



To: **Edward Sheath**
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From: **Plumpton Parish Council**
c/o Jean Stewart, Clerk to Plumpton Parish Council
Downsview Cottage, Riddens Lane
Plumpton Green, East Sussex. BN7 3BJ

Date: 8th November 2011

Re: Plumpton Parish Council Response to LDC Draft Core Strategy

Dear Mr Sheath

Thank you to you, Natalie and Catherine for taking the time to come and talk Plumpton Parish Council (PPC) and the Parishioners of Plumpton through the Draft Core Strategy (DCS) proposal. After the public consultation, PPC invited comments from Parishioners and these have been consolidated by a team of Councillors to draw out the points where there is a strong consensus of opinion.

Overall Context and Summary

Attached is a summary of the Parishioners feedback, which focuses almost exclusively on the number of potential dwellings, the nature of these dwellings and the potential knock on consequences (both positive and negative). In summary over the period covered by the DCS, 21% expressed a preference for no development, 34% for up to 30 units, 28%, 30-60 units and 3% over 60 units. A further 13% did not indicate specific numbers and of these, 9% appeared to favour a minimal amount of development and 4% a significant amount of development. Of these, the preference was almost exclusively for Affordable Homes with some also expressing a preference for any market housing to be units of 2-3 bedrooms. Of the specific points raised additional traffic volumes was cited most frequently and the impact on the Utilities infrastructure was a key concern (Water, Sewerage and Surface Flooding).

Headline Points raised through the Questions

Within the spirit of the responses received, the Council has added its own comments to some of the more specific questions asked in the DCS. These are detailed in the following pages with a summary provided below:

- PPC agree with the Vision, Objectives and Settlement Hierarchy.
- Falmer, Kingston and Cooksbridge should also be categorised as "Service Villages".
- The number of dwellings for Ditchling and Glynde should be consistent with other "Service Villages".
- Existing plans for Affordable Housing should be included in the target number of dwellings.
- The targeted number of dwellings for Plumpton Green should be at the low end of the 30-100 range.
- PPC agree that 40% of units should be Affordable, with any existing plans counting towards this.
- Steps to address the capacity of Utilities and minimise surface flood risk need to be incorporated.
- Consideration must be given to the impact of incoming traffic from surrounding villages.
- Any housing allocation must address the traffic, parking and junction safety impacts it causes.

We have also attached the Parishioners responses for your reference, and ask that these are added to any responses you may have received directly. PPC will also be communicating this response to the Parishioners through its website and the results of the Parishioner feedback will be posted on the village notice-boards.

Please feel free to get in touch if you require further information or clarity.

Yours sincerely

Jean Stewart (on behalf of Plumpton Parish Council)

RESPONSE TO SPECIFIC QUESTIONS

A portrait of Lewes: Have the correct characteristics that are relevant to Lewes District been identified or not?

Yes, these have been correctly identified.

A portrait of Lewes: Have any characteristics been misinterpreted:

No.

Strategic Issues and Challenges: Do you agree with the issues and challenges that have been identified in this section?

Yes.

A Vision for Lewes District: Do you consider the vision to be achievable, realistic and relevant to Lewes District?

Yes.

A Vision for Lewes District: Do you consider the vision to be locally distinctive to Lewes District?

Yes, as far as is possible.

A Vision for Lewes District: Do you agree with the different character areas identified in the vision?

The recognition of the Low Weald as a distinct area is appreciated, and PPC share the desire to enhance the attractive character and identity of the Plumpton and Plumpton Green. PPC are concerned however, that the train service, even if enhanced does not represent a sustainable means of transport for the majority of residents and the heavy reliance on the private car needs to be emphasised further. The additional traffic, parking and dangerous junctions at either end of Station Road/ Plumpton Lane were the most frequently cited concern by Parishioners. Furthermore, the lack of mains gas drives a reliance on oil and gas deliveries to the majority of properties. Potential developments in neighbouring villages, using the Station in Plumpton will also drive additional traffic through the main part of the village. Traffic calming whilst worthy of consideration, will not address the overall increase in the volume of traffic on a narrow stretch of road with a large number of parked cars. This does therefore not provide an adequate solution and this is an important consideration when looking at housing allocations.

Strategic Objectives: Do you consider that the strategic objectives will achieve the vision:

Yes.

Strategic Objectives: Can the objectives be achieved by 2030?

Yes.

Strategic Objectives: Will the objectives help achieve the vision and priorities that are set out in the Sustainable Community Strategy?

The sustainable community strategy has not been reviewed so PPC are unable to comment.

Spatial Strategy: Do you agree with the settlement categories identified and the functions that have been identified?

Yes.

Spatial Strategy: Do you agree with how the settlements have been categorised? If not, what changes should be made to the settlement hierarchy?

Yes, with the exception of Falmer, Kingston and Cooksbridge. These settlements should also be considered as "Service Villages". PPC are satisfied with the designation of Plumpton and Plumpton Green.

Spatial Strategy: Do you agree with the level of growth that is considered appropriate to the types of settlement?

No. The range of potential units for "Service Villages" (30-100) is too broad and needs to be more specific in the final document. The top end of the range is also too high, and is inappropriate when most of the communities in this category have very limited services with constrained transport and Utilities infrastructure. With an overall housing growth requirement of 9% (DCS page 16) an allocation to the "Service Villages" at the upper end of the

30-100 range would drive a disproportionate amount of the development into these settlements and conflict with the objective of promoting alternative and sustainable modes of transport to the private car (DCS Page 31). Clarity also needs to be provided that any eventual target will include any Affordable Housing being considered separately by Local Councils. Failure to do this will discourage Local Councils from progressing much needed Affordable Housing until the DCS is adopted in early 2013. This would conflict with the vision to provide Affordable Housing in the rural area (DCS page 29).

Accommodating and Delivering Growth: Do you agree with the level of housing and employment growth that is proposed for the plan area?

Yes, however, PPC would also like to encourage the DCS to consider how the growth could be accommodated through the better use of existing dwellings. With population levels expected to remain stable (DCS page 15) this would provide a more sustainable and less environmentally damaging means to accommodate the growth in housing need. More lenient policies on the sub-division of existing dwellings or incentives to promote this approach could provide a means to achieve this.

Accommodating and Delivering Growth: Do you have any view on any of the options that have been considered?

No.

Distribution of Development: Do you have any views on the options for the levels of growth that are being considered for the settlements identified in table 5?

Yes. The treatment of Ditchling and Glynde should be consistent with that of other Low Weald Villages, many of which border the South Downs National Park and will make an equal contribution to its sustainability.

Distribution of Development: Do you agree with the approach to housing developments for the villages within the National Park?

See response to previous question.

Distribution of Development: Should Ringmer have a planned level of housing growth that meets a wider district housing need?

PPC have no comments in relation to this question.

Distribution of Development: Do you have any views on the options that have been identified for strategic housing allocations/broad locations for growth?

PPC have no comments in relation to this question.

Distribution of Development: Which, if any of the options should be taken forward in the Core Strategy Document?

As per previous comments, the target housing level for Plumpton Green should be amended to a single number at the lower end of the range proposed (30-100). This would better reflect the majority views of Parishioners in Plumpton and Plumpton Green and provide a more sustainable solution which would better achieve the vision and objectives defined. It is also unclear why all of the other settlements categorised as "Service Villages" (Page 35) have been allocated just 30 units, or in the case of Glynde and Ditchling no units. This is an inconsistency which needs to be addressed.

Any eventual allocation for any of the settlements should also incorporate the Affordable Housing development currently being considered for Exception Sites.

Distribution of Development: Do you agree the broad location options at Ringmer should be considered through the Ringmer Neighbourhood Plan?

PPC have no comments in relation to this question.

Distribution of Development: Are there any development principles that should be applied in relation to specific sites if they are allocated or identified in the Core Strategy?

Yes, site allocations should first be focused on Brownfield with a staged release of Greenfield sites (in line with Objective 6 – Page 31). Limitations should be put in place to ensure that development in each location is done steadily over the plan period and not in a single burst at the outset of the plan period. PPC would also encourage

LDC to consider the subdivision of existing dwellings and existing redundant commercial buildings to satisfy the identified housing needs. The conversion of existing units could include or be combined with new development of live / work units.

Distribution of Development: Do you consider that other options for strategic housing allocations / broad locations for growth that need to be considered?

PPC have no further comments aside from those provided to the points raised above.

PPC have not provided responses to the questions in section 6.64 to 6.8 as they relate to strategic sites outside of the Parish.

Core Policy 1 Affordable Housing: Do you agree with the preferred policy approach identified?

PPC agree with the importance of Affordable Housing for the District and are progressing plans to build 10-14 units in the near future, and longer term are aiming to increase this to circa 40. The Parishioners expressed a strong preference, that if a housing allocation is made to Plumpton or Plumpton Green, then this should include a high proportion of Affordable provided it is used to satisfy a local need (as per DCS page 63). PPC agree with the proposed approach to Core Policy 1 (i.e. 40% to be affordable), and it is requested that this is considered in conjunction with existing Affordable Housing work underway by PPC. Once the level of housing allocation in Plumpton / Plumpton Green is agreed, any development completed between now and the Core Strategy adoption should be taken into account.

Core Policy 1 - Affordable Housing: Do you have any comments on the other options that have been considered?

No.

Core Policy 1 - Affordable Housing: Are there any options that have not been identified that should be considered in development this policy area?

No.

Core Policy Option 2 - Housing Type, Mix and Density: Do you agree with the approach proposed?

Yes, the responses from Parishioners strongly favour Affordable Housing, and if there is also to be market housing then this should be small in nature (i.e. 2-3 bedroom) targeted towards young families and the elderly. PPC agree with the density assumptions proposed of 20-30 per hectare based on site characteristics.

Core Policy 2 - Housing Type, Mix and Density: Do you have any views on the policy options that have been discounted at this stage?

No.

Core Policy 2 - Housing Type, Mix and Density: Do you think there are other options that should be considered in relation to housing types, mix or density?

No.

Core Policy 3 - Gypsy and Traveller Accommodation: Do you agree with the approach that is proposed, including the level of pitches to be planned for?

Yes. As articulated in previous questions, Plumpton and Plumpton Green already have stretched infrastructure and roads and the addition of any Gypsy and Traveller Accommodation will only serve to impact on this further.

Core Policy 3 - Gypsy and Traveller Accommodation: Do you consider the most suitable sites identified through the Site Assessment work to be suitable for use for Gypsy and Traveller accommodation?

Yes.

Core Policy 3 - Gypsy and Traveller Accommodation: Do you know of any other sites that may potentially help meet the need for additional pitches?

No.

Core Policy 4 - Encouraging economic development and regeneration: Do you agree with the proposed approach?

Yes.

Core Policy 4 - Encouraging economic development and regeneration: Do you think there are other options that should be considered that would help support economic growth and regeneration within the District?

This is possible, however, PPC do not consider there to be any in Plumpton or Plumpton Green, other than possible development of live/ work units to address both housing and commercial sustainability requirements. This will support Core Policy 4, parts 4, 5 and 9.

Core Policy 5 - The Visitor Economy: Do you agree with the preferred approach that is proposed?

Yes, PPC are fully supportive and are keen that Plumpton Parish forms a key gateway to the National Park and support sustainable tourism in the District.

Core Policy 5 - The Visitor Economy: Do you think there are other options that should be considered that would help support the visitor economy in the District?

There are no known opportunities identified within Plumpton or Plumpton Green.

Core Policy 6 - Retail and Sustainable Town and Local Centres:

PPC have no comments against any of the questions in this section.

Core Policy 7 - Infrastructure: Do you agree with the approach proposed?

The feedback from Parishioners indicates significant concern on the road infrastructure and utilities within Plumpton and Plumpton Green to support additional housing. Provision needs to be made as part of any development, either through s106, Community Infrastructure Levy (CIL) or through the direct works of developers to ensure this infrastructure is not compromised further. On road infrastructure and parking this maybe something that necessitates public consultation on the available options, their suitability and potential effectiveness.

Core Policy 7 - Infrastructure: Do you think there are other options that should be considered that would help provide suitable infrastructure in the District?

LDC may want to consider incentives to encourage the use of Brownfield, redundant commercial property and the sub-division of existing housing units.

Core Policy 7 - Infrastructure: Do you have views on key pieces of infrastructure in the District?

No, aside from the points already made in previous sections on road infrastructure, parking and Utilities.

Core Policy 7 - Infrastructure: Do you consider the combination of s106 planning obligations and CIL to be an appropriate funding mechanism for infrastructure?

Yes, provided these are robustly enforced and within the local area.

Core Policy 8 - Green Infrastructure: Do you agree with the approach proposed?

Yes.

Core Policy 8 - Green Infrastructure: Do you think there are other options that should be considered that would help protect, enhance and provide green infrastructure in the district?

This is possible; however, none have been identified by PPC.

Core Policy 9 - Air Quality: Do you agree with the approach that is proposed?

PPC agree with the proposed policy approach, but are concerned that the proposals to allocate up to 100 additional houses to Plumpton Green conflicts with objective of improving air quality. Because of the high car dependency, this will drive pollution that could be avoided if development was focused on town locations with better amenities and more sustainable transport infrastructure. See also our response on the Vision for Lewes, in relation to traffic from neighbouring villages using Plumpton roads to access the station.

Core Policy 9 Air Quality: Do you think there are other options that should be considered that would help improve air quality in the district?

This is possible; however, none have been identified by PPC.

Core Policy 10 Natural Environment and Landscape Character: Do you agree with the approach proposed?

Plumpton has a Wildlife and Habitat Group that has identified a number of species on and around the potential development sites in the village. A copy of this report was provided during the previous stage of the consultation and an updated copy is provided in Annex 2.. This remains a concern to a number of Parishioners and it is not apparent from the policy how such species will be protected should any development take place.

Core Policy 10 Natural Environment and Landscape Character: Do you think there are other options that should be considered for this policy area?

Yes. Greenfield development should be minimised, and where necessary provisions made to accommodate wildlife currently occupying potential development sites.

Core Policy 11: Built and Historic Environment and High Quality Design:

PPC have no comments against any of the questions in this section.

Core Policy 12 Flood Risk, Coastal Erosion and Sustainable Drainage: Do you agree with the approach proposed?

PPC recognise that this section is primarily focused on Lewes and Newhaven, but would like to draw LDC attention to the concerns on surface water flooding raised by a number of Parishioners in Plumpton Green. This includes claims of sewerage on the playing field, the flooding of gardens and high volumes of surface water on fields surrounding the existing settlements. PPC are keen that these are addressed as part of any plan to further develop the village.

Core Policy 12 Flood Risk, Coastal Erosion and Sustainable Drainage: Do you think there are other options that should be considered that would help manage flood risk and coastal erosion in the district?

This is possible; however, none have been identified by PPC.

Core Policy 13 Sustainable Travel: Do you agree with the approach that is proposed?

PPC agree with the proposed policy approach, but consider this to be inconsistent with the housing distribution (DCS page 43) proposal which gives a disproportionate amount of development to the Low Weald villages. These villages have a heavy reliance on the private car, with limited facilities and public transport. It is also understood that no transport modelling has been done for the Low Weald villages, and given this is the top concern of Parishioners it is requested that this is completed as part of the next phase of the process.

Core Policy 13 Sustainable Travel: Do you think there are other options that should be considered that would support and encourage sustainable transport use in the District?

Yes, subsidised public transport would encourage less use of the private car. The consistency between the housing distribution numbers and this policy need to be addressed.

Core Policy 14 Renewable and Low Carbon Energy and Sustainable Use of Resources:

PPC are concerned that any development in Plumpton and Plumpton Green will drive a greater dependence on oil and gas deliveries to the villages. This would not be consistent with the aims of Core Policy 14.

For any questions on this response, please contact:

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ANNEX 1: SUMMARY OF PARISHIONER FEEDBACK

DRAFT CORE STRATEGY: SUMMARY OF PARISHIONER FEEDBACK

CONTEXT

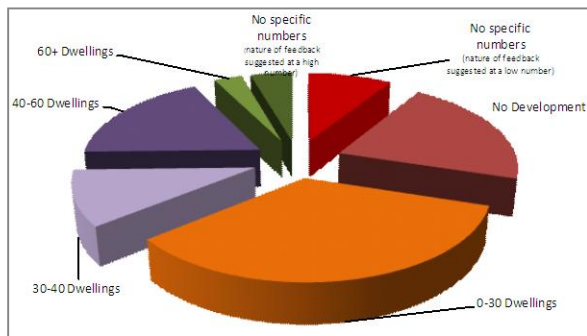
Thank you for taking the time to provide feedback on the Lewes District Council Draft Core Strategy. A team of Parish Councillors have collectively reviewed the responses and categorised according to the key sections of the Draft Core Strategy Document. The results provided below capture the items most consistently raised, typically where more than 5 people made the same point. We have not considered any points made in relation to specific sites, as this is not something required as part of our response at this time. Should the Draft Core Strategy conclude that a housing target is to be set for Plumpton and/ or Plumpton Green, then site allocation options will be considered then, and the appropriate engagement with Parishioners conducted. This is unlikely to be until at least mid 2012. Thanks again to those who responded (102 in all).

PLUMPTON
PARISH COUNCIL



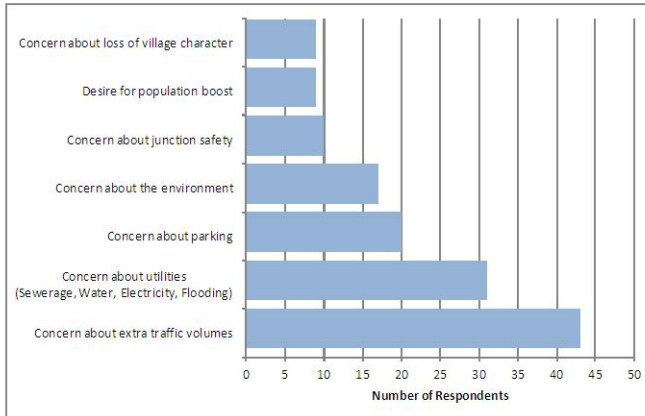
CATEGORISATION OF RESPONSES

	% of Total
No specific numbers (nature of feedback suggested at a low number)	9%
No Development	21%
0-30 Dwellings	34%
30-40 Dwellings	10%
40-60 Dwellings	18%
60+ Dwellings	3%
No specific numbers (nature of feedback suggested at a high number)	4%



TYPE AND MIX OF HOUSING

Of those who gave a view on the type and mix of housing preferred, 36 respondents favoured affordable housing and a further 7 respondents favoured small market housing (e.g. 2-3 bedroom). 8 respondents expressed a desire for development to be focused on brown-field and a further 2 for retirement units.



ADDITIONAL COMMENTS

Responses	Number of Respondents
Concern about extra traffic volumes	43
Concern about utilities (Sewerage, Water, Electricity, Flooding)	31
Concern about parking	20
Concern about the environment	17
Concern about junction safety	10
Desire for population boost	9
Concern about loss of village character	9

Note:
Some respondents gave multiple comments and therefore maybe counted in more than one category.

OTHER COMMENTS

Various other comments were made on a number of other points, including the overall Vision for the District, the Draft Core Plan Objectives, Traveller Sites and the Settlement Hierarchy. In each instance, there was either significant inconsistency and thus no clear conclusion, or a very small number of respondents. These have thus been excluded from this summary but will be born in mind as part of the Parish Council response.

WHAT NEXT?

The Parish Council will now formulate a response to the Draft Core Strategy based upon your responses. This will be reviewed and agreed by the Council as a whole before it is submitted and thereafter made available on the Parish Council website. All of the emails and forms recieved will be attached to the Parish Council response and provided to Lewes District Council (LDC).