

## **The Friends of Lewes Society**

### **Response to the SDNPA Draft Design Guide Supplementary Planning Document (SPD) July 2021**

Friends of Lewes welcomes the opportunity to comment on the SDNPA Draft Design Guide Supplementary Planning Document (SPD). The Society supports the principles of the SPD which lays out what is desirable and what is not and provides a consistent background for assessing planning applications. It does not prevent innovation or variation, but these have to be justified. It will be helpful when the Society is considering its representations on planning applications and in its discussions with developers on development proposals.

As a general comment Friends of Lewes consider that the SPD draft provides a useful coverage of many of the aspects which frequently require comment in consideration of planning applications. However, at over 70 pages this document contains design advice over such a wide range of topics that it is not easy to use. The sequence of topics in the publication starts well with "Part 1: Introduction" and "Part 2: Design Process" but then becomes muddled in "Part 3: Design Guidance" with its wide range of topics ranging from Public Realm to Materials and Architectural Detail and Place Making. Within each section there is a blue box for key design expectations, landscape led hints, landscape led mini case studies, landscape led illustrations, photographs and illustrations relating to the text. This has resulted in a cluttered, difficult to access, reference document. The SPD would benefit from a robust layout edit. In addition, although the illustrative photographs of local design examples are very helpful, a general reformatting would allow the user to more easily identify their required information.

The Society supports the landscape approach to design in Part 2 and the need for proportionality, iteration and consistency is to be commended when assessing proposed schemes in the wider landscape context. However, at the more detailed level of consideration of this document, more commonly used terms such as "Townscape", "Context" and "Local Character" are more relevant to the assessment of proposed schemes within existing built-up areas and local communities.

The Society supports the guidance in Part 3.3 with respect to development in Conservation Areas. It is particularly pleased that the guide seeks to avoid the use of uPVC windows and fascia cladding, which the Friends of Lewes has campaigned for over many years.

The SDNPA has adopted the Lewes Conservation Area Management Plan as planning policy and we consider that reference to this document would be helpful in this section.

Friends of Lewes support the guidance in section 3.4 on Household Extensions. It welcomes the inclusion of guidance on roof dormers and the illustrations of good and bad examples. The Society has become increasingly concerned at the proliferation of planning applications for dormer windows, as the cumulative effect can lead to an adverse impact on the street. It has drafted its own guidelines on the design of dormer windows to address these concerns in Lewes - Dormer Windows: Friends of Lewes Planning Advice Note, March 2017 <https://friends-of-lewes.org.uk/resources/friends-of-lewes-planning-guiding-principles/dormer-windows-planning-advice-note-march-2017/> Friends of Lewes would welcome a reference to this document in Appendix A.

Friends of Lewes support the design guidance set out in Part 3.5 with respect to Development Type. However, it considers that there are two more development types that should be considered for inclusion in the SPD.

The first is the conversion of retail premise to residential use, particularly in the conservation areas. Lewes, like many towns, has seen a steady decline in the number of small retail shops in the High Street and a trend to convert these shops to residential use. The Society considers it is important that key planning principles are set out to maintain the quality of design within the urban environment and preserve the existing streetscape. It has drafted its own guidelines on three

options for conversion - Retention of the shop front features, Return to the original pre-shop façade and Re-modelling of the front façade or part of façade in a contemporary form. Friends of Lewes consider the principles set out in The Retail to Residential: Friends of Lewes Planning Advice Note, April 2021 <https://friends-of-lewes.org.uk/resources/friends-of-lewes-planning-guiding-principles/retail-to-residential-friends-of-lewes-planning-advice-note-april-2021/> should be included in the SPD and referenced in Appendix A.

The second additional development type for consideration is garden rooms. The Friends of Lewes has noticed that the number of planning applications for garden rooms, to be used as home offices or to provide additional accommodation for members of the extended family, has increased year on year. The natural features and spaciousness of gardens make an important contribution to the Lewes townscape as well as supporting climate change mitigation through surface water management and urban cooling. A garden room can have a significant impact on local character, amenity and flood risk. In July 2015, the Friends of Lewes drafted its Guiding Principles for the Design of Garden Rooms, <https://friends-of-lewes.org.uk/resources/friends-of-lewes-planning-guiding-principles/garden-rooms-friends-of-lewes-planning-advice-note-march-2017/> which sets out the key principles regarding the design of garden rooms. The Society considers guidance on this type of development should be included in the SPD and referenced in Appendix A.

Green Infrastructure - 3.9.2 Trees: Friends of Lewes strongly support the expectation that new developments should retain existing trees wherever possible since their ecosystem values would outweigh that of any replacement trees for several decades. Where there are sound justifications for removal of trees, e.g., through disease, any replacement trees should be carefully chosen for their longevity and resilience in our current climate. The Society also supports the additional planting of new trees and hedgerows of suitable size and species to increase the percentage tree canopy cover towards recommended minimum of 20% for urban environments. Friends of Lewes recommends the inclusion of a long-term tree maintenance agreement with all plans for new developments.

Green Infrastructure – 3.9.3 Sustainable Drainage: The inclusion of a section on Sustainable Drainage is welcomed but would be much improved by robust editing and reformatting, to include the key design expectations, SDNP requirements, sources of technical guidance plus relevant local photographs of sustainable drainage.

Friends of Lewes comment that the 800-page CIRIA produced SuDs guidance is much easier to use than the SPD, despite having considerably greater detail and content. The CIRIA guidance helpfully groups relevant photographs and diagrams in a section together. The confirmation of the SDNP preferred approach is considered helpful together with the use of local illustrative photographs. However, both captions and photographs could be improved in this section.

The need for SuDs to be maintained in perpetuity needs to be addressed in the SPD. Maintenance must not be left to individual or groups of householders. Inclusion of a lifetime maintenance plan, within the key design expectations, should be highlighted further and include ownership and funding requirements necessary to ensure an operational drainage scheme throughout the life of the facility.

#### Materials - 3.12

12.1.1.b “modern materials should only be used where they are of high quality, and justified for technical reasons”. In place of the underlined section the Society would prefer “and appropriate to their context”.

3.12.1.1 ADD after “Village Design Statements” “and guidance documents produced by local amenity societies”.

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3.12.1.15 Raking of mortar joints is not a traditional technique and is not suited to all types of bricks, especially where the bricks are soft and absorbent. It should only be used for new construction, or where the existing building has raked out joints.

Fig 12.5 “mortar *jointing*” should be “mortar pointing”.

A section should be added regarding repointing of brickwork: joints to be raked out by hand, not mechanically; new mortar should match original mortar (especially where this is lime-based) allowing for future weathering; mortar joint should match existing; brick faces must be kept clean.

3.12.1.18 Fig 12.10 We believe this shows beach cobbles, not ‘cobbled flint’.  
Fig 12.11 shows knapped squared flint  
Fig 12.12 should explain that flint shards (called gallets) are incorporated in the mortar. Who would know what galleted flint is?

3.12.1.21 Mathematical tiles are laid on top of bricks too. They were commonly added to existing buildings, either to enhance the appearance or to add weather resistance.

Fig 12.17 We believe the second photo shows blue headers, not MTs. There are far better buildings to illustrate their use; most are red.

3.12.1.29 ADD “a darker plinth is traditional to conceal splash back and wear & tear.”

3.12.1.32 Last sentence: change for clarity to “Timber cladding on north facing or shaded locations should generally be avoided to prevent damp staining.”

3.12.1.35 ADD after “powder coated aluminium” “or cast iron”, after “well considered ADD “to avoid unsightly offsets”.

3.12.1.36 REWRITE first sentence “The use of uPVC etc....is never appropriate in Conservation Areas and its use elsewhere is discouraged”.

3.12.1.2 Preamble: reference should be included to permeability, SUDs etc.  
Repairs, making good after utilities works should always use matching or compatible materials. In paved areas tarmac or concrete repairs will rarely be acceptable.  
Traditional granite and stone kerbs should be retained wherever possible.

Architectural Detail 3.13 – The Friends of Lewes does not agree that this more detailed section should be referred to as being ‘landscape-led’, when it is dealing with what is more commonly referred to as ‘context’ and the need to respect the local scale of existing buildings or groups of buildings and to incorporate the use of appropriate local materials in order to successfully integrate any new proposal within its particular setting. In this context, the draft document does include certain architectural principles such as ‘Architectural Styles’, ‘Proportions’ before addressing in great detail ‘Roofs’, ‘Windows’, ‘Entrances and Doors’ and ‘Chimneys’, all of which are useful sources of reference.

The Society would like to take the opportunity to correct the captions on the following photographs:

- In Fig 13.1 on page 57, both buildings are traditional warehouses in the centre of Lewes.

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- In Fig 13.2 also on page 57, we would question whether the illustration is a good example of “Locally Characteristic Scale”.
- On pages 59 & 60 there is use of the caption “Landscape-Led Hint” which we suggest is inappropriate as it refers to a local material and two window styles used in Lewes.
- Fig 13.32 on page 62 refers to “Lewes Town Hall”, accompanied by a photograph of the Depot Cinema, which is an obvious mistake.

Chris Kneale  
for The Friends of Lewes Society  
c/o Town Hall  
High Street  
Lewes  
BN7 2QS

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