



Lewes District Council and South Downs National Park Authority
Plumpton Neighbourhood Plan Regulation 16 Consultation
5th October – 22nd November 2017

The following page presents a summary, written by Officers at Lewes District Council, of the comments made during the Regulation 16 consultation on the Plumpton Neighbourhood Plan. The summary is written to provide assistance to the Examiner and to allow anyone who wishes to see some of the issues raised; it does not contain every point a consultee has made. The Examiner will be provided with the comments made by each consultee in full.

Number	Consultee	Comments	Date Received
1	Susan Martin	Comments on one of the proposed projects which could receive Community Infrastructure Levy funding affecting Novington Quarry - (listed in section 6.4)	09.10.2017
2	National Grid	National Grid has identified that it has no record of electricity and gas transmission apparatus which includes high voltage electricity assets and high pressure gas pipelines within the Neighbourhood Plan area.	10.10.2017
3	South Downs Society	<ul style="list-style-type: none"> • Concise and well thought out Neighbourhood Plan, looking sensitively to the future and reflecting residents' fondness for the area and their priorities • Welcomes use of green gaps to promotes distinct identities of settlements • Welcomes the fact that sites for further housing development within the Neighbourhood Plan are outside of the South Downs National Park Area • Welcomes specific policies referring to the college and racecourse • Good to see policies that look to protect the landscape, biodiversity, shops, businesses, community facilities and green spaces • Projects proposed for receipt of Community Infrastructure Levy funds are varied and looked forward to 	18.10.2017
4	Cala Homes (South Home Counties)	<ul style="list-style-type: none"> • Supports the plan because it meets the basic conditions <ul style="list-style-type: none"> ○ The site is one of the highest scoring sites in the Sustainability Appraisal ○ The site allocation benefits the Neighbourhood Plan in terms of meeting the basic conditions ○ Overall, the Basic Conditions Statement is welcomed and it shows conclusively that the basic conditions for the Neighbourhood Plan preparation have been met. ○ Policy 6.4 should be retained by the Examiner and in meeting the basic conditions, should proceed to Referendum • Submission Policy 6.4 allocates land to the rear of Oakfield for residential development comprising 20 dwellings, open space and landscaping. Recommends minor changes to the wording of Policy 6.4, which will strengthen the overall performance of the Plan in delivering sustainable development. Comments that it can only support Policy 6.4 subject to the following amendments: <ul style="list-style-type: none"> ○ The site amounts to 1.63ha not 1.5ha - the correct site area should be included in the policy ○ The policy wording refers to adjoining land at The Glebe, which is allocated separately under Policy 6.3. As the policy intention is for the Glebe Land to be accessed directly from the Oakfield site via a single shared access, the wording of both Policies 6.3 and 6.4 should state this. It is likely the two sites will come forward separately, so the wording should ensure no phasing restrictions will apply, with regard to this access. <ul style="list-style-type: none"> ▪ Recommended amended wording of Policy 6.4 is as follows: <ul style="list-style-type: none"> • <i>The land, as shown on Policy Map D amounting to 1.63ha, is allocated for residential development for up to 20 homes. In addition to conforming to the policies contained in the PPNP, the adopted development plans all other</i> 	23.10.2017

		<p><i>applicable statutory requirements, development in this location will:</i></p> <ol style="list-style-type: none"> 1. <i>be designed to include landscape buffers between it and the site allocated for residential development in Policy 6.3, to emphasise the separation of the sites;</i> 2. <i>be designed to avoid proximity of houses to existing properties along Station Road</i> <p><i>In view of the multiple records of protected and notable species in the area, an Ecological Impact Assessment should be carried out and, where indicated, steps taken to avoid and compensate for impacts on biodiversity and strengthen connectivity between existing habitats. As this site is adjacent to site 6.3, a detailed design brief should be prepared to cover the relationship between the sites, and their design, landscaping and layout.</i></p> <p><i>To help protect the valued historic character of All Saints Church, Rectory ad gardens and Strollings, the site will provide a single vehicular access from Station Road to the boundary of site 6.3. The access for site 6.3 will be shared with and pass through site 6.4. No phasing restrictions shall apply to allow the sites to come forward independently of each other.</i></p>	
5	Jason Clift	Expresses support for the Plan, noting the hard work that has gone into it and hopes for it to become a reality soon	07.11.2017
6	Paul Stevens	<ul style="list-style-type: none"> • Supports the plan • Plan meets the Basic Conditions • Plan has been subject to extensive consultation and co-operation from Lewes district Council • Weight should be given to the Plan when determining planning applications, even though it is not currently fully 'made' 	09.11.2017
7	East Sussex County Council	<p>In relation to the Neighbourhood Plan meeting the basic conditions, comments are made with regard to it contributing to the achievement of sustainable development:</p> <ul style="list-style-type: none"> • Comment refers to the requirements of Policy 6.3 <ul style="list-style-type: none"> ○ Policy needs to include measures to ensure sufficient wildlife buffers and open space are provided ○ Recommended that new item is added to Policy 6.3 ○ Proposed addition to Policy 6.3 to read as follows: <ul style="list-style-type: none"> ▪ <i>Development in this location will:</i> <ul style="list-style-type: none"> • <i>Be designed to provide a buffer between development and retained boundary habitats to benefit wildlife, and be designed to include open space within the</i> 	10.11.2017

		<i>development to help offset impacts on biodiversity.</i>	
8	Catherine Jackson	<p>Supports the Neighbourhood Plan</p> <ul style="list-style-type: none"> • Offers best solution to requirement for 50 new dwellings • Selected sites meet LDC criteria for inclusion in its SHLAA (available and deliverable in Plan period) • Would provide 68 new homes in the village (range of sizes and affordable homes) • Some inevitable impact on local wildlife, but Plan requires mitigation measures on sites • In conformity with strategic plans for area • Does not conflict with E.U. obligations • Plan reflects village preference for smaller sites (max. 20 homes) spread across the village, which reflects local character 	13.11.2017
9	South Downs National Park Authority (SDNPA)	<ul style="list-style-type: none"> • Plumpton Parish Council should be congratulated on turning this plan around so swiftly following the last Reg. 14 consultation • The Neighbourhood Plan is locally-distinctive and clearly written • SDNPA very pleased that the majority of its comments made at Reg. 14 have been taken into account in this submission version (in particular the removal of the Plumpton Racecourse site as an allocation site) • Other comments are stated to repeat points made at Reg. 14 which have not been taken on board and those which the SDNPA are particularly supportive of: <ul style="list-style-type: none"> ○ Para. 3.5 - the quashing of policies SP1 and SP2 of the JCS in relation to the National Park mean that it may be advisable to include as a footnote that as a result of this ruling policies SP1 and SP2 of the Lewes JCS do not apply in the National Park ○ Para. 3.11 - include reference to the fact that nearly half of the parish is in the SDNP and reference its purposes and duties. As required by section 62 of the Environment Act 1995, all relevant authorities or public bodies have a duty to have regard to the National Park purposes ○ Chapter 5 - include protection of special qualities of National Park within Environment objectives ○ Policy 10 - welcome this policy, but while previous comments have largely been taken on board in this policy, concerns remain that the policy is not flexible enough as it has not included the word 'appreciation' and without this it is interpreted as being a requirement to maintain a rigid physical gap between the two areas to the east and west. Amend second sentence of last paragraph to say: <ul style="list-style-type: none"> ▪ <i>The masterplan/estate plan for this site should identify how the understanding and appreciation of this separation will be conserved and enhanced in any future development proposals.</i> ○ Policy 2 - pleased our previous comments on this policy have been included in the revised 	13.11.2017

		<p>plan, including new development avoiding light pollution</p> <ul style="list-style-type: none"> ○ Policy 4 - welcome the inclusion of our suggested wording for this policy (layout and landscape plans to be informed by landscape character and achieve landscape and biodiversity enhancements). Also supportive of, the creation of multifunctional green networks ○ Community Infrastructure Projects, pleased that this section is included in the Plan and are particularly supportive of reference in 6.4 to: <ul style="list-style-type: none"> ▪ a cycle path network to connect railway station and SDNP ▪ additional footpaths at north and south of Parish where there are no pavements for safer pedestrian access ▪ a bridleway network at the north and south of Parish ▪ our suggestion of the inclusion of the restoration of Novington Quarry/Sand Pit as a Community Infrastructure project to provide an incredible green space/local nature reserve for the community ○ Policies Map (p.62) - the policies map shows Local Green Space and housing sites, but the network of cycle routes and footpaths (existing and aspirational) that will join these together is missing. The plan would be enhanced if it included a map of (or this map were annotated to include) 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 60. This approach is supported by government advice which recommends that local areas produce Cycling and Walking Infrastructure Plans (CWIP). 	
10	Georgina Vestey	<p>Supports the Plumpton Neighbourhood Plan</p> <ul style="list-style-type: none"> • The sites chosen preserve the green space around village and create a buffer that preserves its rural character • the sites chosen near the centre of the village are the most sustainable in terms of access to local amenities. Choosing sites that are up to 1 km distant from the amenities will only encourage more cars to enter the village which will lead to greater congestion and parking issues. 	13.11.2017
11	Richard Watson	<p>Strongly supports the Plumpton Neighbourhood Plan as submitted to LDC. In favour of the plan for four reasons:</p> <ul style="list-style-type: none"> • Planned development is largely hidden and will not substantially impact the 'look' of the village from the north or south • It is especially important not to extend the village in a northerly direction as this will surely lead to 'fill in' developments over time will eventually 'join' with other settlements. Each village should remain physically distinct with significant green spaces between each • If any development occurs substantially out of the village in any direction it will surely lead to more 	13.11.2017

		<p>traffic and greater congestion</p> <ul style="list-style-type: none"> From a sustainability point of view, developments that are close to the village school/shop/station in the centre are surely preferable 	
12	Gina Hawthorne	<p>Adds full support for this plan</p> <ul style="list-style-type: none"> Plan has been arrived at through a long and diligent process Particularly support the green buffer zone to the North and South which maintains the beautiful rural nature of our village The choice of sites centrally situated is the best way to expand our village and allows new residents easy access to village facilities and will hopefully encourage residents to walk within the village 	13.11.2017
13	Julia Hadden	<p>Supports the Neighbourhood Plan which has taken months of hard work and commitment by the community to complete. Two main points were particularly important to many in the community:</p> <ul style="list-style-type: none"> the plan leaves the green spaces to the north and south of the village developments are smaller units spread near the centre of the village 	13.11.2017
14	Richard Fawdrey	<p>Register my support for the Plumpton Green Neighbourhood Plan</p> <ul style="list-style-type: none"> The plan is sensible as it is sensitive Developments are near the centre of the village which is less likely to cause congestion and road safety issues as new residents will likely walk The plan also develops mostly on the eastern side this not causing further rain water flooding as the water flows away to the east Protecting the green northern and southern boundaries keeps the village feel and stops ribbon development that has never been permitted 	13.11.2017
15	David Hadden	<p>Expresses support for the Neighbourhood Plan</p> <ul style="list-style-type: none"> It promotes smaller sites within the village, close to local amenities Seeks to protect and preserve the village character by not promoting sites on green spaces beyond the established village boundaries. 	14.11.2017
16	Simon Farmer	<p>Supports the draft plan's adoption and further considers that all the basic conditions have been met by the Draft Neighbourhood Development Plan as it stands</p>	14.11.2017
17	Jean B Harling	<p>Supports the draft plan's adoption and further considers that all the basic conditions have been met by the Draft Neighbourhood Development Plan as it stands</p>	14.11.2017
18	Ben Farmer	<p>Supports the draft plan's adoption and further considers that all the basic conditions have been met by the Draft Neighbourhood Development Plan as it stands</p>	14.11.2017
19	Natural England (NE)	<ul style="list-style-type: none"> Wealden judgment (CO/3943/2016) Wealden District Council v Secretary Of State For Communities and Local Government The Planning Policy department of the SDNPA is fully aware of the potential issues that have arisen from Justice Jay's ruling on legal challenge regarding the HRA, so NE 	15.11.2017

		<p>recommend this issue is discussed with them to ensure that the Neighbourhood Plan is compliant with SDNPA's overall approach</p> <ul style="list-style-type: none"> • 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. 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 • 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) 	
20	Dominic Williams	<p>In favour of the proposed Plan</p> <ul style="list-style-type: none"> • It is well thought through and constructed, taking into account the housing needs of local people • Sites are of preferred approach (centrally located and made up of smaller sites) • New houses will integrate into current housing stock 	15.11.2017
21	National Federation of Gypsy Liaison Groups	<p>Neighbourhood Plan is not compliant with national and local planning policy</p> <ul style="list-style-type: none"> • National planning policies require that provision should be made in planning policy documents to ensure that sufficient sites to provide a five year supply of pitches are allocated for Gypsies and Travellers (similar to requirement for housing sites) • National policy also requires that planning policies should set out criteria to deal with planning applications affecting Traveller pitches • These requirements are invariably dealt with in Local Plans, but it is important that in preparing Neighbourhood Plans, regard should be given to these requirements and any Local Plan policies relating to Gypsy and Traveller provision should be reflected in the Neighbourhood Plan • The Gypsy and Traveller Accommodation Assessment recognises need for Traveller pitches, it is important that the Neighbourhood Plan addresses this need 	17.11.2017
22	Catherine Gold	<p>The Plumpton Neighbourhood Plan satisfies environmental, social and economic concerns, particularly the siting of housing in the centre of the village</p>	20.11.2017
23	Historic England (HE)	<ul style="list-style-type: none"> • Further to our comments on the earlier draft of the Plan, set out in our letter of 28 June 2016 to the Parish Clerk, we are pleased to note that appropriate revisions have been made to: <ul style="list-style-type: none"> ○ The wording of Policy 2 ○ The supporting text to Policy 6.1 (Para. 5.42) to include reference to the Archaeological Notification Area • Adequate measures are included in the Plan for the protection of the settings of other heritage assets (sites associated with Policies 6.3, 6.4 and 8) 	20.11.2017

		<ul style="list-style-type: none"> • HE strongly advise the Council's Conservation staff are closely involved throughout the preparation of the Plan 	
24	Lewes District Council (LDC)	<ul style="list-style-type: none"> • Congratulate the Parish Council for getting to this stage of the process as it is clear that a great deal of time and effort has gone into producing the Plan • LDC raised some concerns at the Reg. 14 consultation relating to some policies and allocations, as well as aspects of the neighbourhood plan preparation; however, amendments have been made to the Neighbourhood Plan since the Draft Plan was consulted on, which reflect comments made on it by LDC and other parties • The Plan is supported by a robust and consistent Site Assessment Report • LDC made recommendations with respect to the Draft Neighbourhood Plan policies. Mostly these comments were to strengthen the policies but, it was also felt that some of the policies made inappropriate reference to current planning policy documents. The comments aimed to address these points and on the whole, these recommendations have been taken into account • There are some formatting errors apparent with the submission plan. None of these formatting issues are considered to have jeopardised or hindered the legibility of the document overall, but will require review. There are also some points we recommend are reviewed for general legibility also. Errors a points to review are as follows: <ul style="list-style-type: none"> ○ 'Map D' on p. 26 is incomplete, showing approximately half of the intended information ○ There are two different maps titled 'Map D' (one on p. 26 and one on p. 53) within the document and this may lead to confusion. It is recommended that maps are clearly labelled, given different references ○ Text box containing 'Policy 6: New Housing' on p. 40 overlays some supporting information in paragraph 5.36 ○ Policies 6.1, 6.2, 6.3 and 6.4 refer to 'Map D' for specific site references, however 'Map I' is the policies map and policies may be clearer if referring to this map instead of 'Map D' ○ Policy 11 refers to community facilities, but the referred to sites are not contained within the policy itself, only the supporting text • The Neighbourhood Plan is in general conformity with the development plan for the area • The emerging South Downs National Park Local Plan is gaining weight in the determination of planning applications as it has now reached pre-submission publication; once it is submitted and progressing through examination its weight increases further until full weight can be given to it upon its adoption by the South Downs National Park Authority. This is stated clearly in the Basic Conditions Statement and we agree with their findings • The Stanton's Farm and Novington Sandpit site (identified as a 'Mineral Safeguarding Area') of the East Sussex and Brighton & Hove Waste and Minerals Sites Plan (adopted 7 February 2017) lies 	21.11.2017

		<p>adjacent to the Parish, within East Chiltington Parish. The nature of the site and its position outside the Neighbourhood Plan Area is considered to render it nominal to the considerations of the emerging Plumpton Neighbourhood Plan</p> <ul style="list-style-type: none"> • LDC is of the opinion that the Plan has been prepared with regard to national policy and guidance and concurs with the information provided by the Parish Council in their Basic Conditions Statement • Screening opinions were prepared by Lewes District Council officers for both the Habitat Regulations (HRA) and Strategic Environmental Assessment (SEA). The HRA screening opinion concluded that there was no need for further stages of the process, whereas the SEA screening opinion identified the need for a full SEA to be prepared to inform the neighbourhood plan. LDC believes the submitted SA (incorporating SEA) is compliant with relevant legal and statutory requirements at the national and European level. In light of the above, we believe that the making of the Neighbourhood Plan would not breach E.U. obligations • The findings of the SA have informed the submitted neighbourhood plan to ensure that it helps to achieve sustainable development. • Consultation has been extensive throughout the plan-making process and has gone beyond the minimum prescribed requirements - a wide range of stakeholders, including the local community, have had the opportunity to express their views. LDC view the process as a good example of community engagement 	
25	Steve Long	<p>Voices support for the Plumpton Neighbourhood Plan</p> <ul style="list-style-type: none"> • The plan reflects the best interests of the village and takes into account local views plus regional and national policies • The plan that is being proposed is the best plan possible given the available options • In addition to my support for the plan, is that I think it would be beneficial if it was possible to have a single access road onto the Glebe and Oakfield developments 	21.11.2017
26	Southern Water	<ul style="list-style-type: none"> • Southern Water is the statutory wastewater undertaker for Plumpton Parish • The Consultation Statement does not mention our earlier representations or the justification for the removal of Policy 3: Associated Infrastructure. • Former Policy 3: Associated Infrastructure has been removed from the Submission version of the Plan and in so doing has removed the NDP's support for the delivery of essential wastewater infrastructure. Such policy provision, if included, would also be in line with the main intention of the National Planning Policy Framework (NPPF) to achieve sustainable development. • Our proposed policy provision supporting the delivery of utility infrastructure would address these omissions and enable the basic conditions necessary for a Neighbourhood Plan to be met, namely: to have regard to national policies • We recommend that the following policy provision be inserted as part of Policy 5: Sustainable drainage 	21.11.2017

		<p><i>and wastewater management, as follows:</i></p> <ul style="list-style-type: none"> ○ <i>....as part of a network of multi-functional landscapes. New and improved wastewater infrastructure will be encouraged and supported in order to meet the identified needs of the community, subject to other policies in the development plan. New development will be required to assess....</i> 	
27	Ruth Long	<p>Offers support for the Plumpton Neighbourhood Plan</p> <ul style="list-style-type: none"> • It best addresses the issues and feedback given on the previous plan from the community 	21.11.2017
28	Chichester Diocese c/o Evison & Company	<ul style="list-style-type: none"> • The single access criterion for access to both sites 6.3 and 6.4 is not consistent either internally with other policies of the PNP nor with the Basic Conditions that require adherence to the principles of sustainable development and to national policy. • The Diocese land described as The Glebe is allocated for residential development for up to 20 dwellings under Policy 6.3 of the PNP. The Diocese supports this allocation but has the following comments on certain details of the policy. Paragraph 6 of Policy 6.3 reads: <i>To protect the valued historic character of All Saints Church, rectory and gardens and Strollings, vehicular access to this site from Station Road will be shared with and pass through site 6.4. A footpath and cycleway will connect it directly with Station Road.</i> <p>The Diocese requests that this paragraph is deleted for the following reasons:</p> <ol style="list-style-type: none"> 1. It is in conflict with criterion 5 of Policy 2 because a single road access will not prevent the merging of the two sites into one. Landscape buffers along those parts of the site boundary that are not part of the access connection will not alter the fact that all access whether vehicular, pedestrian or cycle from the Glebe site will pass though and effectively become part of the remainder of an enlarged site of up to 40 dwellings. This is not the type of development that the PNP rightly seeks to promote. 2. The rationale for the single access policy is “<i>to protect the valued historic character of All Saints Church, rectory and gardens and Strollings</i>” is not supported by advice from heritage consultants [of the Diocese] Heritage Collective as set out in their representations. In conclusion, from a heritage perspective the single access requirement is premature, excessive and unjustified. 3. The single access requirement is not justified on highways grounds as shown in a report from GTA Civils (consultants of the Diocese). This report concludes that the separate access to The Glebe (proposed by the Diocese) will be in accordance with East Sussex County Council standards and that a single access serving both sites would be a dis-benefit in terms of journey length and time discouraging future residents from walking particularly in the hours of darkness. <ul style="list-style-type: none"> • In addition, it is suggested that paragraphs 4 of both Policies 6.3 and 6.4 should be deleted. These 	21.11.2017

		<p>propose a design brief to cover the relationship between the sites. This is inconsistent with the Policy 2 principles of small independent sites with their own character and identity. These sites are in separate ownership and may be developed at different times and the development management process is robust enough to ensure both sites are developed in a sustainable way and inconformity with policy.</p> <ul style="list-style-type: none"> • Amendments requested: <ul style="list-style-type: none"> ○ Delete paragraph 6 of Policy 6.3 and replace it with a sentence to the effect that vehicular, pedestrian and cycle access will be directly from Station Road ○ Paragraph 5.69: delete the words “via site 6.4” ○ Paragraph 5.65: delete the final sentence and replace with a sentence consistent with the revised wording in the first point above ○ Complementary and consistent amendments should be made to paragraph 6 of Policy 6.4 (Land rear of Oakfield) and paragraph 5.74 regarding access ○ Paragraph 4 of Policies 6.3 and 6.4 should be deleted • The Diocese supports the other policies and provisions of the PPNP and congratulates the Steering Group and Parish Council for the great effort and the professionalism that has been necessary to produce this submission plan 	
29	Emma Innes-Whitehouse	<p>Objects to the Plumpton Neighbourhood Plan as it does not fulfil the wishes of the Plumpton Parishioners and declares own interest as joint owner of a site originally chosen for development</p> <ul style="list-style-type: none"> • The Plan which has now been submitted does not in any way respect the wishes of Plumpton residents which were originally collated from the village consultations that took place in 2014/2015 • The draft plan of 2016 did reflect the views of the majority of the village but since the composition of the Plumpton Neighbourhood Committee has entirely changed and with it the shape of the plan • Suggests there may be a conflict of interest regarding members of the Steering Group and sites chosen for allocation. States that Reg.14 responses bring this concern to the fore. • The significant reference to a 'green gap' in the present plan is again not based on the wishes on the community but the nibyism of the Committee to prevent development 'in their back door'. The proposal at one point to declare 'Land North of the Police Station' and 'Shaw Farm' as 'Green Spaces', which was a complete misuse of Planning and now removed from the Plan, was the same. In the original assessment, the lower halves of both 'Land North of the Police Station' and 'Shaw Farm' scored one of the highest marks against assessment for being developed. Comparing the 2016 and 2017 assessment of sites documents makes interesting reading when taking into account the bias of the Committee. • The instigation of neighbourhood plans was a laudable way of giving a community a say in future housing - but this plan has been hijack by the self interest of a few individuals and on this basis the plan should be reassessed with a new group 	21.11.2017

30	Nick Beaumont	<p>Wholeheartedly supports the Plumpton Neighbourhood Plan</p> <ul style="list-style-type: none"> • The Plan allows for 68 houses (being in excess of the required 50) and therefore hopes and expects LDC to defend the Plan and reject any large planning application for sites not included 	21.11.2017
31	Highways England	<ul style="list-style-type: none"> • Highways England is concerned with proposals that have the potential to impact the safe and efficient operation of the strategic road network (SRN), which is a critical national asset • We note that the four policies in the Neighbourhood Plan related to proposed development sites at Plumpton Green equate to 68 units, where the Lewes Local Plan proposes a minimum of 50 units at Plumpton Green • We do not have any objections at present to the Plumpton Neighbourhood Plan Consultation (Regulation 16) with regard to the safe and efficient operation of the SRN 	21.11.2017
32	Fairfax Acquisitions Ltd c/o Rodway Planning Consultancy	<ul style="list-style-type: none"> • 'Land east of Nolands Farm', is identified at Map D in the Parish Council's Submission Version of the Neighbourhood Plan as 'Site 9' and is owned by Fairfax Acquisitions Ltd, a land parcel that they have been actively promoting for some time <ul style="list-style-type: none"> ○ The Site Assessment report for the Neighbourhood Plan, assesses the site as being largely suitable and achievable and acknowledges that it is available ○ The site is continuing to be promoted as being suitable, with an Outline planning application has been submitted for 45 new dwellings (including 40% affordable units) the demolition of two existing dwellings and outbuildings, new vehicular and pedestrian access via Station Road, open space, associated infrastructure and landscaping (LDC application reference LW/17/0885). The supporting information confirms that limited mitigation is required (e.g. ecology matters), but this is manageable, viable and achievable on land in the applicants control or on highway owned land • On the specific policies and text contained in the Submission Version of the Plumpton NP, we also make the following comments: <ul style="list-style-type: none"> ○ The NP only goes so far as allocating 68 dwellings (only marginally in excess of the 50 units set out within Spatial Policy 2 of the Lewes Core Strategy. This is considered to be a missed opportunity. ○ We consider that Plumpton Green is suitable for 100 units as a minimum ○ Contrary to the overview set out in the Settlement Hierarchy (Lewes Core Strategy), we consider Plumpton Green is the only settlement in the parish that has a planning boundary, it is the most sustainable part of the Parish, the focus of new housing development should be there ○ Plumpton Green is relatively unconstrained - the village is outside of the South Downs, not within the High Weald AONB and lies outside of the Ashdown Forest SPA/SAC 7km buffer zone. We argue that Plumpton Green must be considered suitable for an increased number of units, which will ease the pressure on other parts of the District 	22.11.2017

		<ul style="list-style-type: none"> ○ NP Policy 1 '<i>Spatial Plan for the Parish</i>' states development will be permitted provided the development is within the built-up area boundary and accords with other policies. 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, and not just restricted to "small, unallocated sites" (para 5.9 refers). The Government have confirmed that policy documents and decision makers should seek to boost significantly the supply of housing. This policy, as worded, casts doubt as to whether this will be allowed to occur, and sites would only be acceptable in principle if they are located within the built-up area boundary (as amended). ○ The supporting text to 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 in meeting its objectively assessed housing needs, and reduce the burden placed on other more constrained and/or less sustainable settlements. The supporting text and/or the Policy should indicate that the village can deliver 100 dwellings (min.) throughout the plan period, providing the community with control over the location of development, given that the District's Local Plan Part 2 will likely make further allocations at Plumpton Green. ○ Policy 1 should be amended to accept the principle of development provided it is located within or adjoining the built-up area boundary, is sustainably located and is compliant with other policies contained in the Development Plan. Reference should also be made within the policy to provide an indication of the minimum level of housing that is deemed suitable for the Parish within the Plan period – i.e. at least 100 units ○ Policy 6 entitled 'New Housing', our only concern of this fairly general main housing policy is that it stipulates that housing sites should be "<i>provided in small-to-medium clusters around the village centre</i>" (point 4). Unfortunately, the supporting text to this policy is obscured by the policy itself, so it is not possible to ascertain how or even if this policy requirement is explained or justified ○ Ancillary to the main policy are a number of sub-policies (specifically policies 6.1 – 6.4 inclusive), which detail each of the four housing allocations providing for "up to" 68 new dwellings. Our site ('Site 9') is not included as an allocation and it is clear that our site has been omitted from the Plan. The principle reason appears to be that our site is assessed as being acceptable aside from the community's desire to have 'small pockets' of housing and the Parish do not consider that a scheme for 45 units accords with this desire. It seems clear that the Parish agree that development at land at Nolands Farm would comprise sustainable development, and if it were not for the community's aspiration to restrict development sizes (we are told by the Parish that 20 units is their cap), then our site would likely have been allocated. It is considered that other issues raised are dealt with by the supporting documents for the planning application. 	
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		<ul style="list-style-type: none"> ○ 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. ○ 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 	
33	Environment Agency	<ul style="list-style-type: none"> ● We have to focus our detailed engagement to those areas where the environmental risks are greatest. Our detailed comments are as follows: <ul style="list-style-type: none"> ○ Policy 4 <i>Landscape and Biodiversity</i> p. 35 <ul style="list-style-type: none"> ▪ Protected species are suspected to be present in the Neighbourhood Plan area ▪ The effectiveness of Policy 4 should be strengthened to avoid significant harm being caused to protected species, with proposals instead seeking to protect and enhance them if windfall developments come forward ○ Policy 5 <i>Sustainable drainage and wastewater management</i> p.37 <ul style="list-style-type: none"> ▪ We support the requirement for Sustainable Drainage Systems ▪ Policy 5 seeks adequate sewerage capacity. We expect housing allocation sites to be connected to the mains foul sewer. The wording in Policy 5 and in Policies 6.1-6.4 should be strengthened to make this clear ○ Policy 6 <i>New Housing</i> p. 40 <ul style="list-style-type: none"> ▪ Could more effectively manage flood risk by incorporating the wording “All housing to be allocated in Flood Zone 1 only” ○ Policy 6.1 Riddens Lane, Plumpton Green <ul style="list-style-type: none"> ▪ Following comments on the Pre-Submission version, we are pleased to see that the policy now acknowledges that both Flood Zones 2 and 3 on this site ▪ We suggest that it is explicitly stated in the policy wording (and not just supporting text 5.47) that “All housing will be allocated in the areas of the site that are within Flood Zone 1 only”. Map D (p. 26) and Map I (p. 62) show the whole boundary of the site including areas within Flood Zones 2 and 3, which makes it particularly important ▪ Housing development allocated in Flood Zones 2 and 3 would require the Sequential Test to be undertaken (in accordance with the NPPF para 100-102) ○ Policy 6.2 Wells Close, Plumpton Green <ul style="list-style-type: none"> ▪ We are pleased to see that this allocation is located within Flood Zone 1 ▪ We are pleased to see that following our comments on the Pre-Submission version that Section 5.49 now references the need for investigation and possible remediation of the site due to previous use as a coal yard. To ensure this requirement is effective, this should be within the policy wording rather than just the supporting text of 5.49. 	22.11.2017

		<ul style="list-style-type: none"> ○ Policy 6.3, The Glebe, Plumpton Green <ul style="list-style-type: none"> ▪ We are pleased to see that this allocation is within Flood Zone 1 ○ Policy 6.4 Land Rear of Oakfield, Plumpton Green <ul style="list-style-type: none"> ▪ We are pleased to see that this allocation is within Flood Zone 1 	
34	Parker Dann on behalf of Messrs Kenyon and Maxwell-Gumbleton	<ul style="list-style-type: none"> • The draft Plan would does not meet the Basic Conditions as set out in Paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990. We suggest modifications to assist the Examiner with re-drafting of the Plan • We are generally supportive of the plan overall but disappointed that comments we made the Neighbourhood Plan Steering Group at Reg. 14 have not been embraced • 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 • Our primary interest in the Plan relates to the allocation of residential development, in particular Site 1 land at Riddens Lane • We are satisfied that the Plan complies with the requirements under Paragraph 8(1) of Schedule 4B to the Town and Country Planning Act 1990 to confirm that: <ul style="list-style-type: none"> ○ 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 PCPA 2004 ○ the Neighbourhood Plan meets the requirements of Section 38B of the 2004 PCPA ○ the 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 have concerns with the Parish Council's draft Plan in terms of meeting the basic conditions <ul style="list-style-type: none"> ○ 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 Lewes District Local Plan Part 1. These concerns have been raised at Reg. 14 stage but do not appear to have been given due consideration in the Consultation Statement or the Basic Conditions Statement. ○ We suggest that the Examiner recommends that the Plan proceeds to Referendum following changes, on the basis that it does not meet the relevant legal requirements in its current form. • We have identified the areas of concern, explained the problems and recommended solutions: <ul style="list-style-type: none"> ○ Policy 1 <ul style="list-style-type: none"> ▪ We support the spatial strategy which extends the development boundary to incorporate the sites allocated for residential development (including site 1). ○ Policy 2 <ul style="list-style-type: none"> ▪ We agree with the general ambition to achieve a high quality built environment through good design 	22.11.2017

		<ul style="list-style-type: none"> ▪ Concerned that the policy applies blanket approach to all new development and precludes a height of greater than two storeys (criterion 2) ▪ The draft Plan is supported by a Design Statement but this is more of an aspirational document rather than an analysis. There has been no objective assessment of adverse impacts that would arise due to developments of over two storeys and no rationale for this approach. ▪ Accommodation in excess of two storeys assists efficient use of land. This policy prevents the implementation of national and local objectives (NPPF para. 17) ▪ We suggest criterion 2 is deleted or reworded in a positive fashion to allow the decision maker to refuse 3 storey developments if they were harmful to the area but would not preclude it outright, such as: <i>“Ensuring new developments: are of an appropriate height, bulk, mass and scale related to their context.”</i> ○ Policy 6 <ul style="list-style-type: none"> ▪ We can see no evidence of what “<i>type of housing will meet local needs</i>”. The 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 ▪ Previously requested that evidence should be provided, regrettably it has not ▪ We suggest criterion 2 of Policy 6 is deleted ▪ Alternatively, criterion 2 should be amended to 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 ▪ Paragraph 5.35 is obscured by Policy 6, a formatting issue that must be corrected. We were previously supportive of the text in the Reg. 14 version that confirmed the draft Plan identifies that housing sites for 68 dwellings have been found. ▪ We cannot tell if our previous suggestion that the first sentence of paragraph 5.34 (now para. 5.35) was amended to read “<i>This policy identifies housing sites for a minimum of 68 units</i>” has been embraced. If it hasn’t been, it would be helpful in bringing the policy in line with the strategic policies of the development plan for the area, notably Spatial Policy 1 ○ Policy 6.1 <ul style="list-style-type: none"> ▪ Support the site allocation and welcome acknowledgement in the Strategic Environmental Assessment that it is the most sustainable site in the village ▪ We believe the area shown on ‘Map I: Policies map’ and Map D: Map of assessed 	
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		<p>sites amounts to more than 0.6h, being closer to 1ha</p> <ul style="list-style-type: none"> ▪ The text in Policy 6.1 referred to the title of the map that it is intended to reference. There are two Map D's. One relates to Plumpton College. Neither is entitled "Policy Map D" as per the text in the policy. This should be corrected. ▪ 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 has been examined time and time again with the same outcome. 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 6 : 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. The cap should either be removed or increased to 20 dwellings to reflect the community's aspirations noted in the evidence base. ▪ Criterion 2 of Policy 6.1 indicates that development is to "<i>be confined to the northernmost portion of the site to mitigate flood risk (Flood Zone 2 and 3) in the southern section.</i>" This is unnecessary as the area susceptible to flooding is not shown on Map I or Map D. It sits outside the area highlighted for allocation. This criterion should be deleted as it does not "<i>provide a clear indication of how a decision maker should react to a development proposal should be included in the plan.</i>" (NPPF Para. 154) 	
35	Gladman Developments Ltd	<ul style="list-style-type: none"> • It is considered that some policies do not reflect the requirements of national policy and guidance, Gladman has therefore sought to recommend a series of alternative options <ul style="list-style-type: none"> ○ Policy 1 <ul style="list-style-type: none"> ▪ Whilst acknowledging the change that was made to this policy Gladman suggests that further flexibility could be added where development proposals would be considered adjacent to the planning boundary as well as within the boundary would ensure greater conformity with the NPPF ○ Policy 12 <ul style="list-style-type: none"> ▪ Gladman welcomes that two parcels have been removed since the Reg. 14 consultation however maintain that LGS5 is an extensive tract of land in relation to the size of Plumpton Green and therefore fails to meet the criteria of Paragraph 76 of the Framework and should be deleted. • Gladman is concerned that the plan in its current form does not comply with basic condition (a) and as the Plan does not conform with national policy and guidance 	22.11.2017

