommodate Gypsies and Travellers? If you can identify a site, please submit it to our call for sites using the form on the consultation portal.

Not qualified to comment.

## **Economy and Regeneration Theme**

Are there any further policies you would like to see included to meet economic and regeneration needs? Why do you think they should they be included?

No.

Do you agree with the policy direction for employment and economic development? What other issues should the policy consider?

Not qualified to comment.

Do you agree with our policy direction relating to retail and leisure? If not, what would you change and why?

Not qualified to comment.

## **Infrastructure and Community Facilities Theme**

Are there any further policies you would like to see included to meet the need for infrastructure and community facilities? Why do you think they should be included?

Policy IC8: Sustainable transport and movement and Strategic Policy SDS1: a spatial development strategy approach is where the integration of land use and transport should come together in a strategic place-based policy, such as Spatial Option 4. The location of planned sustainable growth (mostly new housing) and the location for strategic transport infrastructure investment must be aligned in a single iterative process.

While Policy IC10: Former Lewes to Uckfield railway line is supported, other new routes could also achieve the same, and more, Local Plan objectives depending on the location planned for the additional economic growth identified as a necessary pre-condition in the DfT's 2017 study. We note that TfSE plans refer to the whole Lewes-Tunbridge Wells corridor, via Uckfield.

Should there be a separate policy on resisting the loss of playing pitches?

Not qualified to comment.

Should a design-led policy for parking standards be progressed and included in the next version of the local plan?

Not qualified to comment.

How should we seek to manage cycle hire schemes to encourage the modal shift but at the same time avoid their potential for cluttering the street scene?

Not qualified to comment.

## **Design, Landscape and Built Environment Theme**

Are there any further policies you would like to see included to guide Design, Landscape and the Built Environment? Why do you think they should they be included?

No.

Do you agree with the proposed policy directions that are being considered for further development? Are there alternatives that we should be looking at?

Not qualified to comment.

Do you think that having concept masterplans for all residential development sites would assist in bringing forward sites and retain the design quality of the development? If yes, what stage of the plan should these be prepared and agreed?

Not qualified to comment.

### **Water Theme**

Are there any further policies you would like to see included to respond to water resources and water management? Why do you think they should they be included?

Not qualified to comment.

Should the water quality policy specify standards for development for intensive livestock production?

Not qualified to comment.

Should the new local plan continue with the existing policy approach set out in Policy DM18: Recreation and Rivers or go further and consider specific locations for recreational uses, and other, or more specific areas/water bodies.

Not qualified to comment.