



Lewes
Town
Council

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To: Angela Rayner MP, Secretary of State for Levelling Up, Housing and Communities

25 September 2024

Dear Secretary of State

Bus Station, Eastgate Street, Lewes
Planning Application SDNP/23/02973
Call-In Application PCU/RTI/Y9507/3349906

I am writing to you on behalf of Lewes Town Council and Lewes residents to express how appalled we are at the recommendation of the South Downs National Park Authority (SDNPA) to allow the demolition of the town's bus station and to add our voice to the many who are urging you to call in this controversial and entirely unacceptable application.

We strongly believe that due processes have not been followed and that several policies have been breached.

We believe that the application and recommendation by SDNPA:

- Conflicts with national policies on sustainable transport and protecting towns within national parks
- Will have a significant long-term impact on economic growth in the National Park and Lewes District
- Undermines policies on the provision of affordable housing across the country, and specifically within the National Park
- Will undermine bus provision nationally by setting a precedent siting bus interchanges on either side of busy A-roads
- Contravenes the objectives of Conservation Areas and National Parks by replacing unique, historic buildings with bland architecture of a size and style entirely out-of-keeping with the protected area.

Further, we believe that the South Downs National Park Authority has failed in its purposes and duties:

- By recommending the demolition of a unique, historic building and its replacement by bland, oversized and out-of-character architecture, it has failed "to conserve and enhance the [...] cultural heritage of the area"
- By accepting the replacement of a purpose-built bus station with bus stops on either side of a busy, dangerous A-road, it has failed "to promote opportunities for the [...] enjoyment of the special qualities of the National Park by the public", especially those with protected characteristics or who are dependent on public transport
- By approving the loss of a popular and well-used Asset of Community Value, it has failed "to foster the social [...] wellbeing of the local communities within the National Park".

Further details are below which clearly demonstrate the number of breaches and a lack of understanding of Lewes, and of the transport and mobility needs of both residents and visitors.

National Policy

The decision conflicts with National policy in that it does not support sustainable transport and it also demonstrates the lack of protection for towns within national parks.

It has international implications in that there will likely now to be no provision for left-hand drive coaches bringing tourists to the town.

SD3 - South Downs National Park Local Plan Core Policy

No assessment of need for the development and the impact upon the local economy was carried out.

SD5 of the South Downs Local Plan 2014-2033, Policy PL1 A of the Lewes Neighbourhood Plan 2015-2033 and the National Planning Policy Framework

The application would have unacceptable amenity impacts on No. 27 East Street through the loss of daylight. The proposal is therefore contrary to SD5 of the South Downs Local Plan 2014-2033, Policy PL1 A of the Lewes Neighbourhood Plan 2015-2033 and the National Planning Policy Framework.

SD28 – Affordable Homes

The Local Plan requires a minimum of 50% affordable homes, however only 2 out of 33 dwellings would fit this category. With a number of developments in progress, the town does not require any further unaffordable housing.

Only 16 spaces on this planned site would be available for car parking, which would be insufficient and add pressure to an already challenging situation.

SD57 – Local Plan Policy

The proposals fail to meet the requirements of SDNP Local Plan Policy SD57 3j with regard to equal convenience, accessibility, safety, being operationally satisfactory and providing an interchange.

Bus facilities are required in a central position in Lewes and in the absence of this, the proposal is contrary to policies SD19 and SD57 of the South Downs Local Plan 2014-2033, policy AM2 of the Lewes Neighbourhood Plan 2015-2033, the National Planning Policy Framework and the English National Parks and the Broads: UK Government Vision and Circular 2010.

A set of bus stops divided by a busy 30 mph two way 'A' road carrying 21,000 vehicle movements daily cannot possibly be described as of **equal convenience** compared to the existing, purpose built off- street bus station.

Furthermore, there is no evidence that The Equality Act has been taken into consideration. **Safety** has been ignored, crossing the road to change buses, for passengers with visual impairment, mobility issues or young children, is potentially hazardous where nearby crossings are not used.

SD57 states that the development of the bus station can only take place if an '**operationally satisfactory**' alternative is provided, safe, accessible, attractive and convenient, which is not the case.

The failure to deliver a bus **interchange** of equal or better quality affects the attraction of bus services to all the surrounding villages, which was not considered in the decision-making process.

Moreover, the Bus Back Better policy and the national policy of promoting sustainable, public transport have been completely ignored by the developers and the South Downs National Park Authority.

The proposal fails to mitigate its direct impacts and therefore is contrary to policies SD19, SD21, SD28 and SD57 of the South Downs Local Plan 2014-2033 and policies PL1 A and AM2 of the Lewes Neighbourhood Plan 2015-2033, the National Planning Policy Framework and the English National Parks and the Broads: UK Government Vision and Circular 2010, in the absence of a completed **Section 106 legal agreement**, securing:

- The Travel Plan and its mitigation measures
- Traffic Regulation Orders for the bus re-provision, creation / alteration of access into the site, creation of footway on Eastgate Street, creation of service lay-by and exploring the potential to prevent future occupants from applying for parking permits in nearby streets, and
- Highway works required to create the access to the site, creation of footway and creation of service lay-by.

Asset of Community Value

Lewes Bus Station is a registered Asset of Community Value (ACV) and the decision recognises that "the continued use of the Bus Stop Area and Main Building in ways that further the social interests or social wellbeing of the local community is realistic".

We also note the recent Inspector's decision in respect of The China Hall, 141 Lower Road, London (DCS reference 200-012-999, Inquiry 19/07/2024, Southwark) which rejected the conversion of a pub to residential on grounds that it held ACV status.

Heritage

The demolition of the last single Island art deco bus station in the country, to be replaced by 6 floor apartments, which design together with material used would seriously compromise the townscape and is not in keeping with the surrounding conservation area of low medieval buildings and Georgian terraces.

The proposal is therefore contrary to 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.'

Insufficient information has been submitted to satisfactorily demonstrate that the proposal would not have a harmful impact on archaeological heritage assets and that satisfactory mitigation measures can be achieved. The proposal is therefore contrary to Policies SD16 and SD57 of the South Downs Local Plan 2014-33 and the National Planning Policy Framework.

Trees

The proposed tree planting, including proposed species, on East Street are too close to the proposed built form and not suitable for the site conditions.

Therefore, the proposal is contrary to policies SD11 and SD57 of the South Downs Local Plan 2014-2033, the Design Guide Supplementary Planning Document and paragraph 131 of the National Planning Policy Framework and the English National Parks and the Broads: UK Government Vision and Circular 2010.

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The above clearly demonstrates the number of breaches and a lack of understanding of Lewes which distinctive character was key to the overall vision of our neighbourhood plan, its objectives, individual projects and policies, all designed to sustain this character.

Preserving the bus station both as a building and an interchange is a unique opportunity that connects a culturally significant building from the past, with a forward-thinking, environmentally minded future.

Until the Generator Group closed the site, the Bus Station was much used, serving not only Lewes, but also the many outlying villages whose residents needed a central site in their largest town in the South Downs National Park. Such was its thoughtful construction, it served people with disabilities, wheelchair users, rollator users, parents with pushchairs or toddlers, those suffering long COVID fatigue, ME sufferers, and anybody who is unable to travel easily independently. These people are often the first to be overlooked, and residents have expressed to us their shock and horror at the lack of a sufficient solution in the plan that has been approved.

The residents of Lewes are at a loss for how to more strongly communicate the ways this plan will harm the town. Our request carries not only the voices of Lewes Town Council, but also reflects that of all elected representatives from Lewes Town, Lewes District, Lewes Division representatives of East Sussex County Council and the member of HM Government for the Lewes Constituency, are unanimously opposed to the proposal.

However, there is no elected representative from the town of Lewes on the Planning Committee. And, despite our requests, the National Park have not provided any way for our elected representatives to participate in the planning recommendation or Planning Committee. This is an enormous democratic deficit and a huge failure of the National Park's governance.

We have written to Mary Creagh MP, Parliamentary Under-Secretary at the Department for Environment, Food and Rural Affairs and Minister for National Parks to request that she asks for the planning application to be called-in in order to carry out a thorough examination against the national park purposes.

Yours sincerely

V Poutrel

Veronique Poutrel
Town Clerk