

**PLUMPTON PARISH DRAFT NEIGHBOURHOOD PLAN RESPONSE FORM.**

The draft Plan has been prepared after extensive consultation, including survey forms, meetings and Open Days and reflects the majority views of residents across the Parish who have participated so far.

To help us, please fill in your name and Post Code (anonymous forms cannot be accepted)

Please make any suggestions/comments as concisely as possible

**Please submit this form by Tuesday, 28 June, 2016.**

**Name:** (required)

Glenbeigh Developments Ltd

**Post code** (required)

c/o Barton Willmore, 7 Soho Square, W1D 3QB

**Comment** (state policy reference)

**Evidence Base – Sustainability Appraisal**

**Suggested modification**

The Draft PPNP is supported by Sustainability Appraisal incorporating Strategic Environmental Assessment (SA) dated May 2016. Having reviewed the SA, we would argue that this document is flawed for the following reasons:

Appraisal of Neighbourhood Plan objectives:

- The SA claims that the PPNP will have a 'significant positive effect' on the delivery of affordable and sustainable homes (SOC1). However the Draft PPNP fails to reference delivery of affordable homes on most of the sites identified for development. Further, the distribution of development across a number of smaller sites will deliver less affordable homes than if fewer larger sites were chosen.
- The SA claims a 'positive effect' on enhancement of new community facilities and accessibility to community facilities (SOC2). However, how this will be achieved is not clear in the Draft PPNP and new developments on smaller sites are unlikely to be able to assist in enhancing facilities. Further the distribution of proposed development to the extreme north and south of the village will have a negative impact on accessibility to existing facilities.
- In terms of SOC3 the distribution of proposed development away from the existing village envelope will have a negative not a positive impact on sustainable travel within the village, increasing the need to travel by private car.
- Overall the appraisal fails to give adequate explanation to support the level of effect attributed to each objective.

Appraisal of Neighbourhood Plan options:

- Policy 1 sets out that the SA considered 2 options for future growth in the Parish over the Plan period. These are (1) to direct growth within the existing planning boundary or (2) to allow sporadic development. The text states that Option 1 is the only reasonable approach as (2) would not confirm with national policy. However, this conflicts with the approach taken in the Draft PPNP which recognises that growth cannot be met without review of the existing planning boundary. Further, this assessment of alternatives can only be robust with a third middle alternative included (3) to direct future development in sustainable locations immediately adjacent to the existing planning boundary.
- The Parish then score Options 1-3 which have not previously been discussed earlier in the Report.
- In terms of SOC1 Option 1 (expanding the village centre) scores + for ensuring delivery of affordable and sustainable homes. However, option 2 (Continuing the Linear Pattern) and option 3 (A combination of small scale pockets) both score ++. There is no explanation given as to why the linear approach would score higher other than simply that the community prefer it. This is NOT a planning response and does not address the questions that ought to be considered in accessing acceptability. Option 1 when assessed properly is in fact likely to score higher than options 2 and 3 as it will deliver homes in more accessible and sustainable locations. Further, the opportunity to deliver a larger site rather than smaller sites will enable greater delivery of affordable homes and a varied mix of dwelling types. We would therefore argue that this scoring is fundamentally unsound.
- We agree with the SA's assessment that Option 1 would provide greater community enhancements (SOC2) and promote a more sustainable pattern of development (SOC3).
- In terms of ENV4, there is no justification for the SA's assessment that Option 1 would have a negative effect on the risk of flooding. As stated in the SA, there is land available in the Village Centre within Zone 1, in the same way there is for Option 2. There is therefore no reason therefore why the scoring between the options should be materially different.
- Option 2 fails to take into account the environmental impact of development close to the SDNP, which will have serious negative effects.
- Option 2 fails to take into account the environmental impact if development to the north encroaching on the green gap, which will have serious negative effects.
- Despite Option 1 scoring higher in many regards, Option 2 is chosen as the preferred option simply on the grounds that it is the most acceptable to Parish residents, and not on the basis of any evidence at all. We would therefore argue that the SA is seriously contrived and wholly unsound.

Appraisal of Sites Considered:

- The Assessment of Little Inholmes Farm considers two options (1) 20 units and (2) 40 units. Both options should score ++ in respect of SOC1-3. In respect of ENV1, the assessment for the site sets out a neutral impact in terms of impact on wildlife habitats. In fact, development could enhance the biodiversity at the site. Nevertheless, we would argue that if accepted that there is a neutral impact, development of the site should not be restricted on this basis.
- There is no landscape and visual evidence supporting the assessment of sites and therefore the assumptions made against ENV2 for the Little Inholmes site cannot be relied upon. Further, the assessment simply provides a question mark against ENV2 suggesting the PPNP is unclear what impact development here would have.
- The assessment of Site 2 states that the fact that a listed building exists adjacent to the site will generate negative effects. There is no explanation for this or consideration of how any negative effects could be mitigated.
- Despite being largely in Flood Zone 1, the assessment against ENV4 suggests development on Little Inholmes Farm will have negative effects. This is completely without supporting evidence or justification.
- Overall, the land at Little Inholmes Farm scores higher than many of the other sites assessed. The scoring is contrived and lacks supporting evidence.

In summary, we would argue that the SA is wholly unsound for the reasons set out above.

Would you vote for this plan at a referendum?      ~~Yes~~      No  
If no, why?

**For the Reasons set out above**

**PLEASE RETURN THIS FORM BY ONE OF THE FOLLOWING METHODS**

1 Deliver to Plumpton Post Office and Store

2. By email to [damian.mooncie@plumptonpc.co.uk](mailto:damian.mooncie@plumptonpc.co.uk)

3. By post to Damian Mooncie, Parish Clerk, Little Talland, The Street, Firle BN8 5UR

This form will go directly to the Clerk of Plumpton Parish Council. Your comments will be read carefully and may result in small modifications to the draft Plan. Thank you for your feedback

**OUR VILLAGE – OUR COMMUNITY.**

**Help shape its future.**