

## **Modification MM05 - Spatial Policy 4 – Old Mallings Farm, Lewes**

Friends of Lewes and the South Downs Society (the Societies) object to Spatial Policy 4 for inclusion of Old Mallings Farm, Lewes as a strategic housing site allocation.

This site has previously been considered, but rejected, for housing development as it is a greenfield site of high landscape quality, outside the current development boundary and is very visible from the western side of the Ouse valley north of Lewes. Development would reduce the green finger of land that comes into Lewes from the north and diminish the landscape attraction that Lewes has as a gap town surrounded by the Downs. In addition, the fields on which development is proposed provide the link between Mallings Deanery and Old Mallings Farm which in mediaeval times was a busy religious centre containing a palace used by the Archbishop of Canterbury and it is highly likely that undiscovered archaeological remains lie underneath. They are also Grade II agricultural land which is in short supply in the National Park. At the public inquiry for the inclusion of Lewes in the South Downs National Park similar reasons were put forward and these were accepted by that Inspector in his recommendation to Government.

Nothing has changed since the Secretary of State's confirmation of the National Park in 2009 to justify development on the site and the June 2014 Lewes District Council (LDC)/South Downs National Park (SDNPA) Strategic Housing Land Availability Assessment (SHLAA) is clear in its conclusion that development at Old Mallings Farm is unacceptable due to the high landscape character sensitivity and altering of its relationship with the Ouse Valley. The subsequent January 2015 South Downs National Park SHLAA is also very clear in its conclusion for this site that *“development on the site would have a potential adverse impact on the character and appearance of the landscape. Development on this site would have a potential adverse impact on heritage assets.”*

The Societies consider the impact of potential development at Old Mallings Farm would be:

1. The eastern side of the valley is undeveloped beyond the Mallings Deanery Conservation Area which has a particular village and edge of countryside quality from which development would be likely to detract. The Conservation Area description clearly states that the relationship between the paddock to the east of the church, which provides views out to the wider countryside (the site) to the north, is important in terms of its setting. Development would therefore either change these views into views of housing, or truncate them with screening planting, either of which is unsatisfactory and does not support the National Park purpose of conserving and enhancing the natural beauty, wildlife and cultural heritage of the area.
2. The experience of walking the Ouse Valley Way (OVW) would be affected by development to an unacceptable degree. The limit of development on the east side of the river in this location is currently the former railway line to Uckfield which, largely located in cutting and with the tree belt that has grown alongside it, forms a robust screen and framework to the development along Old Mallings Way. The impacts on users of the OVW would be to introduce visual impact from development on the higher levels of the site which would be in contrast to the rural outlook which currently exists.

This would compete with the skyline views of Lewes castle and church at the northern end of the Pells. These are currently the only buildings which break the skyline above the tree line.

3. Tranquillity is a quality of the landscape which increases along the valley floor as one travels north out of Lewes on the OVW. At present the eastern bank and the valley spur which includes the site helps to create this rural setting. Housing development at Old Mallings Farm would effectively restrict this experience and bring the impacts of the town further out into the rural area to a marked degree. The exposure of the site to the OVW is extensive along all of the western side and the northern extent of the valley side spur for approximately 1.3km. The degree of change in the transition from countryside to town that would result from development would be unacceptable.
4. The site is also very visible from the isolated and very tranquil Hamsey Church which is separated by the river from Old Mallings Farm but is nevertheless close to it. Whilst Landport and the railway to the west of the OVW are a direct contrast, these are less visible and audible from the path. The railway is mostly visible and audible during the passage of trains which have an occasional rather than continuous impact.
5. The development of the site would require significant belts of tree planting in order to be screened and it is considered that this would be contrary and inconsistent with landscape character given the age of the landscapes (1400-1600AD). Visual impact and landscape character impacts would be increased during autumn and winter following leaf fall.
6. Whatever screening is provided the site would still be very visible from the high points on the downs to the west of the valley such as Offham Hill and the Landport Bottom access land. From these viewpoints the fields that form the site are seen as part of the green tongue of high quality landscape going into Lewes as part of the river valley.
7. The need for street lighting in the development will result in increased light pollution in the area that is likely to have an impact on tranquillity and dark skies in this prominent location.
8. Development would increase the vehicular traffic in Old Mallings Way as the proposed entrance to the site is at its northern end. This would also increase the impact of the development from Hamsey Church. Even though it is proposed that the old bridge to Old Mallings Farm should be used as a pedestrian route into the site, it is still some way from the nearest shop opposite Police HQ, as well as the town centre of Lewes and it does not therefore seem an appropriate site for a high percentage of affordable housing.

We therefore strongly contend that development on this site would be detrimental to the setting of Lewes in its position as a gap town in the National Park whilst the impacts on the nearby section of the Ouse Valley Way and the transition from countryside to town would be unacceptable. Furthermore, the views from surrounding higher ground, particularly to the west, are also likely to be significantly affected. It would also negate one of the reasons for including the town of Lewes within the National Park.

Paragraph 13 of the August 2015 Proposed Modifications Background Paper Old Mall Farm, Lewes (MM05), makes the point that mitigation proposals which rely on screening suggest that such a development is flawed from the outset and that just because you cannot see something does not necessarily mean it is acceptable. The Societies agree and share the concerns expressed that if the approach proposed is taken, the character of the area could be adversely affected by screening planting; it would also reduce the enjoyment of the two fields within the landscape and reduce the impact of the spur and the approach to Lewes along the Ouse Valley Way.

The Societies have seen no evidence that demonstrates that the mitigation measures proposed in Spatial Policy 4 will be successful. At best they are likely to be only partially successful due to the topographic limitations on screening from higher ground and autumn leaf fall. This is supported by the August 2015 South Downs National Park Sustainability Appraisal (SA) of the South Downs Local Plan. It concludes with respect to the impact of development at Old Mall Farm on the Landscape that "While the policy approach will help limit effects on visual amenity, the development of this green field site will have inevitable and potentially significant effects, on landscape quality." In addition the SA also concludes with respect to Cultural Heritage that "inevitable effects on the setting of the [Malling Deanery] conservation area and [five] listed buildings are likely to take place."

We therefore do not consider the August 2015 Lewes District Local Plan Addendum to the Sustainability Appraisal to be sound as it is based on assumptions that the policy criteria of Spatial Policy 4 will succeed in reducing or removing the adverse impacts of development. We believe the supporting evidence behind the Sustainability Appraisal should be the subject of further testing through an Examination in Public.

National Planning Policy Guidance paragraphs 115 explicitly states that "Great weight should be given to conserving landscape and scenic beauty in National Parks...which have the highest status of protection in relation to landscape and scenic beauty. The conservation of wildlife and cultural heritage are important considerations in all these areas, and should be given great weight..." Whilst agreeing with the need for affordable housing in Lewes the Societies do not concur with the Inspector's Interim Findings that development at Old Mall Farm would help provide a better balance in respect of meeting the social and economic needs of the town and the National Park. They are not convinced that "no stone has been left unturned" by the two planning authorities, in terms of seeking as many appropriate sites as possible for new housing that are realistically deliverable in sustainable locations across the plan area. In that connection the Societies accept the concept of developing brown field sites for housing subject to the design being appropriate.

The Societies strongly maintain that development at Old Mall Farm risks significant damage to the landscape of Lewes in the context of the National Park, and, if agreed, would be a damaging precedent that could be used in favour of developing other greenfield sites in this and other National Parks.