



PLUMPTON PARISH

NEIGHBOURHOOD PLAN

CONSULTATION OPEN EVENTS

The revised draft pre-submission Plumpton Parish Neighbourhood Plan has been published for consultation. Come to the open events to find out what it proposes for our village's future:

- **21 June 7–9.30pm at the Pavilion**
- **16th July 11am–4pm at the Village Hall**

Copies are available online at
www.plumptonpc.co.uk/neighbourhood-plan

Hard copies can be read at the Half Moon, Fountain and Plough, the Station, Village Hall, Village Shop and Church Annexe

Your Parish – Your Future

PLUMPTON PARISH DRAFT NEIGHBOURHOOD PLAN RESPONSE FORM

Thank you for taking the time to feedback on the draft Neighbourhood Plan.

Some guidance notes to help you complete it in a way that will assist the Steering Group in finalising the document:

- While the final referendum will only be open to registered voters, at this stage the Steering Group are keen to get the widest range of input. To achieve that, this form is available to all individuals (i.e. not simply one per household), regardless of age, but only one form per individual will be accepted.
- Please note that anonymous forms cannot be considered and will therefore be ignored.
- If you choose to feedback, then please complete Part A and Part B – while this exercise is primarily qualitative in that it seeks your views, it is also useful to take the opportunity to gauge the overall support for the draft plan.
- Part C is optional, but must be completed if you have indicated in Part B that there are specific policies you do not support – the Steering Group need to know **why** a policy is not supported in order to consider any amendments to it.
- It would assist the Steering Group in collating responses if you would use the electronic version of the form, available from the Neighbourhood Plan website (www.plumptonpc.co.uk/neighbourhood-plan/), and keep your comments constructive and as concise as possible. If you wish to make several comments on the electronic form, please insert additional rows in Part C as required. For paper forms, simply use as many copies as required.
- The closing date for responses is 31 July 2017. Please return the form by one of the following methods: a) dropping into the box at Plumpton Post Office and Store, b) by email to np@plumptonpc.co.uk, c) or by post to the Parish Clerk: Anita Emery, Plumpton Parish Council, Elm Cottage, Church Street, Hartfield TN7 4AG

PART A – Respondent details (must be completed)

Name:	
Postcode:	
Connection to Plumpton:	Resident in Parish YES/NO
	Business within Parish.....YES/NO
	Landowner of Land within Parish.....YES/NO
	Other (e.g. a planning consultant or similar representing any of the above) – Please specify below

PART B – Summary of overall support

Do you support the draft plan? (Please delete the answer that does not apply)	Yes/No
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If you answered 'Yes' to the above, then the Steering Group will presume you support all the policies within the plan, but if that is not the case, then you can indicate so below. You are also free to add comments in Part C.

If you answered 'No', then the Steering Group need to know which policies you do not support (and why)? Please make that clear below (on the electronic form, simply delete all the policies that you are happy with, to leave those you do not support. On the paper form, just indicate [e.g. by ticking, circling or similar] those policies that you do not support). Then complete section C to provide the reason why you do not support that policy.

- Policy 1: Spatial Plan for the Parish**
- Policy 2: New-Build Environment and Design**
- Policy 3: Associated Infrastructure**
- Policy 4: Provision of Adequate Parking**
- Policy 5: Landscape and Biodiversity**
- Policy 6: Sustainable Drainage and Wastewater Management**
- Policy 7: New Housing**
- Policy 8: Local Employment**
- Policy 9: Plumpton Village Centre**
- Policy 10: Plumpton College**
- Policy 11: Plumpton Racecourse**
- Policy 12: Community Facilities**
- Policy 13: Local Green Spaces and Open Spaces**

PART C – General

Comments on general sections of the documents	Page and/or paragraph number	Comment	Suggested improvement
Comments on specific policies in the draft plan	Policy and/or page or paragraph number	Comment	Suggested improvement

**OUR VILLAGE – OUR COMMUNITY.
Help shape its future.**



Plumpton Parish Neighbourhood Plan

Regulation 14 consultation

June/July 2017

Residents' responses

Regulation 14 consultation: June–July 2017-09-10

The following is a verbatim copy of all comments received from residents in response to the Draft Neighbourhood Plan consultation process.

We had 48 responses from residents. Of these 18 did not support the plan , 26 supported the plan and 4 either did not give an answer or said they would support if a one of the policies changed. Most respondents who supported the plan did not have any further comment to make.

Note: the policy numbers in the resident responses refer to the consultation document. This was subsequently revised and what was policy 3 was removed. SG responses here refer to the policy numbers in the final Plan (notably, Policy 7 becomes Policy 6).

Resident comments	Page and/or paragraph number	Comment	Suggested improvement	PPNP SG response
Resident 1				
Policy 11	n/a	<p>I have general comments on the inclusion of this site. I do not support this for several reasons:</p> <ol style="list-style-type: none"> 1. No development south of the railway. It will adversely affect our views of the Downs and Lewes Council has already indicated they will not support any development south of this point. 2. The ‘thin end of the wedge’. I have no doubt once development rights are granted development will continue until here is a new large housing estate in this space. This cannot be allowed to happen. 3. No access. The site does not even have access – why is it even included? What if you need to use a reserve site – you can’t even use this site! The group’s unwavering support for the racecourse site despite it not being proceedable seems rather suspicious. 4. We don’t have to destroy the views on the countryside to get a few parking spaces for goodness sake. Why can’t folks use the playing field car park? 	Remove the racecourse site from the plan henceforth and do not include it again.	Racecourse site dropped from plan due to lack of access

		<ol style="list-style-type: none"> 5. By allowing this to happen (and it is not even logistically possible anyway) you will put another company out of business (Hill's) 6. The racecourse is a nuisance neighbour with several complaints about it in progress with senior members of the environmental health team at Lewes DC about appalling levels of noise from early in the morning to late at night (7am to 1am on a Sunday with banging, shouting, screaming, amplified bass music, rave music thundering through the village and even as far as East Chiltington!) and a lack of control over guest behaviour at their events. Quite how an estate of new homes will feel about this virtually in their living rooms is perplexing. 7. The racecourse have several pie in the sky ideas about how to create access – including building a lift towering over people's gardens, illuminating properties at night and removing any sense of privacy and affecting light (prohibited under a restrictive covenants for most properties in East View Fields), not to mention the noise issues this would cause, and the fact that an electronic lift is completely out of keeping with the local area. Bonkers, and it will never be given planning permission. 8. My final comment is that I think there should be one large development, not several smaller ones. This will keep disruption to a minimum and hopefully prevent development 'creep' over time at the smaller sites. 		
Resident 2				
Policy 7.4	48	<p>Reference Policy 7.4 - The final sentence of the highlighted text "<u>2. be designed to avoid proximity of houses to existing properties along Station Road</u>"</p> <p>The proposed layout is not compliant with the aims of the policy referenced above. Houses 1, 3, 4, 5, 6 have gardens backing directly onto existing properties in Station Road. (see attachment 1)</p> <p>Over 25% of the plot is given over to "Open Space".</p>	I have taken the existing proposed plan and redistributed the 6 new properties adjacent to Station Road. Part of the "open space" has been redistributed to provide a buffer zone to the existing residents. (see attachment 2)	Developers of this site have adjusted layout to maximise buffer between new and existing housing

		<p>There is enough space to for the developer to comply with this policy and create a significant buffer zone between existing properties and the development, thus minimising the visual and audible effects.</p>	<p>The suggested layout is simply a cut and paste exercise, though it is to scale and demonstrates there is plenty of room for everyone to have space around them.</p> <p>I appreciate the commercial concerns mixing “affordable” with “premium” but there is room for all and it would not take too much effort for the architect to implement a much more sympathetic layout as it effects existing residents.</p>	
Resident 3				
	Page 42 Policy 7.1	<p>I do not think that Riddens Lane can cope with any more building. This is a narrow farm track used by some very large tractors and trailers and is thus not suitable for additional traffic calming measures as has been suggested and the concern about screening from the rest of the village has got to be a joke given that the new building in North Barnes Lane can be seen clearly from the National Park.</p>	<p>I am sorry, but I will oppose any development in Riddens Lane for the reasons given.</p>	<p>Noted. ESCC have approved access.</p>

		<p>I am appalled that the Steering Group would consider building in Riddens Lane. Access on to Station Road is already difficult and, as the village expands, will become more so. The shop is now the epicentre of Plumpton Green and attracts ever more traffic. The junction is on the brow of a hill, is close to other road junctions, bus stops, old people's flats and, most importantly, the primary school crossing.</p>	<p>I am sorry, but I will oppose any development in Riddens Lane for the reason given. There are other much less congested options.</p>	
		<p>It is my understanding that two properties on the South side of Riddens Lane are suffering from subsidence and one has to be demolished. This may be due to alluvial silt in the Bevern Stream area or inadequate footings in the original building but I am still concerned that any new building on the South side of Riddens Lane might need to be pile driven to be sure of long term stability. Pile driving would have an impact on my property which is sufficiently close to the proposed site and would be adversely affected. The same argument applies if speed humps are introduced as a traffic calming measure; I understand that this has already been proposed.</p>	<p>I am sorry, but I will oppose any development in Riddens Lane for the reason given.</p>	<p>Noted.</p>
Resident 4				
	<p>Page 42 Policy 7.1 Item 5.44</p>	<p>I am appalled that this site is still considered to be acceptable to the steering group despite the fact that Riddens Lane enters Station Road on the brow of a hill and this already busy and tricky junction is very close to the Primary School crossing. With the advent of further building in the village our only shop is destined to become ever busier which will only compound the traffic difficulties in this vicinity. I note that the Steering Group already recognise that there is often (my underlining) poor visibility at this junction and if that is the case why do they continue to promote the Riddens Lane site when there are much safer options?</p>	<p>I would urge the Steering Group to reconsider their opposition to the Nolands Farm site and thus remove some of the newly generated traffic away from the Riddens Lane junction.</p>	<p>As above.</p>

		<p>I am saddened that the Steering Group do not see fit to add the Nolands Farm site to the list of those sites supported by the SG. This site is surely a massive advantage to the village as a site which could provide almost all of our presently required allocation and it is central but just sufficiently removed from the most congested part of the village. It is also my understanding that LDC favour this site and I am very concerned that the owners will apply for and gain approval for development at this location, at some point, regardless of the SGs stated preferment. It would be outrageous if this were to occur and the properties then not count toward our allocation. Adoption of this site could also serve to concentrate development into the area East of Station Road and not disrupt the area in the vicinity of the village shop which is already heavily congested.</p>	<p>I would urge the Steering Group to reconsider their opposition to the Nolands Farm site.</p>	
<p>Resident 5</p>				
	<p>Page 4</p>	<p>“maintain the ‘green gap’ to the north that is so important to many residents” – How many? Where is the evidence? How does this compare to preferences like “north-south” development which was rejected?</p>	<p>Include a section that provides an unfiltered summary of the raw survey responses. Then ensure “subjective” statements case be justified based on the survey results, e.g.(TBA)% people expressed a desire to “maintain the ‘green gap’ to the north that is so important to many residents” and 63% people expressed a preference for “North-South” development. The policy is</p>	<p>As reported in the NP, this area is considered least sustainable and therefore least appropriate for development. The revised Policy 1 outlines the supporting arguments for maintaining the green gap north of</p>

			therefore to...(complete as per the village's stated preference).	Plumpton Green settlement.
	Page 9 Section 1.7	<p>"In addition, PPC must be able to show that it has properly consulted local people and other relevant organisations during the process of making its Neighbourhood Plan and has followed the 2012 Neighbourhood Planning Regulations"</p> <p>The PCC and SG have patently failed to properly consult with local people. Examples include:</p> <ul style="list-style-type: none"> ☒ Ignoring survey results ☒ Not responding to adequately to questions, e.g. various email sent by Mr & Mrs ***** ☒ Disregarding historic evidence provided for Strollings and All Saints Church by Mr & Mrs ***** ☒ SG changing the plan a short notice in March without consulting the village or PC ☒ Overly economic recording of minutes, for example the minutes for PC meeting 13th June, do not reflect all the items raised in the meeting. 	N/A see comments	Noted. The SG is satisfied that it has consulted fully with the village.
	Page 14 Section 3.2	<p>"Conserving and enhancing the historic environment (paragraph126);"</p> <p>Where is this actually addressed in the plan? Why is the Vicarage and Glebe included as sites when they are major historic sites in the village?</p> <p>Why has the information that was provided by Mr & Mrs ***** not been included?</p>	N/A see comments	Noted. Policy 6.3 amended to preserve this area. Access required to be via 6.4
	Page 26 Section 4.41	<p>"For all these reasons, it was decided to review the site allocations and submit a revised draft plan for Regulation 14 consultation."</p> <p>Yes, but 4.38 and 4.39 merely state LDC</p>	The plan needs a specify the guiding principles and criteria and then	

		<p>preferences and as pointed out many times, but ignored / not minuted, these are LDC preferences and are NOT mandatory. The plan does not highlight or explain why LDC preferences are given greater weight than the village's own preferences.</p>	<p>needs to clearly demonstrate how those principles where applied to each included / rejected site. At the moment, the reasoning used to include /exclude specific sites is used in isolation and scattered haphazardly throughout the document. It is currently impossible to ascertain if the site selection process was applied holistically and coherently.</p>	
	<p>Page 26 Section 4.42</p>	<p>“A further significant factor in the decision to revise the plan was LDC’s advice that it has to allocate 200 additional units across the district in its Local Plan Part 2 process. ... This meant reviewing some of the previously rejected sites to find substitutes for the withdrawn site and the racecourse, and to provide sites for some additional housing.” Again, the plan has not explained why the plan includes the Vicarage/Glebe land (highly historic with only vague plans for development in 5+ years) over and above other sites that could be developed today.</p>	<p>The plan needs a specify the guiding principles and criteria and then needs to clearly demonstrate how those principles where applied to each included / rejected site. At the moment, the reasoning used to include /exclude specific sites is used in isolation and scattered haphazardly throughout the document. It is currently impossible to ascertain if the site selection process was applied holistically and coherently.</p>	
	<p>Page 28 Section 5.2</p>	<p>“to conserve and enhance the historic environment of the parish including its archaeological interest using the Historic Environment Record and East Sussex Record Office as the</p>	<p>The new information needs to be acknowledged and included in the plan. The plan needs to</p>	<p>See above.</p>

	<p>Point 4</p>	<p>primary evidence base;" Mr & Mrs ***** provided the SG with copious historic information about Strollings, the Vicarage, and Glebe land. This information has also been provided to Historic Environment Record and East Sussex Record Office. The SG have not acknowledged receipt of this information. The information has not been included in the plan. The matter was raised at the PC meeting on 13th July 2017 but not actioned or minuted.</p>	<p>remove the Vicarage/Glebe site OR at least explain why this historic site has been included despite the alleged objective being to preserve historic assets.</p>	
	<p>Policy 1 Section 5.9 (DO NOT SUPPORT)</p>	<ul style="list-style-type: none"> • The proposed plan of 3 adjoining sites (albeit with screening) does not meet the "small medium" criteria • How many people expressed a desire for "maintaining green gaps to the north and south of the village"? • There is marginal benefit to the village in having green spaces on the outskirts of the village that are adjacent to vast tracts of green space. It would be far better to allocate the green space in the centre of the village where they will benefit a far larger number of people. 	<ul style="list-style-type: none"> • Avoid adjoining sites / creating "super-sites" • Move green space to the centre of the village where they will benefit a far larger number of people <p>Or at least...</p> <ul style="list-style-type: none"> • Explain why green space on the outskirts of the village adjacent to vast tracts of green space is so beneficial <p>In addition, the plan should explicitly highlight that 2 members of the SG live near the sites that were rejected for development but proposed as protected green areas. To quote the Plumpton Parish code of conduct, Prejudicial Interest generally should be declared if 10(1)(b) "(b) the interest is one which a member of the public with</p>	<p>Policy 6 seems to ensure visual and landscape separation of these sites.</p>

			<p>knowledge of the relevant facts would reasonably regard as so significant that it is likely to prejudice your judgement of the public interest". Certainly, as an impacted member of the public, I would regard non-disclosure as significant in this case.</p>	
	<p>Policy 5 Section 5.21</p>	<p>Any development in-and-around the Vicarage, cemetery, etc. fails the following criteria: <i>"The distinctive views of the surrounding countryside that are enjoyed from the many public vantage points in and around Plumpton Green should be protected and preserved."</i></p>	<p>Remove Vicarage and Glebe land from the plan</p>	<p>See response above.</p>
	<p>Policy 7</p>	<p>The policy does not define any requirements for minimum distances and screening to protect existing housing from any new development.</p>	<p>The policy needs to define requirements for minimum distances and screening to protect existing housing from any new development.</p>	<p>See response above.</p>
	<p>Policy 7 Section 5.34</p>	<p>"...Therefore, it is possible that some of these additional 200 homes could be allocated on sites in the parish. LDC has not made any decision to date on this matter, but has advised the PPNP Steering Group that allocating sites for more than the minimum required would put us in a stronger position to guide development in our parish up to 2030."</p> <p>I believe this advice is verbal only and there is no guarantee it will prevent LDC or other windfall development. Especially given the unclear and unstated approach to site selection and rejection.</p>	<p>As suggested to SG and PC previously... Reduce the proposed number to the minimal amount required and remember to include the houses already built. Over-allocating will not protect the village if a developer pushes another site, especially if some of proposed sites are not readily available.</p>	<p>Houses at Sun Close are not included in the LDC requirement.</p>

	Policy 7.3	<ul style="list-style-type: none"> • Ignores the historic importance of the site • Fails to meet the requirement 5.21 “The distinctive views of the surrounding countryside that are enjoyed from the many public vantage points in and around Plumpton Green should be protected and preserved.” • Does not mention that the Diocese do not have any concrete plans to develop the site. Any development will be at least 5 years away 	Acknowledge All Saints church, cemetery and war memorial as important heritage assets and remove the Vicarage/Glebe site from plan accordingly	See response above.
	MISSING	Where is the historic policy?	A historic policy needs to be added and needs to include the relevant information on Strollings, Vicarage and Glebe land as provided by Mr & Mrs *****	See response above.
	Section 13 Page 61 DO NOT SUPPORT	The inclusion on protected green spaces on the outskirts of the village that border vast tracts of green space is questionable and wasted opportunity.	<ul style="list-style-type: none"> • Move green space to the centre of the village where they will be benefit a far larger number of people <p>Or at least...</p> <ul style="list-style-type: none"> • Explain why green space on the outskirts of the village adjacent to vast tracts of green space is so beneficial <p>and in addition...</p> <ul style="list-style-type: none"> • the plan should make it clear, that 2 members of the SG live near the sites that have been rejected for development but proposed as protected green 	The village green and other areas in the centre of the village are designated LGS.

			<p>areas. To quote the Plumpton Parish code of conduct, Prejudicial Interest generally should be declared if 10(1)(b)“the interest is one which a member of the public with knowledge of the relevant facts would reasonably regard as so significant that it is likely to prejudice your judgement of the public interest”. It is reasonable to assume that failure to disclose this information would be construed in a poor light by most people.</p>	
Resident 6				
		<p>I support the concept of a Steering Group and of a Neighbourhood Plan – however, I am very concerned about the basis on which judgements are being made on the most suitable plots to build on, and the apparent limited restrictions being put in place for any new developments. Individual Landowners should not be able to influence the Steering Group, and judgements should be made on the overall best interest of Plumpton Green, which has been chosen by residents as a small rural community.</p> <p>The wording describing the total number of additional properties being built in Plumpton needs to be restricted. At the moment, it refers to a minimum number – this is extremely dangerous and could see Plumpton being unfairly and disproportionately grown. A maximum number of new dwellings should be considered and noted</p>		<p>Noted. All members of the SG have declared their interests. None have a financial interest in the outcomes of the Plan.</p> <p>The minimum number is set by LDC.</p>

<p>Policy 1</p>	<p>30</p>	<ul style="list-style-type: none"> • It is not appropriate to restrict developments to the ‘centre of the village’ when the village itself does not cover a great geographical area • This unnecessary high concentration in a small section of the village puts pressure on surrounding existing residential properties • The village itself extends from The Plough PH to beyond the station – it does not seem sound judgement to not cover the whole area 	<ul style="list-style-type: none"> <input type="checkbox"/> Reconsider 2,3,4,5, 9 and 10. No valid justification for exclusion has been given. All are still within very reasonable walking distance of village amenities. <input type="checkbox"/> No reference is made to why sites 2, 3, 4, 5, 9 and 10 have been removed from consideration. Site 9 would provide enhanced benefit compared to site 8, as would not involve removing a vibrant local business nor be adjacent to other sites, which creates a ‘super-site’ against the small development only principles of the plan. <input type="checkbox"/> Site 3 and 5 provide excellent opportunities for development and appear not to contradict any of the policies set out. These should therefore be included. 	<p>The SG is confident that it has explained its reasons for allocating the chosen sites.</p>
<p>Policy 2</p>	<p>31</p>	<p><input type="checkbox"/> Point 5 states that “where development sites are adjacent, maintain a clear separation between them by means of a green landscape buffer”. Initial plans shown by the architect for 7.4 shows a number of new properties directly bordering existing properties – severely impacting the privacy of a number of existing Plumpton Green residents.</p>	<ul style="list-style-type: none"> <input type="checkbox"/> Consider sites that do not bear such a significant impact on existing residents <input type="checkbox"/> Specific details should be given to any construction companies to outline a 	<p>See responses above.</p>

		<p><input type="checkbox"/> Reference is made to helping to “retain the rural character of the village” – yet building houses directly overlooking existing properties, as in planned in 7.4 contravenes this.</p>	<p>minimum of 10 meter landscape screening – with reference to mature plants that provide instant screening and protection for any local residents impacted by new developments.</p> <p><input type="checkbox"/> Layouts of any new developments should take into consideration any existing residents that are affected and ensure that new housing is laid out in a sympathetic manner to ensure minimal impact. Preference should not be given to Landowners who are building their own property on the site!</p>	
<p>Policy 5</p>	<p>34</p>	<p><input type="checkbox"/> Reference to landscape screening is too minimal – need to build in more protection for local residents</p>	<p><input type="checkbox"/> Ensure all new properties developments do not directly overlook / existing residential properties. Respect to be given to existing levels of privacy.</p> <p><input type="checkbox"/> Screening to include mature plants that provide instant screening, protecting existing residents.</p> <p><input type="checkbox"/> Minimum of 10 metre buffer zone to be put in place to prevent ‘town feel’ of houses backing directly onto one</p>	<p>See responses above. Requirements for additional landscape buffers and tree planting have been included in the revised Plan.</p>

			another. Careful selection of sites should mean that impact on existing residents can be kept to a minimum.	
Policy 7	Item 4 (Page 39)	It is not clear why housing needs to be clustered around the village centre. The village amenities are spread from the Plough PH, through the old brickworks to the Station / Playing Field (and arguably the Half Moon PH) and therefore there is no justification for clustering housing around the centre.	<input type="checkbox"/> Reference to housing being clustered around the village centre should be removed. <input type="checkbox"/> All identified sites are within a reasonable walking distance from village amenities, and arguably building north of the village would have positive impact on businesses positioned within this vicinity eg: The Plough Pub	The siting of developments is led by the LDC SHLAA
Policy 7	Item 7 (Page 39)	The screening requirements for new developments must be much more specific and include a set screening distance.	Add landscape screening to be a minimum of 10 meters, and be mature planting not something that will take 5+ years to take effect.	See above.
Policy 7.3	Page 46	This site clearly does not meet the flooding concerns defined in section 4.19, does not spread the development evenly around the village defined in section 4.20.	Site 7 should be removed from consideration and replaced with sites 3, 5 or 9 (see Map 3 comments)	This is not as we are advised. ESCC has not raised objections
Policy 7.4	Page 48	This inclusion of this site: <ul style="list-style-type: none"> <input type="checkbox"/> Does not protect view and green spaces referred to in section 4.7. <input type="checkbox"/> Congregates development in one location, which contradicts the feedback in section 4.20 (development spread evenly around the village). 	Site 8 should be removed from consideration and replaced with sites 3, 5 or 9	Noted. See comments re mitigation measures above.

		<p><input type="checkbox"/> Does not deliver to the ambitions of 69% of respondents (section 4.28) and in fact does the complete opposite and will force an existing business to cease trading.</p> <p><input type="checkbox"/> From the outline plans shared by Cala Homes at the open event, this has not been designed to avoid proximity to the existing properties along Station Road. In fact the proposed design aligns properties to overlook the gardens of existing properties significantly altering the privacy of existing housing which has no natural screening currently.</p>		
Policy 8	Page 52	This policy states that the loss of existing employment or business use will be resisted. The inclusion of Policy 7.4 as a favoured site completely contradicts this and will close a vibrant local business.	Site 8 should be removed from consideration and replaced with sites 3, 5 or 9	The business is on a short-term lease and therefore not viable in the long-term
Policy 9	Page 53	See Policy 8		
Resident 7				
		<p>I have provided below some specific points in relation to the sections of the document but would like to highlight some broader concerns with the plan as proposed.</p> <p><input type="checkbox"/> It fails to deliver on the vision it sets out.</p> <p><input type="checkbox"/> A 'minimum' target makes the document worthless. A 'maximum' needs to be agreed with LDC.</p> <p><input type="checkbox"/> It has simply reiterated the site allocations set out by Lewes, in fear of the now over-turned situation that happened in Newick in relation to Micklewood Farm.</p> <p><input type="checkbox"/> The justification for the inclusion and exclusion of each site is in some cases non-existent and in other cases very weak.</p>		Noted – see comments above.

		<p><input type="checkbox"/> It is entirely focused on housing location, and does not address the shortage of recreational space, broader village infrastructure nor house styling.</p> <p><input type="checkbox"/> It fails to protect existing residents with suitably robust controls.</p> <p><input type="checkbox"/> No timing is set out for development.</p> <p>Overall, I do not consider the plan to be cohesive, consistent nor robust and in its current form is blank cheque to developers and landowners to over develop the village in a short time frame without robust controls.</p>		
Foreward	4	<p>Maintain the 'green gap' to the north that is so important to so many.</p> <p>The plan doesn't deliver any additional 'Local Green Spaces', and in fact does the opposite by adding additional strain on the existing green spaces, and in particular recreational space.</p> <p>The plan does not protect important community assets – namely the garage Brighton Garage Services nor does it offer these local businesses the support they need to grow. The inclusion of site 7.4 does the complete opposite to this and will close it down!</p>	<p>The proposed sites to the north of the village whilst shrinking the 'green gap' still leave a considerable gap. It should also be quantified how many object to this compared to those that didn't object. These sites should remain under consideration within the plan. At least one of the sites proposed should include additional recreational space.</p> <p>The inclusion of policy 7.4 should be reconsidered.</p>	<p>See above. Policy 12 now maintains this green gap to the north of Plumpton Green settlement.</p> <p>See note above re Brighton Garage.</p>
Joint Core Strategy (Local Plan Part 1)	3.8	<p>The number of net additional units should be a maximum not a minimum, otherwise this essentially become a 'blank cheque' to an unlimited number of dwellings which would contravene everything that the policy sets out to achieve.</p>	<p>The word 'minimum' should be replaced by the word 'maximum'.</p>	<p>See comments above. This is outwith the powers of the NP.</p>

	3.9	The 200 net additional units need to be allocated to settlements across the district should be challenged.	The NP Steering Group need to challenge LDC on their proposals on how these houses are allocated.	
Policy 5, item 6	Item 6 (Page 36)	The screening requirements for new developments must be much more specific and include a set screening distance and details of the nature and timing of screening being introduced.	Add landscape screening to be a minimum of 10 meters, and be mature planting that provides near instant screening.	See comments above.
Policy 7	Item 4 (Page 39)	It is not clear why housing needs to be clustered around the village centre. The village amenities are spread from the Plough PH, through the old brickworks to the Station / Playing Field (and arguably the Half Moon PH) and therefore there is no justification for clustering housing around the centre.	Reference to housing being clustered around the village centre should be removed.	See comments above.
Policy 7	Item 7 (Page 39)	The screening requirements for new developments must be much more specific and include a set screening distance.	Add landscape screening to be a minimum of 10 meters, and be mature planting not something that will take 5+ years to take effect.	See comments above.
Map 3	Page 41	No reference is made to why sites 2, 3, 4, 5, 9 and 10 have been removed from consideration. Site 9 would provide enhanced benefit compared to site 8, as would not involve removing a vibrant local business nor be adjacent to other sites, which creates a 'super-site' against the small development only principles of the plan. Site 3 and 5 provide excellent opportunities for development and appear not contradict any of the policies set out. These should therefore be included.	Reconsider sites 3, 5 and 9. Provide details of why sites have been excluded.	See comments above. the SG is confident it has fully explained and justified its thinking behind the site allocation.

Policy 7.3	Page 46	This site clearly does not meet the flooding concerns defined in section 4.19, does not spread the development evenly around the village defined in section 4.20.	Site 7 should be removed from consideration and replaced with sites 3, 5 or 9 (see Map 3 comments)	
Policy 7.4	Page 48	This inclusion of this site: a. Does not protect view and green spaces referred to in section 4.7. b. Congregates development in one location, which contradicts the feedback in section 4.20 (development spread evenly around the village). c. Does not deliver to the ambitions of 69% of respondents (section 4.28) and in fact does the complete opposite and will force an existing business to cease trading. d. From the outline plans shared by Cala Homes at the open event, this has not been designed to avoid proximity to the existing properties along Station Road. In fact the proposed design aligns properties to overlook the gardens of existing properties significantly altering the privacy of existing housing which has no natural screening currently.	Site 8 should be removed from consideration and replaced with sites 3, 5 or 9 (see Map 3 comments)	See comments above.
Policy 7.5	Page 50	This site has very poor access, on to a dangerous section of Plumpton Lane. Alternative means to access need to be considered for this site to stand.	This site should be reconsidered.	This site has been removed from the Plan.
Policy 7.6	Non-Existant	These policies should cover the other sites previously included and now excluded from the plan to explain the justification of their exclusion. They cannot simply be removed without explanation.	There needs to be transparency of these sites and how they stack up against the evaluation criteria.	See comments above.
Policy 8	Page 52	This policy states that the loss of existing employment or business use will be resisted. The inclusion of Policy 7.4 as a favoured site completely contradicts this and will close a vibrant local business.	Site 8 should be removed from consideration and replaced with sites 3, 5 or 9 (see Map 3 comments)	See above.

			<p>Spaces and this has not been openly declared.</p> <p>The 2017 PPNP SG has not met its own terms of reference regarding transparency. There is evidence of non-quorate decisions being made, no minutes, private meetings and decisions being made by the SG without PPC's approval.</p> <p>Some sites were rejected based on Viability reports however not all sites were tested to see if they were financially viable/sustainable. Most sites were not visited by the SG to see their suitability and impact on neighbouring properties. The same selection procedure needs applying to all sites equally to see if they are financially viable/sustainable/suitable before submission to a further Reg 14 consultation.</p>	
Do not support	2.1	<p>This historical Evidence report was according to its author David Millum <i>'compiled based on the sites allocated in the draft 2016 PNNP'</i>. Since then a study of the history of All Saints Church, its burial ground, its war memorials, The Rectory and adjacent properties has been conducted and sent to PPNP SG, PPC, Historic England, ESCC HER, SDNPA, LDC prior to the formal adoption of the draft 2017 PPNP by PPC, yet there is no</p>	<p>NPPF Historic environment 169 states <i>'Local planning authorities should have up-to-date evidence about the historic environment in their area and use it to assess the significance of heritage assets</i></p>	<p>See comments above in relation to site 6.3.</p>

		<p>reference to it. Contrary to NPPF para 126 guidelines there is no Policy on heritage or historic environment.</p>	<p><i>and the contribution they make to their environment. They should also use it to predict the likelihood that currently unidentified heritage assets, particularly sites of historic and archaeological interest, will be discovered in the future.'</i> To meet NPPF guidelines the 2017 PPNP needs to redo its Historical Evidence Report to include the evidence that was sent to the SG and PPC regarding the history of All Saints Church, its burial ground, its war memorials, The Rectory and adjacent properties.</p> <p>Create a Policy in the PPNP 2017 on heritage or historic environment.</p>	
<p>Do not support</p>	<p>Policy 1</p>	<p>5.9</p>	<p>The 2017 PPNP does not provide small to medium clusters which are sustainable and enhance the existing character of the village as Policy/site 7.2, 7.3 and 7.4 are adjacent and provide a cluster of 52 units which is almost the whole of LDC's allocation. Site 9 was rejected as being too big with 50 units. The same principle must be applied to</p>	<p>See comments above re measures to ensure sites retain low density of housing and landscape buffers.</p>

			<p>the above sites with the one in the middle 7.3 being removed. Sites to the North and South were preferred by residents and statutory consultees over three years of consultation as evidenced in the 2016</p> <p>PPNP Reg 14 consultation.</p> <p>Any development of Policy/site 7.3 would not conform to Policy CT1 Planning Boundary and Key Countryside Policy and would not be in line with Policy SP1 and SP2 of the LDC JCS.</p>	
Do not support	Policy 2	<p>Summary Panel</p> <p>5.13</p> <p>5.14</p> <p>5.15</p>	<p>States '<i>new development will...complement the architectural and historic character of the surrounding area.</i>' Any development of Policy/site 7.3 would not meet this policy requirement.</p> <p>States '<i>every effort should be made to maintain local habitats, ancient woodlands and hedgerows which in turn sustain wildlife corridors.</i>' Any development of 7.3 would not meet this Policy requirement.</p>	See above.

			<p>Maintain a clear separation between adjacent sites. Policies/sites 7.2, 7.3, 7.4 are not significantly separated by green space. Site 7.3 needs removing from PPNP 2017 to create this clear separation.</p> <p>Any development of Policy/site 7.3 would not meet retained Policy ST3, ST11 and CP10 Natural Environment and Landscape Character of the LDC JCS or Policy CP8 Green Spaces. It would also not meet NPPF guidance on building on residential gardens.</p>	
Do not support	Policy 3 & 6	5.16	<p>The 2016 Reg14 response from Southern Water warned PPNP SG that <i>'a complete upgrade of waste water/sewage removal'</i> will be needed if any more houses are built in Plumpton Green. The main sewer pipe runs the length of the village down the main road and was built in early 1900s for less than 100 houses. All current houses in Plumpton Green feed into this pipe and due to its age and size it is constantly blocked and needs urgent repair. (SW has a log of call outs). To simply put the onus on</p>	<p>This is not within the remit of the NP. Developments will not be approved by the Planning Authority without adequate waste water and sewerage capacity.</p>

			<p>developers to provide their own piping to feed into this current system is ignoring the advice of Southern Water and will overburden a system which has is already working at full capacity and is not coping.</p> <p>The draft 2017 PPNP has ignored the advice of Southern Water and does not meet policy CP7 Infrastructure of the LDC JCS.</p>	
Do not support	Policy 5		<p>Any development of Policy / site 7.3 would not meet the requirements of retained Policy ST3 Design, Form and Setting of Development and ST11 Landscaping of Development of the 2003 LDC LP and Policy CP10 Natural Environment and Landscape Character of the LDC JCS. Policy CP8 Green Infrastructure or NPPF para 118.</p>	Noted.
Do not support	5.2	<p>This Biodiversity Evidence report is based on the sites included in the 2016 PPNP. Since then a study of the biodiversity of All Saints Church, its burial ground, its war memorials, The Rectory and adjacent properties has been conducted and sent to PPNP SG and PPC.</p>	<p>To meet NPPF guidelines include the evidence that was sent (via email on 10th June) to PPNP SG and PPC regarding the biodiversity of All Saints Church, its burial ground, its</p>	Noted. See comments above.

			war memorials, The Rectory and adjacent properties.	
Do not support	Policy 7	<p>No mention is made of a need to preserve sites of historical importance. To comply with NPPF para 126 PPNP needs to <i>'have a positive strategy for the conservation and enjoyment of the historic environment. In doing so, it should recognise that heritage assets are an irreplaceable resource and conserve them in a manner appropriate to their significance.'</i></p> <p>To comply with para 141 the PPNP SG should make information about the significance of the historic environment gathered as part of plan-making or development management publicly accessible. It should also require developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible.</p> <p>The Glebe- it is not just the glebe land.</p>	<p>The 2017 PPNP needs to include a Policy on protecting heritage assets and the historic environment.</p> <p>The PPNP needs to make the four reports that it was sent in early 2017 on the History and Biodiversity of All Saints church, its Burial Ground, its War Memorials, the Rectory and its garden, and Strollings public and add it to its Evidence base. The PPNP SG then needs to consult with residents as to whether the whole area is designated as a Conservation area or Green Space.</p> <p>See also improvements to paras 5.56 & 5.57.</p>	Noted. See comments above.
	7.3	There are no listed buildings in the vicinity The site may require demolition of the Rectory. The site will affect a number of adjoining properties.		
	5.57	Access would be on Station Road with a point of good visibility.		

	<p>5.58</p> <p>5.59 & 5.61</p> <p>5.61</p>	<p>There is a presence of protected species and ancient trees and hedges. There are three TPOs, two at the site entrance.</p> <p>There is no evidence of archaeological interest</p> <p>Natural screening should be preserved and steps taken to mitigate the effects of development and wildlife and biodiversity.</p> <p>Development of the site would need to conform to Policies 2-6.</p>	<p>Add 'The Rectory, and Rectory garden' to the title.</p> <p>The Rectory and garden is being used by the Rector for the next 5 years plus. This needs adding to the text.</p> <p>Add <i>'All Saints Church, its war memorials and burial grounds, The</i></p> <p>Rectory and adjacent property form one of the most important groups of heritage assets in Plumpton Green. Applications are in process for these and their curtilage to be Listed by Historic England. In addition, applications have also been made to ESCC/SDNPA/LDC for the site to be <i>given non-designated heritage status.'</i></p> <p>Add <i>'where the traffic does not naturally slow down'</i> as in the 2016 site assessment report. Add <i>'If this site is developed there will be entrances to four</i></p>	
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housing developments within close proximity of each other.'

Amend to say 'This site has the highest concentration of ancient trees and hedges out of all the proposed sites which would have a significant effect on current wildlife.'

'Any development of this site would mean there is nowhere for the wildlife to migrate to/move freely as the site is situated in the middle of 7.2 and 7.4 development/ sites.'

'Retaining the natural screening would make the development unviable as the root structure of the current trees/hedges would be compromised, making them unstable.'

Add 'Access to this site would require the removal of two TPOs which goes against PNNF Policy 118'.

This is not true. PPNP SG and PPC have been given documentation on the History and Biodiversity of All Saints

			<p>church, its Burial Ground, its War Memorials, the Rectory and its garden, and Strollings and there is significant historical interest.</p> <p>Had the PPNP SG and PPC visited the site they would have seen that the natural screening comprises extremely large oak trees and ancient hedges- any damage to their roots would make them unstable. If they are to be retained it would make the site financially unviable. There would be no way of mitigating the effects on wildlife as there would be no natural corridor for them to migrate.</p> <p>Amend to say that the development of the Rectory and garden and the glebe land does not meet the requirements of PPNP Policy 3.2 or NPPF para 109, conserving and enhancing the natural environment and para 126 conserving and enhancing the historic environment or NPPF para 118.</p> <p>Any development of this site would not meet PPNP 2017</p>	
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			<p>4.12, 4.17, 4.20 (1), 5.2 (1), 5.2 (3), (4), (7), and Policy 5.4 and 5.5. or 5.13</p> <p>In addition, development of this site would not meet LDC's JCS 2016 Policies 10 &11 to conserve the cultural heritage of the area.</p> <p>This site was rejected in the 2016 PPNP and should be rejected also within the PPNP 2017 as any development of it would be against local, regional and national planning guidelines.</p> <p>This site should be assessed as being a potential site to be designated as a green space for the reasons specified in the section below.</p>	
<p>Do not support</p>	<p>Policy 13</p>	<p>LGS5</p> <p>LGS 5,6 and 7</p>	<p>No specific survey of landowners or residents as to which sites they would prefer LGS designation has been conducted as advised in para 77 NPPF.</p> <p>Is an 'extensive tract of land' which NPPF para 77 specifically says should not be designated as a local green</p>	<p>Noted. There is a limit to the number of suitable LGS and tight restrictions on eligibility. The SG feels the sites it has allocated are reasonable and achievable and can identify no others.</p>

Additional/replacement LGS- Policy 7.3

space. The evidence to support this in the 'PPNP Local Green Space' report has been somewhat misappropriated.

These sites were included as being potential developments in the 2016 PPNP & LDC 2016 SHLAA and were considered acceptable by the majority of residents and statutory consultees so it is surprising to see them now as Local Green Spaces.

Policy/ site 7.3 should be considered for designated as a green space as it meets a significant number of criteria as specified within NPPF para 77.

By being designated a LGS it would provide a natural corridor to wildlife which will have been displaced by 7.2 and 7.4 as well as preserving Plumpton Green's most valuable listed heritage assets.

Part of the site should automatically be designated as it contains a cemetery. It would make sense to also include the Church, its war

			<p>memorials, the Rectory and its garden within this LGS.</p> <p>The Report that the PPC and PPNP SG has on the History and Biodiversity of All Saints church, its Burial Ground, its War Memorials, the Rectory and its garden, and adjacent buildings needs making public and residents consulted as to whether they agree that it should become a LGS.</p>	
Resident 9				
Section 2 Assessment Process	Page 4, Para 1, Parish Quest ...	<p>“There was strong support (87%) for pockets of small-scale development between 10 & 20 units, in keeping with development in the last 100 years.</p> <p>Misleading – EVF 68 Units, Woodgate Meadow 30+, West Gate 25+</p>		Noted, but the principle is supported by the responses to the questionnaire.
Section 3 Site Assessments	Page 10 Site 1 Riddens Lane	<p>The junction by the village shop is a major hazard, the worst junction in the village. The document says “there is poor visibility at the brow of the hill approaching Riddens Lane from the north” There is also poor visibility from the south. There is parking at the side of the shop which is required. There is parking on the other side of the road for the flats that is required. There is a small lay-bye which obscures vision from the south. To remove this would make the situation worse with people parking outside the shop on the brow of the hill.</p> <p>There is also limited pedestrian access on the road.</p> <p>This planning application is the only one which fails shows the size of the properties planned.</p>	<p>This site should be removed. The access is not safe and the plan gives no detail for any scope for safe access at the Station Road junction.</p>	Noted. See comments above.

		Having gone to the Downs on 30th July 2017, this site is clearly visible.		
Section 3 Site Assessments	Pages 21-26 Site 6 Wells Close Site 7 Glebe Land Site 8 Land Rear of Oakfield	The current plan, which will become evident soon, is for 45 dwellings (net 43, as 2 houses will be demolished), the majority of which are 1,2 and 3 bedroom dwellings with considerable landscaping and tree planting etc. The site is practically invisible from the Downs. There will be ample parking available for vehicles currently parked on Station Road, therefore there are no visibility issues and it is sufficiently far from the brow of the hill to eliminate any concerns. There is also virtually no contact with other housing (apart from the side of Sun Close), so will cause the minimum problems with neighbours.	Meet with Fairfax Developments and study their plans in detail.	As explained in the NP, the density of housing on this site was felt to be less in keeping with the rural character of the village. The Plan recommends the sites considered most in keeping with the vision of the NP, beyond the minimum number of houses required by LDC.
Section 3 Site Assessments	Page 29 Site 10, Land behind the school	Having discussed this with Fairfax Developments it is not known where this has come from. There are no plans and have never been plans to develop this area. This should be removed from all plans		Noted. This site was originally put forward by the landowner.
Section 3 Site Assessments	Page 31 Site 11, Racecourse Land	There is no way of resolving the village access issues with this land. It is clearly a danger and certainly should not be on the reserve list as stated.	This should be eliminated from the plans.	Removed, as above.
Resident 10				
Section 4 Site Assessments	Page 10 Site 1 Riddens Lane	The access to and from Station Road to this site is of great concern. This is already a busy junction and there does not appear to be any way of improving it short of removing the car parking facilities for the shop and residents at the entrance to Riddens Lane, thus widening the road and being able to provide some pedestrian access also. There is a lot of vehicle movement at this part of the road with vehicles reversing out of parking spaces directly into the road which is a safety issue for	This site should be removed. The access is not safe and the plan gives no detail for any scope for safe access at the Station Road junction.	See comments above.

		<p>pedestrians and other road users. The Plan only states that the site is 'subject to the provision of suitable vehicle and pedestrian access to Station Road' but no detail as to how this could be achieved. Then there is the issue of the poor visibility problems onto Station Road due to the extremely close proximity of the brow of the hill and the fact that vehicles regularly park on the brow on both sides of the road to use the shop and the restricted view with cars parked in the layby on Station Road. In view of the above safety concerns I cannot see how this site can be promoted as an option. The plan also states that this site is partially screened and not visible from the Downs. Having been on the Downs recently this land appears to be very visible from the Downs.</p> <p>This is the only site which has given no indication as to the size and type of housing to be built. I cannot see how parishioners can support a development where the size and type of housing has not been identified.</p>		
<p>Section 4 Site Assessments</p>	<p>Page 21 Site 6 Wells Close Page 23 Site 7 The Glebe Page25 Site 8 Land Rear of Oakfield</p>	<p>2. Methodology, para 2.2 Assessment Process</p> <p>In this paragraph the plan states that 'there was strong support (87%) for pockets of small-scale development of between 10 and 20 units, in keeping with the pattern of development in the last 100 years ...'</p> <p>This is not correct. Development over the last 100 years has included East View Fields, Woodgate Meadow and Westgate, all larger than 20 units.</p> <p>Whilst I have no particular concerns about these developments, I do have a concern regarding the combined size of the three sites together. If the plan is to follow the preference of the parishioners, combining three separate adjoining sites totalling 52 dwellings does not meet the criteria.</p>	<p>The plan should state although separate developments, this would be a development of adjoining sites totalling 52 dwellings.</p>	<p>Noted. See response above.</p>

<p>Section 4 Site Assessments</p>	<p>Site 9 Land East of Nolands Farm</p>	<p>Issues with the assessment of this site are as follows. The plan states that this site is too large. This is a smaller site than the 3 separate plots of Wells Close, The Glebe and Oakfield. Only two properties either side of the access road and Sun Close would be affected by this development and extensive tree screening is included in the plan.</p> <p>The assessment mentions that there is a listed building within the vicinity. Is this a relevant comment as this house is not on the land proposed for development and shouldn't this house also appear on the suitability paragraph for the Oaklands site.</p> <p>The current plan for this site places the new housing at a considerable distance from Station Road and would provide ample parking (if required) for Station Road residents. There is only one house opposite this proposed development which does not have a drive. In any case any development with an exit onto Station Road has the potential to have cars parked opposite the exit road. The lack of visibility is far more prevalent for the Riddens Lane development yet this development is on the plan.</p> <p>Having been on the Downs recently it cannot be this development is not any more visible from the Downs than any of the proposed sites</p>	<p>As this plan has changed and is now providing a majority of one, two and three bedroom homes, which is what the parish has indicated it is in favour of, it would be advisable for the Steering Group to revisit this site.</p>	<p>Noted. See comments above.</p>
<p>Section 4 Site Assessments</p>	<p>Page 31 Site 10 Racecourse Land</p>	<p>I acknowledge that this site is a reserve site, but I do not understand how this can be promoted when there is no safe and sensible pedestrian access. i.e. railway footbridge or having to walk over the road at the level crossing. As there does not appear to be a straightforward resolution to this problem it does not appear to be a sensible option to have in reserve.</p> <p>Although it includes the promise of more car parking for the station there could be a danger of that car parking being filled and cars still congesting the roads. This has been a conundrum now for several years and extra parking does not necessarily mean less parking on the road.</p>	<p>This site should be removed from the plan.</p>	<p>Removed. See comments above.</p>

		This site is visible from the Downs.		
Resident 11				
	Section 1 and 4, particularly 4.1	This plan now completely ignores the earlier expressed views of the majority in questionnaire and consultation meetings about the linear nature of the village in favour of the minority. "The plan" now accords with what LDC planners and developers want, rather than the earlier expressed majority view of the parish as a whole, thus the nimbies in the North and South of the village and those sitting on land within the current planning area get what they wanted all along. So much for the idea that this process should be driven by the views of local communities on development in their localities! The SG has now turned 180 degrees and, contrary to the wording of Section 4.1, this plan, in my view, can no longer claim to be "based on the results of these consultations, which have included meetings, open days and community surveys".		See comments above.
	Policy 6 Policy 7.2	<p>What sanctions do we have to ensure developers will actually meet the SG's stated requirement for</p> <p>"sufficient infrastructure capacity is either available or is delivered along with the new development to serve it for its anticipated lifetime"?</p> <p>The SG originally was to recommend up to 6 units on this space which is about the wettest place in Plumpton Green, according to the water map (Map D, Policy 6). Policy 6's aims are highly relevant to this site. I have serious doubts about any developer's ability to ensure that there will be no surface water flooding within a new development, however small, let alone for 12 units and am even more concerned about the consequences for the properties within Wells Close, particularly at the East end of the road. Moreover, a previous attempt to obtain planning consent for this site was turned down and had noted, inter alia, in Aug 1988 (Planning Office notes quoting ESCC County Engineer) "the proposed vehicular access via Wells Close is unsatisfactory and its use</p>		<p>Noted.</p> <p>Access via Wells Close is supported by ESCC.</p>

		would be contrary to the free flow of traffic and pedestrian safety. In the intervening 30 years, the number of vehicles belonging to the residents of the Close has risen significantly, with many of them parked in the roadway and children regularly playing in it. If planning permission for this site is granted access to it should not be via Wells Close for site vehicles as the Close is not large enough.		
Resident 12				
	Policy 1 Policy 2 (and Policy 5)	Reserve site at Racecourse is outside boundary. You state it will not be supported anyway. Item 5 – green buffer between sites – impossible as hedges/tress will have to be taken our anyway		See comments above.
	Policy 4 Policy 6 Policy 7.3	Car parking – no mention of spaces for smaller houses apart from the elderly. (Does this mean mostly larger homes?) Existing properties in Wells Close are already have problems with sewers and surface water You admit the size and proximity to other developments and existing houses could be a problem! Wells Close, the Glebe and Oakfield would end up as one big building site.		Policy 3 amended to address this See comments above.
Resident 13				
	Policy 6 Policy 7.2	I am saying the drainage is not up to it. There has been major repairs four times in the last two or three years. It is major problem as the pitch fibre pipe has gone oval shaped. To replace it, the village would be in chaos for a year or more. Will you stop calling it under the title Wells Close. It should be called Straw lands development. It has its own road and access and our road is not wide enough for all the extra traffic plus all the construction traffic.		Strawlands is a single-lane, unmade track.

Resident 14				
	Policy 7.1 5.39	<p>Query minimal impact on other properties. 16 dwellings, 32 cars minimum. Upgrade of lane –does it include widening and where extra land coming from?</p> <p>Drainage and sewage a concern for both lane and village drains, both overburdened. Lighting in a lane?</p> <p>Egress onto main road – many near misses as it is. Take into account that existing properties mainly bungalows.</p>		See comments above.
Resident 15				
	41	<p>Sites 7 & 8 and to a lesser extent site 6, effectively make one large site. This is against the general feeling of small sites of 20 or less</p>	<p>There could be definitive green space corridors to avoid the sites becoming one. I.e. build on the north of site 7 and south of site 8.</p>	See comments above.
		<p>There is little detail on the problem of parking in the station area Commuters already park inconsiderately.</p> <p>No mention is made of the fact the school was supposed to have a 30-year lifespan and was built in 1974</p> <p>This is really a planning document and very little consideration has been given to any other matters. It appears to merely satisfy a tick box exercise</p>	<p>Charge for parking in the Playing Field for non-users</p> <p>One of the sites could have been considered for a new primary school.</p>	Noted. Parking at the station and matters relating to the school are outwith the NP remit.
Resident 16				
	5.9	<p>Development to be around the centre of Plumpton Green. This will lead to further congestion of traffic and worsen traffic flow problems.</p>	<p>Disperse the developments throughout the village i.e. use the north and south areas too.</p>	The NP explains our reasoning for our site allocations.

	Policy 7.2	<p>This site is not north of Wells Close but to its northeast.</p> <p>The proposed 12 new houses will increase the size of Wells Close by 60%, so not in sympathy with the surroundings!! Access from Wells Close has been denied for about 20 years, it should be regarded as an extension to Strawlands, as it was in the planning applications of the early 1990s.</p>	Reduce the number of new houses and access from Strawlands	
Resident 17				
On proposals for land East of oakfield		Feel that the development is pushing too far eastwards with the one large 5 bedroom house infringing on unbuilt and unoverlooked open space.		
Resident 18				
		Overall comment – many thanks to the Steering Group for their hard work on what is too often a thankless task.		
Parking	Policy 4	It is touched on in the reserve site policy but otherwise no mention of the need to provide extra parking to support the railway station.	Add in a call for extra parking to be supported	See comments above.
Local employment/ Village Centre/Community Facilities	Policy 8 Policy 9 Policy 12	There is little mention of the village primary school, which is also a local employer along with the racecourse and the college (which get their own policies). Hamsey’s neighbourhood plan for example has a separate policy for their school including a commitment to seek funding to replace their pre-fabricated classrooms with permanent buildings. Plumpton Primary School (which has just received a “good” Ofsted rating and if the village is going to grow more funding for the fabric of the school will be needed) has three of these classrooms, and is an example of where extra funding is needed to replace the buildings.	<p>Add in call to support improvements to the school buildings – or ideally to support the replacement with new school buildings, or similar words.</p> <p>This would best sit in policy 9. Otherwise it could sit in the community infrastructure</p>	<p>See above.</p> <p>Noted.</p>

Housing Design	Policy 7	I think there is a good opportunity to support environmentally sustainable measures such as encouraging rainwater harvesting and making good use of renewable energy. Also with the recent government announcement over the phasing out of diesel and petrol engines can external charging points outside new builds be supported in the plan?	<p>projects in section 6.4 on page 72.</p> <p>Add support for such measures in building design – eg in policy 7 add support for the plan to encourage the use of measures such as rainwater recycling and renewable energy and support external charging points on new homes.</p>	Covered in policy 5
Riddens Lane development	Policy 7.1	This is the only planning proposal which has already come before the Parish Council (In January 2015) where it was unanimously rejected at a meeting where 70 members of the public were present. The minutes showed the planning committee were especially concerned over access issues, including the junction with Riddens Lane and Station Road (the minutes state that the committee saw this junction as “exceedingly dangerous”). Concerns were also expressed at this meeting about pedestrian access. And with parked cars on both sides of the junction end of Riddens Lane (at The Riddens flats and the shop) it is difficult to see how safe pedestrian access can be provided (I accept both car parks are necessary to provide parking space for the shop and Riddens flats).	Have a similar condition to the racecourse site – that the site should only be released once the concerns over safe pedestrian access both at the junction and on the lane itself have been met.	See comments above. ESCC has approved access.

		Having looked at the plans on display at the public drop in session it is unclear how things have improved in this regard since the original application. This is in contrast to the policy for the Racecourse site which will not support the Have a similar condition to the racecourse site – that the site should only be released once the concerns over safe pedestrian access both at the junction and on the lane itself have been met.		
Local Green Spaces	Policy 13	Can the plan add the lower part of the field next the Riddens Lane development (7.1) as a Local Green Space? It does at the moment include a footpath with the bridge going over the Bevern stream and is a route over to East View Fields.	Add new local green space as suggested.	This area is within Flood Zone 3 and cannot be built on.
Resident 19				
		<p>I would like to thank the steering committee for producing such a detailed and responsible plan for the future of the Parish. I would like to partially welcome the inclusion of a site for old people to downsize, which will further free up existing family sized homes and encourage new more families to join the village alongside the inclusion of affordable homes.</p> <p>Furthermore, the protection of green spaces is an extremely important policy for the protection of the village and I agree strongly with the designations that have been outlined.</p>		Noted.
Resident 20				
	Policy 1	<p>All the sites put forward in the 2nd draft plan are outside the planning boundary.</p> <p>The selection of sites 6 and 7 regardless of a nominal ‘buffer’ constitutes a development of 40 units, which goes against this policy Plans should not allow for housing to be placed directly in front of existing residential properties</p>	There are other sites considered in the initial draft plan which are outside the planning boundary which could/should be adopted to prevent this More	See comments above.

			consideration is required to mitigate this in the policy	
	<p>Policy 2 5.14</p> <p>Policy 7.2 5.51</p> <p>5.52</p>	<p>Selecting sites 6 and 7 side by side means that in essence, despite a buffer, this will be visible and seen as a large development of 40 houses both for those living within and around the development and from the south Downs</p> <p>Placement of housing in provision plan does not assist this point</p> <p>Units plan does not allow open space between existing development of Wells Close</p>	<p>Quantify the size of the buffer. It needs to be substantial to partially offset this.</p> <p>House plan needs to demonstrate a better awareness of the need to mitigate surface water flood risk</p> <p>Group development to the northern area primarily to allow some demarcation between developments, in other words, a 'buffer'</p>	<p>See comments above.</p>
	<p>Policy 7.3</p> <p>Point 1 and 2</p>	<p>The screening needs to be substantial and not to be part of unit15 garden as this would mean residents in close proximity would have no control over this screening</p>	<p>Clarity over who owns buffer and screening, and ownership should be stipulated</p>	<p>See comments above.</p> <p>Where relevant, polices now recommended shared ownership of open green space within developments.</p>

	<p>5.57</p> <p>5.6</p> <p>Policy 13</p>	<p>The eastern portion of this site is partially screened by trees on site 8 in summer. This is not the case in winter and will not be the case if trees are removed for development on site 8. The two sites together will be visible from the South Downs.</p> <p>Placement of units alongside stream</p> <p>No open space between sites 6/7/8</p>	<p>Careful consideration to placement of housing, buffer and screening taking into account the fact that both site 7 and 8 adjoin each other. Not allowing two such large developments next to each other would be a better solution.</p> <p>A reasonable area alongside the stream should be designated as a wildlife/nature reserve in consideration of mitigation of surface water flood risk</p> <p>Allow for open spaces</p>	<p>See comments above.</p>
<p>Resident 21</p>				
	<p>Policy 7.1 P42</p>	<p>It is noted that development in this location:</p> <ol style="list-style-type: none"> 1. will upgrade Riddens lane with a suitable surface to provide safe access for vehicles between the site and Station Road. <p>A. The phrase 'suitable surface' should be defined</p> <p>B. The draft working plan should confirm that the upgrading of the surface of Riddens lane should not involve any widening of Riddens lane between the site and Station Road.</p>		<p>See comments above.</p>

		<p>c. The draft working plan should make it clear that the upgrading of the surface of Riddens lane will not contravene Policy 5 landscape and biodiversity in particular sub paragraph 1 and 3.</p> <p>2. 'Obtrusive features such as lighting will be kept to a minimum' – for the avoidance of doubt, it should be confirmed that, as now, there will be no street lighting in Riddens Lane (policy 2.3)</p> <p>3. In paragraph 5.4.4 of the draft plan it is stated that there are concerns about the impact of vehicles on traffic flow where Riddens Lane enters Station Rod at a busy intersection. There is also often poor visibility at this junction due to parked cars in Station Road. With respect, the wording of this paragraph understates the problems caused by the prevailing situation.</p>		
		<p>No mention is made of commercial vehicles many of which are large, quite properly making deliveries to the village shop or the fact that not infrequently as a result of such vehicles being parked whilst deliveries are effected, visibility from Riddens lane into Station Road is reduced to nil.</p> <p>In addition, there is the problem of vehicles turning from Station Road into Riddens lane in order to use the parking facility at the village store. These vehicles subsequently emerge from Riddens Lane onto Station Road.</p> <p>Thus the flow of traffic at this busy intersection is already a hazard.</p> <p>If the development set out in the working plan is carried out, there will be increased traffic flow from the site along Riddens lane of between 16 and 32 vehicles, together with the service and commercial vehicles attending the site. As a result, an already busy and hazardous intersection is likely to become dangerous, with all the attendant risks which that will entail.</p>		See above.

		It is respectfully submitted that it is essential that this aspect is fully addressed in the final version of the Neighbourhood Plan.		
Resident 22				
	P46/47	I do not support the demolition of the Rectory and building on the Rectory garden. Strollings will become an island	Maintain rectory and some of garden to rear of Strollings.	See comments above and amended Policy 7.3
Resident 23				
5.63	P47	An additional concern would be that 'Strollings' would be surrounded by roads. One of the oldest houses in Plumpton	Reduce the level of development there and allow for green space between any development and Strollings.	See above
Resident 24				
	Policy 13	It is a well-considered plan, after much consultation and debate. However to properly protect LGS6 from future development, subject to stipulations/conditions referred to in the policy document, the paddock with small pond on its southern boundary and adjacent to Station Road, should be included within LGS6, to prevent development on the bend in the road, at the crest of the hill leading north from the village.		Noted.
Resident 25				
		Connections It would make sense to connect the two developments via a footpath/cycleway. Children and families will be able to see each other without having to go out onto Station Road.		Following revision, these sites now share an access road.
Resident 26				
Policy 13		Whilst strongly supporting the spatial integrity of the village, especially against what would be unnecessary development at the current time, it must be reluctantly conceded that the advice to allocate LGS status to a	Policy 1 must clearly state that even within the presumption of	See amended Policy 1

		number of the sites does not meet the spirit (and potentially the letter) of the NPPF in this respect.	sustainable development, the integrity of the spatial characteristics of a service village can be maintained (and legal agreements entered into in good faith should be defended).	
Resident 27				
		Very keen to keep green strips to North and South of village		See above.
Resident 28				
Policy 1		Development of this size should not go South of the railway as this detracts from the feeling of being the gateway to the SDNP.	Development North of the railway only	See comments above.
Policy 7 - Racecourse		<p>Parking is available on this land already. The more parking we have the more cars we will have on the road passing through our village.</p> <p>The development would be an absolute eyesore and it would destroy a much loved view for all the village.</p> <p>There are proposed tall buildings (two storey) neighbouring smaller level properties (bungalows).</p> <p>The issue of lighting is extremely concerning – we and the entire village have said that we want to protect our dark skies and not have more lighting.</p>	Take the Racecourse site out – not leave it in at all, even as a reserve.	<p>See above.</p> <p>Policy 7 offers a strong policy on unnecessary lighting.</p>
Resident 29				
Policy 7.1: Riddens Lane Page 42		1) The Riddens Lane/Station Road junction currently offers significant potential risk to both vehicle and pedestrian traffic. Visibility is poor in both directions on Station Road which is further exacerbated by buses at the adjacent stops, vehicles in the lay-by, delivery and post-office	This site should not be included in the final form of the plan.	See comments above.

		vehicles calling at the shop, as well as customers who park on Station Road itself. There is insufficient space to allow alteration to the road layout, especially as any change would certainly impact the essential parking facilities for both the flats and the shop itself. Riddens Lane is not wide enough in parts for two-way traffic, nor for a pedestrian path that would be needed as far as the site itself. 2) Residents of East View Fields will certainly, and rightly, be concerned about the flood risk (particularly given the already acknowledged need to differentiate between risk levels in different parts of the site.) 3) The site is clearly and easily visible from the Downs.		
	Policy 7.3: The Glebe Page 46	I understand this site cannot be available for at least five years.		Noted. This is within the timescale of the Plan.
	Policy 7, Map E, Site No. 9: East of Nolands Farm Page 41	This site – which has not been included in the Pre-submission Working Draft of June 2017 – would seem to have the potential to meet all requirements of suitability whilst impacting the lowest number of existing residents. Moreover, of all feasible available sites, it is closest to the centre of the village; for the majority of people it is within walking distance of the shop/postoffice, the school and the railway station. Fairfax Properties are in the final stages of preparing proposals for development of this site.	Discuss with Fairfax properties its proposals for the site.	See comments above.
Resident 30				
Protecting the 'Gateway to the park'	Pgs. 4, 19, 23, 27	Thank you for all your hard work throughout this process and in putting this latest draft plan together. The Racecourse development would be harmful for the Parish' vision (5. Pg. 27) of 'the parish and SDNP will have worked together to protect their shared setting and to define a role for the parish as a gateway to the park'. The development here would ruin the existing vista which welcomes everyone to the glorious view of the Downs – both walkers and train travellers alike. A housing development would completely mar	The Racecourse site should be withdrawn altogether – not kept as a reserve site. The other sites are far more discreet in terms of their visibility within the village and are largely extensions of existing housing areas, not a	See above.

		<p>this view – what I would say is the loveliest in the village. The racecourse also goes counter to policies and feedback received from the village: Pg. 4 The policies aim to ‘Protect existing landscape’ Pg. 19 Consultation feedback ‘Views and green spaces should be protected’ Pg. 23 Resident questionnaire feedback – most valued open spaces were ‘South Downs’ and ‘footpaths’.</p>	<p>brand new housing development dropped into an open space with wonderful views.</p>	
<p>Policy 1 – spatial plan for the parish</p> <p>Policy 7 – new housing</p>	<p>Policy 1 – pg.30</p> <p>Policy 7 – pg.39</p> <p>Policy 7 – pgs.50/51 Racecourse</p>	<p>I do not agree with extending the boundary south of the railway line. This spilling over detracts from the centre of the village and encroaches on the beauty of the SDNP.</p> <p>Point 3. I would like this point to be extended so that it is ‘sympathetic’ to the existing homes it borders with i.e. not having large homes built on sites adjacent to bungalows.</p> <p>I do not support the draft plan to have the Racecourse site included. I wrote a full and complete document about my objections to this site at the time of the previous consultation – there has been no response to this. This latest plan does not address the points raised except for the safety of access for pedestrians issue.</p> <p>Point 5.72 states there would be ‘significant benefit of parking’ – there already is the facility to park in this area!!!! We do not need to build 19 houses to get a car parking facility!!!</p> <p>This current document gives the impression that this land is a bit of an eyesore - point 5.73 (pg.50) refers to ‘a large bund of industrial hard waste’. I am not aware of a bund??? The only area I wonder this may be is a mound of earth which was dug from the racecourse to make a reservoir – not industrial waste. Either way, this area is not an eyesore. It allows an extension of the vista across the course to the Downs and is</p>	<p>Do not go south of the railway line.</p> <p>Be considerate of adjacent existing homes e.g. bungalows would not have houses built by them.</p> <p>Take the Racecourse site out – not leave it in at all, even as a reserve.</p>	<p>See above.</p> <p>Noted. The Plan includes mitigation requirements.</p>

		<p>admired by many who enjoy walks to the Downs and countryside surrounding the course.</p> <p>Point 5.75 is a little confusing. The site would be clearly visible from East View Fields – not partially screened as is stated. This is made even worse by the fact that the development is planning two storey buildings when the neighbouring East View</p> <p>Fields properties are bungalows. Point 5.76 – I am alarmed to see that there would be lighting going into this area – rather than being ‘kept to a minimum’ I would have expected there to be no additional lighting at all given the clear message from residents about light pollution. We would lose our dark skies. Would the proposed car parking coming with lighting?? The racecourse have suggested a new bridge with a lift, presumably with lighting – quite literally lighting up our skies (and with added noise pollution of a lift)!!</p>	<p>Like for like housing across developments i.e. bungalows only in racecourse plans</p> <p>No additional lighting</p>	
<p>Policy 8 – local employment AND Policy 11 – Plumpton Racecourse</p>	<p>Policy 8 pg.52 Policy 11 pg. 56</p>	<p>Whilst I would like to support local business, I do not feel we should be held to ransom by the business. The racecourse representatives, I believe, have been putting undue pressure on the steering group / residents to accept their proposals. They seem to be scare mongering saying that if they don’t get this through the racecourse business will fold and then.... (with the inference that we will have thousands of houses being built there). Have you actually seen the published Accounts of the racecourse? They talk of best ever attendance levels in the Parish Mag...</p> <p>Policy 11 mentions development ‘necessary for the sustainable operation of the racecourse’. How do you define this? This current proposal could be just the thin end of the wedge.</p>		<p>See comments above.</p>

		<p>Like for like housing across developments i.e. bungalows only in racecourse plan.</p> <p>I find the ‘second biggest local employer’ comment (5.92 pg.56) misleading – you have acknowledged it is a much smaller workforce than the college but have not provided numbers of which I suspect there are a very small number of permanent staff. There is also mention of the racegoers coming by train – the lovely view they and all of the other train passengers currently have as they come into Plumpton from the west, would be ruined – instead of the vista to the Downs, they would see yet another housing estate. Rather than maximising it’s proximity to the SDNP, it would be detrimental to this</p>		
Resident 31				
		<p>I would like to register my overall agreement and approval with the Plumpton Parish pre – submission plan.</p> <p>I accept the need for additional houses in the village and I am content with all of the sites put forward in the middle of the village and numbered 1,6,7 and 8 on the diagram in the plan on page 41.</p> <p>I am pleased that the plan now protects the rural aspect to the north of the village.</p> <p>I disagree with the land at Plumpton Racecourse being put forward as a reserve site. I do not want to see any houses being put on the racecourse, it is a principal we have fought against for the last few decades and I see no reason to change that view. There is no need for this site to be a reserve and if we go ahead with such a designation we are effectively saying the village is happy for future houses there – I don’t agree with that. It seems to have been suggested simply to appease the Racecourse owners who have said they are concerned about its financial future, which may just be a commercial ploy to get</p>		<p>See comments above.</p>

	<p>development on the site. Finally, I don't believe new housing is deliverable on this site in any case due to lack of suitable access.</p> <p>It is important that although the plan identifies a number of suitable sites, the village should only build the number of houses requested by LDC and over a length of time. We do not need to build all of the new houses in one go. We should not be cornered into accepting more houses than necessary just because we have now identified a number of sites which allow for more houses than we need to build!</p>		
Resident 32			
	<p>Whether development be to the east or west of the village it is imperative that access should be via new roads branching off Station Road at both north and south of the present 30 mph section. Parked cars currently transform long sections of Station Road effectively into a one lane road making it difficult and sometimes dangerous for residents to come out of their drives. With every new house liable to have at least one and probably more cars, the character of the village could become more like that of a town if all the vehicles need to use the built-up section of Station Road.</p>		Noted.



Plumpton Parish Neighbourhood Plan

Regulation 14 consultation

June/July 2017

Statutory bodies' responses

PLUMPTON PARISH DRAFT NEIGHBOURHOOD PLAN RESPONSE FORM

Thank you for taking the time to feedback on the draft Neighbourhood Plan.

Some guidance notes to help you complete it in a way that will assist the Steering Group in finalising the document:

- While the final referendum will only be open to registered voters, at this stage the Steering Group are keen to get the widest range of input. To achieve that, this form is available to all individuals (i.e. not simply one per household), regardless of age, but only one form per individual will be accepted.
- Please note that anonymous forms cannot be considered and will therefore be ignored.
- If you choose to feedback, then please complete Part A and Part B – while this exercise is primarily qualitative in that it seeks your views, it is also useful to take the opportunity to gauge the overall support for the draft plan.
- Part C is optional, but must be completed if you have indicated in Part B that there are specific policies you do not support – the Steering Group need to know **why** a policy is not supported in order to consider any amendments to it.
- www.plumptonpc.co.uk/neighbourhood-plan/), and keep your comments constructive and as concise as possible. If you wish to make several comments on the electronic form, please insert additional rows in Part C as required. For paper forms, simply use as many copies as required.
- The closing date for responses is 31 July 2017. Please return the form by one of the following methods: a) dropping into the box at Plumpton Post Office and Store, b) by email to np@plumptonpc.co.uk, c) or by post to the Parish Clerk: Anita Emery, Plumpton Parish Council, Elm Cottage, Church Street, Hartfield TN7 4AG

PART A – Respondent details (must be completed)

Name: Southern Water	
Postcode: BN1 9PY	
Connection to Plumpton:	Resident in Parish NO
	Business within Parish.....NO
	Landowner of Land within Parish.....NO
	Other (e.g. a planning consultant or similar representing any of the above) – Please specify below
	Statutory consultee and wastewater service provider in Plumpton Parish

PART B – Summary of overall support

Do you support the draft plan? (Please delete the answer that does not apply)	No
<p>If you answered 'Yes' to can indicate so below. You are also free to add comments in Part C.</p> <p>If you answered 'No', then the Steering Group need to know which policies you do not support (and why)? Please make that clear below (on the electronic form, simply delete all the policies that you are happy with, to leave those you do not support. On the paper form, just indicate [e.g. by ticking, circling or similar] those policies that you do not support). Then complete section C to provide the reason why you do not support that policy.</p>	
Policy 1: Spatial Plan for the Parish	

PART C – General

Comments on general sections of the documents	Page and/or paragraph number	Comment	Suggested improvement
Comments on specific policies in the draft plan	Policy and/or page or paragraph number	Comment	Suggested improvement
	Policy 1, Page 30	<p>Southern Water understands the desire to protect countryside areas surrounding the built up area. However, we cannot support the current wording of Policy 1 as it could create a barrier to statutory utility providers, such as Southern Water, from delivering essential infrastructure required to serve existing and planned development.</p> <p>Policy 1 seeks to prevent all development outside the built up area. This is not in line with the National Planning Policy Framework (NPPF), unless the land has been designated as Green Belt (Paragraph 89). Paragraph 80 of the NPPF establishes that one of the purposes of Green Belt land is 'to assist in safeguarding the countryside from encroachment'. However, caveats necessarily exist, and in the case of Green Belts, paragraph 90 of the NPPF states that 'certain other forms of development are also not inappropriate', including 'engineering operations'.</p> <p>Furthermore, there may be limited options available for the location of new sewerage infrastructure (e.g. a new pumping station) due to the need to connect into the existing sewerage network, and since such works would be classified as 'engineering operations', it is considered</p>	<p>We propose the following additional wording (<u>underlined</u>) for Policy 1:</p> <p>New developments outside the planning boundary will not be supported, <u>unless it is for essential utilities infrastructure, where no reasonable alternative site is available.</u></p> <p>SG response: Policy 1 amended</p>

		that the provision of sewerage infrastructure constitutes appropriate development. The National Planning Practice Guidance (ref: 34-005-20140306) recognises this scenario and states that 'it will be important to recognise that water and wastewater infrastructure sometimes has particular locational needs (and often consists of engineering works rather than new buildings) which mean otherwise protected areas may exceptionally have to be considered' .	
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OUR VILLAGE – OUR COMMUNITY.

Help shape its future.

Fwd: Plumpton Parish Council - Neighbourhood Plan

Anita Emery, Clerk to Plumpton Parish Council <anita.emery@plumptonpc.co.uk>

3 July 2017 at 14:20

To: Nick Beaumont <nick.beaumont@plumptonpc.co.uk>, Catherine Jackson <catherine.jackson@plumptonpc.co.uk>

Kind Regards,
Anita Emery

Parish Clerk
Plumpton Parish Council

Elm Cottage
Church Street
Hartfield
East Sussex. TN7 4AG

Tel: 07570 445501 (ansaphone)

www.plumptonpc.co.uk

“Our village Our community”

----- Forwarded message -----

From: **Dance, Lee** <Lee.Dance@southeastwater.co.uk>

Date: 21 June 2017 at 22:10

Subject: RE: Plumpton Parish Council - Neighbourhood Plan

To: "Anita Emery, Clerk to Plumpton Parish Council" <anita.emery@plumptonpc.co.uk>

Dear Anita Emery,

Thank for forwarding a copy of the Plumpton Parish Council Neighbourhood Plan.

I have read and have no further comments to make.

Many thanks

Lee

Lee Dance

Head of Water Resources
Water Resources

DDI 01634 87 3904 Mob 07976 820943

Lee.Dance@southeastwater.co.uk / www.southeastwater.co.uk



Lewes District Council

Planning Policy Team
Neighbourhood Planning
Southover House
Southover Road
Lewes BN7 1AB
01273 085402
www.lewes.gov.uk

31 July 2017

Anita Emery
Parish Clerk
Plumpton Parish Council
Elm Cottage
Church Street
Hartfield
East Sussex
TN7 4AG

Via Email Only

Dear Anita,

Draft Plumpton Neighbourhood Plan – Pre-submission Consultation and Publicity

Thank you for inviting us to comment on the Draft Neighbourhood Plan. This second pre-submission consultation is welcomed and the Parish Council should be proud of their effort to date.

The comments set out below are the view of officers at Lewes District Council and have been approved by the Lead Member for Planning. Comments from the planning policy team focusses on whether the draft neighbourhood plan meets the basic conditions and therefore is capable of progressing to the next stage and being successful at examination.

If you have any queries on the Council's comments, please contact:

Estelle Maisonnial

estelle.maisonnial@lewes.gov.uk

01273 085 402

Planning Policy

General comments

The Council fully supports the community's initiative to produce a Neighbourhood Development Plan. Neighbourhood planning aims to give people greater ownership of plans and policies that affect their areas. The government is clear that the intention of Neighbourhood Development Plans should be to set out policies on the development and use of land in a neighbourhood area.

The Parish Council should be congratulated for the time and effort they have put into producing a locally-distinctive neighbourhood plan, the policies of which will be very helpful to planning officers when determining future applications in the Parish. The Draft Plumpton Neighbourhood Plan (the Plan) includes a number of well-considered policies and allocates a number of residential sites and local green spaces that will ensure that the parish's most valued natural and built features are protected and that future development is in line with community aspirations.

Site Assessment Report and selection of residential site allocations

The Plan is supported by a robust and consistent Site Assessment Report. It assesses potential residential sites against a set of clearly identified criteria as requested by National Planning Practice Guidance and reflects a objective, as well as subjective, analysis of potential residential sites which factors in issues that are of importance to parish residents. The Site Assessment Report identifies the key site-specific issues and it is clear that a balanced and robust assessment process has taken place.

Sustainability Appraisal (incorporating the Strategic Environmental Assessment)

A Sustainability Appraisal (SA), incorporating a Strategic Environmental Assessment (SEA), has been prepared by the Parish Council with assistance from District Council officers. It is recognised that a great deal of effort has gone into preparing the SA, which the District Council believes is compliant with the relevant legal and statutory requirements at the national and European level.

Neighbourhood Plan Policies

The analysis of the draft policies are presented in a table. For ease of reference the policies have been colour coded to represent the following:

Green	The policy is considered acceptable against the criteria we have assessed it against.
Amber	Although the policy is generally considered acceptable, we do recommend certain changes in order to improve it, particularly when it comes to its usability by Development Management officers, Planning Committees, applicants, agents, consultees, etc.
Red	We advise against the inclusion of the policy in the NDP/the policy is not useable/the policy presents us with concerns in terms of meeting the basic conditions.
Blue	Although acceptable, the policy achieves little/repeats policy in higher-level documents

Policy	Regard to National Policy?	Does it undermine strategic policies?	Notes
1	Yes/No	No/Yes	<p>This policy intends to set a spatial plan and direct development in the Plan area. However, paragraph 2 is considered overly restrictive and at odds with other policies contained in the Plan (e.g. Policy 7, 8, 10 and 11), the Joint Core Strategy and retained 2003 Local Plan policies (e.g. Policy CT1) and the National Planning Policy Framework (e.g. paragraph 55). It could constrain future sustainable and necessary development of land beyond the planning boundary.</p> <p>It is suggested to amend the policy to the following: <i>Proposals for development outside the planning boundary will not be supported will be granted if they are consistent with the policies contained in the development plan and the NPPF.</i> POLICY AMENDED</p>

2	Yes/No	No	<p>The intention of this policy is supported.</p> <p>In light of the examiner's findings regarding proposed policies on street lighting in the report for the Ringmer Neighbourhood Plan and the Newick Neighbourhood Plan (copied below for ease of reference), we would recommend reviewing paragraph 3 to ensure it has regard to the NPPF.</p> <table border="1" data-bbox="768 376 2089 874"> <thead> <tr> <th data-bbox="768 376 987 408"></th> <th data-bbox="987 376 1469 408">Proposed policy on street lighting</th> <th data-bbox="1469 376 2089 408">Examiner's findings</th> </tr> </thead> <tbody> <tr> <td data-bbox="768 408 987 624"> <p>Ringmer Neighbourhood Plan</p> </td> <td data-bbox="987 408 1469 624"> <p><u>Policy 4.7</u> New development, especially new development in the countryside, should minimise additional light pollution, through careful design, location and inclusion of mitigation measures if necessary.</p> </td> <td data-bbox="1469 408 2089 624"> <p>This Policy seeks to minimise light pollution. It has regard to the Framework and is in general conformity with the Lewes Local Plan. Both these documents seek to protect local character. Policy 4.7 meets the basic conditions.</p> </td> </tr> <tr> <td data-bbox="768 624 987 874"> <p>Newick Neighbourhood Plan</p> </td> <td data-bbox="987 624 1469 874"> <p><u>Policy HO1.7</u> New housing developments shall not be equipped with street lighting.</p> </td> <td data-bbox="1469 624 2089 874"> <p>Policy HO1.7 does seek to prevent housing development being equipped with street lighting. No evidence is presented to demonstrate that such an approach would be safe or appropriate in all circumstances and consequently, HO1.7 fails to have regard to the Framework, which seeks to secure a good standard of amenity (para 17) and safe environments (para 58).</p> </td> </tr> </tbody> </table>		Proposed policy on street lighting	Examiner's findings	<p>Ringmer Neighbourhood Plan</p>	<p><u>Policy 4.7</u> New development, especially new development in the countryside, should minimise additional light pollution, through careful design, location and inclusion of mitigation measures if necessary.</p>	<p>This Policy seeks to minimise light pollution. It has regard to the Framework and is in general conformity with the Lewes Local Plan. Both these documents seek to protect local character. Policy 4.7 meets the basic conditions.</p>	<p>Newick Neighbourhood Plan</p>	<p><u>Policy HO1.7</u> New housing developments shall not be equipped with street lighting.</p>	<p>Policy HO1.7 does seek to prevent housing development being equipped with street lighting. No evidence is presented to demonstrate that such an approach would be safe or appropriate in all circumstances and consequently, HO1.7 fails to have regard to the Framework, which seeks to secure a good standard of amenity (para 17) and safe environments (para 58).</p>
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<p>Ringmer Neighbourhood Plan</p>	<p><u>Policy 4.7</u> New development, especially new development in the countryside, should minimise additional light pollution, through careful design, location and inclusion of mitigation measures if necessary.</p>	<p>This Policy seeks to minimise light pollution. It has regard to the Framework and is in general conformity with the Lewes Local Plan. Both these documents seek to protect local character. Policy 4.7 meets the basic conditions.</p>										
<p>Newick Neighbourhood Plan</p>	<p><u>Policy HO1.7</u> New housing developments shall not be equipped with street lighting.</p>	<p>Policy HO1.7 does seek to prevent housing development being equipped with street lighting. No evidence is presented to demonstrate that such an approach would be safe or appropriate in all circumstances and consequently, HO1.7 fails to have regard to the Framework, which seeks to secure a good standard of amenity (para 17) and safe environments (para 58).</p>										
3	Yes	No	<p>Paragraph 2 should distinguish between the pieces of infrastructure that will be delivered through the Community Infrastructure Levy (CIL) and other pieces of infrastructure required to make the development acceptable in planning terms.</p> <p>It is understood that this matter is important by the local community. However, a similar policy is included within the Joint Core Strategy (Policy CP7) and those proposing development would have to have regard to all relevant policies contained in the development plan, therefore it is considered that this policy is not necessary.</p> <p>Infrastructure that is not covered by CIL and the Regulation 123 list of infrastructure must pass the test of CIL Regulation 122. Where this test is met arrangements for the provision or improvement of infrastructure that is not intended to be wholly or partly funded by the CIL will be secured by means of planning obligations via legal agreement (section 106 agreement),</p>									

			<p>or by conditions attached to the planning consent or by any other appropriate mechanism.</p> <p>The CIL will be collected upon commencement of the development and its spending will be subject to a bidding process; items on the Regulations 123 list are likely to be prioritised through this process; however we cannot guarantee the timely delivery of certain pieces of infrastructure connected to individual development. POLICY 2 AMENDED</p>
4	Yes	No	This policy is supported.
5	Yes	No	<p>The intention of this policy aligns with national and local policy and is supported.</p> <p>It should be noted that some elements of criteria 1 may not be enforceable as landowners can remove trees and hedges without the need for a planning application where they are not otherwise protected through TPOs etc.</p>
6	Yes	No	<p>This policy is supported.</p> <p>The last paragraph repeats policy 3. Those proposing development would have to have regard to all relevant policies contained in the development plan, and it is therefore not considered necessary.</p>
7	Yes	No	<p>This policy is supported.</p> <p>We would recommend replacing the reference to the Lewes District Joint Core Strategy (policy 7 paragraph 5 and 10 and policy 7.1 to 7.5) and to the SDNPA policy/Development plan (policy 7 paragraph 10 and policy 7.1 to 7.5) with <i>the adopted development plan</i>. This is:</p> <ul style="list-style-type: none"> - to ensure that the Plan remains up-to-date as LDC and the SDNPA are both preparing development plan document that will become relevant to the area once adopted - because the SDNPA Development Plan will only apply to the area it plans for (i.e. the National Park) and none of the sites allocated for housing in the Plan are within the National Park. POLICY AMENDED <p>The title of the map referred to in the residential allocation policies seems to be missing.</p>
7.1	Yes	No	Subject to the comment made under policy 7, the allocation of this site is supported.
7.2	Yes	No	<p>Subject to the comment made under policy 7, the allocation of this site is supported.</p> <p>The site does have development constraints in particular risk of surface water flooding which</p>

			<p>is likely to limit the developable area of the site. Investigation into mitigation options may however reveal additional scope for development and therefore it is thought that the flexible nature of the policy should enable the delivery of an appropriate and viable development.</p> <p>It is suggested to amend the policy to the following: POLICY AMENDED <i>1. provide up to 12 x one- and two-bed units specifically designated for older people.</i></p>
7.3	Yes	No	Subject to the comment made under policy 7, the allocation of this site is supported.
7.4	Yes	No	Subject to the comment made under policy 7, the allocation of this site is supported.
7.5	Yes	No	<p>The allocation of this reserve site for residential development is supported. Residential development on this site would enable the upgrading of the racecourse necessary to secure its long term future. This policy therefore aligns with Core Policy 4 of the Joint Core Strategy in its support for tourism and the rural economy and with the desire of the local community to ensure the continuation of the Racecourse.</p> <p>At this stage, no acceptable solution for pedestrian access has been proposed in line with the Highways Authority's requirement. Until this issue is addressed, it is considered that a sustainable residential development on this site is not achievable and therefore not deliverable. POLICY REMOVED FROM PLAN</p>
8	Yes	No	<p>The intention of this policy is clear and supported. However, you must be aware that change of use can be carried out under Permitted Development legislation and so may not necessarily require a planning application, but this is clearly an important issue to the local community and so this preference for retaining retail and commercial premises in the village is supported.</p> <p>It is suggested to amend the policy to the following: POLICY AMENDED <i>New development proposals that result in the loss of an existing employment or business use will be resisted, unless it can be demonstrated that its continued use is no longer viable. Proposals to expand an existing employment or business use will be supported, provided they conform with all relevant policies in the PPNP contained in the development plan.</i></p>
9	Yes	No	The comment made for policy 8 applies.
10	Yes	No	<p>This policy is supported. POLICY AMENDED</p> <p><i>In accordance with SDNPA policy should be removed. There is no existing planning policy</i></p>

			relating to Plumpton College.
11	Yes	No	<p>This policy is supported.</p> <p>Suggested wording POLICY AMENDED <i>Any development at Plumpton Racecourse will maintain, and if possible enhance, the valued Ashurst Farm Meadow Site of Nature Conservation Interest (SNCI) and preserve the special qualities and setting of the views from the South Downs National Park.</i></p>
12	Yes	No	<p>This policy is supported.</p> <p>The intention of this policy is supported and in many respects aligns and builds upon national and local policy (Core Policy 7) by identifying the parish's valued community assets. You must be aware that many forms of change of use development can be carried out under Permitted Development legislation without the need for a planning application. However, again, this is clearly an important issue to the local community and so this clear preference for retaining the parish's community facilities is supported.</p> <p>Further to this, as mentioned in the supporting text, parish councils can nominate their most valued community assets for registration on an Assets of Community Value register which would remove PD rights for certain changes of use. Any planning applications would then be considered against this policy.</p> <p>It is suggested to amend the policy to the following: POLICY AMENDED The PPNP will support <i>Proposals to improve the viability and current community use of the buildings and facilities included on Map H will be supported.</i></p>
13	Yes	No	<p>Although supportive of maintaining a green gap north of the Plumpton Green planning boundary, further justification would be welcomed for LG6 and LG7 to demonstrate how these sites specifically meet the criteria in the NPPF in particular how they are special to the local community and hold a particular local significance. SEE REVISED POLICY 1</p> <p>The implications of the local green space designation is includes in the NPPF (paragraph 76) and therefore it is not thought that the last paragraph of the policy is needed.</p>



To assist decision makers, it is recommended that the map in the policy is given a title and a reference number (both in the policy and in the appendix).

Comments for Environment Team

Policy 2

Given concern about flooding expressed - could there be a clear link to ensuring that development is delivered at locations where there is minimal risk of flooding (from all sources) and would not increase risk of flooding down stream. In particular developers should be required to have regard to guidance documents such as East Sussex County Councils- Guide to Sustainable Drainage Systems in East Sussex and SuDS Decision Support Tool for Small Scale Developments - these can be found on the ESCC web-pages. The delivery of SuDS at locations in Plumpton will not only reduce flooding within the Parish but also down stream.

Policy 4

Unfortunately there is no mention of provision of parking and electric charging points and possibility of developing a Plumpton Green Car Club - reducing the need for a 2nd car perhaps?

Policy 6

See comments on policy 2 - could this be strengthened by specific reference to appropriate guidance documents?

Paragraph 5.24: history of farm pollution could be mentioned - most recently from Plumpton College

Paragraph 5.27: Development could enable the resolution of existing drainage issues in the parish.

Paragraph 5.32: Could there be references to the ESCC web-pages as discussed above

Map D:

Historic issues of surface water flooding in the North Barnes lane area due to current road layout and lack of drainage

The map does not include Plumpton College- this is large area of hard-standing - albeit within the SDNPA administrated area.

Policy 7.3

Paragraph 5.60: should it be mentioned that development may need to be limited to western side of site?

Policy 7.4

Paragraph 5.68: development of the site will require a phased land contamination assessment

Policy 7.5

Paragraph 5.73: development at this site may require site investigation if site brought forward as development and noise/vibration assessment - train and racecourse noise.

Paragraph 5.79: there will be a need to reduce risk downstream including railway line.

Community infrastructure projects

Paragraph 6.4 : the project could also suggest the potential for retrofitting flood alleviation schemes, such as water meadows and ponds along the streams flowing through the Parish as means of reducing the rate of flow downstream and so reduce risk of flooding both within the Parish, but also downstream of the Parish. Such Natural Flood Risk Management initiatives would tie in with ongoing projects to map the streams flowing into the Ouse being undertaken by Ouse and Adur River Trust and Sussex Flow Initiative at the bequest of LDC. We would be pleased to discuss further with the Parish Council.

Plumpton Parish Neighbourhood Plan 2017-2030
Pre-submission Plan Working Draft Consultation

EAST SUSSEX COUNTY COUNCIL RESPONSE –JULY 2017

Thank you for the opportunity to comment on the Plumpton Parish Neighbourhood Plan. The following are officer comments from East Sussex County Council (ESCC) which have been sub-divided into the respective disciplines for ease of reference. Where appropriate the specific section, policy or document within the consultation documents has been referred to.

If you have any queries on the County Council's comments please contact:

Strategic Economic Infrastructure Team
Communities, Economy & Transport
East Sussex County Council
01273 481397
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1. Transport Development Control (Highways)

- 1.1 The response provided below follows on from comments that were previously made by Transport Development Control (TDC) in June 2016 and is based on the limited information provided, along with the information and knowledge held by the TDC team.
- 1.2 As stated in our comments of June 2016, should planning applications be submitted for sites in Plumpton, it is likely that we will request further information to be provided that enables us to fully consider the highway implications of the proposals. In this regard, we would suggest that reference is made to the relevant pages of the County Council's website (see: <https://www.eastsussex.gov.uk/environment/planning/applications/developmentcontrol/tdc-planning-apps/>), which provide information on what matters we would wish to see addressed in any applications.

Newly proposed allocations: Glebe Land (Policy 7.3) & Land rear of Oakfield (Policy 7.4)

- 1.3 It is noted that the sites are within the village centre, close to amenities (school, shop, station etc.) so can maximise the opportunity for sustainable travel to and from the sites, although improvement to footway links and bus stops will be required.
- 1.4 The County Council's Transport Development Control team has recently provided pre-application advice/comments on these two sites for the prospective developers. The consultation was received from one agent acting for both developers so our comments covered both sites in one response.
- 1.5 The pre-application advice was as follows:
- The Highway Authority would prefer to see one access serving both sites.

- However, a separate access to each of the two sites may be possible provided they are far enough apart and an assessment is provided to ensure no conflict with other junctions.
- The NDP states that the sites should be separated by a landscape buffer - presumably in the case where separate vehicular accesses are provided, alongside the landscape buffer, there will be no non-car links between the two sites. While the Highway Authority would accept separate accesses subject to suitable access design, it is recommended that in order to provide the most direct and attractive routes for sustainable trips (walking and cycling trips to local facilities, bus stops and station), that footway and cycleway connections between the two sites and linking to Station Road should be provided. A landscape buffer incorporating pedestrian links could still achieve a suitable balance between landscaping and accessibility.
- Please note that if the shared access onto Station Road to the site is provided at Glebe Land that pedestrian access to Station Road from Land at Oakfield will be required.
- Such facilities will improve the sustainability of these sites.
- Any application(s) should be supported by a Transport Report and Safety Audit (for the access proposals). It is recommended that the need for highway improvements is made clear in the policy.

POLICIES AMENDED

Policy 7.1: Riddens Lane

- 1.6 In the May 2016 consultation this was a reserve site but is now a proposed allocation for 16 homes. As concluded in the previous comments, the allocation of this site is acceptable in principle in highway terms. It is noted that upgrading the construction of Riddens Lane and the introduction of traffic calming measures is included in the policy. Riddens Lane is currently a private road and any such works would need agreement with land owners rather than the Highway Authority.

NOTED

Policy 7.2: Wells Close ('Land at Strawlands'/Wells Close)

- 1.7 This site was proposed in the previous iteration of the Neighbourhood Plan as an allocation for 6 to 10 housing units. This has increased to a maximum of 12 one and two bed units specifically designated for older people. This site was previously considered acceptable in principle in highway terms and this small increase in units does not raise concern.

Policy 7.5: Land at Plumpton Racecourse

POLICY REMOVED

- 1.8 The Highway Authority has previously made comments on this site, in particular highlighting concerns over the ability to achieve safe vehicular and pedestrian access to the proposed development. At this point in time, these concerns remain and until it can be demonstrated otherwise, significant doubts remain as to whether the proposed vehicular access onto Plumpton Lane can be provided to the satisfaction of the Highway Authority (particularly in terms of ensuring that the required visibility splays are provided), as well as the pedestrian access into the site.
- 1.9 Although the policy refers to the need to satisfy the Highway Authority with regards to pedestrian access, we request that the policy is also explicit in the need to satisfy the Highway Authority when it comes to vehicular access to and from the site. Until such satisfaction has been provided it should be recognised that the deliverability of this reserve allocation should be in doubt.

Policy 4: Provision of adequate parking

- 1.10 In principle this policy is considered acceptable. However, the policy refers to 1 parking space per 1-2 bed unit being only applicable to older person units. The parking standard of 1 parking space should apply to any 1-2 bed unit and the policy should be amended as such.
- 1.11 It should be made clear in the policy that all parking provision will be in accordance with ESCC guidance, and not just visitor and cycle parking. **POLICY AMENDED**
- 1.12 It should be noted that the ESCC guidance not only covers an appropriate number of spaces but the size and location of spaces, and includes advice on garages and car ports.

2. Landscape

Policies 7.3 (The Glebe) and 7.4 (Land at Rear of Oakfield, Plumpton Green)

- 2.1 From a landscape perspective the inclusion of these policies is supported - as they are enclosed sites close to the built up area boundary. The existing well treed eastern boundary would make a defensible new edge to the village development. The well-defined field boundaries and trees within these sites should be retained as part of any development proposals (this is covered by the new Policy 5). The southern edge of the site covered by Policy 7.4 would need to be reinforced with tree planting – it is suggested that this is made a policy requirement. In landscape terms, these two sites are good replacement suggestions for the 3 sites which have now been omitted. All of those would have extended the village boundary outside the current footprint and they did not have clearly defensible boundaries with the countryside. **POLICY AMENDED**
- 2.2 As outlined above, the omission of sites 3, 5 and the one south of the railway (not shown on map E) is welcomed. The changes to the policies 7.1 and 7.2 are supported. The public footpath which crosses the northern part of site 6 Wells Close should be accommodated in a generous green corridor of at least 5 m wide, or as advised by ESCC Rights of Way Team. It is suggested that this is referred to in the policy. **NOTED**

Policy 4: Provision of Adequate Parking

- 2.3 Policy 4 is supported in landscape terms, in particular the reference to the need for parking to be appropriately located or screened to minimise landscape impact.

Policy 10: Plumpton College

- 2.4 Policy 10 is supported in landscape terms.

Local Green Space (LGS) Policy **NOTED AND AMENDED**

- 2.5 LGS: Various changes have been made which largely reflect previous landscape comments on these designations. It is noted that the original LGS1 is omitted and this is welcomed as the previous reason for designation was in relation to proposed development in this area.
- 2.6 The numbering of the remaining LGS has changed to reflect this. The original LGS 7 and 8 are now 6 and 7. These have both been extended to protect the extent of the gap between the

settlements which makes sense. LGS 5 has been reduced in area and this reflects my previous comments with regard to the local value of the fields and justification of the designation.

3. **County Ecologist**

POLICY AMENDED TO REFLECT IMPACT MITIGATION CONCERNS

Policy 7.3: Glebe Land

- 3.1 NPPF states that “*the planning system should contribute to and enhance the natural and local environment by... minimising impacts on biodiversity and providing net gains in biodiversity where possible...*” (paragraph 109). The NPPF also sets out principles that LPAs should seek to apply when determining planning applications in order to conserve and enhance biodiversity in and around developments, and refusing planning permission for developments that would result in the loss or deterioration of irreplaceable habitats, unless the need for, and the benefits of, the development in that location clearly outweigh the loss (paragraph 118).
- 3.2 The Glebe Land site is not designated for its nature conservation value but there are multiple records of protected and notable species in the local area, including bats (European Protected Species). There are known roosts nearby, and the habitat on and surrounding the site, most notably trees, hedgerows and ponds, are likely to provide foraging and commuting habitat as well as possible roosting habitat for bats, as well as potential habitat for other notable species.
- 3.3 Any development of the site (and indeed any of the proposed allocation sites) would need to be accompanied by an Ecological Impact Assessment (EclA) carried out in line with BS42020:2013 and best practice guidelines. Ecological impacts should be assessed, and recommendations for appropriate mitigation, compensation and enhancement made, following the mitigation hierarchy. The EclA should consider the existing nature conservation resource of the site, identify impacts and assess the need for avoidance, compensation and new benefits for biodiversity, including the need to create and/or strengthen connectivity between existing habitats. It is suggested that the policy and/or the supporting text refers to this.
- 3.4 The cumulative and in combination effects of the development with other local developments/plans/projects should be considered. Of particular relevance is Policy 7.4 which relates to the adjacent site. If impacts are identified that cannot be adequately mitigated or compensated, permission should be refused.
- 3.5 Potential impacts that will need consideration include, but are not limited to, habitat loss, fragmentation of habitats, isolation of populations, light and noise pollution, changes to hydrology and increased predation.
- 3.6 The proposed layout shows that hedgerows and treelines within and adjoining the site would be severed, which could have significant impacts on biodiversity. The layout also shows no open space within the site and no buffer between the development and boundary habitats. Whilst it is not possible to provide specific comments on the impacts of the proposed allocation on biodiversity, from the information available, it is considered likely that a development of this scale could have significant impacts.

Policy 7.4: Land rear of Oakfield

- 3.7 As for the adjacent site, the proposed allocation site is not designated for its nature conservation value but there are multiple records of protected and notable species in the local area, including bats (European Protected Species). There are known roosts nearby, and the habitat on and surrounding the site, most notably trees, hedgerows and ponds, are likely to provide foraging and commuting habitat as well as possible roosting habitat for bats, as well as potential habitat for other notable species.
- 3.8 Any proposed development should be accompanied by an EclA and if impacts identified cannot be adequately mitigated or compensated, permission should be refused. As with Policy 7.3, it is recommended that the policy and/or supporting text refers to the need for an appropriate EclA to be accompanied by any planning application on this site.

4. Archaeological Heritage

POLICY AMENDED TO REFLECT CONCERNS

Policy 7.3: Glebe Land and Policy 7.4: Land rear of Oakfield

- 4.1 The group of buildings comprising All Saint's church, The Rectory, Strollings and the site of the former Private Chapel (Episcopal) to the south could potentially be of heritage / archaeological significance. None of the above are presently listed, though arguably they could be, in particular Strollings which appears to be at least of early 18th century date, if not earlier and is a relatively rare surviving example in Plumpton Green of the farm houses adjacent to the main routeway.
- 4.2 Further assessment should be undertaken of the significance of the buildings (and in turn, their settings), which we would suggest is discussed with the Conservation Officer at Lewes District Council in the first instance. Any such assessment should further inform the proposed allocations of the Glebe Land and Land rear of Oakfield.
- 4.3 In addition, the two areas of land (Glebe land and rear of Oakfield) being proposed for development, would appear to be part of the former farm land of 'Upper Strollings Farm' and as such consideration should be given to the impact on the significance of the surviving farm house of any change to its setting through the loss of surviving farmland.
- 4.4 Neither site is presently within an Archaeological Notification Area and there are no immediate designated heritage assets with the exception of the Archaeological Notification Area immediately adjacent to the South West corner of the Oakfield proposed site. However, both sites may have below-ground archaeological interest, particularly towards the stream to the east. This potential archaeological interest would need to be evaluated through the use of geophysical survey and trial trenching. Ideally this should be undertaken before the proposed allocations are confirmed. If this is not the case, then such an evaluation would need to be undertaken in support of a planning application(s) on these sites – this should be made clear in the relevant policies. It should be recognised that there is a risk in not evaluating these sites before they are allocated, that in the event that significant below ground archaeological remains were found to exist, these might preclude development or put high costs on to any development in order to mitigate impacts through recording before loss.

5. **Flood Risk and Drainage** **NOTED**

- 5.1 East Sussex County Council is the Lead Local Flood Authority for the county and as such has responsibility for managing flood risk arising from surface water, ground water and ordinary watercourses. It is also a statutory consultee to the planning system on drainage and local flood risk matters insofar as they relate to development proposals.
- 5.2 Paragraph 3.10 of the Neighbourhood Plan provides a selective list of Joint Core Strategy policies that are considered as having an important part to play in shaping the parish. It is not clear why certain policies are not mentioned, such as Core Policy 7 (Infrastructure) and Core Policy 12 (Flood Risk, Coastal Erosion, Sustainable Drainage and Slope Stability). Within this context, we are minded to question what additional value Neighbourhood Plan policies 3 and 6 will bring, as they seem to just reiterate the aforementioned Joint Core Strategy policies and are not particularly locally distinctive. Hence, although the Neighbourhood Plan policies do not cause us any undue concern, we would question their value as an overall part of the development plan.
- 5.3 Neighbourhood Plan Policy 6 can be split into three parts: 1. The requirement for SuDS, 2. securing adequate sewerage capacity and 3. infrastructure provision. With regard to part 1 it should be recognised that the Lead Local Flood Authority is consulted on major planning applications (10 or more residential units) and provides a technical review of the adequacy of drainage proposals as part of a planning application. All the proposed sites in the NP cross this threshold and therefore we would be consulted on applications made in pursuant of the proposed allocations. Should the Parish Council wish to retain Neighbourhood Plan Policy 6, you may wish to add, in the supporting text, that the Lead Local Flood Authority has produced advice and guidance which is available on the ESCC website on the use of SuDS and that we would expect this to be utilised in designing the drainage proposals for the proposed housing allocations.

6. **Infrastructure** **NOTED**

Paragraphs 6.4 - 6.9: Infrastructure Projects

- 6.1 We would welcome the opportunity to work with and assist the Parish Council, alongside Lewes District Council, on the prioritisation and the identification of appropriate infrastructure schemes / projects that could be funded or partly funded using the Parish Council's 25% share of Community Infrastructure Levy (CIL) monies.

SDNPA response to Plumpton pre-submission Neighbourhood Development Plan

The comments set out below are South Downs National Park Officers views only under Delegated Powers.

All references to emerging South Downs Local Plan policies relate to the Preferred Options rather than any subsequent revision (unless specified). All text to be added is underlined, all deleted text is ~~struck through~~.

Ref	Comment	SDNPA Recommendation
General Comments	The parish council should be congratulated on producing a comprehensive and locally-distinctive neighbourhood plan. The plan is well-presented, well-written and clear. However we have made some suggestions in the table below to help refine policies further to ensure that they are more effective in meeting the aims and objectives of the Neighbourhood Plan; and respect the purposes and duties of the South Downs National Park Authority (SDNPA). We also have concerns regarding the allocation of the site at Plumpton Racecourse which will be seen in views, from and towards the SDNP, as an incongruous extension beyond the railway line, contrary to the established settlement pattern. Our comments on this particular site are outlined in more detail in the table below.	N/A
Green Infrastructure	We welcome the recurrent theme of Green Infrastructure throughout the document. However, there is a reliance on Core Policy 8 of the Lewes JCS to set out the GI policy requirements for the NDP. We suggest that more should be stated at an NDP level about GI in the Parish, and what are the key types of assets, where they are located, and how enhancements could be achieved.	Provide more specific details about GI in the parish, what enhancements could be provided and where and how this could be delivered. Comments noted
Chapter 3 – para 3.5 The Joint Core strategy (Local Plan part 1) (JCS)	A legal challenge was made by Wealden District to the Lewes Joint Core Strategy. The judicial review centred on the methodology for the Habitat Regulations Assessment (HRA). The High Court ruled that in-combination assessments of development plans with other plans and projects is required in relation to air quality impacts on SAC's. The neighbourhood plan group should seek advice from Lewes District Council with regard to this.	It is recommended that the Neighbourhood Planning Group seek advice from Lewes District Council with regards to the implications of the High Court ruling and how this might impact on the Plumpton Neighbourhood Plan. This issue will also need to be referenced in the Sustainability Appraisal. Actioned
Chapter 3 para 3.11 – The South	A significant part of the neighbourhood plan area lies within the SDNP. We welcome the mention of the importance of the National Park to the parish in the Neighbourhood Plan. However we consider, that the SDNPA's purposes	Include reference to the fact that nearly half of the parish lies within the SDNP as well as reference to the SDNPA's purposes and duties. As required by section 62 of the

Ref	Comment	SDNPA Recommendation
Downs Local Plan	and duty should be expressed on more occasions throughout the Neighbourhood Plan, including within this section. All bodies and organisations have a duty to have regard to National Park purposes when carrying out their functions.	Environment Act 1995, all relevant authorities or public bodies have a duty to have regard to the National Park purposes. Noted
Chapter 5 - Vision	We welcome the mention of the relationship of the village with the SDNP in the vision and to the provision of a more integrated access network with a desire to improve and extend the network and in particular links into the National Park. Delivering this could have a positive impact on young people's travel behaviour in particular as the consultation noted many young people are put off walking and cycling through the lack of safe facilities and by speeding traffic (pages 27/28).	
Chapter 5 - Objectives	<p>We consider that the protection of the special qualities of the South Downs National Park, which is a national designation, should be included in the objectives.</p> <p>We are surprised that there isn't a specific policy in relation to Objective 7 in para 5.2 p28. This would support the Local Green and Open Spaces policy 13.</p>	<p>Include protection of special qualities of National Park within Environment objectives and consideration of specific policy relating to protection and enhancement of rural lanes, footpaths, bridleways and cycle routes.</p> <p>Noted</p>
Policy 1: Spatial Plan for the Parish	We have some concerns that the last paragraph of this policy is overly prohibitive and will prevent sustainable rural development taking place. In some respects it is contrary to policies 10 and 11 of the NDP relating to Plumpton College and Plumpton Racecourse.	<p>Amend last paragraph to say: Amended</p> <p>New developments outside the planning boundary will not be supported. <u>will be permitted where they comply with the relevant policies contained in the development plan.</u></p>
Policy 2: New-build environment and design	<p>Our Design Officer has looked at this policy and suggests a number of revisions to the text to improve its effectiveness and clarity in delivering high quality, contextual design.</p> <p>In terms of street lighting and other forms of outdoor lighting, such as security lighting, you may wish to look at SD8: Dark Night Skies Policy and supporting text in the emerging South Downs Local Plan. The whole of the SDNP has been designated as an International Dark Sky Reserve. Given the proximity of Plumpton to the National Park, and that the settlement can be seen from the top of the scarp slope, it is important to ensure that development does not cause light pollution and harm the quality of dark night skies.</p>	<p>Amend text to say: Amended</p> <p>New developments, including alterations to existing buildings, will complement the architectural and historic character of the surrounding area. This will be achieved by reflecting the scale, density, massing, landscape design and material of the surrounding buildings (as set out in the published Design Statement) and by ensuring new developments:</p> <ol style="list-style-type: none"> 1. use high-quality building materials <u>and construction methods</u> reflecting the local vernacular finishes and landscaping that complement the surroundings; 2. are no more than two storeys in height, although this

Ref	Comment	SDNPA Recommendation
		<p>would not preclude the use of roof space;</p> <p>3. do not use street lighting, <u>and avoid other forms of external lighting</u>; to avoid prevent light pollution;</p> <p>4. in the areas within, and in the setting of, the South Downs National Park, avoid any detrimental impact on its landscape and natural beauty;</p> <p>5. where development sites are adjacent, maintain a clear separation between them by means of a green landscape buffer. Replace with: <u>Proposals for new woodland and hedgerows as 'landscape buffers' should be designed to be consistent with local landscape character in terms of species, scale and pattern and should be incorporated into the GI plans for the site;</u></p> <p>6. <u>provide locally appropriate and characteristic landscape features which deliver multiple benefits for people and wildlife (such as integrated SuDS, wildlife habitats/corridors, improved visual amenity and local greenspaces)</u></p>
Policy 3: Associated Infrastructure	There is no mention of Green Infrastructure or Community Infrastructure Levy (CIL) in this policy or supporting text. This section should distinguish between infrastructure that will be delivered through the (CIL) and infrastructure required to make the development acceptable in planning terms. It is suggested that this section is linked to the section in Chapter 6 on Community Infrastructure.	<p>Consider inclusion of the mention of green infrastructure and CIL and linking this to the section in the NDP on Community Infrastructure projects.</p> <p>Noted</p>
Policy 4: Provision of adequate parking	We suggest some revisions to the wording of this policy. The 'form' or type of new parking may need to be specified so as to avoid tandem and triple parking courts which will bring their own issues. Reference should also be made to appropriate landscaping of parking areas and cycle parking should be secure covered parking. In relation to bullet point 1 of this policy this statement needs to be re-worded. Car parking should always be located sensitively, in terms of minimising landscape and visual effects.	<p>Consider revisions to policy text relating to the form or type of parking required, appropriate landscaping and covered cycle parking.</p> <p>Noted</p>
Policy 5: Landscape and	We are supportive of this policy which seeks to protect landscape and biodiversity. Given that a significant part of the parish lies within the National Park, we suggest that this policy also refers to the conservation and	<p>Amend policy text to say: Amended</p> <p><u>Layout and landscape schemes of new development should be informed by the landscape character of the area, seek to</u></p>

Ref	Comment	SDNPA Recommendation
Biodiversity	<p>enhancement of the landscape of the South Downs, and its special qualities. New development should avoid causing harm to these qualities of the National Park, including through development in its setting.</p> <p>We also suggest a number of specific revisions to the policy to improve its effectiveness in help to conserve the special qualities of the South Downs.</p> <p>In terms of criteria 2 we do not think that ornamental planting is appropriate in in most rural planting schemes and the term ‘in harmony’ is very difficult to define. We recommend that reference to these terms is removed. In rural settlements we advise that all species are locally appropriate, native and of local provenance, otherwise schemes begin to appear urbanised.</p> <p>It is suggested that Policy 5 (landscape and biodiversity) & policy 6 (SUDS) should cross reference each other in terms of creating multi-functional landscapes.</p>	<p><u>achieve landscape and biodiversity enhancements and will have regard to the following principles:</u></p> <p><u>Where they are located within the South Downs National Park or its setting, they will conserve and enhance its special qualities:</u></p> <p>1. Trees and hedges make a valued contribution to the local landscape. Existing trees and hedges, including those that are not covered by relevant protection, should be retained and protected. Where this is not feasible, they should be replaced with native species of local provenance that reflect the <u>local landscape character</u>.</p> <p>Remove criteria 2</p> <p>3. We suggest the word natural is changed to characteristic landscape features instead;</p> <p>5. Developments must retain existing green corridors, ponds and other wildlife habitats and be landscaped to provide green corridors <u>to connect the scheme with the between open countryside and existing wildlife habitats and which incorporate new SUDS features (as set out in policy 6) and PROW/permissive paths where possible, to create a network of multi-functional landscapes.</u></p> <p>6. We suggest that landscape screening is replaced with <u>should provide appropriate and characteristic landscape features which mitigate landscape and visual effects.</u></p>
Policy 6: Sustainable drainage and wastewater management	<p>We consider that the word feasible in this policy is not a strong enough as sustainable drainage systems should be a standard requirement in new developments. Where SuDS are used they should be integrated with the landscape scheme in new developments and have a vegetative element, in order to be able to deliver other benefits such as amenity space, habitats etc.</p>	<p>Amend policy text to say: Amended</p> <p>These should be designed to manage the risk of flooding, groundwater flooding, flash flooding and surface water run-off over land, and the impact on the sewerage network <u>and naturalised in design terms wherever possible as part of a network of multi-functional landscapes.</u></p>
Policy 7: New housing	<p>We suggest that the NDP might wish to include more specific guidance on the design of new developments addressing issues such as contextual contemporary architecture v traditional approach. Guidance on appropriate boundary</p>	<p>Amend policy text to say: Amended</p> <p>New housing on sites allocated in the PPNP, and ideally also on any small windfall sites, will conform to the following:</p>

Ref	Comment	SDNPA Recommendation
	<p>treatments, external storage and the spaces between buildings should also be provided.</p> <p>In terms of criteria 7 'Landscape buffers and screening' we recommend that any mitigation measures must be landscape-led, characteristic and appropriate. They should deliver multiple benefits e.g. restoration of landscape character/SuDS/habitats etc. not just screening.</p>	<p>3. Housing will be sympathetic to the scale, topography and setting of the parish <u>and respond to its local context, character and traditional materials. Housing development schemes within the SDNP will take a landscape-led approach to the layout and design of the scheme</u></p> <p>6. Appropriate <u>sustainable</u> surface water drainage <u>such as SuDS</u> will be provided so there is no increased risk of flooding to properties downstream of any site;</p> <p>8. Proposals for new housing will be expected to be accompanied <u>by a landscape and visual impact assessment (LVIA) to inform location of access roads, layout and design as well as landscaping</u> and by a comprehensive assessment of the impact of the proposal on wildlife. All protected and wider species and their habitats will be accommodated, and any ancient hedges on a site will be preserved;</p> <p>9. <u>Opportunities for new footpaths/bridleways including connections to the existing PROW networks should be sought at the masterplanning stage as part of a green infrastructure network.</u></p>
Policy 7.3;The Glebe, Plumpton Green	This site is adjacent to Policy 7.4: Land rear of Oakfield and together they represent a large development. It is suggested that a detailed design brief is prepared for the two sites in order to ensure that a well-considered relationship between the two sites is achieved based on GI planning principles and a landscape led approach.	<p>Include additional criteria for sites Policy 7.3 and 7.4 that a detailed design brief is prepared to cover the relationship between the site, their design, landscaping and layout.</p> <p>Amended</p>
Policy 7.4 Land rear of Oakfield	Please see comments above relating to Policy 7.3: The Glebe.	Please refer to comments relating to Policy 7.3.
Policy 7.5: Land at Plumpton Racecourse	<p>We have concerns regarding the allocation of this site for residential development.</p> <p>We understand some of the reasoning behind its allocation, in that it is proposed as a form of 'enabling development' to deliver additional income to support the racecourse business. However, the SDNPA must give primacy to its</p>	<p>It is the recommendation of officers at the SDNPA that the site is removed from consideration as a potential site allocation for the Plumpton Neighbourhood Plan.</p> <p>It is suggested that as a way of supporting Plumpton Racecourse, Policy 11 is amended to propose a masterplan or</p>

Ref	Comment	SDNPA Recommendation
	<p>first purpose and duty. This is to conserve the natural beauty, wildlife and cultural heritage of the National Park’s landscape, including its setting. The racecourse site is very open and exposed and is also visible to the public from the trains and in views from Footpath 24 within the National Park Boundary, as well as at the top of the scarp slope.</p> <p>New housing development at this location would have the potential for significant visual impact on the setting of the National Park, particularly in views of the backdrop of the elevated Downs to the south, in views from the top of the scarp towards the village and from the footpath. The new housing would not be physically related to, and would be somewhat separated from, the long established settlement pattern of Plumpton village, which is located on the north side of the railway line. As a result, the development will be seen as a clear encroachment across into land that has a very different character to the main settlement of the village and would be contrary to the existing settlement pattern. It would bring development closer to the National Park in an area of mainly rural buildings and agricultural and other countryside uses. This, would impact on the transitional countryside land between the built up area of Plumpton up to the boundary of the National Park, detrimental to the setting of the South Downs National Park.</p> <p>In addition it would set a precedent for further expansion of additional residential development in this location. We recommend that any future development for housing should be restricted to land north of the railway line, within the planning boundary. We refer you to section 62 of the Environment Act 1995, where all relevant authorities or public bodies proposing development outside of the National Park, but which may impact the National Park, have a duty to have regard to the National Park purposes.</p> <p>It is suggested that Policy 11 provides scope for a much more holistic approach to future development at Plumpton Racecourse. This should be identified through a wider estate or masterplan for the site that proposes a landscape led approach to the consideration of the type, scale and location of any new development that is clearly justified to sustain the racecourse.</p>	<p>estate plan approach to the consideration of future development at the Racecourse, that is landscape led, in order to protect the rural setting of the village and the setting of the SDNP.</p> <p>Amended</p>
Policy 10:	We welcome this policy. Estates and farms across the National Park have an	Amend last paragraph of policy as follows:

Ref	Comment	SDNPA Recommendation
Plumpton College	<p>important role to play in the conservation of the landscape, the development of a sustainable rural economy and ecosystem services. The emerging SDNP Local Plan recognises the importance of estate and farm plans and offers a degree of flexibility in the consideration of development proposals. We suggest some minor changes to the policy as paragraph 3 of this is not technically correct. While the gap between the two areas to the east and west is important, there is no specific policy in the Local Plan that mentions this. In addition, being so categorical might prohibit an acceptable form of development coming forward as part of any masterplan that still allows the appreciation of this separation. We suggest instead the policy is worded to recognise the importance of this gap in understanding the historical evolution and origins of the site and how the appreciation of this should be retained as part of the masterplan/ estate plan for college.</p>	<p>In accordance with SDNPA policy, <u>The gap between the two areas to the east and west of the church is important in helping to understand the origins and historic development of the site. The masterplan or estate plan for this site should identify how the appreciation of this separation will be retained in any future development proposals. All Positive regard will be given to development proposals for the site that are in accordance with a masterplan/estate plan for the college that has support from the SDNPA.</u> should be submitted against a full estate plan for the college</p> <p>Amended</p>
Map H: Assets map	<p>The assets map could show the network of footpaths which is referred to in the list of assets on P60 but not actually mapped. However, ideally we think that the extensive access network merits separate mapping.</p>	<p>Annotate assets map to show network of footpaths.</p> <p>Amended</p>
Community Infrastructure Projects	<p>We are pleased that this section is included in the Plan and are particularly supportive of reference in 6.4 to: a cycle path network to connect the railway station and South Downs National Park; additional footpaths at the north and south of the parish to provide safer pedestrian access where there are no pavements; and a bridleway network at the north and south of the parish.</p> <p>In respect of para 6.4, work did start last year with the parish and SDNPA looking at a route from the bottom of the scarp slope through Plumpton College and ending at the Railway Station. This is a vital route that could make the college much more sustainable with students using the train rather than all being bused in. It would be great to setup a free cycle hire at the station and the college for the students or even the public to access the foot of the downs.</p> <p>We are also supportive of para 6.9 which will ensure new development links to the existing access network and that improvements are delivered, including links to local green spaces. This approach is welcomed. It is compatible with the SDNPA Cycling and Walking Strategy Objectives and in line with current government policy and plans.</p>	<p>Consider inclusion of the restoration of Novington Quarry/Sand Pit to provide a local green space/nature reserve/country park as a community infrastructure project.</p> <p>Added</p>

Ref	Comment	SDNPA Recommendation
	<p>While not specifically mentioned in the NDP, another potential infrastructure project could be achieved at Novington Quarry/Sand Pit. The main entrance and site office are within the parish of Plumpton, with the main quarry pit and lakes in the adjacent East Chiltington parish. The operator of the site has planning permission until 2026 for Sand abstraction which will start shortly. Following completion of the extraction works, Plumpton and East Chiltington parishes could work together to achieve the restoration and planting of the site to provide an incredible green space/local nature reserve for the community.</p>	
Policies Map page 64	<p>While the policies map shows Local Green Space and housing sites, the network of routes both existing and aspirational that will join these together is missing. The plan would be enhanced if it included a map of footpaths and cycle paths along these lines, in particular the proposed route between the South Downs, Plumpton College and the railway station. This would help to ensure that CIL gets spent on the infrastructure identified on page 62 and page 63. This approach is supported by government advice which recommends that local areas produce Cycling and Walking Infrastructure Plans (CWIP). ESCC is undertaking work on a district level with respect of this. Plumpton could consider a simplified version of such a plan to support their policies and implementation of CIL.</p>	<p>Annotate map to show to show all existing and aspirational access networks or provide a separate map of this.</p> <p>Amended</p>
Other		
SA/SEA	<p>As stated above, the Sustainability Appraisal may need to be updated to reference the High Court ruling relating to the methodology for the Habitat Regulations Assessment (HRA) in regard to in combination effects, and how this might impact on the Plumpton Neighbourhood Plan.</p>	<p>It is recommended that the Neighbourhood Planning Group seek advice from Lewes District Council with regards to whether there are any implications for the Plumpton Neighbourhood Plan in respect of the High Court ruling.</p> <p>Actioned</p>

Fwd: Plumpton Neighbourhood Plan Pre-Submission Working Draft - Comments from the Environment Agency

Anita Emery, Clerk to Plumpton Parish Council <anita.emery@plumptonpc.co.uk>

1 August 2017 at 18:34

To: Nick Beaumont <nick.beaumont@plumptonpc.co.uk>, Catherine Jackson <catherine.jackson@plumptonpc.co.uk>

Kind Regards,
Anita Emery

Parish Clerk
Plumpton Parish Council

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----- Forwarded message -----

From: **PlanningSSD** <PlanningSSD@environment-agency.gov.uk>

Date: 1 August 2017 at 11:40

Subject: Plumpton Neighbourhood Plan Pre-Submission Working Draft - Comments from the Environment Agency

To: "Anita Emery, Clerk to Plumpton Parish Council" <anita.emery@plumptonpc.co.uk>, "np@plumptonpc.co.uk" <np@plumptonpc.co.uk>

Dear Anita and NP Team,

Thank you for consulting the Environment Agency on the pre-submission version of your Neighbourhood Plan. We are a statutory consultee in the planning process providing advice to Local Authorities and developers on pre-application enquiries, planning applications, appeals and strategic plans. We aim to reduce flood risk, while protecting and enhancing the water environment. We have to focus our detailed engagement to those areas where the environmental risks are greatest.

Together with Natural England, English Heritage and Forestry Commission we have published joint advice on neighbourhood planning which sets out sources of environmental information and ideas on incorporating the environment into plans. This is available at:

http://webarchive.nationalarchives.gov.uk/20140328084622/http://cdn.environment-agency.gov.uk/LIT_6524_7da381.pdf

Our detailed comments are as follows:

As protected species are suspected to be present on some of the sites proposed for housing allocation, we suggest that Policy 5 is strengthened to ensure that development proposals should avoid significant harm to protected species and should seek to protect and enhance them.

Policy 7.1 Riddens Lane, Plumpton Green

We note that point 2. in this policy states that housing will be '**confined to the northernmost portion of the site to mitigate flood risk (Flood Zone 3) in the southern section**'.

Please note that for accuracy, the majority of the southern part of this site is located in Flood Zone 2 with a small proportion in Flood Zone 3.

We suggest that if the intention is to allocate the housing in the area of the site that is in Flood Zone 1 only, then the boundary for the housing allocation on Map E page 41 and on the Policies Map on page 64 are redrawn to reflect accurately where the housing will be allocated ie on the area of the site outside of Flood Zones 2 and 3.

We would have concerns if housing development is shown to be allocated on a map in Flood Zones 2 and 3 without the Sequential Test being undertaken (in accordance with the National Planning Policy Framework (NPPF) para 100-102). The Sequential Test should be informed by the Local Planning Authorities Strategic Flood Risk Assessment (SFRA). Your plan would also need to consider whether the flood risk issues associated with the site can be safely managed to ensure development can come forward.

If the housing allocation is shown on the maps in the Neighbourhood Plan to be within Flood Zone 1 only, then there is no need for evidence of the Sequential Test.

Amended re Flood Zone 2 consideration

Policy 7.2 Wells Close, Plumpton Green

-

We are pleased to see that this allocation is located within Flood Zone 1.

-

Section 5.48 states that the site was previously a coal yard. There is therefore the potential for contamination. Appropriate site investigation and remediation proposals will be required – we suggest that this should be added to the policy wording of Policy 7.2.

Amended

In addition, there is a historic landfill site adjacent to the northern boundary of the site. We suggest that you contact the local authority for further advice.

Noted

Policy 7.3, The Glebe, Plumpton Green

-

We are pleased to see that this allocation is within Flood Zone 1.

Policy 7.4 Land Rear of Oakfield, Plumpton Green

-

We are pleased to see that this allocation is within Flood Zone 1.

Policy 7.5 Land At Plumpton Racecourse

Section 5.73 refers to the site incorporating a 'large bund of industrial hard waste'. Please note that there is therefore the potential for contamination. Appropriate site investigation will be required. Remediation proposals may be required depending on the outcome of the site investigation. We suggest that this should be added to the policy wording of Policy 7.5.

n/a

Map E Page 41

Please note that we have **not** assessed the other 'available sites' shown on Map E as it is our understanding from the document that these sites are not being proposed for housing allocations in the plan (as they are not shown on the Policies Map page 64).

Surface Water Issues

We note that you state that many of the sites to be allocated for housing have surface water issues. Please note that you should consult the Lead Local Flood Authority with regard surface water flooding issues.

Wastewater Treatment

-

We note that Policy 6 Page 36 refers to ensuring that there is adequate sewerage capacity. We would expect that the housing allocation sites should be connected to the **mains** foul sewer. We suggest that the wording in this policy and in Policies 7.1-7.5 should make this clear.

Noted

We hope you find these comments useful.

Best Wishes

Marguerite

Marguerite Oxley|Technical Specialist|Sustainable Places|Solent and South Downs Area|

Environment Planning and Engagement|Environment Agency|Guildbourne House|Chatsworth Road|
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Tel external: 02030257171|Tel internal: 57171|Mobile:- 07733077926|

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Historic England

Anita Emery
Clerk to Plumpton Parish Council

Plumpton PCNP <np@plumptonpc.co.uk>
by email only

Our ref: 2017.07.31
Your ref: Plumpton NP
Pre-
submission
RLS
Comments
01483 252028

Telephone
Fax

31st July 2017

To whom it may concern:

Plumpton Neighbourhood Plan Pre-submission version

Thank you for consulting Historic England on the pre-submission version of the Plumpton Neighbourhood Plan. Historic England are the government's advisors on planning for the historic environment including the conservation of heritage assets and championing good design in historic locations. As such we have focused our comments on those areas of relevance to us.

Policy 7.1 Riddens Lane, Plumpton Green

Noted and actioned with developer

The site assessment identifies that the site is located within an archaeological notification area – an area that either has known archaeological heritage assets of with a high potential for the presence of previously unidentified heritage assets. It isn't clear from the site assessment how any potential harm to the significance of these heritage assets that might result from the proposed development has been taken into account in allocating the site, or what measures have been taken to minimise or avoid any harm. The supporting text to the policy suggests that recent investigations have provided up to date evidence on the presence of archaeological remains. The NPPF states that a purpose of all planning should be to conserve heritage assets in a manner appropriate to their significance. To consider that the plan promotes sustainable development we need to see more information both on what the archaeological remains that could be affected by this development are and how the need to conserve them in a manner appropriate to their significance has been taken into account in the choice of sites for development.

The NPPF also requires councils to ensure that applicants present evidence of the significance of any heritage assets that could be affected by development and the nature of the impacts that would result. We agree with the statement at 5.41 of the plan that further research should be expected before a decision on a planning application could be made, this is required to reduce or mitigate potential harm to

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these heritage assets. However, in our advice note on site allocations (HEAN3) we point out that the most appropriate place to identify any mitigation measures considered necessary to justify the allocation of a site is within the policy itself to ensure they are implemented. If, having reviewed the archaeological evidence and the potential harm to any heritage assets that may be present, the steering group still feel this site is appropriate for development we would recommend including a clearly worded requirement for archaeological investigation to be undertaken to inform the design of any proposal. This will be important in avoiding or minimising harm and ensure any remains of national importance are preserved ‘in-situ’.

The recently ‘made’ Haywards Heath Neighbourhood Plan Policy H2 provides a useful model for such a policy requirement, which has been tested through examination:

“Be informed by archaeological investigation undertaken according to a written scheme of investigation agreed in writing with the District Council’s archaeological advisor and will seek to retain archaeological remains, and particularly those of national importance, in-situ. Where it is felt that the merits of development justify the loss of archaeological remains that are identified as present a suitable programme of recording and publication of those remains will be required.”

Given the known potential impact of development of this site in particular this element is justified in addition to the more general requirement for archaeological desk-based assessment set out in Policy 7.

Policy 7.3 The Glebe.

Noted and policy amended

We note the concern expressed at 5.57 that development of this site should not result in the demolition of the Rectory, as well as the requirement to include a landscape buffer between new housing and the existing residential properties. We have been approached by a member of the public who is keen to ensure that the historic interest of the grouping of the church, rectory and earlier Strollings House and the contribution these buildings and their historic and architectural interest make to the character and sense of place of the village centre is sustained. We have also received applications for the listing of each of these buildings. We will consider how to take these applications forward in due course and subject to our priorities and resources.

Notwithstanding their eligibility or otherwise for national designation it appears that each of these buildings has a historic, architectural or artistic interest that merits consideration in planning – as suggested by the desire to prevent harm to the rectory and church buildings in particular. This suggests that they should be considered as non-designated heritage assets within the government’s definition set out in annex 2 of the NPPF.

Have the steering group given consideration to the potential for these buildings to be classed as heritage assets? If so, has their significance been taken into consideration



in assessing the suitability of this site for development, particularly where it might create pressure for the demolition (total loss) of one of them? Or harmful impacts to the setting of all three. Clearly identifying those features of the site and its surroundings that the community agree are non-designated heritage assets and requiring proposals seek to conserve them or positive features of their settings (as appropriate) within the allocation policy, provides a robust approach to conserving their value and would be considered an important element of the sustainable development of this site. To this end it may also be worth considering whether any part of the Rectory garden should be more clearly excluded from the allocation to provide the 'buffer' that is considered desirable to protect the amenity and (in our view) historic setting of the adjacent properties.

The site has limited potential for access that would not affect the setting of the Rectory. We would like to recommend the steering group give further consideration to how the access to the site can be achieved and how any harm to the setting of heritage assets could be minimised or avoided to ensure that proposals will constitute sustainable development. One option would be to require that development proposals clearly set out how measures to sustain and, where practical, enhance the setting of heritage assets has informed the design of access arrangement, although how the community expect this to be achieved might be set out through clearer design guidance.

Policy 7.4 Land at Rear of Oakfield

Noted, actioned with developer and amended

We note that the site lies adjacent to an Archaeological Notification Area that does not appear to have been considered in the site assessment document. Whilst ANAs may represent a well-defined area of archaeological interest, in many cases it is possible that related remains may be found in the surrounding area. Without knowing for what reason the area has been identified as an ANA it is difficult to make a judgement about whether allocation of this site could have potential harmful impacts to archaeological remains. We would expect this to be explored in the Site Assessment Document, as well as the SEA.

We recognise that Policy 7 provides some requirement to explore the archaeological potential of the site. However, to ensure that any development proposal is guided to include consideration for potential archaeological impacts we recommend that the proximity of the archaeological notification area to the site is noted in the supporting text and a requirement for proposals to be informed by archaeological investigation secured within policy 7 if necessary. Yours faithfully

We hope these comments are of assistance to the neighbourhood plan steering group. Nevertheless, please don't hesitate to contact me if there are any queries that arise from them or if you would like any further information.

Yours sincerely



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Fwd: (NE ref - 218452) Plumpton Parish Council - Pre-Submission Neighbourhood Plan (Lewes DC)

Plumpton PCNP <np@plumptonpc.co.uk>

31 July 2017 at 18:50

To: Nick Beaumont <nick.beaumont@plumptonpc.co.uk>, Catherine Jackson <catherine.jackson@plumptonpc.co.uk>

----- Forwarded message -----

From: **Plan Cons Area Team (Sussex and Kent) (NE)** <PlanConsAreaTeamSussexandKent@defra.gsi.gov.uk>

Date: 27 July 2017 at 18:50

Subject: (NE ref - 218452) Plumpton Parish Council - Pre-Submission Neighbourhood Plan (Lewes DC)

To: "np@plumptonpc.co.uk" <np@plumptonpc.co.uk>

anita.emery@plumptonpc.co.uk**218452) Plumpton Parish Council - Neighbourhood Plan (Lewes DC)****Noted and actioned with LDC**

Dear Sir/Madam,

Thank you for consulting Natural England on your Pre-Submission Neighbourhood Plan.

General comments**Habitats Regulations Assessment –Air Quality**

Wealden judgment (CO/3943/2016 Wealden District Council v Secretary Of State For Communities and Local Government <http://www.bailii.org/ew/cases/EWHC/Admin/2017/351.html>

As you are aware, Lewes District Council, South Downs National Park Authority and CLG were the subject of a Judicial Review by Wealden District Council on how air quality was assessed within the Habitats Regulations Assessment of the Local Plan. The Planning Policy department of the South Downs National Park is fully aware of the potential issues that have arisen from Justice Jay's ruling on this so Natural England recommend that you discuss this issue with the planning Policy Department of the SDNPA to ensure that the Neighbourhood Plan is compliant with SDNPA's overall approach.

This judgment has implications for the screening of air quality impacts on European Sites under the Habitats Regulations, and therefore for the Plumpton Neighbourhood Plan

Background

The judgment clarifies a limitation on the use of guideline thresholds in ruling out the likelihood of significant effects either alone or in combination with other plans or projects as part of a Habitats Regulations Assessment (HRA) of Development Plans. Specifically, the use of the 1000 average annual daily traffic (AADT) proxy for changes requiring further assessment outlined in Highways England's Design Manual for Roads and Bridges was covered.

The Judgment found that the use of 1000 AADT and equivalent 1% of critical level/load guidelines as the sole means of catering for in-combination effects lacks coherence, particularly where other figures are known which, when added together, would cause that threshold to be exceeded.

From that, the Court concluded that where the likely effect of an individual plan or project does not itself exceed the threshold of 1000 AADT (or 1%), its effect must still be considered alongside the similar effects of other live plans and projects to check whether their added or combined effect on a site could be significant.

The threshold itself was not criticised. The fault was found in the use of the threshold to rule out the likelihood of significant effect both alone and in combination, without looking any further.

Implications for Plumpton Neighbourhood Plan

For both the screening (for likely significant effects) and appropriate assessment stages of an HRA, the likely effects of a plan or project need to be considered individually and in combination with other relevant plans or projects. This is a legal requirement of the Habitats Regulations 2010 (as amended) which aims to ensure that European sites are not inadvertently damaged by the additive effects of multiple plans or projects.

If there are issues I have not covered, please let me know and I will respond as quickly as possible. If discussion would be helpful, please give me a call.

If you wish to comment on the service provided by Natural England, please use the appended form.

Yours sincerely,

Rebecca Bishop MRTPI

Adviser

Sustainable Development

Sussex & Kent Team

Natural England

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Kind Regards,
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Department for Environment, Food and Rural Affairs (Defra)

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Plumpton Pre-Submission NP Consultation Feedback Form.pdf

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Fwd: Plumpton Neighbourhood Plan Consultation Deadline

Anita Emery, Clerk to Plumpton Parish Council <anita.emery@plumptonpc.co.uk>

31 July 2017 at 18:41

To: Nick Beaumont <nick.beaumont@plumptonpc.co.uk>, Catherine Jackson <catherine.jackson@plumptonpc.co.uk>

Kind Regards,
Anita Emery

Parish Clerk
Plumpton Parish Council

Elm Cottage
Church Street
Hartfield
East Sussex. TN7 4AG

Tel: 07570 445501 (ansaphone)

www.plumptonpc.co.uk

“Our village Our community”

----- Forwarded message -----

From: **Liz Bennett** <streat.pm@btinternet.com>

Date: 31 July 2017 at 12:52

Subject: Re: Plumpton Neighbourhood Plan Consultation Deadline

To: "anita.emery@plumptonpc.co.uk" <anita.emery@plumptonpc.co.uk>

Noted.

Dear Anita,

Streat has one observation on the plan that it wished to draw your attention to, regarding Policy 10. Any development proposed to the west of Wales Farm would impact on the "protected views" referred to in the Ditchling, Streat and Westmeston Neighbourhood Plan.

Kind regards,

Liz Bennett
Clerk and RFO
Streat Parish Meeting
01444 483018

On Wednesday, July 26, 2017 8:18 PM, Plumpton PCNP <np@plumptonpc.co.uk> wrote:

Dear Sir/Madam

I am writing to remind you that if you wish to respond to the above consultation, the deadline is 31st July 2017.

If you do not wish to reply formally, I would appreciate a no comment email if at all possible.

Yours faithfully

Anita Emery
Clerk to Plumpton Parish Council

Fwd: Plumpton Neighbourhood Plan Consultation Deadline

Anita Emery, Clerk to Plumpton Parish Council <anita.emery@plumptonpc.co.uk>

1 August 2017 at 18:35

To: Nick Beaumont <nick.beaumont@plumptonpc.co.uk>, Catherine Jackson <catherine.jackson@plumptonpc.co.uk>

Kind Regards,
Anita Emery

Parish Clerk
Plumpton Parish Council

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Church Street
Hartfield
East Sussex. TN7 4AG

Tel: 07570 445501 (ansaphone)

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“Our village Our community”

----- Forwarded message -----

From: **Liz Bennett** <streat.pm@btinternet.com>

Date: 1 August 2017 at 10:29

Subject: Re: Plumpton Neighbourhood Plan Consultation Deadline

To: Clerk To Plumpton Parish Council Anita Emery <anita.emery@plumptonpc.co.uk>

Dear Anita,

Further to my email of yesterday, our Chairman has suggested that you add the following phrase to Policy 10 "taking into account the provisions of the Neighbourhood Development Plans of adjoining parishes"

Regards,

Liz Bennett
Clerk and RFO
Streat Parish Meeting
01444 483018

On Monday, July 31, 2017 12:52 PM, Liz Bennett <streat.pm@btinternet.com> wrote:

Dear Anita,

Streat has one observation on the plan that it wished to draw your attention to, regarding Policy 10. Any development proposed to the west of Wales Farm would impact on the "protected views" referred to in the Ditchling, Streat and Westmeston Neighbourhood Plan.

Kind regards,

Liz Bennett
Clerk and RFO
Streat Parish Meeting
01444 483018

Fwd: Plumpton Neighbourhood Plan Consultation Deadline

Plumpton PCNP <np@plumptonpc.co.uk>

31 July 2017 at 18:41

To: Nick Beaumont <nick.beaumont@plumptonpc.co.uk>, Catherine Jackson <catherine.jackson@plumptonpc.co.uk>

----- Forwarded message -----

From: **ECPC Clerk** <clerk@eastchiltington.net>

Date: 31 July 2017 at 11:43

Subject: Re: Plumpton Neighbourhood Plan Consultation Deadline

To: Plumpton PCNP <np@plumptonpc.co.uk>

Hi Anita,

I'm sorry to say only 3 got back to me about it and they had no comment, which makes it quorate so I think it has to be 'no comment' from East Chiltington parish council.

From the clerk though, I'd like to say well done to everyone who put it together. I am clerk to Hamsey as well and spent 3 years getting that plan sorted. I think Plumpton has done a really good job.

Kind regards

Jenni Toomey

Clerk to ECPC

On 26-Jul-17 8:18 PM, Plumpton PCNP wrote:

Dear Sir/Madam

I am writing to remind you that if you wish to respond to the above consultation, the deadline is 31st July 2017.

If you do not wish to reply formally, I would appreciate a no comment email if at all possible.

Yours faithfully

Anita Emery

Clerk to Plumpton Parish Council

anita.emery@plumptonpc.co.uk



Plumpton Parish Neighbourhood Plan

Regulation 14 consultation

June/July 2017

Developer/agents' responses

Plumpton Parish Council

**Plumpton Neighbourhood
Development Plan Revised Pre
Submission Document - Regulation
14 Consultation**

Representations submitted on behalf of:

Cala Homes (South Home Counties) Ltd

July 2017



1.0 INTRODUCTION AND SCOPE OF REPRESENTATIONS

A Introduction

- 1.1 These representations on the Plumpton Pre Submission Neighbourhood Plan have been prepared on behalf of Cala Homes (South Home Counties) Ltd. The company has a controlling interest in 1.5ha of land to the rear of Oakfield which has been identified as a deliverable and developable site in the Lewes District Strategic Housing Land Availability Assessment (SHLAA). It is now included as a potential housing allocation for 20 dwellings in the revised Pre Submission (June 2017) Plumpton Neighbourhood Plan Policy 7.4 and Cala Homes support the allocation.

B Scope of Representations

- 1.2 Cala Homes submitted representations to the last Pre Submission Neighbourhood Plan in June 2016. The representations objected to the Plan because its proposed residential allocations had been informed by a flawed Site Assessment and Sustainability Appraisal (SA). It was pointed out that the inconsistencies in the way the sites were appraised led to the selection of the wrong sites and land at Oakfield being overlooked as a proposed housing site altogether.
- 1.3 Cala Homes is therefore pleased that the content of the SA and the Site Assessment after correction, has led to the identification of land to the rear of Oakfield as a preferred residential allocation for 20 dwellings after all. Accordingly **Cala Homes supports the residential allocation in policy 7.4.**
- 1.4 The Plan now appears to meet the basic conditions for Neighbourhood Plan preparation and Cala Homes support it.

2.0 POLICY CONSIDERATIONS FOR THE DRAFT NEIGHBOURHOOD PLAN

A The Basic Conditions

2.1 The Localism Act 2011 inserts provisions into the Town and Country Planning Act 1990 (“the Act”) in relation to neighbourhood development orders and into the Planning and Compulsory Purchase Act 2004 in relation to neighbourhood development plans. Paragraph 8(2) of Schedule 4B of the 1990 Act sets out the basic conditions a Neighbourhood Plan must meet and which an examiner must consider before it can go to referendum. The statutory test is:

- Having regard to national policies and advice, whether it is appropriate for the Neighbourhood Plan to be made
- Having special regard to the desirability of preserving any listed building or its setting or the character or appearance of any Conservation Area
- Contribute to the achievement of sustainable development
- Be in general conformity with the strategic policies of the development plan for the area
- Be compatible with the European Union (EU) and European convention on human rights (ECHR) obligations

National Planning Policy Framework

2.2 The National Planning Policy Framework (NPPF) (paragraph 14) defines sustainable development. For plan making it states that this means meeting the objectively assessed needs of an area with sufficient flexibility to adapt to rapid change unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits.

2.3 Paragraph 110 -111 advises that in preparing Plans to meet development needs the aim should be to allocate land with the least environmental or amenity value and policies should encourage the effective use of land by reusing previously developed land.

2.4 Neighbourhood Plans must be in general conformity with the strategic policies of the Local Plan and should not promote less development than set out in the Local Plan or undermine its strategic priorities.

Planning Practice Guidance

2.5 The on line Planning Practice Guidance (PPG) provides further guidance on Neighbourhood Plan making. It confirms that a Plan can allocate sites for development and an appraisal of options and

an assessment of individual sites against clearly identified criteria should be carried out including consideration of how sites can contribute towards sustainable development.

- 2.6 The PPG therefore advises that the preparation of a Sustainability Appraisal may be useful in demonstrating how a Plan can achieve sustainable development. Where a Plan is expected to have significant environmental effects a Strategic Environmental Assessment (SEA) may also be required. Paragraph 46 (id:11-046-20150209) states that this may arise where a Plan allocates sites for development or the Neighbourhood Plan area contains sensitive natural or heritage assets that might be affected by the proposals in the Plan.
- 2.7 The SEA process is explained in the PPG (paragraph 38 id: 11-038-20150209) and it requires proposals in a Neighbourhood Plan to be considered against reasonable alternatives to assess the likely significant effects of the available options. The PPG says it should outline the reasons the alternatives were selected, the reasons the rejected options were not taken forward and the reasons for selecting the preferred approach in light of the alternatives including those selected as the preferred approach in the Neighbourhood Plan.

The Adopted Lewes District Local Plan

- 2.8 The Plumpton Neighbourhood Plan is required to be in general conformity with the strategic policies of the Local Plan and should not promote less development than set out in the Local Plan or undermine its strategic priorities.
- 2.9 In this regard the Lewes Local Plan was recently adopted in May 2016. The Plan provides for a minimum of 6,900 net additional dwellings District wide in the period 2010-2030 with some sites being allocated in the Council's Site Allocations Document and in Neighbourhood Plans.
- 2.10 Policy 2 deals with the distribution of housing and a minimum of 50 dwellings are identified as planned housing growth at Plumpton Green and a further 200 dwellings in as yet undetermined locations. Policy 2 and its lower case policy text in paragraph 6.37 states that Neighbourhood Plans could be used to identify sites to meet the extra 200 dwellings in the as yet unnamed locations and if Plumpton is selected then it can be expected to find significantly more than the minimum 50 dwellings.

Summary

- 2.11 For the Plumpton Neighbourhood Plan to be considered properly prepared and proceed to referendum, the following considerations will therefore apply:
- **That all the basic conditions for Neighbourhood Plans have been satisfied;**

- **This includes proper consideration of the selected sites against reasonable alternatives to assess whether it can deliver sustainable development in accordance with national policy;**
- **And the Plan is in general conformity with the strategic policies of the Lewes Local Plan**

3.0 THE PLUMPTON SITE ASSESSMENT AND SUSTAINABILITY APPRAISAL

3.1 The revised Pre Submission Plan 2017 version at paragraphs 4.37-4.42 explains why the original 2016 Pre Submission Plan was withdrawn and the residential development sites reconsidered again principle. In assessing the site options for development in the Plumpton Neighbourhood Plan the Parish has revised its Site Assessment Report and its Sustainability Appraisal incorporating a Strategic Environmental Assessment.

The Site Assessment Report

3.2 The revised Site Assessment Report has informed the inclusion of development sites in the 2017 Neighbourhood Plan and is therefore a highly relevant part of the evidence base for the Plan.

3.3 **Site 8 – Land to the rear of Oakfield** was reconsidered by the Neighbourhood Plan Steering Committee and the Site Assessment pro forma states:

‘The site assesses poorly against environmental objectives, due to presence of protected species, trees and hedges on the site, and its partial visibility from the Downs.

Mitigation measures would be needed to manage surface water flood issues on the site and to protect species and habitats.

Its proximity to Site 7 means that careful planning will be needed to manage the density of development, in association with Site 7. The two developments should not be built to their respective boundaries and should preserve a green landscape buffer between them, incorporating any existing boundary hedgerows.

The site’s development would mean the loss of the garage business. However, the garage is understood to be on a short-term lease.

However, the site is recommended for inclusion in the Neighbourhood Plan, subject to necessary mitigation of these adverse impacts, as it scores well on sustainability, due to its proximity to the village centre’.

3.4 We agree that the site has absolute geographical advantages being centrally located within the village close to the village hall and other facilities. We disagree however that it assesses poorly in terms of biodiversity. For instance, a phase 1 habitat survey has already been carried out on the site and concluded there are no ecological impacts that cannot be adequately mitigated and should not therefore preclude its residential development. It found:

- The loss of the semi-improved grassland on the site to development does not represent a loss of an important habitat.
- Key mitigation measures related to bats can be undertaken including the provision of bat boxes and a lighting strategy carried out to limit light spill;
- Reptile habitat focused on the site fringe can be enhanced and not lost as a result of development;
- A badger Settle on adjoining land can be protected during construction; additional planting and the provision of bird boxes can be provided for the bird population.

3.5 Surface water can be adequately mitigated. The density of 20 dwellings on a site of 1.5ha is equivalent to just 13dph and there is more than enough space to provide a landscape buffer with the adjoining site 7 to the north. In short, taking all these factors into account, our view is the site actually performs better than the Site Assessment findings indicate.

The Sustainability Appraisal and Strategic Environmental Assessment

3.6 The revised Sustainability Appraisal (incorporating SEA) has reconsidered the overall housing distribution and the site options themselves. The housing distribution options are:

- Option 1 - Expanding the centre of Plumpton Green
- Option 2 – Expanding to the north and south of Plumpton Green
- Option 3 – A combination of small-scale pockets of development within Plumpton Green

3.7 It concluded that a combination of Option 1 and 3 best met the objectives and Vision for the future of Plumpton. It would mean most of the sites would be within the central area of the village, which is more sustainable as it would reduce car use within the village and give better pedestrian access to village facilities and services. Small-scale pockets would spread the development across the village, avoiding a concentration of new-build housing and mitigating impact on the village’s rural character.

3.8 The SA also considered the 11 residential site options. In the event, bearing in mind the distribution preferences for a combination of Option 1 and 3 and the merits of the sites themselves it recommended the following for allocation in the Plumpton Neighbourhood Plan:

- Site 1 – Riddens Lane (16 units);
- Site 6 – Wells Close (12 units);
- Site 7 – The Glebe (20 units);
- Site 8 – Land rear of Oakfield (20 units); and
- Site 11 – Racecourse land as a reserve (19 units).

- 3.9 **Site 8 – Land to the rear of Oakfield** scored well against the social objectives, due to its central position, within walking distance of village facilities. Existing surface water flood risk, potential biodiversity and landscape impacts including the site’s visibility from the Downs were concerns. It stated that ‘development would need to be clearly separated from the contiguous (allocated Site 7) reflecting the parish preference for small scale pockets of housing’.
- 3.10 We would comment that consultants acting for Cala Homes have already demonstrated that landscape and biodiversity impacts and concerns about flood risk can all be mitigated. Cala Homes can deliver a scheme that meets the above considerations. It has already provided a draft layout Plan to the consultation events for the revised Neighbourhood Plan. It will consider further revisions that maintains individual site character with Site 7 prior to the submission of a planning application.
- 3.11 The Policy 7.4 Neighbourhood Plan allocation for land to the rear of Oakfield already proposes wording that alludes to the green landscape buffer with site 7. However to strengthen this objective and to reflect the likely phasing of the 2 sites separately given the differences in ownership we propose the following minor amendments:

Policy 7.4: Land to the rear of Oakfield, Plumpton Green

The land, as shown on Policy Map E amounting to 1.5ha, is allocated for residential development of around 20 dwellings, with open space and a new access from Station Road.

In addition to conforming to the policies contained in the PPNP, LDC District Local Plan, SDNPA Development Plan and all other applicable statutory requirements, development in this location will:

- 1. Be designed to include landscape buffers and open space with a layout that can secure the separation with the site allocated for residential development in Policy 7.3;**
- 2. Be designed to avoid proximity of houses to existing properties along Station Road.**
- 3. Subject to the above no phasing restrictions shall apply and the sites can come forward independently of each other.**

PLUMPTON PARISH DRAFT NEIGHBOURHOOD PLAN RESPONSE FORM

Thank you for taking the time to feedback on the draft Neighbourhood Plan.

Some guidance notes to help you complete it in a way that will assist the Steering Group in finalising the document:

- While the final referendum will only be open to registered voters, at this stage the Steering Group are keen to get the widest range of input. To achieve that, this form is available to all individuals (i.e. not simply one per household), regardless of age, but only one form per individual will be accepted.
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- If you choose to feedback, then please complete Part A and Part B – while this exercise is primarily qualitative in that it seeks your views, it is also useful to take the opportunity to gauge the overall support for the draft plan.
- Part C is optional, but must be completed if you have indicated in Part B that there are specific policies you do not support – the Steering Group need to know **why** a policy is not supported in order to consider any amendments to it.
- It would assist the Steering Group in collating responses if you would use the electronic version of the form, available from the Neighbourhood Plan website (www.plumptonpc.co.uk/neighbourhood-plan/), and keep your comments constructive and as concise as possible. If you wish to make several comments on the electronic form, please insert additional rows in Part C as required. For paper forms, simply use as many copies as required.
- The closing date for responses is 31 July 2017. Please return the form by one of the following methods: a) dropping into the box at Plumpton Post Office and Store, b) by email to np@plumptonpc.co.uk, c) or by post to the Parish Clerk: Anita Emery, Plumpton Parish Council, Elm Cottage, Church Street, Hartfield TN7 4AG

PART A – Respondent details (must be completed)

Name: Martin Page, Complete Land Management Ltd on behalf of Shaw Farm (Plumpton) Ltd	
Postcode: Complete Land Management Ltd, Sackville House, Hartfield, East Sussex TN7 4AW	
Connection to Plumpton:	Resident in Parish YES
	Business within ParishYES
	Landowner of Land within ParishYES
	Other (e.g. a planning consultant or similar representing any of the above) – Please specify below
	Planning Consultants and Agricultural Advisors representing the landowners Shaw Farm (Plumpton) Ltd

PART B – Summary of overall support

Do you support the draft plan? (Please delete the answer that does not apply)	No
<p>If you answered 'Yes' to the above, then the Steering Group will presume you support all the policies within the plan, but if that is not the case, then you can indicate so below. You are also free to add comments in Part C.</p> <p>If you answered 'No', then the Steering Group need to know which policies you do not support (and why)? Please make that clear below (on the electronic form, simply delete all the policies that you are happy with, to leave those you do not support. On the paper form, just indicate [e.g. by ticking, circling or similar] those policies that you do not support). Then complete section C to provide the reason why you do not support that policy.</p>	
<p><u>Policy 13: Local Green Spaces and Open Spaces</u></p>	

PART C – General

Comments on general sections of the documents	Page and/or paragraph number	Comment	Suggested improvement
Comments on specific policies in the draft plan	Policy and/or page or paragraph number	Comment	Suggested improvement
	<p>Policy 13 LGS6</p>	<p>The Site</p> <p>This objection seeks removal of Local Green Space Policy LGS6 from the farmland north of ‘Trillium’, west of Station Road, Plumpton Green. This is a field with a roadside hedge and which has a track and barn in the south. It is on rising land and to the north is bounded by the wooded surrounds of Inholms Farm, Station Road.</p> <p>Rationale for the Local Landowner/Business Objection and Summary</p> <p>Local Green Space allocations are said by Government in the NPPF (paras 76 - 78) to be a designation intended to last beyond the end of the plan period. Our clients do not wish to stand in the way of the community’s wishes for the NP generally and have noted, without further comment, the deletion of a draft</p>	<p>Change the <u>Policies Map</u> to remove notation LGS6 entirely and leave the Site as general countryside outside the planning boundary of Plumpton. Renumber Site LGS7 accordingly.</p> <p>Delete from <u>Policy 13</u> the following text:- ‘Site: LGS6 – Field between Trillium and Inholms Farm, west of Station Road;’.</p> <p>Re-number Site 7 accordingly.</p>

	<p>housing allocation in the southern part of the LGS6 policy area now proposed. However our clients do not wish to have their land blighted in the long term – i.e. beyond 2030 - by a Local Green Space policy that is not soundly arrived at.</p> <p>In summary LGS6 the draft NP is not sound as it stands because the application of Policy 13 to the Site is not based on sound evidence, conflicts with Government policy in the NPPF, and is not supported either by the relevant policies of the saved 2003 Local Plan or adopted Joint Core Strategy (JCS).</p> <p>Conclusively in this case, the draft designation is superfluous. There is adequate protection from development outside the planning boundary of Plumpton via the last sentence of Policy 1 without use of Policy 13 in this case. As shown below it is clear that the NP simply seeks an extra layer of protection from development and is not able to offer any creative or policy-relevant future for the field in question.</p> <p>Lack of Soundness Due to Conflict with NPPF and Lack of Evidence</p> <p>The rationale for LGS6 fails to reflect the purpose of Local Green Space as set out in the NPPF. To explain, the NPPF at Para 77 says:-</p> <p><i>'The Local Green Space designation will not be appropriate for most green areas or open space. The designation should only be used:</i></p> <ul style="list-style-type: none">● <i>where the green space is in reasonably close proximity to the community it serves;</i>● <i>where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and</i>● <i>where the green area concerned is local in character and is not an extensive tract of land.'</i> <p>The relevant extract from the PPNP Local Green Space evidence report (2017) supporting the draft plan, says of</p>	
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		<p>this site:-</p> <p><i>'Value to the community:</i> <i>The site is proposed primarily to maintain an east-west open area across the north end of the proposed development area centred around Plumpton Green. With site LGS7 it would provide a corridor as a contribution to Green Infrastructure. The view from the 15 road by the top of this field looks across the top of the village to the South Downs; that view has been highlighted as important to many people and should not be impaired by development.'</i></p> <p>There is in effect no value to the community because the justification set out in the evidence report is a functional one – i.e. to maintain an open east-west area and to prevent development that might affect a view from the roadside (there being no footways or footpaths on or near the field). The evidence has jumped direct to justification of the outcome of the policy (i.e. to rule out development) without first assessing why that policy should be applied, if at all.</p> <p>The lack of significance of the Site is borne out in so far as there is no mention of it in the April 2014 consultation summary report, the September 2014 Analysis of Feedback report and few if any discernable references in any of the Question 7 responses that are logged in the PPNP Village Questionnaire – Complete Raw Data (2015). The Brief Outline of Results 2015 report bears this out as it shows that the Site did not feature as significant in the Q7 response. Even though the foreword to the Draft Plan refers to a green gap important to many residents (pp.4) the evidence is thus that the Site is not locally important.</p> <p>The evidence in fact shows clearly that there is nothing <i>'demonstrably special'</i> to the local community about this field as is required by the NPPF. For that reason the evidence for the policy allocation is absent and the lack of an evidence-based justification for it means the neighbourhood plan is not sound.</p> <p>The draft policy as applied to this site conflicts with the</p>	
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Government's recognised use of Local Green Space policy in plan-making, because Test 2 of the three NPPF para 77 prerequisites is not passed. The conflict with Government policy again makes this allocation fundamentally unsound. It is instead a NPPF paragraph 77 case where "*The Local Green Space designation will not be appropriate for most green areas or open space...*"

PPNP Objective for Local Green Spaces Not Served

PPNP Objective 7 at para 5.2 is '*to plan for increased public access to and enjoyment of local green spaces and the SDNP as a recreation, education and leisure amenity.*'

Our clients' field has no public access and is part of a farming operation. It has no hope whatsoever of contributing to the otherwise laudable aspirations of this Objective. For that further reason LGS6 as a policy is not based on any prospect of a positive role for the land and is again a superfluous designation.

No Contribution to Green Infrastructure

The field cannot contribute to green infrastructure as it does not pass the definition of that term. It is incapable of being part of a '*...Strategically planned and delivered network...*' nor can it '*...thread through and surround the built environment and connect the urban area to its wider rural hinterland..*' as per the Natural England Definition on pp 3 of the PPNP Local Green Spaces evidence report 2017.

Joint Core Strategy 2016 Policy CP8 and Lewes District Local Plan 2003 Saved policy RES19 and RE2

JCS Policy CP8 refers to green infrastructure as '*... a connected network of multifunctional green infrastructure..*' and at para 7.80 sets out 11 specific categories of land that comprise green infrastructure. Not only does our clients' site have no connection to any other network, but it does not fall within any of the

	<p>categories set out. As a result even though the PPNP makes the claim, LGS6 cannot be regarded as an allocation in pursuance of development plan policy CP8.</p> <p>The draft PPNP at para 5.103 also seeks to justify Local Green Spaces Policy 13 in pursuance of LDLP 2003 Saved policy RES19, but this policy relates to the provision of playing space and is thus irrelevant to our clients' agricultural field. The PPNP also refers in part to Saved policy RE2 but again this is not relevant as the policy is specific to existing recreational open spaces.</p> <p>For these reasons PPNP policy 13 as it would otherwise apply to the Site is completely without justification arising from the development plan, the policies of which are uniquely related to green areas with public access.</p> <p>We therefore respectfully request that changes are made to the PPNP as set out in the next column. END</p>	
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OUR VILLAGE – OUR COMMUNITY.

Help shape its future.

PLUMPTON PARISH DRAFT NEIGHBOURHOOD PLAN RESPONSE FORM

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- Please note that anonymous forms cannot be considered and will therefore be ignored.
- If you choose to feedback, then please complete Part A and Part B – while this exercise is primarily qualitative in that it seeks your views, it is also useful to take the opportunity to gauge the overall support for the draft plan.
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PART A – Respondent details (must be completed)

Name: Mr M Hull (KLW Ltd) on behalf of Mrs E Whitehouse and Mr G Thomas	
Postcode: c/o KLW, Ridgers barn, Bunny Lane, Eridge TN3 9HA	
Connection to Plumpton:	Resident in Parish YES /NO
	Business within ParishYES/NO
	Landowner of Land within ParishYES/ NO
	Other (e.g. a planning consultant or similar representing any of the above) – Please specify below
	Planning consultant representing the landowners

PART B – Summary of overall support

Do you support the draft plan? (Please delete the answer that does not apply)	Yes/No
If you answered ‘Yes’ to the above, then the Steering Group will presume you support all the policies within the plan, but if that is not the case, then you can indicate so below. You are also free to add comments in Part C.	
If you answered ‘No’, then the Steering Group need to know which policies you do not support (and why)? Please make that clear below (on the electronic form, simply delete all the policies that you are happy with, to leave those you do not support. On the paper form, just indicate [e.g. by ticking, circling or similar] those policies that you do not support). Then complete section C to provide the reason why you do not support that policy.	
Policy 1: Spatial Plan for the Parish Policy 7: New Housing Policy 13: Local Green Spaces and Open Spaces	

PART C – General

Comments on general sections of the documents	Page and/or paragraph number	Comment	Suggested improvement
Comments on specific policies in the draft plan	Policy and/or page or paragraph number	Comment	Suggested improvement
	Policy 1	<p>This policy does not accord with sustainable development objectives at paragraph 14 of NPPF and so is not sound. If, in the future, the District cannot deliver a 5 year housing land supply or further sites are needed for whatever reason, then it is possible that sustainable sites that are not allocated and are outside the planning boundary for Plumpton will need to be considered for housing. In such circumstances the last criteria “new development outside the planning boundary will not be supported” is overly protectionist and contrary to paragraph 14 of NPPF since it prevents the consideration of sustainable development adjacent to the planning boundary of Plumpton. Such an approach would prevent the delivery of housing and other development and so potentially harm matters relating to social and economic sustainability.</p> <p>In addition the policy prevents any form of development outside the planning boundary and this could include replacement dwellings, extensions, agricultural buildings or recreational development.</p> <p>Consequently the Plan does not meet the basic condition of contributing to sustainable development and neither does it accord with National Policies.</p>	<p>Delete last sentence and replace with a suite of criteria for judging the suitability of housing sites that might come forward on land outside the village planning boundary.</p> <p>Introduce a second policy which addresses the requirements of other forms of development outside the planning boundary.</p>

	Policy 7	<p>This policy is principally based upon the housing site allocations and its criteria cannot readily apply to windfall sites located either within the planning boundary or indeed those outside the planning boundary. If our representations on Policy 1 are successful then this policy will need to be amended.</p> <p>Notwithstanding, Criterion 4 is overly restrictive and does not accord with the principles of sustainable development (see our representations on Policy 1 above). If a new housing need emerges then sites away from the village centre may need to be found. The correct approach is to allow such site proposals to be tested by an appropriately worded policy.</p> <p>Criterion 8 is considered unreasonable because if a windfall development came forward for redevelopment of a brownfield site then there may not be a need for a habitat assessment. Replacement dwellings would also be caught unnecessarily. There is no evidence published on the Parish web site that explains why all proposals must be accompanied by an archaeological desk based assessment. It would seem odd to require it of a replacement dwelling scheme or a redevelopment of previously developed land. Generally this policy would need to tie in with the comments we make in relation to Policy 1 .</p>	<p>Create two policies, one which deals with allocated sites and one which deals with housing development on unallocated sites.</p> <p>This may require the deletion of references to windfall development so the policy is related to just allocated sites.</p> <p>Criterion 8 is overly prescriptive and must clearly distinguish between allocated greenfield sites where wildlife is important and other windfall sites where wildlife may not be an issue.</p> <p>Criterion 9 is overly prescriptive as not all windfall development will require a heritage or archaeological assessment. For example redevelopment of disturbed land, previously developed land or simple replacement dwellings.</p>
	Policy 13 (site LGS7)	<p>The landowner of the identified site raises objection to the inclusion of the site as a local green space and open space. The site is a paddock and has been used by the owners for grazing of animals. It is not an open space nor is it a green space able to be used by the public and the owners would no accept any public access across their land in the future nor the use of this land by the public. NPPF paragraph 76 to 78 are meant to be designations which last beyond the Plan period. Although the land owners respect the decision to remove the housing allocation, the introduction of a Local Green Space designation would effectively blight the site in the long term.</p> <p>The identification of site LGS7 as open space has only occurred because the site</p>	Delete policy and instead rely on the existing policies in the District wide plan, which controls development in the countryside.

was promoted as a housing allocation. It is interesting to note that the Local Green Spaces assessment was published in 2017 whereas the site was promoted for development during 2016 and no issues were raised at that time about its open space benefits. In fact it was a preferred housing site in an earlier draft of the Plan. The identification of the site as a green and open space must have come about as a result of the removal of the site as a draft housing allocation and not because of any assessment of its community, environmental or landscape benefit/contribution.

It is noted that the Parish have not protected other paddocks and agricultural fields around the village, particularly those behind Chapel Road, Woodgate Meadow and east of Whitehouse Farm. It is noted that in the Joint Core Strategy 2016, Policy CP8 and in the Lewes District Local Plan 2003 Saved policy RES19 and RE2 green infrastructure is referred to as ‘... a connected network of multifunctional green infrastructure..’ and at para 7.80 sets out 11 specific categories of land that comprise green infrastructure. The LGS7 site does not connect to any other network, and it does not fall within any of the categories set out in that Plan. To illustrate this we note that other proposed open spaces are inconsistent with this policy. Only a short section of the Bevern Stream is protected under LGS2. Consequently the methodology for choosing sites is very unclear and at best sporadic. The Local Green Space report refers to the connectivity of green infrastructure but none of the identified sites link together particularly well and there is no clear evidence as to what the Parish is trying to achieve by identifying these spaces. LGS2 is a good example, where the policy fails to protect the whole length of the stream as it runs through the village. For example, unidentified parts of the Bevern Stream which link King George’s Field Recreation Ground and Ridens Farm, along the length of Bevern Stream are simply omitted for no reason yet are just as ecologically important as the identified section of stream.

The Local Green Spaces report explains that initiatives to improve access to open spaces increases their use, however, the LGS7 land is private land as are other identified open spaces. Section 2 of the Local Green Spaces report begins to hint at a methodology for choosing sites and refers to NPPF criteria for choosing sites. In relation to these criteria, the LGS7 site does not serve the community as it is

private land. Secondly there is no local significance – it has no special beauty, recreation value, historic significance nor is there any evidence of a rich wildlife. Any drove route related matters quoted in the Local Green Spaces report are acknowledged to lay outside the site. Finally the land is not local in character but a simple agricultural field used for grazing. It is well enclosed by hedging and so it is not widely visible nor is it necessary to identify a protectionist policy.

The specific assessment of LGS7 relies on the drove road outside the site. The site has not been surveyed for biodiversity reasons and the extent to which it provides an open gap is not in itself a reason to impose a planning policy , which prevents any use and development apart from open space.

A rigorous assessment should have considered all these criteria carefully and a balanced decision taken on their results. However that has not happened. Other locations around the village should also have been assessed (as noted above) even if they were eventually discounted. Not to do so is unsound and indicates that the assessment has been superficial and based on a desire to prevent further development at certain locations rather than a fair assessment of the village environs. The Local Green Spaces report lacks robust and proportionate evidence to support Policy 13 and specifically to identify this LGS7 site as a green and open space. As such the green space policy is being misused.

The last sentence of Policy 13 does not accord with NPPF paragraph 14 and the representations we make regarding Policy 1 and providing a criteria based approach for judging future housing or other development needs. Whilst the owners of the site accept and respect the wishes of the community regarding the previously proposed allocation for housing, if future sites need to be found in sustainable locations then LGS7 could be one such site. The policy wording prevents this site from being considered should a future need arise. The policy also prevents other forms of development such as field shelters or agricultural buildings or stables to support its current use as a grazing field. In these circumstances, and given the wider countryside policies which exist in the District wide Development Plan, a Local Green Space designation is considered unnecessary and a hindrance to the on-going agricultural use of the field.

	<p>In particular the last sentence of Policy 13 is unacceptable to the land owners as it implies that the land in question is already a public recreation use which it clearly is not. In any event the policy is too restrictive and provides no scope for its continued use as either a paddock or for agricultural grazing land where support buildings might be needed.</p> <p>We have reviewed the Wantage Neighbourhood Plan Examination Report produced by the Examiner John Parmiter in 2016. Some of the issues contained in that Examination are relevant to this Neighbourhood Plan. Section 9 of that Examination report is a warning signal to Plumpton Parish and should be reviewed. Examiners are not content to allow Plans which are overly negative or not based on sound evidence. Currently Policy 1 and 13 fall into this category.</p>	
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PLUMPTON PARISH DRAFT NEIGHBOURHOOD PLAN RESPONSE FORM

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- If you choose to feedback, then please complete Part A and Part B – while this exercise is primarily qualitative in that it seeks your views, it is also useful to take the opportunity to gauge the overall support for the draft plan.
- Part C is optional, but must be completed if you have indicated in Part B that there are specific policies you do not support – the Steering Group need to know **why** a policy is not supported in order to consider any amendments to it.
- It would assist the Steering Group in collating responses if you would use the electronic version of the form, available from the Neighbourhood Plan website (www.plumptonpc.co.uk/neighbourhood-plan/), and keep your comments constructive and as concise as possible. If you wish to make several comments on the electronic form, please insert additional rows in Part C as required. For paper forms, simply use as many copies as required.
- The closing date for responses is 31 July 2017. Please return the form by one of the following methods: a) dropping into the box at Plumpton Post Office and Store, b) by email to np@plumptonpc.co.uk, c) or by post to the Parish Clerk: Anita Emery, Plumpton Parish Council, Elm Cottage, Church Street, Hartfield TN7 4AG

PART A – Respondent details (must be completed)

Name: Diocese of Chichester (Agent – David Evison)	
Postcode:	
Connection to Plumpton:	Resident in Parish YES/NO
	Business within ParishYES/NO
	Landowner of Land within ParishYES
	Other (e.g. a planning consultant or similar representing any of the above) – Please specify below

PART B – Summary of overall support

Do you support the draft plan? (Please delete the answer that does not apply)	Yes

If you answered ‘Yes’ to the above, then the Steering Group will presume you support all the policies within the plan, but if that is not the case, then you can indicate so below. You are also free to add comments in Part C.

If you answered ‘No’, then the Steering Group need to know which policies you do not support (and why)? Please make that clear below (on the electronic form, simply delete all the policies that you are happy with, to leave those you do not support. On the paper form, just indicate [e.g. by ticking, circling or similar] those policies that you do not support). Then complete section C to provide the reason why you do not support that policy.

- Policy 1: Spatial Plan for the Parish**
- Policy 2: New-Build Environment and Design**
- Policy 3: Associated Infrastructure**
- Policy 4: Provision of Adequate Parking**
- Policy 5: Landscape and Biodiversity**
- Policy 6: Sustainable Drainage and Wastewater Management**
- Policy 7: New Housing**
- Policy 8: Local Employment**
- Policy 9: Plumpton Village Centre**
- Policy 10: Plumpton College**
- Policy 11: Plumpton Racecourse**
- Policy 12: Community Facilities**
- Policy 13: Local Green Spaces and Open Spaces**

PART C – General

Comments on general sections of the documents	Page and/or paragraph number	Comment	Suggested improvement
Policy 7.3	Page 43	The Diocese will amend the illustrative layout to better reflect Criterion 1 of Policy 7.3 (separation of the adjoining allocated sites) and incorporate further measures with respect to Criterion 2.	No policy amendment required.
Comments on specific policies in the draft plan	Policy and/or page or paragraph number	Comment	Suggested improvement

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PART A – Respondent details (must be completed)

Name: Paul White (Genesis Town Planning, 26 Chapel Street Chichester West Sussex)	
Postcode: PO19 1DL	
Connection to Plumpton:	Resident in Parish YES/NO
	Business within Parish.....YES/NO
	Landowner of Land within Parish.....YES/NO
	Other (e.g. a planning consultant or similar representing any of the above) – Yes
	Planning consultant acting for Cala Homes (South Home Counties) Ltd which has an interest in land to the rear of Oakfield presently owned by Mr. and Mrs. Baker

PART B – Summary of overall support

Do you support the draft plan? (Please delete the answer that does not apply)	Yes/No -The Policy 7.4 allocation for land to the rear of Oakfield is supported but we suggest minor revisions to the wording.
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If you answered ‘Yes’ to the above, then the Steering Group will presume you support all the policies within the plan, but if that is not the case, then you can indicate so below. You are also free to add comments in Part C.

If you answered ‘No’, then the Steering Group need to know which policies you do not support (and why)? Please make that clear below (on the electronic form, simply delete all the policies that you are happy with, to leave those you do not support. On the paper form, just indicate [e.g. by ticking, circling or similar] those policies that you do not support). Then complete section C to provide the reason why you do not support that policy.

- Policy 1: Spatial Plan for the Parish**
- Policy 2: New-Build Environment and Design**
- Policy 3: Associated Infrastructure**
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- Policy 8: Local Employment**
- Policy 9: Plumpton Village Centre**
- Policy 10: Plumpton College**
- Policy 11: Plumpton Racecourse**
- Policy 12: Community Facilities**
- Policy 13: Local Green Spaces and Open Spaces**

PART C – General

Comments on general sections of the documents	Page and/or paragraph number	Comment	Suggested improvement
<p>The evidence base for the N Plan comprising the Site Assessment & Sustainability Appraisal (SA)</p>	<p>Pro forma for site 8 in the Site Assessment and Section 10 and scoring matrix for site 8 in the SA</p>	<p>Both documents identify alleged constraints on site 8 that can be mitigated. The site actually performs better than the Site Assessment and SA findings indicate.</p>	<p>The scoring matrix in the SA could be revised changing the negative scores to positive to properly reflect the findings that flooding, biodiversity and landscape impacts can all be mitigated.</p>
Comments on specific policies in the draft plan	Policy and/or page or paragraph number	Comment	Suggested improvement
	<p>Policy 7.4</p>	<p>Minor revised wording is suggested to policy 7.4</p>	<p>Policy 7.4: Land to the rear of Oakfield, Plumpton Green</p> <p>The land, as shown on Policy Map E amounting to 1.5ha, is allocated for residential development of around 20 dwellings, with open space and a new access from Station Road.</p> <p>In addition to conforming to the policies contained in the PPNP, LDC District Local Plan, SDNPA Development Plan and all other applicable</p>

			<p>statutory requirements, development in this location will:</p> <ol style="list-style-type: none">1. Be designed to include landscape buffers and open space with a layout that can secure the separation with the site allocated for residential development in Policy 7.3;2. Be designed to avoid proximity of houses to existing properties along Station Road.3. Subject to the above no phasing restrictions shall apply and the sites can come forward independently of each other.
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Plumpton Parish Council,
Elm Cottage,
Church Street,
Hartfield
TN7 4AG

By email only to: np@plumptonpc.co.uk

RE: Plumpton Neighbourhood Plan Regulation 14 Consultation

Dear Sir/Madam,

This letter provides Gladman Developments Ltd (Gladman) representations in response to the draft version of the Plumpton Neighbourhood Plan (PNP) under Regulation 14 of the Neighbourhood Planning (General) Regulations 2012. This letter seeks to highlight the issues with the plan as currently presented and its relationship with national and local planning policy.

Legal Requirements

Before a neighbourhood plan can proceed to referendum it must be tested against a set of basic conditions set out in paragraph 8(2) of Schedule 4b of the Town and Country Planning Act 1990 (as amended). The basic conditions that the PNP must meet are as follows:

- (a) Having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order.*
- (d) The making of the order contributes to the achievement of sustainable development.*
- (e) The making of the order is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).*
- (f) The making of the order does not breach, and is otherwise compatible with, EU obligations.*

National Planning Policy Framework and Planning Practice Guidance

The National Planning Policy Framework (the Framework) sets out the Government's planning policies for England and how these are expected to be applied. In doing so it sets out the requirements for the preparation of neighbourhood plans to be in conformity with the strategic priorities for the wider area and the role in which they play in delivering sustainable development to meet development needs.

At the heart of the Framework is a presumption in favour of sustainable development, which should be seen as a golden thread through both plan-making and decision-taking. For plan-making this means that plan makers should positively

seek opportunities to meet the development needs of their area and Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change. This requirement is applicable to neighbourhood plans.

The recent Planning Practice Guidance (PPG) updates make clear that neighbourhood plans should conform to national policy requirements and take account the latest and most up-to-date evidence of housing needs in order to assist the Council in delivering sustainable development, a neighbourhood plan basic condition.

The application of the presumption in favour of sustainable development will have implications for how communities engage with neighbourhood planning. Paragraph 16 of the Framework makes clear that Qualifying Bodies preparing neighbourhood plans should develop plans that support strategic development needs set out in Local Plans, including policies for housing development and plan positively to support local development.

Paragraph 17 further makes clear that neighbourhood plans should set out a clear and positive vision for the future of the area and policies contained in those plans should provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency. Neighbourhood plans should seek to proactively drive and support sustainable economic development to deliver the homes, jobs and thriving local places that the country needs, whilst responding positively to the wider opportunities for growth.

Paragraph 184 of the Framework makes clear that local planning authorities will need to clearly set out their strategic policies to ensure that an up-to-date Local Plan is in place as quickly as possible. The Neighbourhood Plan should ensure that it is aligned with the strategic needs and priorities of the wider area and plan positively to support the delivery of sustainable growth opportunities.

Planning Practice Guidance

It is clear from the requirements of the Framework that neighbourhood plans should be prepared in conformity with the strategic requirements for the wider area as confirmed in an adopted development plan. The requirements of the Framework have now been supplemented by the publication of Planning Practice Guidance (PPG).

On 11th February 2016, the Secretary of State (SoS) published a series of updates to the neighbourhood planning chapter of the PPG. In summary, these update a number of component parts of the evidence base that are required to support an emerging neighbourhood plan.

On 19th May 2016, the Secretary of State published a further set of updates to the neighbourhood planning PPG. These updates provide further clarity on what measures a qualifying body should take to review the contents of a neighbourhood plan where the evidence base for the plan policy becomes less robust. As such it is considered that where a qualifying body intends to undertake a review of the neighbourhood plan, it should include a policy relating to this intention which includes a detailed explanation outlining the qualifying bodies anticipated timescales in this regard.

Further, the PPG makes clear that neighbourhood plans should not contain policies restricting housing development in settlements or preventing other settlements from being expanded. It is with that in mind that Gladman has reservations regarding the PNP's ability to meet basic condition (a) and this will be discussed in greater detail throughout this response.

Relationship to Local Plan

The current adopted plan that covers the Plumpton Neighbourhood Plan area and the development plan which the PNP will be tested against is the Lewes District Council Local Plan, adopted in May 2016. The Local Plan covers the period from 2010 to 2030 and provides the overarching spatial strategy for the district.

Within this plan Plumpton Green is designated as a service village, settlements with a basic level of services and facilities and within the spatial strategy new housing is planned to be a minimum net addition of 50 units.

Plumpton Neighbourhood Plan

This section highlights the key issues that Gladman would like to raise with regards to the content of the PNP as currently proposed. It is considered that some policies do not reflect the requirements of national policy and guidance, Gladman have therefore sought to recommend a series of alternative options that should be explored prior to the Plan being submitted for Independent Examination.

Policy 1: Spatial plan for the parish

This policy states that development within the planning boundary for Plumpton Green will be supported with development outside the planning boundary not being supported. Gladman opposes the use of settlement boundaries if these would preclude otherwise sustainable development from coming forward. The Framework is clear that development which is sustainable should go ahead without delay. The use of development limits to arbitrarily restrict suitable development from coming forward on the edge of settlements does not accord with the positive approach to growth required by the Framework and is contrary to basic condition (a). Further, a blanket restriction on all development outside of the planning boundary would not accord with paragraph 55 of the Framework regarding development in rural areas.

Policy 7: New housing

Whilst recognising the plan makes a number of housing allocations, in excess of the minimum target as set out in the adopted Local Plan, Gladman notes there may be access issues with several of the proposed allocations. The Parish Council should ensure that it is confident access can be achieved or the allocations will not be deliverable. This would be a direct conflict with PPG which states plans should be deliverable to ensure they can be implemented as the community intends.

Policy 13: Local Green Spaces and Open Spaces

This policy is seeking to designate 7 parcels of land as Local Green Space (LGS). Due to the lasting nature of this designation and the level of protection of these designations, similar to that of Green Belt, Gladman contends that some of the proposed designations do not meet all the requirements for LGS designation.

In order to designate land as LGS the Parish Council must ensure that it is able to demonstrate robust evidence to meet national policy requirements set out in the Framework. The Framework makes clear at §76 that the role of local communities seeking to designate land as LGS should be consistent with the local planning of sustainable development for the wider area. Paragraph 76 states that:

'Local communities through local and neighbourhood plans should be able to identify for special protection green areas of particular importance to them. By designating land as Local Green Space local communities will be able to rule out new development other than in very special circumstances. Identifying land as Local Green Space should therefore be consistent with the local planning of sustainable development and complement investment in

sufficient homes, jobs and other essential services. Local Green Spaces should only be designated when a plan is prepared or reviewed, and be capable of enduring beyond the end of the plan period.'

Further guidance is provided at §77 which sets out three tests that must be met for the designation of Local Green Spaces. Paragraph 77 states that:

'The Local Green Space designation will not be appropriate for most green areas or open space. The designation should only be used:

- Where the green space is in reasonably close proximity to the community it serves;
- Where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreation value (including as a playing field), tranquillity or richness of its wildlife; and
- Where the green area concerned is local in character and is not an extensive tract of land.'

Gladman suggest that whilst a Local Green Spaces report has been produced to support the proposed designations within the plan that this demonstrates why several of the proposed designations do not meet the full requirements of the Framework for LGS designation and when considered in the context of Plumpton Green the areas are in fact extensive tracts of land.

The issues surrounding LGS designations have been considered in a number of other Examiner's reports across the country and we highlight the following decisions:

- The Seldlescombe Neighbourhood Plan Examiner's Report¹ recommended the deletion of a LGS measuring approximately 4.5ha as it was found to be an extensive tract of land.
- The Oakley and Deane Neighbourhood Plan Examiners Report² recommended the deletion of a LGS measuring approximately 5ha and also found this area to be not local in character. Thereby failing to meet 2 of the 3 tests for LGS designation.
- The Alrewas Neighbourhood Plan Examiner's Report³ identifies that both sites proposed as LGS in the neighbourhood plan '*in relation to the overall size of the Alrewas Village*' to be extensive tracts of land. The Examiner in this instance recommended the deletion of the proposed LGSs which measured approximately 2.4ha and 3.7ha.
- The Freshford and Limpley Neighbourhood Plan Examiner's Report⁴ identified that the six LGS proposed did not meet the criteria required by the Framework either collectively or individually. Indeed, the Examiner identified that the combination of sites comprised of an extensive tract of land. The Examiner also considered that the protection of fields to 'prevent agglomeration between the settlement areas ... is not the purpose of Local Green Space designation'.
- The Eastington Neighbourhood Plan Examiner's Report⁵ recommended the deletion of three LGS (16ha and 2ha) considered to be extensive tracts of land. The third proposed LGS was deleted due to the lack of evidence demonstrating its importance and significance to the local community.
- The Tattenhill and Rangemore Neighbourhood Plan Examiner's Report⁶ recommended the deletion of 2 LGS comprising of 4.3ha and 9.4ha.
- The Norley Examiner's Report⁷ identified a total of 13 parcels of land to be designated as LGS. The Examiner recommended at §4.98 that the identification of these extensive tracts of agricultural land was

¹ <http://www.rother.gov.uk/CHttpHandler.ashx?id=22996&p=0>

² <https://www.basingstoke.gov.uk/content/doclib/1382.pdf>

³ <https://www.lichfielddc.gov.uk/Council/Planning/The-local-plan-and-planning-policy/Neighbourhood-plans/Downloads/Alrewas/Alrewas-Neighbourhood-Plan-Examiners-Report.pdf>

⁴ http://www.wiltshire.gov.uk/freshford_limpley_examination_final_report.pdf

⁵ <https://www.stroud.gov.uk/media/2596/2016-04-28-eastington-examiners-report-final.pdf>

⁶ <http://www.eaststaffsbc.gov.uk/sites/default/files/docs/planning/planningpolicy/neighborplanning/tattenhill/02%20Tattenhill%20Neighbourhood%20Plan%202015.pdf>

⁷ <http://consult.cheshirewestandchester.gov.uk/file/3626372>

contrary to NPPF policy and recommended that the policy should be deleted. The proposed LGS measured in the range of 1ha – 4.3ha.

Conclusions

Gladman recognises the role of neighbourhood plans as a tool for local people to shape the development of their local community. However, it is clear from national guidance that these must be consistent with national planning policy and the strategic requirements for the wider authority area. Through this consultation response, Gladman has sought to clarify the relation of the PNP as currently proposed with the requirements of national planning policy and the wider strategic policies for the wider area.

Gladman is concerned that the plan in its current form does not comply with basic condition (a). The plan does not conform with national policy and guidance. Gladman hopes you have found these representations helpful and constructive. If you have any questions do not hesitate to contact me or one of the Gladman team.

Yours faithfully,

Richard Agnew

r.agnew@gladman.co.uk

Gladman Developments Ltd.

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PART A – Respondent details (must be completed)

Name: K Roger-Jones FRICS, Clifford Dann LLP, Albion House, Albion Street, Lewes	
Postcode: BN7 2NF	
Client's connection to Plumpton:	Resident in Parish YES
	Business within Parish.....YES
	Landowner of Land within Parish.....YES
	Other (e.g. a planning consultant or similar representing any of the above) – Please specify below
	Planning consultant representing a landowner.

PART B – Summary of overall support

Do you support the draft plan? (Please delete the answer that does not apply)	No. Comments are confined to policy 13 and policy 7. None of the other policies in the plan had been considered in detail and are not being commented on.

If you answered ‘Yes’ to the above, then the Steering Group will presume you support all the policies within the plan, but if that is not the case, then you can indicate so below. You are also free to add comments in Part C.

If you answered ‘No’, then the Steering Group need to know which policies you do not support (and why)? Please make that clear below (on the electronic form, simply delete all the policies that you are happy with, to leave those you do not support. On the paper form, just indicate [e.g. by ticking, circling or similar] those policies that you do not support). Then complete section C to provide the reason why you do not support that policy.

- Policy 1: Spatial Plan for the Parish
- Policy 2: New-Build Environment and Design
- Policy 3: Associated Infrastructure
- Policy 4: Provision of Adequate Parking
- Policy 5: Landscape and Biodiversity
- Policy 6: Sustainable Drainage and Wastewater Management
- Policy 7: New Housing**
- Policy 8: Local Employment
- Policy 9: Plumpton Village Centre
- Policy 10: Plumpton College
- Policy 11: Plumpton Racecourse
- Policy 12: Community Facilities
- Policy 13: Local Green Spaces and Open Spaces**

PART C – General

Comments on general sections of the documents	Page and/or paragraph number	Comment	Suggested improvement
	Policy 13: Local Green Spaces and Open Spaces	<p>These comments specifically relate to LGS5 and LGS6. LGS5 forms the major part of Little Inholmes Farm. The access road and land to the south which form part of LGS6 also forms part of Little Inholmes Farm.</p> <p>The second paragraph of the Local Green Spaces and Green Infrastructure Study gives examples of Green Spaces as being parks and allotments, and water courses. Paragraph 013 Reference ID: 37-013-20140306 of the National Planning Policy Guidance (NPPG) gives examples of green areas as possibly including land where sports pavilions, boating lakes or structures such as war memorials are located, allotments, or urban spaces that provide a tranquil oasis.</p> <p>Green Infrastructure is by Natural England’s definition, as set out in the Draft PPNP, strategically planned and delivered network comprising the highest quality green spaces and other environmental features.</p> <p>The land at Little Inholmes Farm is of a different nature to the examples given in the NPPG and by Natural England being private farmland and is considered to be unsuitable for designation under policy LGS.</p> <p>Both paragraph 77 of the National Planning Policy Framework (NPPF) and the NPPG (015 Reference ID: 37-015-20140306) make it clear that designation should not be used where the green area concerned is an extensive tract of land. LGS 5 is an extensive tract of land.</p> <p>The same paragraph of the NPPG states that: “... blanket designation of open countryside adjacent to settlements will not be appropriate. In particular, designation should not be proposed as a “back door” way to try to achieve what would amount to a new area of Green Belt by another name.”</p> <p>Designating land as ‘Local Green Space’ simply as a tool to sterilise the land from development without justification should be resisted. It is clear from comments which</p>	Deletion of LGS5 and LGS6.

	<p>made by local residents that the respondents view the designation as a means by which development can be prevented. LGS 5 includes the fields which had been put forward as a candidate site for residential development (site 2).</p> <p>Paragraph 77 of the NPPF provides that Local Green Space designations will not be appropriate for most green areas or open space. Paragraph 77 requires the local community to demonstrate why proposed designations are demonstrably special and hold particular significance due to their beauty, historic significance or recreational value or tranquillity or richness of its wildlife.</p> <p>In relation to the PPNP assessment of LGS5, much emphasis is placed on the experience of using the public footpath which crosses the northern edge of the land. This is no justification for designating all of the land to the south.</p> <p>In relation to LGS6 a reason for designation is given as “...primarily to maintain an east-west open area across the north end of the proposed development area centred around Plumpton Green.” This is tantamount to a “...Green Belt by another name...”</p> <p>The draft PPNP fails to demonstrate why the sites are demonstrably special. It is apparent that the community is focussing on preventing development contrary to guidance.</p> <p>The assessment of the site (LGS6) within the Local Green Spaces Study cites a number of reasons for designation including the presence of ditches and small ponds; hedgerows and biodiversity. The report does not provide a detailed assessment or justification for inclusion and therefore fails to meet the tests set out in the NPPF and NPPG.</p> <p>The assessment makes a number of claims in relation to ecological species present at the site, without reference to where this evidence was derived from (it does not feature within the Biodiversity report forming part of the evidence base). The ecology report carried out by Ecology Solutions in October 2011 which was submitted in June 2016 by Barton Willmore set out the findings of species on site, and opines that the land is of low ecological value. Higher value areas within the site such as the woodland, hedgerows and ponds would all be retained and opportunities for biodiversity enhanced through development. Ecology Solutions re-visited the site in May 2016 and confirmed that there</p>	
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		<p>had been no material changes to the habitats present.</p> <p>There is nothing so special about either LGS5 or LGS6 that would warrant or justify their designation as 'Local Green Spaces' having regard to the advice and requirements of the NPPG and NPPF. Neither area should be so designated.</p>	
Comments on specific policies in the draft plan	Policy and/or page or paragraph number	Comment	Suggested improvement
	Policy 7: New housing	<p>In June 2016 Barton Willmore for Glenbeigh Developments Ltd submitted detailed comments in support of the allocation of land at Little Inholmes Farm (Site 2 on Map E) on behalf of the landowners. Extensive studies and reports were submitted and there had been widespread engagement throughout the process of producing the PPNP.</p> <p>One of the reasons for opposing the allocation was that “the site would not represent the preference for linear growth of the village, nor is it considered small in scale and nature.” (Site assessment report Site 2-Little Inholmes Farm).</p> <p>That is what the PNNP now proposes through the allocation of sites 6, 7 and 8 on the east side of the village. These sites will give rise to an eastwards extension of the village to a far greater extent than would have been the case with the land at Little Inholmes Farm. Moreover the combination of sites 7 and 8 will give rise to development of a scale and nature far more extensive than in the case of Little Inholmes Farm.</p>	

OUR VILLAGE – OUR COMMUNITY.
Help shape its future.

Our Ref: PD/1926
Your Ref:



Ms. Anita Emery
Plumpton Parish Council
Elm Cottage
Church Street
Hartfield
TN7 4AG

31st July 2017

Dear Ms. Emery,

**Regulation 14 – The Neighbourhood Planning (General) Regulations 2012 and The Localism Act 2011 – Plumpton Neighbourhood Plan - Land at Riddens Lane, Plumpton Green, East Sussex
Site 1**

Executive Summary

In relation to the Regulation 14 consultation on the Plumpton Neighbourhood Plan we are generally supportive of the direction the plan and taken. In particular, we welcome the allocation of Land at Riddens Lane and the recognition that it is most sustainable allocation within the draft Plan as evidenced by the Strategic Environmental Assessment.

We have some concerns with the Draft Plan primarily relating to unnecessary prescription contained within the policies, notably relating to the 'cap' the Plan seeks to impose on the quantum of development for allocations and housing mix. Where we have raised concerns, we have identified the issue and recommended solutions. Please note that our comments in this regard are made to assist the Steering Group and with our common goal of a achieving a 'made' Neighbourhood Plan with land at Riddens Lane allocated for housing as swiftly as possible.

Introduction

Following the production of Plumpton Parish Council's draft Neighbourhood Plan for consultation and the publication of the Plan under Regulation 14 – The Neighbourhood Planning (General) Regulations 2012, please find below our comments made in respect of the Plan on behalf of our clients Messrs Kenyon and Maxwell-Gumbleton.

Our primary interest in the Plan relates to the allocation of residential development, in particular Site 1 land at Riddens Lane.

Overall, we are pleased with the progress that has been made on the emerging Plumpton Neighbourhood Plan and believe that it is clearly a product of a great deal of hard work for which the Steering Group should be commended.

In the preparation of these representations we have reviewed the requirements under Paragraph 8(1) of Schedule 4B to the Town and Country Planning Act 1990 to confirm that:

- the policies relate to the development and use of land for a designated Neighbourhood Area in line with the requirements of Section 38A of the Planning and Compulsory Purchase Act (PCPA) 2004;

- the Neighbourhood Plan meets the requirements of Section 38B of the 2004 PCPA (the Plan must specify the period to which it has effect, must not include provision about development that is excluded development, and must not relate to more than one Neighbourhood Area);
- the Neighbourhood Plan has been prepared for an area that has been designated under Section 61G of the Localism Act and has been developed by a qualifying body.

We are satisfied that this is the case.

We have assessed whether the submitted Plan meets the Basic Conditions as set out in Paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990 following the Localism Act 2011. In order to meet the Basic Conditions, the submitted Plan must:

- have regard to national policies and advice contained in guidance issued by the Secretary of State;
- contribute to the achievement of sustainable development;
- be in general conformity with the strategic policies of the development plan for the area.

On these points we have concerns with the Parish Council's draft Plan. The Parish Council appears to be missing evidence based documents required to support some polices and has other policies that are overly prescriptive and do not sit well with the strategic polices contained in the emerging Lewes District Local Plan Part 1.

Should the Plan be submitted for Examination in its current form, the Examiner would recommend that the Plan does not proceed to Referendum, on the basis that it does not meet the relevant legal requirements. To assist the Parish Council we have identified the areas of concern, explained the problems and recommended solutions.

Policy 1 : Spatial plan for the parish

We support the spatial strategy which extends the development boundary to incorporate the sites (including site 1).

Policy 2 : New-build environment and design

We agree with the general ambition of the policy to achieve a high quality built environment through good design. However we are concerned that the policy applies a blanket approach to all new development and precludes a height of greater than two storeys. (Please refer to Criterion 2.)

The draft Plan is supported by a Design Statement but this is more of an aspirational document rather than an analysis of what forms of development are appropriate and why. There has been no objective assessment of adverse impacts that would arise if development in excess of two storeys took place at locations throughout the Parish. There is no rationale provided as to why this approach is taken. The provision of accommodation in excess of two storeys assists the efficient use of land and therefore this policy prevents the implementation of important national and local objectives (see NPPF paragraph 17).

The Framework is explicit that:

*"Local planning authorities should consider using design codes where they could help deliver high quality outcomes. However, **design policies should avoid unnecessary prescription or detail** and should concentrate on guiding the overall scale, density, massing, height, landscape, layout, materials and access of new development in relation to neighbouring buildings and the local area more generally."*(Paragraph 59) (Our emphasis)

We note the policy guidance quoted above is directed at Local Planning Authorities but is equally relevant to Neighbourhood Plan Steering Groups as they prepare Neighbourhood Plans.

We suggest criterion 2 is deleted or alternatively reworded in a positive fashion such as:

"Ensuring new developments: are of an appropriate height, bulk, mass and scale related to their context."

This would allow the decision maker to refuse 3 storey development if it were harmful to the area but would not preclude it outright.

Policy 7: New Housing

We can see no evidence of what *"type of housing will meet local needs"*. The document entitled Community Evidence (2016) sets out the type of housing that the local community would like to see built, but this is distinctly different to the type of housing that the community needs. Criterion 1 is an understandable aspiration but it is not underpinned by any evidence. Evidence should be provided.

Due to the absence of evidence criterion 2 should be amended to simply say that there will be a mix of housing rather than seeking to prescribe the mix. It is inappropriate to preclude five bedroom properties in their entirety.

We support the explanatory text that identifies that housing sites for 68 dwellings have been found. This represents a pragmatic approach on behalf of the Steering Group given requirement for Lewes District Council to allocate further housing. We would suggest that the first sentence of paragraph 5.34 is amended to read *"This policy identifies housing sites for a minimum of 68 units."* This would bring the policy in line with the strategic policies of the development plan for the area, notably Spatial Policy 1 - Provision of housing and employment land in the Lewes District Local Plan Part 1 Joint Core Strategy 2010 – 2030.

Policy 7.1 : Riddens Lane, Plumpton Green

We support the allocation of the site and welcome the acknowledgement in the Strategic Environmental Assessment that it is the most sustainable site the village has to offer.

We believe the area shown on Policy Map E amounts to more than 0.6 hectares. It is closer to 1 hectare.

Limiting the development to 16 dwellings is inappropriate and is not be in general conformity with the strategic policies of the development plan for the area. This is an issue that have seen examined time and time again with the same outcome.

Strategic Objective 3 of the Lewes District Local Plan Part 1 Joint Core Strategy 2010 – 2030 indicates the Council will aim *"to deliver the homes and accommodation for the needs of the district."*The Council is unable to meet the full objectively assessed housing needs of the district and this has been confirmed at Examination. As a result of this, Spatial Policy 1 - Provision of housing and employment land has been words as follows:

"In the period between 2010 and 2030, a minimum of 6,900 net additional dwellings will be provided in the plan area (this is the equivalent of approximately 345 net additional dwellings per annum)."(Our emphasis)

This was an alteration to the emerging Plan that the examining Inspector insisted upon through MM01 and MM02 to make the Plan sound and legally compliant. Paragraph 56 of his Final Report - March 2016 (Please see Appendix A) confirms:

"Consequently, the Plan as modified now includes a significant increase in the level of new housing provision, from 5,600 as originally submitted, to a minimum of 6,900 in total" (Our emphasis)

Spatial Policy 2 – Distribution of Housing follows the same pattern and explicitly states that Plumpton Green is to deliver *"a minimum of 50 net additional units."*(Our emphasis)

Clearly the Government Inspector's ambition was that the housing target was a floor rather than a ceiling in order to meet the strategic national aim to *"boost significantly the supply of housing"* (NPPF paragraph 47)

The Examiner of the Kirdford Neighbourhood Plan (Appendix B) makes express reference in relation to housing targets being a minimum. The Examiner recommends the following change at paragraph 132 of their Report:

"Recommendation: in order to avoid confusion and to ensure flexibility, I recommend deletion of upper limits where mentioned in the accompanying text to Policies KSS1 and KSS5 and in Section 3. I recommend deletion of the Summary in Section 3. A new paragraph at the beginning of the new Section 'Site Specific Land Use Policies' should explain that the minimum number of dwellings allocated on these sites is 61. The maximum numbers will be determined on a site - by site basis, taking into consideration site constraints and emerging Local Plan Policy."

The Examiner of the Newick Neighbourhood Plan (Appendix C) notes in his Report:

"Nowhere does the Neighbourhood Plan seek to place a cap, or a maximum limit on the number of dwellings to be built in the Neighbourhood Area during the plan period. This approach has regard to the Framework's Presumption in favour of sustainable development."(Page 19)

We infer that had if it imposed a cap, this would have been inappropriate.

We understand the community's aspiration to have housing development spread across sites in clusters of no more than 20 units. We would suggest this is added to Policy 7 : New housing and reference made to the supporting evidence base. Specifying a maximum number of 16 units for land at Riddens Lane does not meet the basic conditions and there is no evidential basis for it.

Conclusion

In our view the draft Plan would not meet the Basic Conditions as set out in Paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990. We have suggested modifications to assist the Steering Group with the re-drafting of the Plan and would be happy to discuss these further at the Steering Group's convenience.

We welcome the allocation of Land at Riddens Lane and the recognition that it is most sustainable allocation within the draft Plan as evidenced by the Strategic Environmental Assessment.

We appreciate that a great deal of hard work has gone into the preparation of the draft Plan and hope that our comments are not seen as obstructive, but rather as drawing on our experience of Neighbourhood Plans to assist the Steering Group in achieving our common goal of a 'made' Neighbourhood Plan with the land at Riddens Lane allocated within it.

If you have any queries please do contact us.

Yours sincerely

Mark Best BSc (Hons) MSc
Planning Consultant
For and on behalf of Parker Dann
mark@parkerdann.co.uk
Tel: 01273 478654

PLUMPTON PARISH DRAFT NEIGHBOURHOOD PLAN RESPONSE FORM

Thank you for taking the time to feedback on the draft Neighbourhood Plan.

Some guidance notes to help you complete it in a way that will assist the Steering Group in finalising the document:

- While the final referendum will only be open to registered voters, at this stage the Steering Group are keen to get the widest range of input. To achieve that, this form is available to all individuals (i.e. not simply one per household), regardless of age, but only one form per individual will be accepted.
- Please note that anonymous forms cannot be considered and will therefore be ignored.
- If you choose to feedback, then please complete Part A and Part B – while this exercise is primarily qualitative in that it seeks your views, it is also useful to take the opportunity to gauge the overall support for the draft plan.
- Part C is optional, but must be completed if you have indicated in Part B that there are specific policies you do not support – the Steering Group need to know **why** a policy is not supported in order to consider any amendments to it.
- It would assist the Steering Group in collating responses if you would use the electronic version of the form, available from the Neighbourhood Plan website (www.plumptonpc.co.uk/neighbourhood-plan/), and keep your comments constructive and as concise as possible. If you wish to make several comments on the electronic form, please insert additional rows in Part C as required. For paper forms, simply use as many copies as required.
- The closing date for responses is 31 July 2017. Please return the form by one of the following methods: a) dropping into the box at Plumpton Post Office and Store, b) by email to np@plumptonpc.co.uk, c) or by post to the Parish Clerk: Anita Emery, Plumpton Parish Council, Elm Cottage, Church Street, Hartfield TN7 4AG

PART A – Respondent details (must be completed)

Name: JULIAN BLACK	
Postcode: BN27 3AL	
Connection to Plumpton:	Resident in Parish NO
	Business within Parish NO
	Landowner of Land within Parish NO
	Other (e.g. a planning consultant or similar representing any of the above) – Please specify below
	PLANNING CONSULTANT REPRESENTING PLUMPTON RACECOURSE

PART B – Summary of overall support

Do you support the draft plan? (Please delete the answer that does not apply)	Yes – please see further comments below

If you answered ‘Yes’ to the above, then the Steering Group will presume you support all the policies within the plan, but if that is not the case, then you can indicate so below. You are also free to add comments in Part C.

If you answered ‘No’, then the Steering Group need to know which policies you do not support (and why)? Please make that clear below (on the electronic form, simply delete all the policies that you are happy with, to leave those you do not support. On the paper form, just indicate [e.g. by ticking, circling or similar] those policies that you do not support). Then complete section C to provide the reason why you do not support that policy.

Policy 1: Spatial Plan for the Parish

The Neighbourhood Plan’s approach to support and distribute new development proposals within the planning boundary for Plumpton Green is welcomed. It is also acknowledged that the planning boundary will be extended to incorporate the sites allocated for residential development: to include the allocation at Plumpton Racecourse. In addition, we suggest that the Plan’s spatial approach should be more flexible towards other sites that are outside the planning boundary, but are suitable for development and are well related to the planning boundary. This would enable for sites with good access to existing services and facilities and with potential to create sustainable links with the core of the settlement to come forward.

Policy 7: New Housing

The criteria set out in Policy 7 that need to be met in delivering new housing on sites allocated in the PPNP, and also on any small windfall sites are supported in general. The policy highlights important environmental considerations that need to be taken into account as part of any scheme.

As far as the affordable housing provision is concerned, Point 5 of this policy requires affordable housing to be included in line with the requirement of the Lewes District Joint Core Strategy. The adopted affordable housing policy (Core Policy 1) in the Lewes District Joint Core Strategy requires 40% affordable housing for schemes consisting of 10 or more units. It also seeks affordable units for smaller schemes (i.e. 1 affordable unit for 3 – 4 unit scheme, 2 affordable units for 5 – 7 unit scheme, and affordable units for 8 – 9 unit scheme). These thresholds set out in Core Policy 1 of the Core Strategy do not reflect the

affordable housing requirements as set out by the National Planning Practice Guidance (NPPG). The NPPG clarifies that, in light of the order of the Court of Appeal, dated 13 May 2016, which give legal effect to the policy set out in the written ministerial statement of 28 November 2014, contributions should not be sought from developments of 10-units or less, and which have a maximum combined gross floorspace of no more than 1,000 sq metres. It is only in designated rural areas that Local Planning Authorities may choose to apply a lower threshold of 5-units or less. This part of the policy should therefore be reworded to also reflect the affordable housing provision threshold set out by the Government.

Para 5.35 of the PPNP, which supplements the context of Policy 7, states that 68 units will be delivered through the allocated housing sites. This is supported.

However, there has been no real progress with the District's Council's Local Plan Part 2 since the last public consultation in 2014 on the Issues and Options Stage. The 2017 Strategic Housing and Economic Land Availability Assessment (SHELAA) is expected to be published shortly following two stages of "call for sites" exercise, which took place and ended in April 2016 and April 2017 respectively. The District Council's Strategic Housing Market Assessment (SHMA) is dated 2008. Thus, the District Council remains to have a duty to update its evidence base, and establish its objectively assessed housing need as a matter of urgency. There is a strong likelihood that this will result in a higher number of units being required under the duty to co-operate. In light of this, whilst it is welcomed that Policy 7 does not specify a figure for the housing delivery, para 5.35 of the PPNP should have regard to potential increase in the housing figures to be delivered during the Plan period.

Policy 7.5: Land at Plumpton Racecourse, Plumpton Green

The allocation of this site for housing development in the PPNP is fully supported, and Policy 7.5 should be retained in the adopted PPNP.

There already has been a detailed and rapid progress in shaping the scheme for the development of the Plumpton Racecourse site since the publication of the first draft PPNP in June 2016. This process has involved ongoing liaisons with the Steering Group, Lewes District Council, and East Sussex County Council, as well as relevant sub-consultants for their input in establishing the development of this site in principle.

As also acknowledged in the current draft PPNP, the allocation and development of the land at Plumpton Racecourse is essential for the retention of the Racecourse. The need for the enabling development opportunity on this land has been triggered by the challenges being proposed and implemented by the Government, which has announced plans to reduce the horse betting levy payable to the racecourse. The combination of limited race meets (16 meets per year), restrictions to the winter months only (national hunt racing) and the Government's plans to further cut the horse betting levy, has forced the owners of the course to review their options. The enabling development opportunity as proposed for this site in Policy 7.5 will improve the quality of the existing facilities offered by the Racecourse for race-goers, owners, trainers and visitors. It will help implement the much needed improvements to the Racecourse and the associated infrastructure, enabling the Racecourse to remain successful and viable in to the future.

The PPNP highlights in para 5.88 that Plumpton Racecourse is the second biggest local employer. The housing development of the land allocated in policy 7.5 is fundamental to the retention of the employment opportunities offered by the operation of the Racecourse, and with the allocated site, the level of employment provided by the Racecourse will be higher.

The benefits of the parking space to be provided for commuters are significant given the most appropriate and convenient location of the car park in relation to the existing railway station.

Any scheme for the development of the land at Plumpton Racecourse would incorporate the necessary landscaping defining the boundaries of the site. With detailed consideration in the design of the scheme and the development of a site/area-specific landscape strategy, the new homes and the car park area can be assimilated into the sensitive environment. The proposed layout of the site will enable the car parking area to be “broken up” further with the introduction of landscaped areas of indigenous species. In a similar vein the southern edge of the new northern access lane to serve the houses and car park will be defined with a combination of native hedging interspersed with trees.

Through a combination of careful design, consultation and undertaking revisions to the spatial arrangement and access arrangements to serve the development of the site allocated through Policy 7.5, new village homes and a commuter car park will be an important part in shaping the future of the village, whilst improving and protecting the future of the Racecourse as a regional attraction for formal and informal sporting recreation and tourism activities.

We also suggest that the wording of Policy 7.5 be revised. The minor amendments in the suggested wording are underlined. It is considered that the suggested wording of “in consultation with the Highway Authority” is more appropriate as this better reflects the role of the Highway Authority in resolving any highway related matters. It should also be taken into account that the principle of the new access arrangements and car park for commuters are agreed in principle with the Highway Authority. Any further details for the provision of safe pedestrian access will be discussed and agreed through appropriate “consultation” with the Highway Authority.

Policy 7.5: Land at Plumpton Racecourse, Plumpton Green

The land, as shown on Policy Map E amounting to approximately 0.7ha, is allocated as a reserve site for residential development for up to 19 new homes and for the provision of extra car parking spaces.

In addition to conforming to the policies contained in the PPNP, LDC District Local Plan, SDNPA Development Plan and all other applicable statutory requirements, development in this location will:

1. include measures to prevent parking on Plumpton Lane and along the new access road;

2. include landscaping to clearly define the boundaries of the development.

This site will be released by the Local Planning Authority for development if safe pedestrian access can be provided between the site entrance and local facilities, in consultation with the Highway Authority.

Policy 8: Local Employment

The PPNP's approach in protecting local employment and existing businesses, unless proven unviable, is fully supported. Paragraphs 2.9 and 5.92 of the PPNP acknowledge the important role of Plumpton Racecourse in providing the majority of local employment. This will be retained and increased through the enabling development opportunity given to the Racecourse in Policy 7.5 of the draft Plan.

Policy 11: Plumpton Racecourse

We welcome the Parish Council's support for the appropriate development of the Racecourse within the context of its wider estate and business plans, which will positively contribute to the rural economy and sustainability.

The acknowledged importance of the facilities and services offered by the Racecourse further emphasises the need for enabling development opportunity to secure the future of the Racecourse. Policy 7.5 of the PPNP will help to meet these aims.

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Help shape its future.**

PLUMPTON PARISH DRAFT NEIGHBOURHOOD PLAN RESPONSE FORM

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PART A – Respondent details (must be completed)

Name: Tim Rodway (Rodway Planning Consultancy Limited)	
Postcode: 91 Victoria Road, Shoreham by Sea, West Sussex BN43 5WR	
Connection to Plumpton:	Resident in Parish NO
	Business within Parish..... NO
	Landowner of Land within Parish..... NO
	Other (e.g. a planning consultant or similar representing any of the above) – Please specify below..... YES
	Planning Consultant, acting for Fairfax Acquisitions Limited, who control land east of Nolands Farm (identified in Parish Council's Site Assessment Report as 'Site 9') and Land behind the School ('Site 10').

PART B – Summary of overall support

Do you support the draft plan? (Please delete the answer that does not apply)	No
	On behalf of our clients, Fairfax Acquisitions Limited, we wish to register our objection to the Pre-Submission version of the Plumpton Parish Neighbourhood Plan (dated May 2017), for the reasons detailed below, and within the attached document.
If you answered ‘Yes’ to the above, then the Steering Group will presume you support all the policies within the plan, but if that is not the case, then you can indicate so below. You are also free to add comments in Part C.	
If you answered ‘No’, then the Steering Group need to know which policies you do not support (and why)? Please make that clear below (on the electronic form, simply delete all the policies that you are happy with, to leave those you do not support. On the paper form, just indicate [e.g. by ticking, circling or similar] those policies that you do not support). Then complete section C to provide the reason why you do not support that policy.	
As currently drafted we do not include the following Neighbourhood Plan policies: <ul style="list-style-type: none">• Policy 1: Spatial Plan for the Parish• Policy 7: New Housing	

PART C – General

Comments on general sections of the documents	Page and/or paragraph number	Comment	Suggested improvement
	<p>Page 39, paragraph</p>	<p>The draft Plan acknowledges that the Lewes District Core Strategy ‘Spatial Policy 1’ (entitled ‘Provision of Housing and Employment Land’) establishes that a minimum of 6,900 net additional dwellings will be provided across the district up to 2030, and JCS Spatial Policy 2 (‘Distribution of Housing’) breaks down this housing growth requirement between the settlements. It establishes that the planned level of growth for Plumpton Green will be a <u>minimum</u> of 50 net additional units over the plan period up to 2030. This LDC policy states that an additional 200 net additional units will need to be allocated to settlements across the district in locations yet to be determined. It may involve some additional housing land allocations in Local Plan Part 2 beyond those identified in the Neighbourhood Plan, and this could include Plumpton Green. The draft NP acknowledges that an increased housing provision will assist with meeting this additional need. However, the NP only goes so far as allocating 68 dwellings (only marginally in excess of the 50 units [minimum] set out within Spatial Policy 2 of the Lewes Core Strategy. This is considered to be a missed opportunity.</p> <p>Plumpton Green is identified at Table 2 (‘Settlement Hierarchy’ of the Lewes Core Strategy, as being a ‘Service Village’ which are described as <i>“villages that have a basic level of services and facilities, public transport provision (possibly not frequent) and limited employment opportunities. Residents can have some of their day to day needs met in such locations, although higher order settlements need to</i></p>	<p>We consider that supporting text to Spatial Policy 1 should be adapted in order to acknowledge the importance of Plumpton in terms of its position within the settlement hierarchy in Lewes District, and that its relatively unconstrained location coupled with its sustainability credentials make the settlement suitable for an increased number of dwellings, which will assist the District in meeting its objectively assessed housing needs, and reduce the burden placed on other more constrained and/or less sustainable settlements.</p> <p>The supporting text and/or the Policy itself should indicate that the village can deliver a <u>minimum</u> of 100 dwellings throughout the plan period. This would provide the community with control over where development is to be located, given the clear acceptance that the District’s Local Plan Part 2 will likely make further allocations at Plumpton Green. We contend that if it can be demonstrated now that the Parish have realised this future requirement and have accounted for it now, then it should be the case that the District would then look elsewhere to make further site allocations as part of the LP Part 2 process. By stating that a minimum of 100 units can be delivered, and then making proactive steps to add further allocations to account for this would put the Parish in a strong position as the next stage of the LP (site allocations) is progressed by the District.</p>

		<p><i>be accessed to enable this to be fully achieved".</i> The table suggests a quantum of development for each settlement in the hierarchy, and in the case of 'Service Villages' 30-100 units is suggested.</p> <p>We consider that Plumpton Green is suitable for around 100 units, at least. Evidently Plumpton Green is the only settlement in the parish that has a planning boundary, and indeed it is the most sustainable part of the Parish. Therefore the focus of new housing development should be in Plumpton Green. Contrary to the overview set out in the Settlement Hierarchy, we consider Plumpton Green to be a sustainable location, with excellent public transport opportunities, a wealth of local facilities and services (including a school, shops and community facilities) and local employment opportunities (for instance, the nearby racecourse). Importantly, it is also noted that in comparison with other settlements in Lewes District, Plumpton Green is relatively unconstrained. The village is outside of the South Downs and is not within the High Weald AONB. In addition the village lies outside of the Ashdown Forest SPA/SAC 7km buffer zone, whilst Newick (which is identified as a 'Rural Service Centre' [100 dwellings+] in the Hierarchy) is within this designation. We therefore argue that Plumpton Green must be considered suitable for an increased number of units, which will ease the pressure on other more rural and/or constrained parts of the District.</p>	
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Comments on specific policies in the draft plan	Policy and/or page or paragraph number	Comment	Suggested improvement
	Spatial Policy 1	<p>Draft Spatial Policy 1 states that development will be permitted provided the site in question is within the built-up area boundary and accords with other policies. The policy notes that <i>“the planning boundary as referred to above will be extended to incorporate the sites allocated for residential development in Policy 7... New developments outside the planning boundary will not be supported.”</i></p> <p>We question whether this policy allows suitable flexibility to allow more housing to be provided over and above that which is proposed to be allocated. The Government have confirmed that policy documents and decision makers should seek to boost significantly the supply of housing. This policy, as worded, does not appear to allow this to occur and sites would only be acceptable in principle if they are located within the built-up area boundary (as amended).</p>	<p>We suggest that the wording is amended so as to accept the principle of development provided it is located within or adjoining the built-up area boundary, and is sustainably located, and is in compliance with other policies contained in the Development Plan as a whole.</p> <p>Reference could also be made within the policy to provide an indication of the level of housing that is deemed suitable for the Parish within the Plan period – i.e. 100 units.</p>
	Spatial Policy 7	<p>As drafted we do not have significant concerns with the wording of this fairly general main housing policy. However, we note that ancillary to the main policy are a number of sub-policies (specifically policies 7.1 – 7.5 inclusive). These sub-policies detail each of the five housing allocations, which cumulatively provide for “up to” 68 new dwellings. Our site (‘Site 9’) is not included as an allocation, and therefore it is clear that our site has been omitted from the Plan. We understand that the principle reason appears to be that our site is assessed as being acceptable aside from the communities desire to have “small pockets” of 20 units. Consequently it is clear that development at land at Nolands Farm</p>	<p>We contend that Site 9 – land east of Nolands Farm should be added to the Neighbourhood Plan as an additional site allocation for residential development.</p> <p>The number of units to be allocated should not be capped, but instead the language that could be used – such as “around” or “approximately” would allow greater flexibility and provide for making the best use of available land, which in turn will accord with the Government’s policy intention to “boost significantly the supply of housing”.</p>

	<p>would comprise sustainable development, and if it were not for the communities aspiration to restrict development sites to not providing any more that 20 units, then land at Nolands Farm (Site 9) would likely have been allocated. References have been previously made in respect of access arrangements (which have now been overcome), and that the proposals include the demolition of 2 non-listed houses so as to provide access – but we cannot understand why this alone would have counted against the positive assessment of the site. Our transport consultants have confirmed that the proposed site access arrangements are satisfactory from a highway safety perspective.</p> <p>We also note that the NP’s accompanying Sustainability Appraisal highlighted potential adverse landscape impacts due to its visibility of the site from the South Downs. However, our client’s landscape consultants have considered this issue in detail, and their summarised response is included within the attached letter. The consultants acknowledge that there will be <i>“some long distance glimpsed views are available from South Downs National Park”</i>, but they conclude by saying that in their professional opinion <i>“with mitigation in place there will be no significant adverse impacts on the existing landscape baseline of the site with residual impacts on the visual baseline limited to one or two properties only and reducing in significance over time. The proposals are considered to be acceptable as a small scale residential development in this location”</i>.</p> <p>Further the landscape impacts resultant from Site 9,</p>	
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		<p>would not be any different from the three sites that are to be allocated (sites numbered 6, 7 and 8), which are located to the north of Nolands Farm. Indeed, we consider our site to be more suitable than these adjacent sites, given our more central location, and that our development would provide a less piecemeal solution to providing new homes for Plumpton. It is noted that sites 7 and 8 combine to provide 40 units on two parcels of adjoining land that is located further away from the centre of the village and its facilities including the railway station than our site. Further this piecemeal approach, as suggested currently by the draft NP, would have a number of other drawbacks, which would not be resultant if our site was allocated:</p> <ul style="list-style-type: none">• These include multiple access points and more infrastructure to serve each site (so therefore there will be increased visual harm);• The physical extent of the land being developed will be greater;• There will be less infrastructure benefits and potentially a reduction in the amount of affordable housing that will be provided;• A proliferation of small, segregated cul-de-sacs will be resultant which will not provide a cohesive form of development, which will not be encouraging of inclusive communities.	
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**OUR VILLAGE – OUR COMMUNITY.
Help shape its future.**

Plumpton Parish Council
FAO: Ms Anita Emery
Elm Cottage
Church Street
Hartfield
EAST SUSSEX
TN7 4AG
VIA EMAIL

28th July 2017

Dear Sir/Madam,

**Response to the Public Consultation in respect of the Pre-Submission Draft Version of the Plumpton Parish Neighbourhood Plan, June 2017
Representations made on behalf of Fairfax Acquisitions Limited**

The comments below should be read in conjunction with those contained in our accompanying 'Consultation Response Form'. Our submissions relate to our client's site '**Land east of Nolands Farm**', identified in Parish Council's draft Neighbourhood Plan as '**Site 9**'. For ease of reference, below is a red lined site plan that identifies the extent of the land in question:



This is a land parcel that my client's have been actively promoting for some time. It is understood that the site measures approximately 2.47 hectares in area. It comprises two existing detached dwellings on Station Road – 'Chestnut House' and 'Saxon Gate', together with land south and east of Nolands Farm. The site encompasses an area of woodland which also contains a number of ponds. The site area adjoins the recent social housing development at Sun Close, which is accessed off North Barnes Lane.

The site is not currently proposed to be allocated for residential development. The Parish Council's Site Assessment report assesses the site as being largely suitable and achievable. It is also acknowledged that the site is available. With respect to acceptability the Parish have advised that the site is a green field site, and the access would mean the loss of two existing properties on Station Road. There are concerns about the access onto Station Road. Further the site is partially visible from the South Downs. However it is understood that the Parish Council's principle concern with the site is that it would comprise a scheme of around 40 houses, and consequently the site does not meet the policy preference for small-scale pockets of development.

The site is continuing to be promoted as being suitable for approximately 40 new residential dwellings, following the demolition of the two houses at the sites frontage, which are required to be removed in order to facilitate access.

As part of our client's ongoing site preparation work, a number of detailed and technical surveys and assessments have been carried out by specialist consultants. In this respect, and in order to confirm the site's suitability, we can confirm as follows:

- **Landscape Considerations**

The applicant's landscape consultants, Hyland Edgar Driver, have carried out an assessment of the landscape and visual impact of the proposed development. They have concluded that:

"The findings acknowledge the following as a summary of the landscape and visual baseline and outcome of the assessment of the impact of the development on this baseline:

- *The site is located on the eastern edge of Plumpton Green village in East Sussex and is designated as Open Countryside in the Lewes District Local Plan. The South Downs National Park is located approximately 1km south of the site. The site falls within the Impact Risk Zone for Ditchling Common SSSI 3.0km north-west of the site. All of these potential landscape receptors have been considered and mitigated for where necessary.*
- *Whitehouse Farm, a Grade II listed building, sits to the north-west of the site. Its setting has been considered and conserved in the design of the scheme.*
- *The site sits within 14 Western Low Weald Landscape Character Area and shares some but not all of the key characteristics typical of this Character Area which are to be conserved in the proposals.*



RODWAY PLANNING
CONSULTANCY LIMITED

- *Within the site, the land is separated into distinct parcels by dense hedge and tree planting. The site comprises Grade 3 agricultural land, and an area of deciduous woodland with several ponds to the south east of the site. Two residential buildings to the far west of the site and miscellaneous farm structures within the site are to be removed within the proposals. All significant site features have been retained and enhanced in the proposals.*
- *The site is well contained on account of the built form on its western boundary, vegetation on its northern, eastern and southern boundaries and hedgerows containing the wider field area to the north and east of the site.*
- *Visual receptors are limited to a few overlooking properties, Plumpton Primary School, bridleway users along North Barnes Lane, motorists, cyclists and pedestrians using a small section of Station Road and isolated farm workers. Some long distance glimpsed views are available from South Downs National Park.*
- *Of these receptors, only a few properties have been assessed as having close distance permanent views of the site. This has been mitigated for by locating the development further east and applying a robust planting strategy within and surrounding the site. Over time, there will be no significant adverse effects on the existing view from the majority of properties.*
- *In the assessment of the landscape, the physical landscape and visual baseline of the site is considered to be of medium value, medium quality and medium sensitivity with a medium capacity for change.*
- *The scheme has considered all of the above in the development of the proposals. Care has been taken to preserve the local character of the site by retaining and enhancing existing key features and vegetation patterns and allowing the existing conditions to dictate the form, siting and scale of the development. Biodiversity, wildlife corridors, habitat creation and SUDs have also been considered in the proposals as an integrated approach to conserving and enhancing the existing ecology, drainage and landscape of the site.*
- *With mitigation in place there will be no significant adverse impacts on the existing landscape baseline of the site with residual impacts on the visual baseline limited to one or two properties only and reducing in significance over time. The proposals are considered to be acceptable as a small scale residential development in this location.”*

- **Highways & Transport**

SK Transport have undertaken a detailed technical appraisal of the site from a traffic and transport perspective. They have confirmed that:

“the development site is sustainably located, being located within an established village and with easy walking and cycling distances to a range of local facilities. The site is also located close to existing bus routes and a rail station, all within appropriate

walking distances from the site. These existing public transport facilities will give end occupiers of the proposed development travel choices, and in the case of rail allow end occupiers to make longer distance leisure and employment-related trips towards a range of local and more distant destinations, including central London.

With respect to vehicular access the development will be serviced by a new priority junction is proposed onto Station Road. As part of the site appraisal it is confirmed that a junction arrangement that provides visibility splays that accord with the guidance in Manual for Streets can be delivered. The priority junction will also be capable accommodating all service and refuse vehicle traffic. The access design would meet adoptable standard requirements, with 2.4m x 43m visibility splays.

An assessment has been made of existing traffic conditions (both in terms of vehicle speeds and traffic volume) on Station Road. The traffic surveys confirm that motorists average speed are in line with the 30mph speed limit, and at its busiest AM and PM peak periods the street accommodates between 212 and 197 two-way vehicle movements. Technical junction modelling confirms that a residential development on this site will have a minimal impact on the performance of Station Road and that the proposed new junction onto this route will operate well within accepted industry-standard thresholds.

In summary the site is sustainably located, and traffic generated by the proposed development will have no material impact on the surrounding highway network. Accordingly the impact of the proposed development is shown not to be 'severe', the test taken from the National Planning Policy Framework. In traffic and transport terms the site is considered to be suitable for inclusion within the Neighbourhood Plan for residential development."

- **Flood Risk & Drainage**

Our clients have commissioned Hilson Moran, a multi-discipline firm who specialise in technical, environmental matters. They have undertaken detailed desktop assessments and on-site survey work in order to appraise the site from a flood risk and drainage perspective. In summary they have concluded that:

"The Lewes District Council (LDC) Strategic Flood Risk Assessment and the Environment Agency (EA) Flood Map indicate that the proposed development is wholly located in the EA's Flood Zone 1, "Low Flood Probability" - i.e. the annual probability of flooding from riverine sources is less than 0.1 %. The EA and LDC information demonstrate that the site does not lie within an area susceptible to groundwater flooding, that the site has low susceptibility to surface water flooding and there are no artificial sources of flooding (i.e. canals or reservoirs) which would affect the site, whilst the sewer records indicate that the risk of flooding of the site from sewers is considered negligible.

The Sustainable Drainage System for the proposed redevelopment will be designed to accommodate all additional runoff from the site for rainfall events up to and including

the 1 in 100-year event inclusive of a 40% increase in rainfall due to climate change and infiltrate it to ground. This will include a detention basin, a swale and subsurface storage to be incorporated within the bounds of the site. As a consequence of the proposal, the rate of surface water runoff generated from the site will be maintained at the current greenfield rate and consequently, there will be no requirement for additional discharges to the surface water sewer system.

In light of the above, the principle of the proposed redevelopment is deemed acceptable on flood risk grounds and will provide a positive contribution to the sustainable management of surface water runoff."

- **Other Survey Work**

In addition, ecology/biodiversity work has also been undertaken on our client's behalf, which has confirmed that with suitable mitigation, there are no protected species or other biodiversity issues that would preclude the site as being considered suitable for residential development.

Further, Archaeology South East have been engaged to assess the site from an archaeology and heritage perspective, and their work has confirmed that the site is acceptable in these respects.

Arboricultural surveys have been undertaken, and it has been confirmed that the access arrangements and development of the site with 40+ new dwellings can be accommodated without impacting on the main landscape features that are within and adjoin the site.

Utility searches that have been undertaken confirm that the site is unconstrained in terms of its ability to be served by appropriate utilities, such as foul sewerage, clean water, and energy sources. Further, our clients are committed to providing developments that are energy efficient, therefore reducing the reliance on 'traditional' forms of energy.

Conclusions

We put forward this site with the intention to provide high quality housing in an area with an identified need. We have made it clear in the above and attached representations that the site is eminently available, sustainably located and can provide much needed new residential units.

The Parish Council's proposed housing figures for the Plan period are considered to be insufficient to meet the needs of the local area, and the wider District requirements. Plumpton is a sustainable location in the context of Lewes District, and given that it is unaffected by wider issues, such as the Ashdown Forest SAC/SPA, we consider that it should be aiming to provide an increased housing figure during the Plan period.



The site my client has an interest in is unconstrained by a landscape or other planning designations of any type. A significant amount of work has already been undertaken, and the conclusions of which clearly identify that the site is suitable for development. Further, the site is available and achievable.

Yours faithfully,

Tim Rodway
Director

c.c. Fairfax Acquisitions Limited