

## **FRIENDS OF LEWES RESPONSE TO OLD MALLING FARM DEVELOPMENT BRIEF**

Although the Friends of Lewes Society objected to the zoning of this site for housing for landscape reasons it accepts that following consideration of its objections by two planning inspectors it is now included in the South Downs Local Plan. It has therefore approached the draft Development Brief in a constructive manner and with the benefit of local knowledge offers the following comments.

1. The specific requirement in policy SD79 of the South Downs Local Plan that the entrance to the site should be at the north end may reduce development costs but will inconvenience the people who will eventually live on the site as they will wish to drive to the south to access any services, the town centre or other destinations. In addition it will increase the traffic volume and consequential noise and emission pollution on Old Malling Way, which is already often congested due to car parking, and is thus contrary to the sustainability principles that the SDNPA promote. However a bridge across the former railway cutting at the south end of the site as the main entrance would avoid these problems and the Development Brief should provide for it. The entrance shown in the Development Brief could be retained at the north end to comply with the policy and by providing two vehicular entrances it would be better from a safety point of view for a development of over 200 houses.
2. The enabling provision which provides for a footpath into the former railway line should be built at the same time as housing on the site itself and thus feature in the Development Brief. Although such a footpath would require steps to descend into the railway cutting it would give pedestrians a much shorter route to Willeys Bridge and across it to the town centre. Whilst the former railway cutting is owned by Lewes District Council this should not prove an obstacle in making this provision although they should be asked to give a commitment to the route being established either as a right of way or licensed footpath.
3. Possibly because it is inappropriate to specify the type of housing in a Development Brief, it appears to make no provision for affordable housing despite the SDNPA having a policy that 50% of any development should be of this kind. This is particularly important in Lewes where affordable housing is much needed and the Neighbourhood Plan adopted last year makes specific provision for Low Cost housing. This issue needs to be comprehensively addressed in the consideration of a planning application.
4. In view of the site being very conspicuous in the South Downs landscape the height of buildings, particularly in the Railway Quarter, should be restricted so that they do not become dominant when viewed from afar.
5. The promotion of public transport in the Development Brief is welcome but it would encourage future residents of the site to use the local bus (service 127) if the frequency were increased from hourly to half-hourly. In addition if two vehicular entrances are provided to the site it would then be possible to route the bus service through the site and make it more attractive to users.
6. Although it is appreciated that ESCC's policy on parking spaces provides for 2 per dwelling we question whether this is really necessary in this development particularly when there are current examples in Lewes eg the former Astley House site, where a lower figure has been agreed. The roads should, however, be sufficiently wide to allow large vehicles such as a bus or fire appliance to pass by any parked cars whilst the public realm should be laid out so that pavement parking is prevented.

7. The commitment to linking the site into the landscape, the SuDS provision, the idea of a green framework which supports wildlife and the pledge of biodiversity gain are all welcomed. As far as the tree strategy is concerned the following alternative species are suggested as being more appropriate to the landscape character or pH of the site. Small Leaved Lime, Field Maple, Wild Cherry, Holm Oak and DED resistant Elm.
8. As the site has many historical connections going back to the Norman period, comfort is sought from acknowledged experts that there has been a thorough investigation of the site for any historical artefacts, assurance that these are being preserved as appropriate, and that no building will take place on sites where historic remains may still exist.
9. It is not clear from the draft Development Brief how the provision in Policy SD79 to provide good access to the surrounding countryside is to be provided. Although the public have enjoyed walking rights over the former railway line for some time it does not provide links to the north as the bridge to Hamsey was taken down soon after the railway line closed. The nearest right of way to the countryside is on the west bank of the river and is currently accessed via Willeys Bridge. This may be sufficient but the SDNPA need to give consideration to whether it adequately meets the requirement.

In addition to these substantive points the following are points of detail.

Page 21 –Public Transport - para 1 - Service 132 only runs on Sundays when the 127 service does not.

- Para 2 – Service 143 no longer runs beyond Hailsham.
- Para 3 - Weekday trains from Lewes to Brighton are every 10 minutes. Bus access from the site to the railway station is best made by the 127 service which stops at the foot of Station Street

Walking and cycling – This paragraph should mention the route over Willeys Bridge into town.

Page 27 – Para 7 should include a footway into the former railway line (see para 2 above).