

THE OLD BRICKWORKS

(Company Registration No. 598835)

The Old Brickworks Industrial Estate & Business Park

Plumpton Green, Lewes, East Sussex BN& 3DF

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13 March 2019

Dear Sir

Lewes District Local Plan Part 2: GT01 Land South of The Plough, Plumpton Green

As the most immediate neighbour of the proposed Gypsy & Traveller Site GT01, and owner of The Old Brickworks Industrial Estate and Business Park, I am writing to express my concerns.

Policy GT01 of the Lewes Local Plan Part 2, allocates land for the development of 5 Gypsy and Traveller pitches at Land south of The Plough, Plumpton Green.

Core Policy 3 of the Lewes Local Plan Part 1 sets out the criteria to be considered in making the Policy GT01 allocation in the Lewes Local Plan Part 2

Policy GT01 has failed to take Core Policy 3 into proper consideration as required, and as such is not considered effective or sound for the reasons set out below:

1. Policy GT01 fails to meet criteria set out in Core Policy 3, specifically:

- **To avoid sites in areas adjacent to existing uses which are incompatible**

We are a busy and thriving industrial estate, home to 23 local businesses, and employing, in total, around 70 people day to day. We occupy the site immediately to the south of the proposed site GT01.

We already have residential properties on our southern boundary, and in the early years we received complaints over the amount of noise created by daily operations on the industrial estate. As a result we have moved all noisy processes (mainly the use of power saws and cutting processes) to our most northerly buildings, where they would be immediately adjacent to the proposed traveller site.

The industrial estate would therefore impact negatively on the ability of the residential occupiers of GT01 – particularly people living in vulnerable chalets, caravans or mobile homes - to have quiet and private enjoyment of their site, due to operating noise, visual impacts, bleeping fork lift truck movements, and the frequent deliveries and collections to and from the industrial estate.

In conclusion, the industrial estate is not compatible with any type of residential development along its northern boundary.

- **Sites should be well related to existing settlements**

The site is located outside of the established settlement boundary, and the existing settlement is not accessible by foot due to the site being situated on a national speed limit road with no footpath to enable safe pedestrian access. It is not well related to the existing settlement and any occupiers would be reliant on their cars for access to amenities

- **Sites should have safe and convenient vehicular access**

The current access is unsuitable and hedges would need to be removed to provide the necessary sightlines. The hedges are not within the site ownership and so a safe access cannot feasibly be provided for this site.

- **There should be capacity to provide on-site infrastructure, such as water power and drainage**

The site assessment clearly identifies that the site suffers from various issues which will mean that the provision of infrastructure will be costly. The location of the site is such that the gas main is several kilometres away and a new drainage system would be required.

2. **It is a key strategic objective of Core Policy 3 to maximise opportunities for the reuse of previously developed land. The Plough site is a greenfield site and therefore contrary to this key strategic objective.**

3. **There is a lack of any robust site assessment behind Policy GT01.** The 2012 site assessment pre dated the JCS, and was therefore incapable of assessing the proposed site against the 'other relevant district wide policies' contained within the Lewes Local Plan Part 1. If the site assessment was updated - which it should be in order to provide a proper assessment of the proposed site and for Policy GT01 to be sound – the proposed site would be ranked considerably lower and is unlikely to be found to be suitable. The assessment of the site identified by Policy GT01 needs to be reviewed.

4. The choice of this site for policy GT01 is based on it being the only site identified by the Council and East Sussex County Council. **A full assessment of the deliverability of the site has not been undertaken.** A reassessment of the original sites has not been undertaken. In order to bring this site forwards for residential use, the Council will need to expend public funds on acquiring the site, diverting the public right of way

which runs across the site, installing a new footpath to the nearest bus stop, finding the funds to maintain the bus service, which is currently under threat, installing new drainage on the site and funding the necessary amendments to make the access viable. The council has not fully considered the potential combined financial impact of the need to provide all of these services against other less constrained sites.

Without further robust evidence to demonstrate how the proposed site will be funded and delivered, Policy GT01 fails to provide an appropriate strategy for addressing the assessed need for permanent gypsy and traveller pitches within the Lewes District.

5. **The allocation under Policy GT01 is contrary to the Plumpton Neighbourhood Plan (“PNP”) as it falls outside of the revised planning boundary.** Policy 1 of the PNP states that development outside of the revised planning boundary will not be supported if it individually or cumulatively results in coalescence and the loss of the separation between and distinct identities of neighbouring settlements and or alters the spatial character and views of the landscape. PNP also seeks to preserve the important “green gap” to the north of the village, and the site would be located within this zone and therefore contrary to the key aim of the PNP in preserving this “green gap” in order to prevent urban creep and loss of the green buffer around the village to keep it separate from neighbouring villages.

To sum up with regard to Core Policy 3, the greenfield site that comprises Land to the south of the Plough, Plumpton Green, is **in direct conflict with 5 of the Core Policy 3 objectives**. It is doubtful that it would be suitable for any type of residential development, and indeed previous investigations as to whether the site might be suitable for residential development were rejected owing to the lack of suitable access and because the site is too far from Plumpton village.

I also believe that GT01 is in direct conflict with **Core Policy 4, Encouraging Economic Development and Regeneration** which requires (among other criteria) support for economic growth in rural areas.

Many tenants at The Old Brickworks are not prepared to stay if Policy GT01 is adopted. There are a number of uncertainties generated by the proposed development, and many businesses are concerned that any proposed development will have an adverse effect on the site’s security.

The level of uncertainty for small businesses which will inevitably be introduced if Policy GT01 is adopted, is in direct conflict with the requirement in Core Policy 4 to support economic growth in rural areas. The rural economy, as we know, does not flourish in uncertain times.

Core Policy 6, Retail and Sustainable Town and Local Centres which requires (among other criteria) support for and retention of local shops and a requirement that local shopping centres remain a vibrant focus for the local community.

The shop in Plumpton Green is a really important part of the village. It employs people who don't have the means to easily travel out of the village, the owners are involved in local events and it is treated as a hub by the local community.

Notwithstanding the above, the reality is that the local shop is not where people go to do their weekly shopping. However, tenants of the Old Brickworks go there daily, people they employ all buy a sandwich there and their clients pop in. The shop is also a post office, and local businesses all do their post there. If the businesses at The Old Brickworks move away, this may well halve the income of the local shop, and it is highly unlikely that any new households generated by the proposed development will replace this.

I do not feel that the council have taken sufficient time to engage with the residents of Plumpton village, or to search for an alternative more suitable site. GT01 is quite clearly an unsustainable, undeliverable site, nor is it suitable for any other type of residential development, and I respectfully request that it be removed from the Local Plan LP2.

Thank you for taking the time to read my representation.

Yours sincerely

Caroline Standen (Director)

The Old Brickworks Industrial Estate & Business Park