

From: Nick Beaumont <nick.beaumont@plumptonpc.co.uk>
Sent: 20 November 2018 14:46
To: andy.smith@lewes.gov.uk; <maria.caulfield.mp@parliament.uk>;
sarah.osborne@lewes.gov.uk; natalie.carpenter@lewes-eastbourne.gov.uk
Cc: <councillors@plumptonpc.co.uk> <councillors@plumptonpc.co.uk>;
<anita.emery@plumptonpc.co.uk>; <ldf@lewes.gov.uk>
Subject: Lewes District Local Plan Part 2 - Background Paper and Site Allocations

Dear all

Further to my letter yesterday to Cllr Smith, the attached document (Lewes District Local Plan Part 2 Site Allocations and Development Management Policies) would suggest that GT01 is not going to be removed from the LPP2 without the need for further consultation. The Parish Council is dismayed to learn that all the representations on GT01 made during consultation appear to be regarded as irrelevant to the soundness of the plan. Plumpton Parish Council and residents are owed an explanation.

I am also attaching the Lewes District Local Plan Part 2 Background Paper which was produced after the consultation ended. The Parish Council disagrees with many of the points made. Please find our response below: -

1. The production of the 'Lewes District Council Local Plan Part 2 Background Paper: Gypsy and Traveller (November 2018)' after the deadline for formal consultation (November 5th 2018) is a further example of how LDC is approaching this aspect of the LPP2 too late and in contravention of the PPTS instruction (7 a) to "*pay particular attention to early and effective community engagement with both settled and traveller communities*"
2. The continued promotion of a site that has been clearly classified by LDC as not suitable for development is against the core principle set out in the PPTS introduction that "*The Government's overarching aim is to ensure fair and equal treatment for travellers, in a way that facilitates the traditional and nomadic way of life of travellers while respecting the interests of the settled community*". To allow development of the site for travellers but not for the settled community is clearly discriminatory.
3. Numbers are now unclear - Section 2.2 refers to only 5 permanent sites being identified in the SDNPA, rather than the 8 required; is there a risk of GT01 being expanded from 5 to 8 dwellings?
4. Section 2.3 refers to the needs assessment of 2016, which was questioned for its accuracy by our local MP Maria Caulfield. The needs assessment is in fact referred to as 'provisional', so some certainty here is required, otherwise LDC is simply providing supply that will drive demand, rather than the other way round.
5. Section 3.6 introduces the speed survey results. Plumpton Parish Council (PPC) would seek confirmation that the conclusions on site lines adequately reflect the influence on 85th percentile speeds due to the fact that measurements were taken immediately next to the entrance to the Old Brickworks, and so many cars would be slowing down to enter, or accelerating after exiting that facility, which are likely to significantly influence the average speeds.
6. Section 4.1 introduces delivery cost elements, though still with no quantification or even order of magnitude. LDC officials indicated to PPC that a cost 'in seven figures' was under discussion for the land element alone. If correct, that appears to be a very significant multiple over the

current value, or even hope value of the land, and disproportionate to the value of 5 static caravan pitches. The economic practicality and cost effectiveness of this policy appears not to be a factor in its development, especially when other costs (such as footpaths in section 4.6) are also not even estimated.

7. Section 4.4 – it remains unclear under what statutory requirement this would be delivered as a public site
8. Section 5.1 – whilst the increased housing provision in Plumpton Green may be ‘modest’ in terms of the total LDC requirement, in terms of the impact in Plumpton Green it is 68 new dwellings which is far from modest. This comment should be clarified as it is at best insensitive, and misleading.
9. Section 5.3 – whilst factually correct, this paragraph is misleading by omission. The GT01 site was not considered during the preparation of the PPNP as it was not available, and excluded in the SHLAA. It is nowhere near the development boundary, and does not qualify for inclusion as an LGS.
10. Section 5.6 – this conflates the spatial plan with visibility of developments. PPNP Policy 1 states ***Development outside 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, notably from the SDNP.*** Whilst modest, the proposed development under GT01 clearly risks coalescence and alters the spatial character by establishing the principle of development at a significant distance from the development boundary. This is a very dangerous precedent.
11. Section 5.8 – PPC does not agree the conclusion that GT01 adequately addresses the provisions of PPNP Policy 1 for the reason stated above.
12. Section 5.10 – PPC does not agree that GT01 will not contradict PPNP Policy 3 on new build environment and design – it is difficult to relate static caravans to the existing vernacular.
13. Section 5.17 – the current businesses would dispute the conclusion that GT01 would have no impact on employment, and this is the subject of their responses and that of the PPC.
14. Section 5.23 – PPC does not agree the conclusion that GT01 has no direct inconsistencies with the PPNP – the proposed site is not regarded as sustainable as a permanent dwelling site in planning terms, and is outside the development boundary so does not contribute to cohesion and inclusion.
15. Section 6.2 – PPC does not agree GT01 is sound, either in process or product, against the PPNP/PPTS/NPPF for the reasons set out in its consultation response.

The Report to Councillors makes clear that due to LDC inability to get a Local Plan out in a timely manner this policy is being driven through regardless of due process or the soundness of the plan. I repeat our demand that this contentious policy GT01 is removed from the Lewes District Local Plan Part 2.

Plumpton Parish Council
