

FRIENDS OF LEWES SOCIETY

South Downs Local Plan

Position statement on Policy SD 79 Old Malling Farm Lewes

- 1) This statement builds on that part of the Society's representations on the draft submission Local Plan, specifically relating to Policy SD 79, which were dated 16 November 2017.
- 2) The Society considers that Policy SD 79 is unsound and should be deleted because it is inconsistent with the overall landscape led approach of the Local Plan referred to in para 1.13 which it supports.
- 3) When the 2015 Joint Core Strategy for Lewes District Council and the South Downs National Park Authority was being prepared this site was given initial consideration as a possible housing site by the two authorities. However the National Park Authority's Planning Committee on advice from its planning officers opposed its inclusion on landscape grounds. Thus the draft Strategy presented for examination by the Inspector did not include this site. However as the thrust of this strategy was to provide more housing sites the Inspector asked, after his initial hearing, that it be put forward for public consultation. This resulted in many objections, including those from the Society, and after a subsequent hearing to consider whether the site should be included in the Strategy, the Inspector decided the landscape argument was not overwhelming and decided in favour of allocation for housing. His reasons were clearly motivated by the need to provide a further strategic site for housing and that, as Lewes is the economic, service and transport hub of the District, this was the most appropriate site to be developed.
- 4) Since this Strategy was adopted in 2015 the Lewes Neighbourhood Plan has been drafted and is currently being considered by an Examiner. As well as the Old Malling Farm site and the strategic North Street Quarter site it envisages a further 295 houses being provided by 2033 which is some 75 more than the figure prescribed by the National Park Authority for the town of Lewes. In addition windfall sites are regularly coming forward in the town whilst increased housing density could be provided on other sites, such as the St Anne's school site, to deliver higher numbers. Within the period of this Local Plan the Society believes that it will be possible to provide the 220 houses envisaged for the Old Malling Farm site in other ways in the town without the need to use any greenfield sites within it. This alternative provision should include at least 50% affordable dwellings as provided for in policy SD28 which the Society supports.
- 5) The Old Malling Farm site is a conspicuous area of Grade 2 farmland that is a spur from the Caburn chalk block. It forms part of a 'green tongue' reaching into the town of Lewes from the north and adjoins the Malling Deanery Conservation Area. This was among the reasons why a previous Inspector and subsequently the Minister decided that the town of Lewes, which is surrounded by downland, should be included in the National Park. This Society was one of the principal campaigners for this inclusion as it considered the conservation powers that a National Park Authority have would provide better protection in the future against greenfield development. In light of this background it seems perverse for this greenfield land to be allocated for housing and severely denigrate the landscape in an adverse way when it forms a key view of how Lewes fits into the river valley between the chalk hills. This is apparent from several surrounding vantage points such as those from the chalk pits on Offham Hill from which the fields at Old Malling Farm are particularly prominent (see attachment).

- 6) These fields are also an area with a significant archaeological background which dates back to the Saxon period and whilst the precise use of the fields over the years is unknown they connected the two parts of the ecclesiastical establishment which came under the Archbishop of Canterbury's jurisdiction at what is now Old Malling Farm and the Malling Deanery site which includes the present church. Although some archaeology has been detected in parts of the site it is possible that more may come forward on physical investigation.
- 7) Further factors against these fields being developed are that the wildlife that currently enjoys its rural nature would be displaced. This year there has been evidence of peregrine falcons, sparrow hawks, nightingales, bats, badgers, deer, pheasants and foxes. Having such a development on the site would disturb these birds and animals. It would also remove its tranquillity, destroy good quality agricultural land, increase water run-off into the flood plain and increase light pollution at night. In addition it would incorporate the small number of existing dwellings at Old Malling Farm into a housing estate and threaten the characteristic seclusion and tranquillity of the Malling Deanery Conservation Area..
- 8) The Society recognises that as part of the allocation of this site in the draft Local Plan as well as the extant Joint Core Strategy any development would be subject to good quality design and several mitigation measures. As far as accessing the site is concerned the Society considers that having the main site entrance at the northern most point will be inconvenient to those living there, including the existing residents at Old Malling Farm, as it will be a longer route than if a bridge were to be provided across the former railway cutting at the south end of the site which is owned by Lewes District Council. The northern entrance also increases the traffic that will need to pass along the existing residential roads of Old Malling Way and Monks Way to the detriment of those living there. It will also lead to increased pollution contrary to sustainability principles. The Society also notes that any proposals to develop the site should provide suitable pedestrian and cycle links to the adjacent countryside. Since there are no public footpaths on the eastern side of the river it suggests that this is best achieved by the provision of a bridge to the public footpath on the western bank of the river.
- 9) Notwithstanding the Society's objection to the site being developed it has held discussions with the planning consultants developing a design brief for the site to try and influence them to provide a development of the highest design standard. The Society has noted that although their draft plans provide for the road entrance to the site to remain at the northern end passive provision is being made for a pedestrian entrance at the southern end leading on to the former railway line and for a cycling track along the whole length of the former railway cutting which is designated as a SSSI. However until a public consultation takes place on the Design Brief it is not possible to make any further comment on this.
- 10) Since no physical work has taken place on the site as a result of its allocation in the Joint Core Strategy the Society considers that it would be possible to reverse the decision made by the previous Inspector to allocate this site for housing by giving greater weight to the purposes of the National Park which among other things are to conserve and enhance natural beauty, wildlife and cultural heritage. If greater weight were accordingly given to the landscape aspects of the Old Malling Farm site it follows that Policy SD 79 should be deleted from the current Local Plan. In the Society's view this would eliminate the unsound aspect of this landscape-led plan, which in other respects it supports.

