



SDNP/23/04659/REM: Old Malling Farm, Old Malling Way, Lewes:

Reserved Matters application for approval of scale, layout, external appearance and landscaping following grant of Outline Planning Permission for erection of 226 dwellings including affordable housing public open space and associated infrastructure including vehicular and pedestrian access from Monks Way (SDNP/18/06103/OUT).

The Friends of Lewes have now had an opportunity to review the details of the Amended Documents submitted on the 04th April 2024 and note that the proposals are basically unchanged.

As a result, The Friends of Lewes continue to strongly object to these reserved matters for the following reasons: -

Part 'A': Scale, Layout, External Appearance and Landscaping: -

The Society's response, dated the 25th January 2024 is therefore still relevant, and for convenience is repeated below: -

(1) For the record, the applicant, TopHat Communities Limited, organised a public exhibition in Lewes in June last year at very short notice, which as a result few interested parties, including the Friends of Lewes, were unfortunately unable to attend.

(2) Whilst appreciating that this project has outline planning approval, the Society is still concerned about certain unsustainable aspects of this scheme and in particular the location of the main vehicular access off Monk's Way at the most point northern, and most remote part of the site.

(3) The Society also notes that the existing access to Old Malling Farm will be used for pedestrians and cyclists as well as by emergency services, which is to be welcomed.

(4) However, the Society considers it essential that a practical third access point at the most southerly part of the site must be included within the development. This will enable the occupiers of the new development to adopt more sustainable journey choices by significantly improving accessibility for pedestrians and cyclists to the town. Ideally such a 'link' should be provided in the vicinity of 'Deanery Corner' and the northern part of Malling Field. In this respect, the suggested ramp, illustrated on the overall site plan, linking to Old Malling Way is not considered to be an acceptable solution and indeed is not considered to be within reserved matters.

(5) This provision needs to be available from the time of occupancy of the first building of the development in order to ensure that sustainable transport habits are established from the outset in order to achieve a modal shift in order to reduce the dependency on vehicular traffic.

(6) Furthermore, in order to encourage pedestrians and cyclists to use this route, proposals throughout the site need to be amended to incorporate a dedicated public footways and cycleways in order to provide safe routes free of conflict with circulating vehicular traffic.

(7) With regard to the proposed layout, the Society is concerned about the dominance of the proposed road layout incorporating what is effectively a 'ring road' around the whole site, rather than incorporating a

suitable road 'hierarchy' that would encourage traffic to slow down within the denser parts of the proposed housing areas.

(8) Indeed, the proposed layout does not engender any sense of a community, as there is no provision of any focal points within the site that could both encourage outdoor group activities provide locations where residents could gather.

(9) In contrast, most of the dwellings are arranged in terraces, with vehicular access directly from a distributor road, and as such effectively act as barriers for the residents to be able to integrate across different parts of the site.

(10) Furthermore, as the development will be visible from afar these terraces will appear as a 'wall' with no attempt to break down the form of development into smaller groups, which would be more appropriate for this location.

(11) Although some existing open spaces on the site have been retained, there is a distinct lack of trees, and overall, the proposed landscape design is considered to be very poor for an edge of town development. Surely on a development of this size, there should be long term commitment to providing a sufficient number of trees in order to enhance both the individual groups of built form and to provide an overall 'sense of place'.

(12) Generally, the proposed density of buildings seems to be significantly more than the original outline application.

(13) Indeed, the overall density of housing is considered to be very high for an out-of-town development and raises the question whether the push for affordable rented homes has resulted in lowering the overall quality of the development. Surely it would be desirable to have a balance of properties to buy as well as properties to rent, and in this respect, it would be interesting to see the available data that determined the mix of housing units currently proposed for this site.

(14) It is understood that all of the houses will be pre-fabricated offsite and transported to Lewes for erection. It is also understood that the housing units will incorporate a number of 'standard finishes. The Society strongly recommends that all external finishes should use locally sourced traditional materials, as the site is located within the South Downs National Park.

(15) The Society also questions whether the widespread use of pre-fabricated units, which have to be transported possibly long distances, are indeed 'sustainable'.

Part 'B' Drainage Comments: -

The Society is aware of the more recent letter from Southern Water, dated the 05th February 2024, that states: -

"Southern Water has recently undertaken more detailed network modelling as part of a network growth review. The result of this assessment indicates that the additional foul flows from the proposed development will not increase the risk of flooding in the existing sewerage network. Southern Water can hence facilitate foul disposal to service the proposed."

In response to this change of opinion from Southern Water, the Society has the following drainage concerns that need to be urgently addressed: -

(1) The Society notes the considerable challenges of dealing with both the foul and surface water drainage of the development in its proposed location. The Society also notes Southern Water's previous concerns about the capacity of the Ham Lane sewerage pumping station.

(2) Should this planning application be supported, the Society requests that it should be subject to a Planning Condition requiring Southern Water to uprate the capacity of their storm overflow storage tanks, so that all the sewerage from the Old Malling Farm development is passed forward to Newhaven for treatment, under all flow conditions, and not be allowed to discharge and / or be discharged untreated.

(3) Please note that the Society considers that such a planning condition should apply to all other significant developments in Lewes, in order to ensure that all future sewerage generated in Lewes will be properly treated in Newhaven, and not allowed to overflow untreated into the sea or the River Ouse.

(4) Furthermore, given the recent reports in the local press regarding the number of times that the Ham Lane pumping station released sewerage into the River Ouse last year, the Society would recommend that there should be an embargo on all future large scale developments in Lewes, until Southern Water have provided sufficient capacity to cater for both future catchment flows and for future rainwater runoff as extreme weather events are only going to increase.

(5) The Society has serious concerns about the proposed treatment of runoff from impermeable surfaces and would like to see further measures at source, for example domestic rainwater harvesting systems, and, in addition, would support a SuDS system which could be adopted by Southern Water and or ESCC Highways and maintained by an experienced organisation.

(6) Finally, there should be no overflows, of any kind or frequency, of foul drainage to the River Ouse.

Ruth

Ruth O’Keeffe
Chair

Roger

Roger Maskew
Vice Chair & Planning Committee Chair