Comments on Lewes District Council's Local Plan

Name:

Postal Address:

Email Address:

Member of the public (Resident of Lewes District)

Question 1: No**.**

Question 2. Spatial Strategy & Settlements

- Inconsistency in Site Allocations
  - 11HY was allocated as "developable" while 19HY remains "potentially suitable"—despite both having high-medium landscape sensitivity.
  - North Barn Farm was removed without explanation—potential procedural unfairness and potential breach of planning law.
- Failure to Properly Assess Sustainability of Development
  - 19HY and 11HY both have limited services, meaning residents will rely on cars, conflicting with sustainable development policies.
  - The plan ignores better brownfield alternatives and prioritises greenfield sites without clear justification.
- Failure to Prevent Urban Sprawl & Coalescence
  - 19HY would cause coalescence between Cooksbridge, Hamsey, and Offham, erasing distinct rural village identities.
  - Violates local Neighbourhood Plan policies (Hamsey NP 2015-2030) that protect settlement boundaries.

Question 15. Climate Change

- Carbon Sequestration & Loss of Greenfield Land
  - The Local Plan does not assess the carbon sequestration value of 19HY, contrary to Natural England's guidance.
  - No evidence that the loss of carbon capture from mature hedgerows, trees, and soil has been considered.
- Failure to Implement Nature-Based Climate Solutions
  - No clear commitment to Sustainable Drainage Systems (SuDS) at 19HY, which could reduce flood risk and improve climate resilience.

Question 40 Natural Environment

- Failure to Properly Protect South Downs National Park (SDNP)
  - Both 19HY and 11HY are adjacent to the SDNP, yet 19HY's impact was emphasised more.
  - The Landscape Sensitivity Study was inconsistent in how it assessed views from SDNP.
  - NPPF Paragraph 182 states development must conserve and enhance National Park landscapes, which may constitute a legal breach.
- Biodiversity Net Gain (BNG) & Protected Species at Risk
  - 11HY and 19HY is close to priority habitats and rare bird species (Rye Brome Grass, bats and birds) and requires further ecological assessment.
  - Natural England's response says the plan should aim for at least 20% BNG—this is not guaranteed for 19HY.
- Loss of High-Value Agricultural Land
  - 11HY and19HY includes Best & Most Versatile (BMV) land (Grade 2), which should be protected for food security.
  - NPPF states that lower-grade land should be prioritised for development, yet 11HY was considered viable.

Question 56. Water

- Failure to Properly Assess Flood Risk at 19HY
  - Flood risks in 19HY require further assessments, and mitigation measures are not outlined.
  - Surface water and groundwater flooding are identified risks, yet no mitigation strategy is in place.
- Lack of Sustainable Drainage Systems (SuDS) Commitment
  - Natural England recommends SuDS for all new developments, but there is no clear policy requiring this for 19HY.

Question 66. Health

- Increased Air Pollution & Road Safety Risks
  - 11HY sits next to the A275, which already experiences long traffic queues and emissions build-up.
  - The congestion created from this site will negatively impact the wider congestion hotspots such as the Lewes Prison Crossroads, creating higher levels of air pollution and unsustainable traffic volume.
  - Increased congestion at the level crossing could contribute to higher emissions, impacting air quality.
- Loss of Green Space & Recreational Areas
  - 19HY includes well-used walking routes (SDNPA, Ramblers, Strava), which support public well-being.
  - Destroying these routes contradicts LDC's green infrastructure commitments.

Question 86. Homes for All

- No Justification for Allocating 19HY Over More Sustainable Brownfield Sites
  - North Barn Farm was excluded without clear reasoning, yet it may be a more sustainable location.
  - Fails the Sequential Test: The NPPF states brownfield land should be prioritized over greenfield—this is not happening here.
- Unsustainable Commuter Dependency
  - Cooksbridge lacks essential amenities, leading to reliance on car travel despite its rail and bus links.
  - Contradicts LDC's sustainability goals by increasing car dependency.

Question 111. Economy & Regeneration

- Limited Economic Benefit for Cooksbridge
  - 19HY is not mixed-use—residential-only development will not improve local employment.
  - 19HY could be better utilised as a strategic Biodiversity New Gain (BNG) site, aligning with Natural England's green economy goals.
- Disrupts Local Agriculture Economy
  - 19HY's land is actively farmed for food production—removing it will impact local farming jobs and rural economy.

Question 136. Design, Landscape & Built Environment

- Inconsistent Application of Landscape Sensitivity Study
  - 19HY's landscape impact was assessed in greater detail than 11HY, leading to potential inconsistencies in site selection.
  - The Landscape and Visual Impact Assessment (LVIA) for 11HY was outdated (2020) but was still used to justify approval.
- Severe Visual Impact on SDNP Views
  - South Downs National Park's View Characterisation Study identifies Cooksbridge as an iconic view—yet this has been ignored in site selection.
  - Fails NPPF Paragraph 182, which requires great weight to be given to National Parks.

Question 149. Infrastructure & Community Facilities

- Severe Transport & Highways Impacts Not Properly Assessed
  - Both 11HY and 19HY increase vehicle congestion on the A275, yet only 19HY's transport constraints were emphasized.
  - A full transport assessment has yet to be completed for 11HY, creating uncertainty about its impact on local roads.
- Level Crossing Risks Ignored
  - 11HY sits near one of the busiest level crossings in the country (Cooksbridge), which already causes long delays and dangerous congestion. 19HY sits next to an automatic level crossing barrier which is not suitable.
  - No clear plan for rail infrastructure improvements, creating severe safety risks.
- Lack of Essential Services & Facilities
  - Cooksbridge lacks GP surgeries, shops, and other basic infrastructure, meaning both 19HY and 11HY developments would be unsustainable.

Post to:

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