



Protecting the beauty of the Downs

To:
Planning
South Downs National Park,
South Downs Centre
North Street
Midhurst
West Sussex
GU29 9DH

By email
Ref: SDS/Lewes/DO16

Date: 10-03-2020

Dear Sir/Madam,

Re: Old Malling Farm Design Brief Consultation

These are the comments of the Friends of the South Downs (South Downs Society) on the above mentioned consultation. The Society has over 1,500 members and its focus is the conservation and enhancement of the landscape of the South Downs National Park (SDNP) and its quiet enjoyment. We comment on planning applications made in, or close to, the SDNP.

Thank you for giving us the opportunity to comment on this consultation.

Yours faithfully,

Victor S Ient
Policy Officer

SOUTH DOWNS SOCIETY

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Friends of the South Downs (South Downs Society) response to Old Malling Farm Design Brief Lewes

The Friends of the South Downs (South Downs Society), herein referred to as 'SDS', welcomes the opportunity to comment on the Design Brief.

It is concerned that our comments on the planning application for access and road layout have not already been taken into consideration. These are fundamental and should be incorporated into any Design Brief.

Sustainability and Climate Change appears at page 48. These framework requirements should appear much earlier in the document since they will be key in the design process in delivering a zero carbon homes development.

This is because to be applied properly, they will have such a fundamental impact on the orientation of the buildings that they should appear at the beginning of the document together with the landscape analysis so that they are borne in mind when considering the design and layout, depending on what measures are adopted for heating and cooling.

Analysis of the site - Function as well as Design

It is essential that an accurate flood map is used and that the access, in accordance with the Examiners comments on the Old Malling Farm LP policy, (that all development should be in flood zone 1), moves the vehicle access development away from the land that flooded in 2000, further south into flood zone 1.

The site survey, on page 12, refers to green and blue infrastructure but fails to show the extent of the flood in 2000 all around the site.

It should be noted in recent heavy rainfall, the end of Monks Way and Mantell Close (Flood Sector B of the Lewes Eastbourne Flood map) were again shown as being vulnerable and in the amber warning zone this February. Local residents confirm that this access point was under water in 2000. With climate change and rising sea levels, stormy weather increasing the risk of flooding, it is critical that the main access is moved further south.



The other crucial point is that to provide zero carbon houses, the design brief layout will be affected by the type of heating to be used. If solar panels are to be used, the layout needs to address this from the outset and not retrofit them. The heating system to be used is a fundamental part of the final design.

Landscape analysis is thorough and perceptive and throws up a number of issues regarding light pollution that would need to be addressed. For example the highway and footpath lighting installed recently in Lewes has reduced night time visibility for pedestrians creating dark areas where parked cars screen footpaths and there has as a consequence been an increase in the installation of LED house lights that are bright and unpredictable and a particular problem for bats. The current fashion for large folding doors means house lighting spills into the countryside and lit urban gardens have also become fashionable. So although the public regime may have controlled low lighting levels their design guide should incorporate lumen guidance or seek and article 4 Direction Order to control domestic external lighting when bats are active.

Movement and Connectivity

The need to look outside the site and consider the impact of the development on the adjacent Malling housing estate is important functionally as well in landscape terms. Routing all the traffic from the new development into a quiet cul-de-sac where children can play is clearly poor planning. Equally, the development should, as it recognizes, provide access to the old railway line for pedestrians, to provide traffic free access to Lewes town centre since the development of the estate proposes no shopping, meeting hall, and nursery or school facilities. It is unrealistic to expect pedestrians to double back and the access points need to be thought through. Unless a good and attractive footpath through the wooded fringes (e.g. resin bound rather than tarmac) is incorporated into the design guide, (Grampian condition flagged here to guide developers) the tendency will be to assume that everyone will drive. Providing pram and disabled access to a sheltered, shady, attractive pedestrian route will encourage people to walk from there, along the river into town and to schools. However the question of winter lighting in the early evenings when children are returning from schools and people are returning home from work maybe problematical if woodland fringe paths are being suggested for all year round use and connectivity. For example, the recent introduction of low-level road lighting in Lewes has made some pavements very difficult to negotiate after dark when surfaces are poorly illuminated.

The Neighbourhood Plan requires that developments provide for the safe movement of children and the disabled first and the document needs to consider children's movement to playgroups (Malling Community Centre) and Malling Infant and Primary School. Malling children also show a desire to attend Ringmer School because of the poor cycle and easy walking routes to Lewes Priory School. If these are not linked to the proposed development, at this distance from the town the tendency will be to drive. The once quiet Malling estate is now very busy as a result of all the police HQ traffic with its attendant parking congestion, especially along Old Malling Way. The development brief should identify the need for a cycle / buggy friendly link at the south end of the site and pathways to it as the most likely desirable route to access the town via a new all weather path along the old railway line to be secured by a Grampian condition/CIL funding. A pedestrian crossing, suitable for children and those with a disability (including hearing and visual impairment i.e. beeping and a clear view of the green man on the opposite side of the road) is needed to comply with the Neighbourhood Plan policy AM1. This is especially the case if the Bus stop at the Police HQ is to be used to access secondary school places at Ringmer.

The identification of the Stoneham Close bus stop is welcomed and CIL funding should be used for a bus shelter and real time display, if the local buses have transponders. Bus frequency is poor for it to be in regular use for accessing schools or work and this is another matter where the developer may be expected to contribute to increased frequency. Making these improvements and providing direct paths prior to the occupation of the housing will encourage more sustainable travel options.

However, the brief for the site needs to flag up the need for parking controls (i.e. no commuter parking for the nearby police HQ along Old Malling Way) for which a developer may have to pay and a 'Grampian' condition requiring a pedestrian crossing of Old Malling Way to facilitate access to the Primary School because of the traffic flows generated by the police HQ and the new development at going to school and home coming times.

The Brief needs to flag up the need for a Construction Management Plan and timetable given the access to the site along narrow residential roads now parked up in a way that was not envisaged when they were designed. The contractors also need to determine the weight limit that may be necessary along that part of Church Lane that passes over garages and consider how any heavy loads would access the site.

Opportunities and Constraints

This section needs to address the overall heating system for the houses, especially since gas central heating will not be permitted in new housing. Orientation – providing warmth in winter by passive heating or solar panels or heat source pumps will affect the layout and design of the housing. Summer cooling is equally important with the prospect of 40 degree C summers becoming more frequent. Again, some protection may be provided by modern insulation but again orientation will be important so houses provide for winter solar gain and summer cooling. The heating and energy consumption are key design considerations from the beginning. It is not good planning to end up “retrofitting” solar panels “where suitable” on this second strategic housing site. If developers know this is a constraint and an opportunity to sell zero carbon homes, that cost little to run, then this needs to be acknowledged in the Design Guide’s constraints and opportunities section at the beginning not relegated to page 48.

The importance given to the woodland is welcomed including the need for ongoing regular two-yearly management system being put in place so that plant diseases can be dealt with on a tree-to-tree basis rather than the woodland neglected so that clear felling is the only destructive option. There are ageing ivy clad trees adjacent to the Conservation Area and this shelterbelt needs additional planting, including some evergreens like holly and holm oak to retain the rural illusion when viewed northwards from the Conservation Area.

Access also lies within flood zone 3 and should be moved to flood zone 1 and this needs to be sorted out before design work commences.

Mammals like hedgehogs and bats will currently criss-cross the area. This means household fences should be designed to allow permeability by hedgehogs. Bats require consideration where to avoid disturbance by garden or house security lighting. It also means that trees should be separately managed from gardens or householders will move into a wooded area and within a few years, the council will permit even group protected trees to be felled as has happened elsewhere in Lewes where housing has been sited too close to protected trees. Proximity to existing woodland, woodland margins management and domestic lighting restrictions should be designed in from the beginning. It is no comfort if the streetlights dim but conservatory roofs, LED garden lights light up the night sky, and disturb wildlife in this previously dark and tranquil area.

The protection of the suspected area / presence of identified archaeology are welcomed. The need for a watching brief during development for yet unidentified archaeology should be identified in the Brief.

A “new neighbourhood” is not being developed as stated. This is a mono culture housing estate with no facilities and this needs to be recognized and addressed by providing easy pedestrian and cycle access e.g. for parents walking with prams or cycling with child buggy adaptations to play groups, nursery and infant/primary schools and for basic shopping needs. Current proposals would have people doubling back to access the railway line and instead the Brief should provide for direct pedestrian routes. Would the Railway line be suitable on dark winter evenings? If not, then lit safe paths need to be provided to key destinations or reactive low level seasonal lighting included.

The developable area of the site, apart from the currently proposed access, is not shown as being prone to flood. However, the area identified does not appear to accord with the Environment Agency nor the Lewes- Eastbourne 2015 flood report. The single vehicle access point to the whole site is liable to flood and is not in flood zone 1 as required by the Local Plan Examiner.

Otherwise, it is considered that the Opportunities and Constraints have been well summed up and the need for providing needed, rather than just desired, housing is appreciated.

Page 26 acknowledges the need for orientation of “some” blocks and mentions energy but it is not discussed as an opportunity or a constraint in the previous pages yet it will be a fundamental consideration in the layout and design.

Page 28 introduces the idea of three-storey housing for the first time with no rationale. Existing housing along Old Malling Way is two storey and there is no flooding justification for higher housing as happens with flood plain development in Lewes. If three-storey housing means flats or larger four bed houses then the design guide should discuss the pros and cons. If the developer envisages the flats will be for Lewes Low Cost Housing in 1 or 2 bed units then this is not the site for rented flats being remote from all facilities for those least able to access them. If it is for large four bed units then the Neighbourhood Plan seeks two and three bed family housing to retain young families in Lewes, those

priced out of recent 4-6 bed developments. The idea of large units adjacent to the existing low-rise housing seems to have been pulled out of thin air. The Brief also needs to acknowledge the design guidance in the Neighbourhood Plan, which applies to all housing developments in Lewes, even if this is a strategic site.

The SDS welcomes the references to 50% affordable housing but this cannot be the current government's definition of 80% of market or it will contradict the Brief's intention to address local need. The scheme needs to provide smaller family houses that can be afforded on local salaries (Lewes Low Cost Housing) as set out in the Neighbourhood Plan.

Higher density schemes do not require high-rise but do require good design. This is not a central urban area and the emphasis to meet need is for what the Malling estate offered: modestly small family houses with gardens for children's safe play that used to be affordable on average salaries. Switching to urban style mews with no urban style facilities – shops, communal meeting spaces etc. is pastiche urban design and not an appropriate design approach in a rural location.

Despite the earlier regard for bats and beasties, the illustrated houses appear to be in a modern idiom with clipped eaves and without any overhanging eaves that support sparrows, martins and swifts, which tend to nest in groups. As eaves houses age, they provide several habitats not provided by clipped eaves fashions and in this rural location, near farm land and enclosed by the river and water meadows on three sides, incorporating eaves would future proof these houses as wildlife friendlier destinations.

Part 5 Landscape Types

SDS welcomes that the gateway will be pedestrian led and that accords with Neighbourhood Plan Policy, AM1. It should be noted early in the Design Brief that permeable hard surfacing to prevent flash flooding so close to the Ouse flood plan, should be used. If the access remains where it is, the buildings should have flood resilient ground floors because Mantell Close was under water in 2000. It is essential that the northern most housing more accurately reflect the 2000 flood boundary. It appears too low a contour has been used, bearing in mind the Mantell Close flood level and detailed advice needs to be taken from local people and the Lewes and Eastbourne map of flooding as to exactly how high the water was. Given that Mantell Close was in the amber warning area this February, the northernmost built development should either be omitted or be future proofed and flood resilient with tiled washable floors on the ground floor level, no single storey development and with electricity brought in from above and WCs etc. trapped. Building on the edge of the flood plain in an area that flooded 20 years ago and was in the amber warning zone is not a considered response to the climate emergency.

It is important that Lewes Low Cost Housing or land to be passed to a housing association is future proofed against flooding and is not located in previously flooded areas or land immediately adjacent since the number of people with mobility problems or disability would need housing where there is a room capable of being a downstairs bedroom or designed with a space for a through floor lift which could be out of use in flood conditions. The incidence of mobility difficulty is higher in genuinely affordable housing for rent.

It is noted that the emergency access over the bridge, is shown with planting and apparently no roadway. Does the applicant propose a 'grasscrete' or similar surfacing alongside the pedestrian access? Tree planting should be limited to ensure the emergency access is accessible when /if the Mantell Close access is closed during flood emergencies and the bridge can take the weight of fire engines or similar rescue vehicles.

The use of swales is noted. If they are adjacent to open space, they will need design measures to ensure that children cannot drown at times when they are full and that any water being stored, moves sufficiently to avoid being attractive to mosquitoes, given the reservation by the health authority in its comments on North Street.

The Village Green is the site of the expected archaeological remains. It is assumed that the proposed 'boundary path' will be preceded by a detailed survey to ensure that the archaeology is protected. The same will apply to the seating of any play equipment. An electronic survey with sample pits or exploratory trenches may be required to determine where play equipment or the path should be located. Future management should be considered if significant archaeological remains are uncovered. It is assumed in these straightened times that its maintenance would be up to a management service paid for by the new residents. The Design Brief 'parkland' could be managed as water meadows with

seasonal grazing and hay making so that any remaining wildflowers are protected. Wild flower Lewes could be approached to determine what native flora remains there and what could be added to restore them. In that way the management of the open space would be less of a burden on the new householders. Aspen or willow planting could be considered. Willows were traditionally planted in the river valley and regularly harvested for many years.

The design of the green spine, where paths would be used for children going to school should take into account the safety of the swales and ensure the water moves through them as commented above.

Old Hamsey Quarter

Measures needed to ensure that any houses at the same level as Mantell Close or lower are designed with flood resilient measures so that they can be reoccupied speedily after flooding and that rescues can be quickly affected.

The choice of heating system for zero carbon homes will have a profound influence on the orientation of the houses and needs to be considered in the very earliest design stages, not retrofitted when the houses have been placed in a layout. A bias towards south facing roofs is not readily apparent in the layout, as it would be if solar thermal or solar power generation were to be maximized. As stated above, how the developer(s) will create a zero carbon development on this greenfield site needs to be set out in the Brief.

Car parking and the scope for on street parking need to be carefully considered given the parking pressures from commuters from the police HQ. Limited opportunities for on street parking and careful design of private spaces need to be considered to avoid the problems suffered by other households in the existing estate. The comment that paths need not be adjacent to open spaces needs to be audited to ensure children can move freely to play areas without unnecessary road crossing where paths are discontinued arbitrarily. In some instances for the safe movement of children, paths may be needed beside open spaces, albeit of a less urban character, to allow them to cycle or walk safely to access play areas, go to school or make their way into town away from vehicle traffic. For example, travelling to school will require a more southerly access to the old railway line or another traffic free route through the old railway line 'quarter'.

Railway Quarter

Again, the design brief needs to ascertain how these will be zero carbon houses and if solar thermal or solar power is to be used adapt the layout accordingly. The 'perimeter' blocks are to be oriented for solar gain but all the housing needs this treatment or be provided with quiet air source or ground source pumps.

The area is adjacent to the old Railway line as its draft name implies and the design should ensure that the old railway line has a clear pedestrian / cycle access suitable for children's travel and that the boundary gardens are designed to prevent slides / scramble paths etc. damaging the sides or leading to erosion especially since this is proposed as a higher density area.

Again, paths / cycle ways need to support the independent movement of children going to school as well as to the town or moving about the site to play spaces or the community centre. If these paths are not adopted, lighting may be needed for the darker winter months that comply with the dark skies policy.

The need to access the bus stop in Monks Way is noted but unless a contribution is made to enhance the frequency of the service, provide real time information and a shelter, it is unlikely to serve key commuting and school travel times and offer a reasonable off peak service.

Riparian 'Quarter'

As its name suggests, it is adjacent to the Ouse. The Lewes – Eastbourne flood maps need to be checked very carefully to ensure that the lowest lying areas did not flood in 2000 and future proof the development at a time of climate crisis. The initial survey part of this report needs to show the whole of the surrounding flooding as well as the strip on the Old Hamsey part of the site that appears to be an underestimate. Malling Deanery area and the wooded margin flooded up to Old Malling Farm. In particular, footpaths / cycle routes need to be above the 2000 flood level if they are the only option for access schools and the town. The same comment about the safe movement of children applies to

discontinuing paths adjacent to green spaces or providing a more 'rural' design of continuing path in order to prevent unnecessary road crossing.

Zero carbon orientation is not in evidence and the heating / cooling mechanism needs to be considered very early in the design process, not as an afterthought.

It is likely that the management of trees and open spaces will fall to residents and any trees close to housing is invariably under threat so a whole estate management plan will be needed and housing designed as a rule to lie outside the falling distance of mature trees or there will be pressure to fell them a few years after the area is built. This will also keep the construction activity well away from the root zone and the construction management plan needs to allow for the generous fencing between the development and existing mature trees. E.g., any proposed all weather path construction through the woods would need special care and protective measures.

In general, the design guidance is welcomed although hipped gables are characteristic of the surviving rural buildings and reused in Edwardian arts and crafts housing, they are mentioned in the text but not illustrated. The use of eaves is welcomed as future wildlife habitats. Some examples illustrated but discounted by the text e.g. the use of buff London brick.

The use of solar tiles or panels integrated into the roofs is welcomed. Any such panels should be dark either unframed or with dark frames and unreflective. That should be a condition for the whole estate, even where added by residents so that they do not dazzle and glint when viewed from the Downs above.